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Anthony McCracken, Chair
Clean Water Council
CWC@dep.nj.gov

Dear Mr. McCracken:

On behalf of SUEZ Water New Jersey Inc., I am submitting the below comments following the Public Hearing that was held on January 21 regarding Permitting of PFAS Compounds in NJPDES Discharges to Surface Water.

SUEZ supports the intent to improve available datasets and reduce the levels of PFAS in the environment. However, additional tools and analyses are needed for an efficient and effective approach.

The first priority of this effort should be to approve and adopt an analytical method specifically for the measurement of PFAS in wastewater and surface water bodies, as opposed to the methods currently approved for drinking water, and support the training and certification of laboratories in this method. Once the analytical method has been approved and is readily available, the Department will be able to monitor PFAS levels in surface water bodies, determine whether stream criteria are needed to protect aquatic and human health, and adopt such criteria. This criteria and analytical method then can be used by the Department to identify significant contributors of PFAS to the aquatic environment, and by WWTPs to voluntarily monitor their own discharges and strengthen their industrial pretreatment programs.

As the Department has only just begun including PFAS monitoring standards in discharge permits upon renewal, there will be the opportunity to gather much more occurrence data over the next few years.

Thank you for the opportunity to comment on this initiative. Please feel free to contact me with any questions or concerns.

Best regards,

A handwritten signature in black ink that reads 'Carol Walczyk'.

Carol T. Walczyk, PE
Vice President, Water Quality & Compliance