

DWQI PFOS Comments:

1. When deciding to regulate contaminants, the EPA considers if treatment technologies are affordable to systems and the incremental costs and benefits associated with MCL values. I could not find any documentation in the Institute draft reports that evaluated the economic impact of the recommended level proposed by the DWQI. At the proposed level, many systems will be forced into treatment for levels below the current EPA Advisory Level. Were land acquisition costs for treatment footprint, operation & maintenance costs and timing for treatment execution considered? Ridgewood Water has reached 90% design on a GAC treatment system for a 1000 gpm system, with a probable construction cost of \$3.4 Million, plus engineering, permitting and annual maintenance costs. The project timeline from the treatment feasibility study to completion of the construction will exceed two years. In this regard, I recommend the Institute reconsider its recommendation until a financial impact study can be completed that considers all factors resulting from the proposed limit.
2. With the recommendation of the most recent contaminant levels for PFOA and PFNA, the Department strongly recommended that systems exceeding the limits either take the impacted sources out of service, install treatment or blend with purchased water. Should a system find that a majority of their sources or largest yields exceed the limit; the recommendations will not be practical. There are limitations on how much water systems can purchase both contractually and hydraulically. Water quality concerns for the increased purchased water, including corrosion control and other parameters, should be considered, as the consecutive system will now be bringing in a much greater volume of non-system generated water. I request that Institute reconsider their recommendations and utilize the EPA health advisory standard as the threshold for taking systems offline and use the proposed limits as the treatment goal with the timing considerations noted here and in comment #1, above.
3. In the final report, the DWQI should recommend that the State aggressively go after the responsible parties for this contamination and develop a spill fund for the treatment project funding.
4. For future recommendations I recommend that the DWQI host stakeholder meetings and provide sufficient notice to all utilities.



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