

Waterkeeper Alliance PFAS Analysis: Hard Questions Document

As of 10.18.22 (working document to be updated as needed)

• **Q:** This study seems to deem surface water contaminated based on drinking water standards, which are sometimes much more stringent. Isn't that a flaw in the methods?

A: It is entirely appropriate to compare the results to the EPA's Health Advisory Levels and EWG's Health Guideline given that 65% of the U.S. public get their drinking water from surface water sources. But this question raises a great point about why we did this study in the first place: for the vast majority of PFAS chemicals, there simply aren't any binding and enforceable standards that protect the public and the ecosystems from PFAS contamination. We need water quality standards and other federal limits for all PFAS chemicals, but they don't exist right now.

The reality is that no amount of PFAS in our waterways is safe. In some cases, we used EPA Health Advisory Levels where they exist – in others we use the Environmental Working Group's standard because it is a science-based level designed to protect human health. But, with either baseline, the contamination levels we found were *exponentially higher* in many places than these standards – a clear clarion call that the federal government needs to step in and act now.

• Q: Won't water treatment facilities clean up most of this PFAS pollution?

A: Most drinking water utilities in the U.S. do not have treatment technology in place to remove PFAS contamination from drinking water before it is distributed to the public. Some technologies for removing PFAS, like employing Granular Activated Carbon and Reverse Osmosis, exist but the technologies have to be tailored to the specific utility, are very expensive, and are still being evaluated for effectiveness in removing all forms of PFAS.

Additionally, there are no good solutions for what to do with the PFAS that are removed during the treatment process, which can either go to a landfill where they can leach back into waters, applied to land in the form of sludge that will leach and run off, or be released back into the surface water to become another community's problem. It is important to realize that dangers of PFAS pollution are not just about treated drinking water supplies. PFAS contamination also endangers our aquatic ecosystems in many ways and it endangers people in other ways too, such as consuming contaminated fish, consuming untreated drinking water, and ingesting contaminated water when swimming. This is why it is so important to have standards in place to prevent PFAS contamination of surface waters in the first place and to clean up existing contamination.



• Q: Is this a boon for the bottled water industry?

A: No, <u>consumer reports</u> tested several brands of bottled water and detected PFAS in many of them. PFAS pollution is not a boon for anyone except the corporations that are being allowed to release dangerous amounts of it into the environment without any federal standards in place to protect the public. In most cases, bottled water is sourced from the same places that the public gets their water, including municipal drinking water utilities, so it is also highly likely to be contaminated by PFAS as well. If PFAS is in the source water, it's in the bottled beverage, but FDA doesn't prioritize PFAS or test for it. Plastic pollution from the bottled water industry is also a huge crisis in its own right – and to require the public to spend their hard-earned money on bottled water from private companies because our government is failing to control cancer-causing pollution is deeply unfair. The public has a right to expect clean water from our taps – the EPA needs to act to ensure that right is secured immediately.

• Q: How can we trust this report from an advocacy group?

A: Waterkeeper Alliance and Waterkeeper groups have a long history of collecting representative, trustworthy water quality data that has been utilized by researchers and the government, as well as found reliable in courts of law. This report is no different and is the result of seven months of hard work by 113 Waterkeeper groups from all over the country that were given training and instruction on water sample collection procedures. Waterkeepers used industry-standard methods and tools to collect samples. Following that, all the results and data were shared with an independent laboratory, which conducted the analysis and provided the technical findings to us. Available for download at waterkeeper.org/pfas, this data forms the basis of our report. In addition, the data and findings were reviewed and confirmed by third-party scientific review. We are confident in these rigorous methods and the independent verification of these results.

• Q: How does this study compare with other existing PFAS analysis?

A: There are many excellent studies of various aspects of PFAS contamination, particularly focused on sources and impacts to drinking water utilities, including <u>EWG's</u> work documenting sources and drinking water contamination. We are not aware of a similar analysis of this breadth and scope looking into PFAS contamination of surface waters across the country in a coordinated sampling project completed using the same methods to collect samples during a discrete period of time (Spring and Summer 2022). This is a first-of-its-kind study. That fact ought to give everyone pause, because we need EPA, Congress, and the Biden administration to act expeditiously to implement robust monitoring and safeguards to detect and control the sources of this public health crisis.



• **Q:** Won't polluting manufacturers pass down the clean up costs to water utilities and then to consumers through rate hikes?

A: With its waterproof and indestructible qualities, PFAS transformed manufacturing in the mid-twentieth century despite concerns raised by the FDA about research involving animals fed with PFAS covered products. Even back in the 1960s, the safety of these chemicals was questioned. The FDA and lawyers for the chemical companies knew that animals fed with PFAS-covered products suffered enlarged livers within three months of exposure. During these experiments, some FDA lawyers called for a two-year safety study on PFOA (a version of PFAS). However, with billions of dollars of profit at risk and facing enormous industry pressure, FDA backed down and reneged in its duty to protect public health.

Cleared to use these chemicals with virtually no oversight and no regulation, PFAS have been discharged by unregulated manufacturers unchecked and unabated for decades. <u>PFAS is now present in rainwater</u>, which means it's evolved into a global threat.

Drinking water utilities and wastewater treatment plants are poorly equipped to cope with the onslaught of these chemicals and require financial assistance as upgrades required for removal are extremely expensive. By the end of 2023, EPA is expected to set drinking water standards for PFOA and PFOS that will require U.S. drinking water utilities — many of which are already in need of substantial infrastructure repairs or replacement due to decades of funding shortfalls — to undertake costly upgrades even as polluting and profit-making industries continue to contaminate public trust waters. A continued failure of regulatory agencies to prevent polluting industries from dumping PFAS into their waste streams, or to hold them responsible for cleanup costs, means that the financial burden will be passed down to water and wastewater utilities and, by extension, to everyday people, who pay for these services.

• Q: Are there currently any attempts by manufacturers or regulators to address PFAS?

A: As the threat of PFAS has come under more scrutiny in recent years, brands such as Starbucks, Patagonia, and Gore-Tex are beginning to remove it from their products and some states are enacting an inconsistent patchwork of product bans and regulatory limits. Any action on PFAS is better than the inaction that has led to this crisis; however, to be truly effective, we need PFAS compounds to be regulated as a class, and on a federal level, versus singling out only two of the most prevalent compounds — PFOA and PFOS — or even a handful of them, for enforceable regulatory limits. Regulating PFAS as a class is supported by the findings in our report, which showed the presence of at least 35 of the 55 compounds that we tested for in U.S. surface waters.