

PFOS/PFOA Regulation: National Association of Water Companies' Position Statement



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The National Association of Water Companies issued a July 11th statement on the United States Environmental Protection Agency (“EPA”) review in which it will determine whether to set a Safe Drinking Water Act maximum contaminant level (“MCL”) for Perfluorooctane Sulfonate (“PFOS”) and Perfluorooctane Acid (“PFOA”).

PFAS (another reference) consist of a large group of man-made chemicals that include perfluorooctanoic acid, perfluorooctane sulfonate, and GenX chemicals.

PFAS properties include resistance to heat, water, oil. They have been described as persistent in the environment and resist degradation.

The compounds have been used in various industrial applications of consumer products such as:

- Fabrics for furniture
- Paper packaging for food and other materials resistant to water, grease or stains
- Firefighting airfields
- Utilization in several industrial processes

Potential human exposure to PFAS includes pathways through drinking water, air or food.

The principle four points in NAWC’s statement include:

1. To ensure a consistent and appropriate science-based standard for all water systems, EPA should complete its process on whether to set a MCL for PFOS and PFOA as soon as reasonably possible
2. EPA should provide routine updates on its schedule for making a final decision on setting an MCL for PFOS and PFOA
3. EPA should take all appropriate actions to ensure that polluters pay for treatment and site clean-up costs related to PFAS contamination
4. When NAWC member companies become aware that they are delivering water that has tested for PFOS and/or PFOA at levels above those set forth in EPA standards/Health Advisories or an applicable state standard, they will:
 - a. Take reasonable measures to publicly disclose such test results
 - b. Take steps to reduce PFOS and/or PFOA levels in finished drinking water, working with environmental and rate regulators to receive the necessary permits and rate recovery for any required capital improvements

- c. In the case of an in-effect contract operations agreement, work with the water system owner to determine appropriate next steps with consideration for the actions set forth above

NAWC describes itself as a representative of regulated water and wastewater companies, including those in partnerships with municipal utilities. Its members are stated to provide such services to 73 million Americans. The organization estimates that its 10 largest members collective invest \$3 billion each year in their water and wastewater systems.

A copy of the news release can be found [here](#).