

December 6, 2018

CFPUA Public Comment on EPA Draft Toxicity Assessment for GenX and PFBS

Cape Fear Public Utility Authority (CFPUA) is a water and wastewater provider in Southeastern North Carolina, serving approximately 200,000 people across parts of New Hanover County. We operate three drinking water systems—the largest of which uses the Cape Fear River as its source water. Over the past several years, more than ten different PFAS chemicals have regularly been detected in our raw and finished water, including the compounds GenX and PFBS. As research continues, scientists at universities across the state are identifying additional contaminants.

CFPUA is pleased to see that EPA has started to assess the risks that GenX and other PFAS may pose to human health and the environment. The Cape Fear River is central to the economy of Southeastern North Carolina, acting as the origin of much of our drinking water, recreation, tourism and industrial activities. A full understanding of the ways these chemicals operate in our bodies, and in the environment, is critical to ensuring an effective response is put into place.

Unfortunately, this risk assessment process did not occur before these compounds were released to the environment. As a result, our community will continue to be exposed to a variety of PFAS chemicals in its drinking water while we wait for a risk assessment process that may take years.

To ensure we are protecting public health, CFPUA has already spent millions of dollars researching these compounds and implementing interim solutions to temporarily reduce them. We are currently designing a permanent upgrade to the water treatment facility. This process will take several years and could cost our residential customers an additional five dollars per month that they should not have to spend.

Thus, while CFPUA welcomes this draft toxicity assessment for GenX and PFBS, much work remains to be done.

From a regulatory perspective, drinking water providers need testing capabilities, regulatory guidance, and treatment goals for comprehensive PFAS reduction. Focusing on GenX, PFBS, PFOA, and PFOS, without considering other PFAS, is not sufficient to protect drinking water supplies and the environment. This information would allow utilities to assess their current treatment capabilities and design effective upgrades.

From a public health perspective, draft toxicity assessments should be made available for all additional PFAS that have been found in the Cape Fear River. Existing toxicity assessments must be updated to include the impact of exposure to multiple PFAS compounds at once.

As the nation's leading regulator of the Clean Water Act and the Safe Drinking Water Act, EPA should continue its risk assessments for a much wider range of PFAS compounds, and work to quickly and effectively turn that information into a regulatory framework protective of public health and the environment.