



## NEW JERSEY CHAPTER

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Susan Rosenwinkel  
Bureau Chief  
NJDEP, Division of Water Quality  
Bureau of Surface Water Permitting  
Mail Code 401-2B  
P.O. Box 420  
Trenton NJ 08625-0420

**Re: New Jersey Drinking Water Act Rules N.J.A.C. 7:10  
Ground Water Quality Standards, N.J.A.C. 7:9C**

May 30, 2019

Dear Ms. Rosenwinkel,

The New Jersey Sierra Club supports and urges adoption of the rule proposal to amend the New Jersey Drinking Water Act rules at **N.J.A.C. 7:10**. The rule establishes a maximum contaminant level (MCL) for perfluorooctanoic acid (PFOA) of 0.014 micrograms per liter ( $\mu\text{g}/\text{l}$ ) and an MCL for perfluorooctanesulfonic acid (PFOS) of 0.013  $\mu\text{g}/\text{l}$ . The New Jersey Sierra Club also supports and urges adoption of the proposal amending the Ground Water Quality Standards at **N.J.A.C. 7:9C**. The rule establishes a specific ground water quality standard for PFOA of 0.014  $\mu\text{g}/\text{l}$  and a specific ground water quality standard for PFOS of 0.013  $\mu\text{g}/\text{l}$ .

We believe these new rules would be an important and overdue step to establishing stricter standards needed for PFOA and PFOS. This is critical for protecting our drinking water and groundwater. PFOA and PFOS are water soluble, and once they bioaccumulate in a body they never leave. Combining them with other PFNAs increases the impacts. The new standards for PFOS in our drinking water and groundwater will be 13ppt and PFOA at 14ppt. We have been waiting for this change for 9 years. Over that time the bioaccumulation of the chemicals in the environment has only magnified the health hazards.

More people in New Jersey are exposed to PFOA and PFOS than in any other state, about 1.6 million people. Serious health risks from these chemicals include testicular and kidney cancer; liver tissue damage; weakened immune systems and increased cholesterol; and developmental problems like low birth weight, accelerated puberty and skeletal variations. The chemicals have also accumulated in our fish, even in some of the most pristine areas of the state.

The DEP should adopt these standards as soon as possible to help protect our communities. An estimated 1 in 5 residents across the state receive tap water that contains at least traces of PFOA or PFOS. The federal Environmental Protection Agency detected PFOA in levels of at least 20 parts per billion in 14 drinking water systems, including Ridgewood Water, Fair Lawn, Garfield, Wallington and Hawthorne. Ridgewood Water has sued several polluters for the PFOA and PFOS contamination caused



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by the companies' chemical firefighting products. High levels of PFOA were also found in Burlington County, in a stream that runs from a wastewater plant at the Joint Base McGuire-Dix Lakehurst military base to Rancocas Creek. In Salem and Gloucester County, PFOS found near the Solvay site were 7 times over standard.

Implementing new groundwater standards is critical because PFOA and PFOS cannot be filtered out of drinking water. The chemicals have to be cleaned up at the source. The new rules will also establish stricter cleanup standards for toxic sites. New Jersey has filed lawsuits against major polluters like 3M, DuPont and Chemours to force them to be accountable for the contamination they've caused. Those polluters would have to abide by the new standards once adopted. The new rules will also apply to Joint Base McGuire-Dix Lakehurst where the Department of Defense will be required to clean up the contamination there.

We believe that based on the most up-to-date scientific and health-based research that the standards for PFOA and PFOS should each be 5ppt. The chemicals are water soluble, and as they bioaccumulate they never leave the body. We need a combined standard for both PFOA and PFOS of 13 ppt because this is a persistent and pervasive chemical that directly affects human health. Tough standards are especially important because the Trump Administration decided not to set a drinking water limit on the harmful chemicals. This means there will be no federal requirements for utilities for testing or removing the chemicals from drinking water supplies. We ask that the DEP move quickly in adopting standards for our drinking water and groundwater of 13ppt for PFOS and 14ppt for PFOA.

If you have any questions please feel free to reach out at any time at 609-558-9100.

Sincerely,

Jeff Tittel

Director of the New Jersey Sierra Club