



January 29, 2021

New Jersey Clean Water Council
Anthony McCracken, Chair

Re: New Jersey American Water Comments on New Jersey Clean Water Council Public Hearing: Permitting of PFAS Compounds in NJPDES Discharges to Surface Water

Dear Chairman McCracken:

The comments below are being submitted to the New Jersey Clean Water Council (CWC) on behalf of New Jersey American Water (NJAW). NJAW supports the CWC efforts to address emerging contaminants in the interest of protecting public health and water resources across the State of New Jersey.

While NJAW supports the intent to expand monitoring and elimination of per- and poly-fluoroalkyl substances (PFAS) in New Jersey, several fundamental issues with the suggested language should be addressed before regulatory requirements can be established. Specifically, enhanced focus is needed to establish consistent and reliable laboratory methods for the characterization of PFAS concentrations in discharge effluents subject to the NJPDES Program. Further, regulatory requirements in the form of wastewater discharge limits could result in shifting the mitigation responsibility from producers and users of PFAS to those who simply receive PFAS-burdened waste. We feel that resources should be focused on source control, identifying and mitigating risk from the direct PFAS polluters, and that the expense of treating PFAS be borne by the polluters.

Focusing on the suggested steps above addresses the intent of gathering information about PFAS occurrence from a local, regional and state-wide perspective. Combining this data also enables the New Jersey Department of Environmental Protection to produce source water characterization summaries, which should be shared with drinking water systems throughout New Jersey.

Please feel free to contact me with any questions or concerns.

Respectfully,

Matthew F Csik

Matthew F. Csik
Director, Water Quality and Environmental Compliance