



**Water Quality Association**

**Statement for the Record**

**Committee on Energy and Commerce Subcommittee on Environment  
United States House of Representatives**

**Re: Hearing entitled "Perfluorinated Chemicals in the Environment: An Update on the Response to Contamination and Challenges Presented"**

**September 6, 2018**

I am writing to the Committee on behalf of the Water Quality Association (WQA) – a not-for-profit association for the residential, commercial and industrial water treatment industry – to communicate our continued support for implementing measures to understand the impact of per- and polyfluoroalkyl substances (PFASs) on human health and to urge support of point-of-use (POU) and point-of-entry (POE) – at the tap or whole house – water treatment technologies to battle these contaminants.

I would also like to thank the subcommittee for holding this hearing and for its focus on PFASs contamination. Our association was encouraged by the FY18 National Defense Authorization Act's (NDAA) inclusion of a national study through the Department of Defense on human health implications of PFASs in drinking water, ground water, and any other sources of water and relevant exposure pathways. This will be the first ever nationwide study on the human health impacts of PFASs which will help Federal agencies and states communicate the risks of PFAS contamination.

When looking at preventing and treating unhealthy PFAS exposure, it would be extremely expensive to remove PFASs from our drinking water using centralized treatment. This would require upgrading drinking water treatment plants not currently designed to remove these chemicals. Many economically challenged communities already struggle to fund necessary maintenance and upgrades to their existing infrastructure for roads, bridges and drinking water pipes. Asking these communities to pay for additional upgrades to their drinking water treatment plant would only increase that burden.

Research shows POU and POE technologies can be used to successfully treat for these contaminants at the home or in a building.<sup>1</sup> They cost only a fraction of the price our society would need to bear to upgrade our drinking water treatment plants for PFAS removal.

These POU and POE technologies include Reverse Osmosis, Carbon Filtration and Anion Exchange. Reverse Osmosis products have been independently tested through WQA in collaboration with the Minnesota Department of Public Health<sup>2</sup>. Carbon Filters have been independently tested by NSF International. And Anion Exchange products have been independently tested through the Water Research Foundation. The testing has shown each of these technologies, with the right design parameters and configuration, can be used as a successful final barrier in the home to protect people from the harmful effects caused by the presence of these chemicals in our drinking water. These tests help the Federal agencies, states, and the public learn how to prevent unhealthy exposures.

<sup>1</sup> <http://www.health.state.mn.us/divs/eh/hazardous/topics/pfcs/>

<sup>2</sup> <http://www.health.state.mn.us/divs/eh/wells/waterquality/poudevicefinalsummary.pdf>





In May 2016, The Federal EPA published a lifetime Health Advisory of 70 parts per trillion for the sum of PFOS and PFOA in drinking water. PFOS and PFOA are two of the more than 3,000-4,000 PFAS chemicals. Manufacturers voluntarily phased out use of PFOS in 2000-2002 and PFOA in 2010-2015. This health advisory is not legally enforceable under EPA regulations or the Safe Drinking Water Act but may be given weight in state regulation.

So far, twenty states have established their own health advisory levels, action levels, drinking water criteria, or state standards for PFASs in ground water, surface water, or drinking water. Attached with this letter is a summary of state actions to address PFASs. Through legislation and agency activities, states are continuing to look for crucial information on the identification, characterization, and monitoring of PFASs and the impacts to human health. There remain gaps in research on PFASs.

WQA staff participated in the Federal EPA summit on per- and polyfluoroalkyl substances (PFASs), in May 2018, and continue to be a resource on PFAS treatment options as communities and legislators try to learn more about the widespread occurrence of PFASs from many sources and how POU and POE treatment can serve as an inexpensive and immediate solution to protect public health.

WQA represents more than 2,500-member companies, including equipment manufacturers, supplier, dealers and distributors of water quality improvement products and services. WQA also operates a product certification program attesting to the safety and efficacy of a variety of water treatment products; and provides training to water treatment specialists through its professional certification programs.

We appreciate the subcommittee's continued focus on issues of water contamination, and WQA stands ready to serve as a resource as Congress works to find sensible, cost-effective solutions to these nationwide problems. If you need any additional information, please contact David Loveday, WQA's Director of Government Affairs, at [dloveday@wqa.org](mailto:dloveday@wqa.org) or by phone at (630) 505-0609.

Sincerely,

A handwritten signature in black ink that reads "Pauli P. Undesser".

Pauli Undesser  
Water Quality Association  
Executive Director  
[pundesser@wqa.org](mailto:pundesser@wqa.org)  
630-929-2514