June 9, 2021

The Honorable Tom Carper
Chairman, Subcommittee on
Environment & Public Works
Committee on Homeland Security &
Government Affairs
United States Senate
Washington, DC 20515

The Honorable Shelley Moore Capito
Ranking Member, Subcommittee on
Environment & Public Works
Committee on Homeland Security &
Government Affairs
United States Senate
Washington, DC 20515

Dear Chairman Carper and Ranking Member Capito:

The National Ground Water Association (NGWA) applauds the Subcommittee's holding of the hearing on the impacts of per- and polyfluoroalkyl substances (PFAS) on communities and states. Over the last five years, as awareness of the nationwide PFAS contamination has grown, we have watched states, cities, and small towns across the country attempt to regulate PFAS and mitigate the impact to their citizens. For too long, our cities and communities have done so with little guidance, regulations or resources from the federal government. We at NGWA are thankful and excited to see that course reversing.

NGWA is the leading trade association and professional society of approximately 10,100 members committed to the management, protection, and use of groundwater resources. Our members are water well contractors, scientists and 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 water supplies from residential water wells.

NGWA has also been a longstanding resource for research, guidance, and education concerning PFAS. We regularly hold PFAS workshops, congressional briefings, and public education events to bring greater awareness of PFAS contamination and options for remediation. In 2017, NGWA published one the first guidance documents on PFAS and groundwater, *Groundwater and PFAS: State of Knowledge and Practice.*

Water wells play a crucial part in America's water infrastructure. There are an estimated 15 million residential water wells located throughout the United States that supply clean water to more than 40 million Americans. These water wells are largely located in small towns and rural areas that are often classified as underserved or disadvantaged.

As the leading organization representing our nation's water well contractors and water well owners, we know firsthand the struggles these communities face when confronting water quality issues such as PFAS. But we also know there are paths forward to assist these communities in overcoming these challenges.

There are simple, proven technologies for effectively testing and removing PFAS from a residential water well. Treatment options such as activated carbon, ion exchange resins and reverse osmosis membranes continue to become more widely used and cost effective for consumers. But, while options for testing and remediation grow, they often remain unknown or unattainable to many well owners.

Whether due to the inability to afford remediation technology, lack of awareness to potential PFAS contamination, or being unable to find a testing laboratory, our members too often meet homeowners unprepared to manage PFAS in their water supply. And, while there has been a massive uptick in state and federal legislation confronting the PFAS contamination, few of these bills adequately address the technical and financial challenges facing our nation's private water well owners. Those who rely on water wells face the same threats of PFAS exposure as those who utilize public water systems, but with a small fraction of the support.

As Congress continues to discuss PFAS legislation and national infrastructure legislation, NGWA strongly urges our leaders to create policies to better assist private water well owners—especially in rural and underserved communities. By including water well support in future legislation, you will increase water quality for millions of Americans while at the same time saving federal dollars by forgoing costly and unnecessary connections to public water systems.

NGWA offers the following recommendations and observations to the subcommittee:

- To most effectively manage PFAS contamination, regulations that are enforceable must be established at the federal level, as soon as possible. Absent of this certainty, states and communities are enacting their own limits, creating additional challenges and confusion for the detection and remediation of contamination across the country.
- Increase federal funding for PFAS testing and PFAS remediation of private water and irrigation wells in rural and underserved areas.
- Create tax incentive programs for the purchase of PFAS remediation technology 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. Increased funding for technical assistance programs to conduct well owner outreach and financial support for water testing must be prioritized, particularly in rural and disadvantaged areas.

- 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.

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. Please contact Ben Frech, NGWA public relations and regional policy manager, with any questions or requests at bfrech@ngwa.org.

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

Sincerely,

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

PFAS and Private Well Owners:

What You Need to Know

What are PFAS?

Per- and polyfluoroalkyl substances (PFAS) are human-made chemicals containing carbon and fluorine that are found in groundwater and surface water throughout the world. The two most prominent PFAS (known as PFOA and PFOS) are no longer made in the United States, but remain in the environment.

PFAS are useful because they are water-repellent and stain- and heat-resistant. These characteristics make them ideal for stain- and water-repellent fabrics, food packaging, and non-stick cookware. PFAS are also surfactants, which make them useful for polishes, waxes, paints, cleaning products, and fire-fighting foams. PFAS are very stable—they last a long time in the environment and in the human body. There is evidence that exposure to some PFAS can be harmful to human health.

PFAS have been the recent focus of scientists, health organizations, and environmental protection agencies worldwide. Many of these groups have issued health-protective drinking water concentration criteria for PFAS. The criteria differ by locale but are generally considered to be stringent and protective of drinking water.

If you own a drinking water well, you should be aware of the potential for PFAS in groundwater. However, you should be assured that a detection of PFAS does not necessarily lead to adverse health effects, and there are things you can do to protect your water supply from PFAS.

How do I test my well for PFAS?

As a private well owner, you want to know your water is safe for your family. It is your responsibility to sample and test for many types of contaminants in accordance with local health guidelines.

NGWA has guidance documents and resources available to help you learn more: *www.ngwa.org/what-is groundwater/groundwater-issues/Groundwater-and-PFAS*.

Many recommendations exist for sampling and testing PFAS. The U.S. Environmental Protection Agency (EPA) has summarized some of its recommendations on its website: *www.epa.gov/pfas/us-state-resources-about-pfas*. Your county or town health departments may also have information on PFAS sampling and locating a laboratory that is certified to test water for PFAS.

Testing for PFAS is one of many reasons to sample your water. It is a relatively simple process, but you must be sure to collect clean water samples. Let the tap run for about 10 minutes before you collect the water and always use laboratory-provided, PFAS-free containers. If you can, compare tap water with water sampled directly from your well borehole. NGWA has a water testing and treatment fact sheet *www.ngwa.org/docs/default-source/default-document-library/groundwater/water-testing-and-treatment.pdf?sfvrsn=bd5616c_2*

The most efficient and reliable PFAS sampling option is to obtain a kit from a PFAS-

certified laboratory. The test kits come with easy-to-follow instructions and you get results quickly. Prices for a test kit and results report vary but can be upwards of $400. If sampling directly from your well, make a note of the depth to water when you collect your sample.

What do my PFAS test results mean?

You've got your PFAS test results back from the lab; now what do they mean? PFAS are measured in "ng/L": These are nanograms per liter, a very small number. Sometimes ng/L are called parts per trillion or ppt. One ng/L is like one drop of water in 13 million gallons of water. Your PFAS test report will also have numbers that are used to explain the smallest amounts that the lab can measure: detection limit (DL), limit of detection (LOD), or limit of quantification (LOQ). "Labeled standards" or "surrogates" will also be reported. These PFAS are added so the lab instruments have something to compare your water to; they are not your water well test results.

How many ng/L are safe? The answer is, we really don't know! That's why different states have different recommendations, and some are different from the EPA's current health advisory level of 70 ng/L for two PFAS: PFOA and PFOS combined.

No one can say for sure if drinking well water that has PFAS in it will harm you, but we do know that touching the water is not harmful. Even if your water has PFAS in it, you can bathe, do your dishes, and wash your clothes without PFAS getting inside your body.

How can I remove PFAS from my water?

There are simple, proven technologies for effectively removing PFAS from your home's water supply. You can choose a solution for treating all the water entering your home (point-of-entry treatment, POET), or simply treating drinking and cooking water (point-of-use treatment, POUT).

Water treatment technologies have been around for years, and include activated carbon, anion exchange resins, and reverse osmosis membranes. You may already have a treatment system in place for other water conditioning that can address PFAS with a different maintenance schedule.

Water treatment systems come in all shapes and sizes, but the most important part of your decision is looking for third-party product certification. That certification provides a level of confidence that your purchase will provide the water quality protection you're looking for.

Third-party product certifiers will test to NSF/ANSI 53 or NSF/ANSI 58 for PFAS, PFOA, and PFOS reduction. Look for those classes of certification on the products you're researching.

Always rely on certified water treatment professionals for application, installation, and maintenance of your treatment system. This is an affordable level of protection required to assure your treatment system works flawlessly.

Your treatment system will need regular maintenance, so remember to ask your service provider for details.

Where can I get more information?

More PFAS information is available on your state and county websites, as well as from EPA and NGWA, at *www.epa.gov/pfas* and *www.ngwa.org/what-is-groundwater/groundwater-issues/Groundwater-and-PFAS*

As a private well owner, you are managing your own water. Groundwater is an inherently safe water supply that is under your control!

There is more information about caring for your well on Wellowner.org. Wellowner.org is the nation's leading resource for homeowners on guidance for maintaining private water well systems. It is a joint venture of the National Ground Water Association and Rural Community Assistance Partnership as part of a program funded by the U.S. Environmental Protection Agency.

Estimated Individuals Served By Private Water Wells

Sourced from The American Housing Survey by The U.S. Census Bureau

STATE	# of Individuals Served by Private Wells
Alabama	526,911
Alaska	157,114
Arizona	202,340
Arkansas	448,894
California	1,298,993
Colorado	300,977
Connecticut	747,890
Delaware	178,652
Florida	1,954,610
Georgia	1,268,081
Hawaii	2,613
Idaho	306,639
Illinois	1,166,329
Indiana	1,472,763
Iowa	529,150
Kansas	263,429
Kentucky	536,952
Louisiana	501,217
Maine	629,330
Maryland	828,813
Massachusetts	516,826
Michigan	2,982,060
Minnesota	1,248,761
Mississippi	336,743
Missouri	855,086
Montana	276,443
Nebraska	281,320
Nevada	93,129
New Hampshire	494,732
New Jersey	688,127
New Mexico	265,895
New York	4,017,704
North Carolina	2,316,767
North Dakota	135,010
Ohio	1,826,732
Oklahoma	387,810
Oregon	448,017
Pennsylvania	2,513,979
Rhode Island	116,887
South Carolina	854,135
South Dakota	126,625
Tennessee	627,049
Texas	1,547,143
Utah	58,363
Vermont	256,476
Virginia	1,407,422
Washington	666,713
West Virginia	469,447
Wisconsin	1,760,494
Wyoming	106,773