



North Wales Water Authority
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March 08, 2022

Lisa D. Daniels, Director,
Bureau of Safe Drinking Water,
P.O. Box 8467,
Rachel Carson State Office Building,
Harrisburg, PA 17105-8467.

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Independent Regulatory
Review Commission

Leda J. Lacomba, Assistant Counsel,
Bureau of Regulatory Counsel,
P.O. Box 8464,
Rachel Carson State Office Building,
Harrisburg, PA 17105-8464

**RE: PROPOSED RULEMAKING, ENVIRONMENTAL QUALITY BOARD
[25 P.A. CODE CH. 109] - Safe Drinking Water PFAS MCL Rule
Advertised at [52 Pa.B. 1245], [Saturday, February 26, 2022]**

Dear Ms. Daniels and Ms. Lacomba,

I am writing on behalf of the North Wales Water Authority (NWWA) in response to the above-referenced water quality rulemaking.

The NWWA provides public water to over 35,000 retail customers in Bucks and Montgomery Counties, as well as about 10 million Gallons of bulk water to our neighboring Authorities and municipal water suppliers each day. We wholeheartedly support your efforts to improve the quality and health safety of all water provided to the public.

Several municipalities and bulk customers we serve have been impacted by PFOA/PFAS water contamination. We have been actively assisting them in their contamination mitigation efforts by providing emergency and permanent alternate water supplies and technical assistance over the past several years.

Mitigation of the impacts of PFOS/PFOA contamination is now an essential element of our daily operations and is expected to remain as such for many years, perhaps decades.

As such, we respectfully request that our following position be considered during the final deliberations related to the proposed rulemaking:

Reply To: Main Office: 200 W. Walnut Street, P.O. Box 1339, North Wales, PA 19454 • Phone: 215-699-4836 • wizard@nwwater.com
 Bucks Office: 1560 Easton Road, P.O. Box 1018, Warrington, PA 18976 • Phone: 267-482-6940 • nwwabucks@nwwater.com



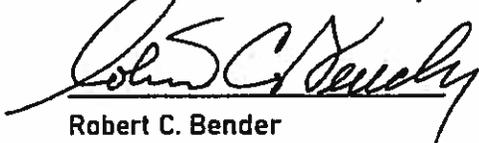
"The North Wales Water Authority (NWWA) fully supports all rulemaking efforts intended to assist in the mitigation and future elimination of PFOS/PFOA within public and private water supplies, provided that, the new rules, regulations, and permitted levels:

- a. Are based upon valid health and scientific studies, using confirmed data considering both the short and long-term impacts of the contaminant(s) being regulated, and correlate with the new maximum levels being proposed, and***
- b. Permit compliance using readily attainable filtration technologies, along with contaminant waste collection and disposal processes, and***
- c. That the regulations do not require excessive expense to ultimately be passed along to the consumer, and***
- d. That proper consideration is given to the proper disposal of the contaminants removed, also including hold-harmless provisions and other indemnities for the water supplier, complying with the new rules, and***
- e. Are not imposed upon the water suppliers as another unfunded mandate, ultimately to be passed onto the water customers, many of which are now dealing with other economic hardships. The new rules should be imposed only in concert with new permanent financial incentives from the State, and***
- f. That new rulemaking is implemented only after full consideration of scientifically based water quality and health reviews and studies, including the recommendations of water industry professionals, and rejecting any non-health and science-based influences.***

Again, we support all reasonable efforts to improve the quality of water provided by the public water industry. However, despite what appears to be good intent, we remain concerned with the "slippery slope" created when water quality standards are developed and imposed without adequate research and supporting data.

Thank you for your consideration of this matter and our comments.

Sincerely,
North Wales Water Authority



Robert C. Bender
Executive Director