



PFAS Interagency Task Force

How are communities in Massachusetts impacted by and responding to PFAS?

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Presentation by:

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Massachusetts Water Works Association

Who we are...

- ◆ MWWA is a non-profit based in Acton, MA.
- ◆ MWWA's 1,300+ members include public officials, water system managers and operators, regulators, consulting engineers, contractors.
- ◆ MWWA members provide their expertise on a number of state committees and workgroups.

◆ Mission Statement:

The Massachusetts Water Works Association is a membership organization dedicated to the advancement of the drinking water profession. Through education and advocacy, MWWA is committed to public health by promoting a safe and sufficient supply of drinking water to Massachusetts consumers



Public Water System Regulatory Obligations

State Initiatives:

- Water Management Act Regulations
- **Per- and Polyfluoroalkyl Substances (PFAS)**
- Manganese
- Perchlorate
- MassDEP Guidelines
- Asbestos Regulation
- Water Conservation Standards
- Security
- Operator Licensing Requirements

Federal Initiatives:

- Risk and Resiliency Assessments
- Emergency Response Plans
- Groundwater Rule
- Long Term 2 Enhanced Surface Water Treatment Rule
- Hexavalent chromium
- Stage 2 Disinfection Byproduct Rule
- Lead & Copper Rule
- Consumer Confidence Reporting
- NPDES Treatment Plant Discharge Permit -Stringent Aluminum Criteria
- Pharmaceutical Impacts on Water Quality
- UCMR 4 (soon to be UCMR 5)— (Unregulated Contaminant Monitoring Rule)
- Revised Total Coliform Rule
- Distribution System Rule





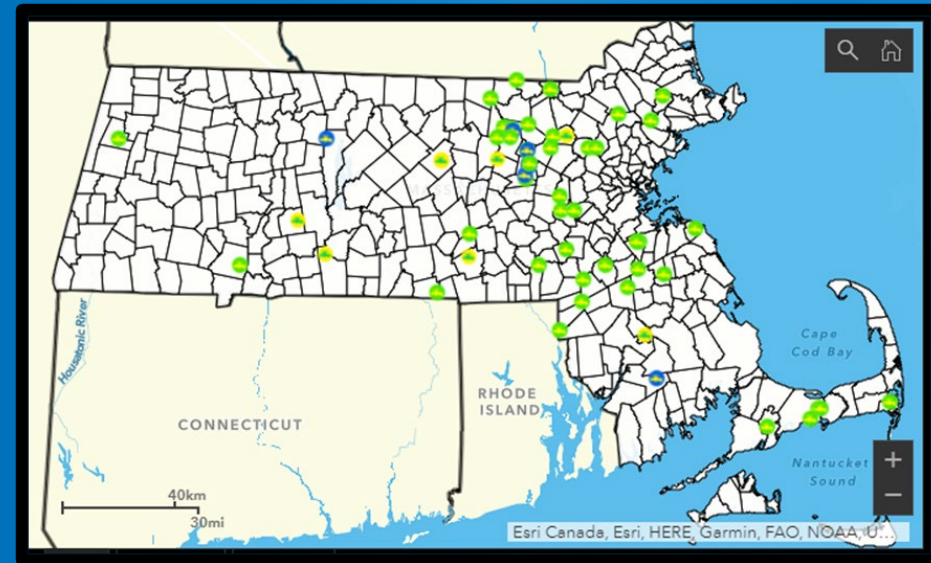
PFAS in Drinking Water in MA

- PFAS Drinking Water Regulations are complex
- The science around PFAS is evolving
- Communicating with the public is a challenge when there are many more questions about PFAS than answers
- Public Education is required for the first confirmed result above 20 ppt
- Public Notice is required for a violation of the Maximum Contaminant Level (quarterly result above 20 ppt)

Public Notice Language:

“Some people who drink water containing PFAS6 in excess of the MCL may experience certain adverse effects. These could include effects on the liver, blood, immune system, thyroid, and fetal development. These PFAS6 may also elevate the risk of certain cancers.”

“Consumers in a sensitive subgroup (pregnant or nursing women, infants and people diagnosed by their health care provider to have a compromised immune system) are advised not to consume, drink, or cook with water when the level of PFAS6 is above 20 ng/L.”



- From [MassDEP website](#) 7/19/21 –
- 59 Public Water Systems have detections over 20 ppt – this map is updated when results are confirmed and PE/PN has been done.
- This map does not reflect all PFAS detections and there are many between 10-20 ppt.
- Results reported to [EEA Data Portal](#) are about 3 weeks behind



- 💧 Treatment costs can be substantial
 - 💧 Hudson - \$4.3 million – Chestnut St. Source
 - 💧 Mansfield - \$4.2 million – Cate Spring Source
 - 💧 Westfield - \$12.2 million – Dry Bridge Rd. Treatment Plant
 - 💧 Littleton - \$24.5 million – Whitcomb Ave. Treatment Plant
- 💧 2021 State Revolving Loan Fund Drinking Water [Intended Use Plan](#) has a number of PFAS-related projects – these are loans and need to be paid back!
- 💧 Funding provided by MA to-date to support drinking water remediation activities is not sufficient to cover the costs being incurred by Public Water Systems and their ratepayers





Water Suppliers Concerns

- ◆ So much focus on PFAS in drinking water and not enough education of other exposure points (consumer products, food, air) and source control (why are we allowing PFAS to be used in commerce)
- ◆ Differing standards in MA than Federal, and even other states
- ◆ Variability in Analytical Results (many samples fail QAQC, results vary by different labs, matrix interference could be an issue with some source waters)
- ◆ Lab Reporting Delays
- ◆ Ongoing sampling costs (results over 10 ppt are triggering monthly sampling)
- ◆ Procurement law changes might be needed
- ◆ Supply chain concerns for common treatment components
- ◆ Provision of alternative water source to sensitive subpopulations can be expensive and logistically challenging (bottled water, bill credits, vending machine, filters, etc.)
- ◆ Delays in investigating who is responsible for the contamination of the water
- ◆ Determining who is responsible for paying for remediation of the contamination
- ◆ Designing solutions/investing funds for a standard that might change in 3 years
- ◆ Ongoing operational and maintenance costs
- ◆ Loss of public confidence in the quality of tap water



Concerns for Municipalities

- Addressing private wells
 - Public Water Supplies have an MCL but private wells do not – Boards of Health have jurisdiction over private wells
 - Town of Harvard is requiring testing of wells in certain areas of town at construction or sale
 - Groundwater clean up standard in MA subjects property owner to potential 21E wastesite investigation if PFAS is over 20 ppt
 - MassDEP is requiring PFAS sampling in NPDES permits, yet there is no approved sampling method; each permittee must have their lab get approval from ORS
 - Beneficial re-use of biosolids may be curtailed if standards are set for PFAS in sludge/biosolids
- Wastewater treatment plants are seeing increased costs related to sludge disposal and are increasingly concerned sludge won't be accepted where it has traditionally been disposed of
 - What if the municipality is the responsible party?
 - Town of Princeton is paying for remediation of private wells
 - What about landfill contribution to contamination?
 - Firefighting activity
 - The current regulations are not really addressing the problem of eliminating PFAS, we are just moving it around (we take it out of water but then we need to dispose of the media that contains PFAS)



Recommendations

- ◆ The Commonwealth should lead and provide clear and consistent statewide messaging regarding PFAS to all residents
- ◆ The Attorney General should pursue legal action to recoup costs associated with remediation
- ◆ Public Water Systems need grants, not loans, and more simplified funding programs (SRF has many requirements)
- ◆ The SRF program needs to allow loans to an individual Public Water System in excess of \$15 million in a given year
- ◆ The Commonwealth should appropriate funds authorized under Chapter 259 of the Acts of 2014 that might assist with alternative supply connections
 - ◆ Section 31A. - A matching grant program for communities who desire to join the Massachusetts Water Resources Authority or any other regional system for wastewater, drinking water or for both wastewater and drinking water
 - ◆ Section 23. – This relates to “additional financial assistance, including principal forgiveness and additional financial incentives”
- ◆ Support Increased funding to the Clean Water Trust Contract Assistance Line Item 1599-0093
 - ◆ This Line Item supports more favorable loan rates - 0% for PFAS projects
 - ◆ The Legislature authorized this Line Item to increase to \$138 million, but funding to that level has not been appropriated (Chapter 259 of the Acts of 2014).
- ◆ The Commonwealth should bulk-purchase common treatment components and have them available to Public Water Systems when needed
- ◆ If alternative water delivery is prescribed by MassDEP, the Commonwealth should be distributing it through MEMA and not leaving it to the individual Public Water System to handle the logistics
- ◆ The Commonwealth needs to investigate Procurement laws and whether they can be eased or streamlined to allow municipalities to more quickly obtain services or treatment
- ◆ MassDEP needs more resources (staff and funding) to manage PFAS response



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A large, light blue water drop graphic is centered on the right side of the page. Inside the drop, the words 'water works' are written in a light blue, sans-serif font, and the word 'pride' is written in a white, cursive script font below it.

water works
pride