March 14, 2022

Chair David A. Bennett
State of Rhode Island General Assembly
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Providence, RI 02903

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State of Rhode Island General Assembly
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State of Rhode Island General Assembly
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Dear House Committee on Environment and Natural Resources Members,

On behalf of the American Supply Association (ASA), the International Association of Plumbing and Mechanical Officials (IAPMO), NSF International (NSF), and the Water Quality Association (WQA), we want to thank you for your commitment to ensuring the health and safety of your constituents through improving drinking water quality.

We would like to offer our support for House Bill 7233 which would require the department of health to establish maximum contaminant levels (MCLs) for per- and polyfluoroalkyl substances (PFAS) in drinking water, set interim standards, establish monitoring and remediation requirements.

PFAS are a large family of man-made chemicals that contain carbon, fluorine, and other elements. These chemicals are used in a variety of different products including firefighting foams, household products such as non-stick cookware, food packaging, and stain and water repellants. The two most widely studied PFAS chemicals are perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS); these chemicals were voluntarily phased out of production in the United States. However, as many as 3,000 other PFAS chemicals still are used in a wide variety of applications. These "forever chemicals" are persistent and resist degradation, meaning they may accumulate in the environment and in your body over time.

The scientific community has raised concerns over the long-term health and environmental impact PFAS has on drinking water and the public, bringing this issue to the forefront of local, state, and federal policymakers. Currently, the U.S. EPA has established a non-enforceable health advisory level of 70 parts per trillion (ppt) for the sum of PFOA and PFOS.[1] There is still considerable work being conducted by EPA through the agency's PFAS Roadmap as well as the broader water quality research community to further the understanding of these forever chemicals.[2] However it remains prudent in light of what is known to address PFAS in water quality to help protect public health.

[1] https://www.epa.gov/sites/default/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfos_updated_5.31.16.pdf
[2] https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf
[3] https://www.nsf.org/news/pfoa-pfos-reduction-claims-requirements-added-to-nsf-standards

When developing MCLs, jurisdictions should understand the limits of medical, scientific, and technological feasibility, for carcinogens. Some states have set lower advisory levels and others have implemented enforceable MCLs for specific PFAS chemicals. Uniformity is key in developing MCLs to ensure local and state regulations align with what is technologically feasible and known in the science. The scientific and health implications of PFAS are still a developing field and we strongly advise you to review federal policy and the health advisory.

Setting standards and monitoring are the first steps, but as areas of contamination are identified, one must look at the ability of water filtration systems to mitigate PFAS in drinking water. While WQA is not able to recommend appropriate MCL levels for PFAS chemicals, we can inform you of the feasibility of mitigation through drinking water standards as accredited through the American National Standards Institute (ANSI). NSF/ANSI 53: *Drinking Water Treatment Units – Health Effects* and *NSF/ANSI 58: Reverse Osmosis Drinking Water Treatment Systems* are existing standards for water filtration devices that can help reduce PFOA and PFOS concentrations in water to below the 70 parts per trillion (ppt) health advisory level set by the EPA.[3]

In summary, our organizations support the overall mission of this bill, and we hope your committee will consider improving the bill by incorporating standards, requiring third-party certification for filtration devices that meet those standards for mitigation efforts, and following federal guidance. We welcome the opportunity to help develop and craft language to support the mitigation of PFAS in drinking water.

Thank you for your consideration of this important matter and for working to ensure the health and well-being of your constituents.

Sincerely,

Stephen Rossi, Director of Government Affairs, ASA
Jim Scarborough, Director of Government Relations, IAPMO
Harold Chase, Director of Legislative & Regulatory Affairs, NSF International
Jeremy Pollack, Director of Government Affairs, WQA

[1] https://www.epa.gov/sites/default/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfos_updated_5.31.16.pdf
[2] https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf
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About ASA

The American Supply Association is the national industry trade association representing distributors and their manufacturers and manufacturer representative agencies serving the PHCP & PVF channel. Serving wholesaler-distributors and their supply chain partners in the plumbing-heating-cooling-piping (PHCP) and industrial pipe-valve-fitting (PVF) industry, ASA is a one-stop-shop for legislative and regulatory advocacy, ongoing business intelligence, employee training and education and peer-to-peer networking.

About IAPMO

IAPMO was founded in 1926 by government officials in the US to protect public health and safety by developing the most progressive and technically advanced plumbing, mechanical and water efficiency codes in the world. A large part of IAPMO's work focuses on product testing for the industry. Our research and testing labs are capable of testing products to more than 400 standards and we provide testing to new plumbing products that enter the market every year. These include such devices as showerheads, faucets, and water filters. Our rigorous process includes following the criteria of the American National Standards Institute (ANSI) and the International Organization for Standardization (ISO).

About NSF

NSF is an independent, not-for-profit organization founded in 1944 in Ann Arbor, MI that develops consensus national standards, provides product inspection, testing and certification, auditing, education, and related services in public health and safety. The core purpose of NSF is to "protect and improve human and environmental health." NSF has a long history of working with the EPA, FDA, USDA, CDC, and health-related governmental entities at the state and local levels, as well as international bodies. NSF is a Collaborating Centre of the World Health Organization for Food Safety, Water Quality, and Indoor Environment.

About WQA

WQA is a not-for-profit trade association representing the residential, commercial, and industrial water treatment manufacturers industry with over 2,700 members worldwide. Since its creation in 1974, WQA has worked tirelessly to improve water quality through sustainable technologies and services. Our members are manufacturers, dealers, and distributors who specialize in point-of-use (POU) and point-of-entry (POE) water filtration systems, which treat water at the tap or entry point of a home or building. WQA also operates an American National Standards Institute (ANSI) accredited testing and certification laboratory that certifies water filtration products to nationally accepted industry standards for contaminant removal.

[1] https://www.epa.gov/sites/default/files/2016-06/documents/drinkingwaterhealthadvisories_pfoa_pfos_updated_5.31.16.pdf
[2] https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf
[3] https://www.nsf.org/news/pfoa-pfos-reduction-claims-requirements-added-to-nsf-standards