



March 20, 2024

The Honorable Ben Allen, Chair
Senate Environmental Quality Committee
1021 O Street, Suite 3230
Sacramento, California 95814

Subject: SB 903 (Skinner): Support

Dear Senator Allen,

The California Association of Sanitation Agencies (CASA) is proud to co-sponsor and strongly support SB 903 (Skinner), which seeks to eradicate harmful forever chemicals from products unwittingly used by consumers in their daily lives. The undersigned coalition strongly endorses this vital policy effort to reduce human health impacts and environmental exposure to these chemicals. Consistent with our coalition's core missions of both protecting public health and the environment and maintaining affordable essential public services, SB 903 is the most cost-efficient method for reducing baseline concentrations of PFAS in our water, wastewater and waste management processes.

In recent years, Per- and Polyfluoroalkyl substances (PFAS) have become a topic of public concern due to their high mobility and resistance to breaking down naturally as well as the persistent detection of PFAS compounds in people's bodies and in the environment. In 2021, the United States Environmental Protection Agency (USEPA) announced and began implementation of the "PFAS Strategic Roadmap" which outlines a whole-agency approach to addressing PFAS. One of the three central directives of the roadmap is to pursue a comprehensive approach to "proactively prevent PFAS from entering air, land, and water at levels that can adversely impact human health and the environment." To this end, several additional action items are underway, including the development of an Effluent Limitations Guidelines program and recently issued EPA guidance for reducing discharges of PFAS into waterways by leveraging the existing NPDES permitting system and local industrial pretreatment programs. Additionally, USEPA is currently considering setting Maximum Contaminant Levels (MCLs) for 6 PFAS chemicals in drinking water.

Consistent with recent USEPA action and guidance, the State Water Resources Control Board issued a statewide monitoring and reporting order in 2020 that required wastewater agencies to monitor and report for PFAS in influent, effluent and biosolids. The Water Board also issued notification and response levels for PFAS in drinking water as well as related monitoring requirements. Preliminary data from the Water Board demonstrates that domestic inputs of PFAS are a significant source of PFAS entering wastewater systems, meaning that products people are using in their homes and businesses are contributing PFAS to wastewater systems through everyday uses that are not controllable through local enforcement or pretreatment programs. Drinking water data indicates the presence of PFAS in varying concentrations in many drinking water sources as well. For this reason, a statewide approach is necessary to remove PFAS from the stream of commerce, including in products which have a direct pathway to our watersheds and waste management systems.

Often referred to as “forever chemicals,” PFAS chemicals are both ubiquitous and indestructible. In some cases, PFAS can be removed from water and wastewater through advanced treatment technology. However, there is no technologically feasible method for the large-scale destruction of PFAS compounds. Instead, once removed, PFAS residuals are merely displaced to another waste stream and typically cycle back through the waste management process. This is why SB 903’s focus on stopping PFAS at its source is vital. Furthermore, as local public agencies begin the process of preparing for implementation of new and proposed PFAS regulations, affordability of essential services is a critical consideration. A recent economic analysis by USEPA estimates that for drinking water systems to comply with a draft Maximum Contaminant Level (MCL) for only a handful of PFAS chemicals will result in annual cost impacts surpassing \$1 billion. Water industry leaders contend these costs are likely much higher, and could surpass \$3 billion annually. These are costs that would be borne by California utility ratepayers. For these reasons, the meaningful and comprehensive source control and pollution prevention strategy presented in SB 903 is the most cost effective and appropriate approach to reducing PFAS pollution in the environment.

For these reasons CASA strongly supports SB 903 and urges your “aye” vote when it is heard in the Senate Environmental Quality Committee.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jessica Gauger".

Jessica Gauger
Director of Legislative Advocacy & Public Affairs
California Association of Sanitation Agencies