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March 14, 2018

By email to: michael.regan@ncdenr.gov

By FedEx to:

Secretary Michael S. Regan
North Carolina Department of Environmental Quality
217 West Jones Street
Raleigh, North Carolina 27603

Secretary Regan,

I am writing to request guidance from the State regarding drinking water treatment goals and health advisories for per-fluorinated compounds.

In late 2016, Cape Fear Public Utility Authority (CFPUA) became aware of the presence of unregulated, per-fluorinated compounds in the Cape Fear River and the finished water at our Sweeney Water Treatment Plant. Levels of GenX have remained below the North Carolina Department of Health and Human Services' provisional health goal of 140 parts per trillion since July 2017. However, the compound, in addition to other per-fluorinated compounds that do not have provisional health goals in place, continue to be detected in the finished water from the Plant.

To address widespread customer concern around the presence of these contaminants, and to investigate the potential to protect our community from future discharges, CFPUA began a pilot study in August 2017 to evaluate the effectiveness of additional technologies in removing unregulated, per-fluorinated compounds and other emerging contaminants. Since many of these emerging contaminants do not have certified testing standards, their levels must be estimated. CFPUA is one of the first utilities in the country to pursue treatment of per-fluorinated compounds such as GenX, and the process has been an arduous one—often requiring us to go significantly beyond our traditional role as a public water supplier. The pilot study has now entered its final stage, and we are evaluating multiple types of Granular Activated Carbon and Ion Exchange media. We expect to have the final results of the study this spring, and these results will be one component of our decision on whether to move forward with potential upgrades to the Plant.

However, as we consider such upgrades, information vital to the evaluation process is missing. In the absence of significant health data or provisional health advisories from the State, it is difficult to determine which treatment goals will best protect public health. The treatment goals will ultimately dictate the size of new facilities needed and the rate at which media will need to be replaced—considerations that directly impact the initial and ongoing upgrade costs to our customers.

We expect that 100 percent removal may not be practical. Thus, our charge is to balance consumer confidence in the public water supply while maintaining affordability.

Should CFPUA move forward with upgrades to the Plant, our customers will be investing over 30 million dollars into our community's primary drinking water facility to ensure they have the cleanest water possible. Estimates suggest the average customer will see an increase of 16 percent to their water bill.

To be the most effective and responsible stewards of our customers' funds, and to ensure we design upgrades to the Plant that are fully protective of public health, we ask the State to provide timely guidance on safe and protective levels of identified per-fluorinated compounds in public drinking water. Additionally, we ask the recommended levels be accompanied by the health data and scientific evidence supporting their establishment.

Sincerely,

A handwritten signature in blue ink, appearing to read "J R Flechtner". The signature is fluid and cursive, with a large initial "J" and "R".

James R. Flechtner, PE
Executive Director

Copy: Governor Roy Cooper

Secretary Mandy K. Cohen, North Carolina Department of Health and Human Services