



September 6, 2018

The Honorable John Shimkus
Chairman, Subcommittee on
Environment
Committee on Energy & Commerce
U. S. House of Representatives
Washington, DC 20515

The Honorable Paul Tonko
Ranking Member, Subcommittee on
Environment
Committee on Energy & Commerce
U. S. House of Representatives
Washington, DC 20515

Re: September 6 hearing on Perfluorinated Compound in the Environment

Dear Chairman Shimkus and Ranking Member Tonko:

The National Ground Water Association (NGWA) applauds the Subcommittee's holding of the hearing on "Perfluorinated Compounds in the Environment." Contamination from per- and poly-fluoroalkyl substances (PFAS) is nearly ubiquitous across the country, and more resources--technical and financial--are needed to accurately identify and address the scale of the problem.

NGWA is a trade association and professional society with over 10,000 members committed to the management, protection and use of groundwater resources. Our members are contractors, scientists, engineers, manufacturers and suppliers, who are actively working to address PFAS contamination on a daily basis--whether working on contaminated sites to devise remediation plans or assisting individuals directly with the testing and treatment of drinking water supplies.

NGWA offers the following recommendations and observations:

- To most effectively manage PFAS contamination, regulatory certainty that is enforceable must be established at the federal level, as soon as possible. Absent of this certainty, states are enacting their own limits, creating additional challenges for the detection and remediation of contamination across states.
- Sound science is an integral part of any regulatory determination. Therefore, chemicals must be assessed individually, and limits must not be set until toxicology values are determined for each chemical.



- Resources must be provided to increase the number of labs capable of testing for PFAS via EPA's method 537. Many states have no labs that use method 537, and the limited number of labs make testing for PFAS cost-prohibitive, particularly for private well owners.
- Private wells pose unique challenges in detecting contamination because there are no requirements for well owners to routinely test their water. Funding for technical assistance programs to conduct well owner outreach and financial support for water testing must be prioritized, particularly in rural areas.
- While PFAS in drinking water is a challenge, it is not a challenge without a solution. Like all contaminants in drinking water, treatment options are available to ensure drinking water remains safe and reliable. Funding should be made available for point-of-use devices to treat contaminated drinking water.

NGWA and its members look forward to continuing to serve as a resource for the committee. Our members stand ready to volunteer their expertise, as solutions and assistance are developed. NGWA also produced a comprehensive guidance document on the state of knowledge and practice surrounding groundwater and PFAS. Please contact Lauren Schapker, NGWA government affairs director, if you would like a copy of this resource or with any questions at lschapker@ngwa.org or 202.888.9151.

We look forward to working with the committee on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Morse". The signature is stylized and cursive.

Terry S. Morse, CIC
Chief Executive Officer
National Ground Water Association