



January 29, 2021

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New Jersey Clean Water Council
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Attention: Anthony V. McCracken, Sr., Chair

Subject: **Testimony related to the Clean Water Council's Public Hearing on
Permitting of PFAS Compounds in NJPDES Discharges to Surface Water**

Dear Mr. McCracken:

The following comments are submitted to the Clean Water Council on behalf of Pinelands Wastewater Company (PWWC), a small wastewater utility serving approximately 2,400 customers primarily in an age restricted community in Southampton Township, New Jersey. We appreciate the opportunity to participate in this dialogue on behalf of our customers discussing PFAS compounds, and contribute information being collected by the New Jersey Department of Environmental Protection (NJDEP) regarding impacts from surface water discharges, including wastewater treatment plants (WWTP).

During the online oral testimony we heard from several wastewater utilities and other professionals regarding the issues and impacts of any discharge limits for the PFAS group of compounds (PFAS) on utilities and WWTPs. PWWC generally agrees with and supports these comments and concerns. Consideration of wastewater discharges for PFAS is at a **very early conceptual stage** with many unknown and uncertain aspects of this subject including extent of the issue, risks, realistic solutions and treatment, and cost impact to customers. Specifically these include:

- Lack of a clear understanding of the problem and impact of PFAS in surface waters, with limited data of existing PFAS concentrations in discharges from sources, WWTP discharges, and receiving streams.
- Lack of a clear understanding of risks and impacts to the public and environment from PFAS in surface waters.
- Lack of treatment works technologies and processes, from both existing treatment plants and systems to be developed, that would provide for effective removal and destruction of the PFAS compounds from wastewater flows.

- Lack of clear understanding of the costs that would be incurred and eventually passed through to the customers (although it is generally accepted that these costs would be inordinate, and result in substantial increases in customer bills).

PWW recommends and requests NJDEP proceed with an approach that is based on science and collaboration, and consideration of risk identification and reduction, and cost impact, including the following items:

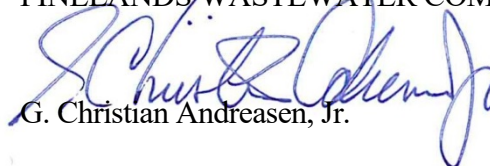
- First, monitor WWTPs and streams to determine existing concentrations of PFAS.
- Then, based on data collected determine whether stream limitation of PFAS are needed to protect aquatic and human health, and if so, adopt this criteria.
- If necessary once criteria are in place, determine whether WWTP effluent concentrations are contributing to exceedances of stream criteria goals.
- If WWTP effluents are contributing, work with stakeholders and wastewater professionals to identify and/or develop realistic solutions including source identification and elimination and wastewater treatment technologies to achieve any identified discharge limit goals.
- include cost impact to consumers as a consideration in any action to be taken for regulatory requirements

As described during the hearing, this issue is being investigated across the country by stakeholders and subject matter experts, generally following this approach. We believe it is essential that New Jersey participate in these collaborative efforts and adopt the scientific approach to assure this issue addressed in a proper and cost effective manner for residents of the state.

Thank you for the opportunity to provide comments on this important matter.

Very truly yours,

PINELANDS WATER COMPANY
PINELANDS WASTEWATER COMPANY



G. Christian Andreasen, Jr.

GCA/acg