WATER QUALITY ASSOCIATION
International Headquarters & Laboratory
2375 Cabot Dr., Lisle, IL 60532
(630)505-0160 | wqa.org
A not-for-profit organization

Water Quality Association Comments
EPA Docket ID No. EPA-HQ-OLEM-2020-0527
Interim PFAS Destruction and Disposal Guidance

The Water Quality Association (WQA) appreciates the opportunity to provide comments on the EPA Interim Guidance on the Destruction and Disposal of Per- and Polyfluoroalkyl Substances (PFAS) and Materials Containing PFAS.

WQA is a not-for-profit 501(c)(6) association for the residential, commercial, and industrial water treatment industry. WQA represents more than 2,500 member companies, many of them small businesses that configure, install, service and maintain drinking water treatment systems in homes and businesses. Our membership also includes equipment manufacturers, suppliers and distributors of water quality improvement products and services. Many of these technologies are increasingly being deployed to reduce PFAS exposure in drinking water. As the EPA, states, utilities, and consumers respond to emerging PFAS requirements, these technologies will play a critical role in protecting public health.

WQA supports EPA's efforts to provide clear, science-based information regarding PFAS destruction and disposal technologies. We are concerned, however, that certain aspects of the guidance could unintentionally blur important distinctions between large-scale industrial PFAS waste streams and residuals generated through drinking water treatment applications.

Distinguishing Treatment Residuals from PFAS Source Materials

The guidance appropriately addresses a wide range of PFAS-containing materials and waste streams. However, EPA should more clearly distinguish between materials that are a source of PFAS contamination and small-scale treatment technologies that remove PFAS from drinking water.

Small-scale filtration products are fundamentally different from manufacturing wastes, concentrated industrial byproducts, firefighting foam stockpiles, or remediation wastes generated through PFAS production or use. As implementation of EPA's drinking water standards proceeds, increasing volumes of spent treatment media will be generated as a direct consequence of successful treatment and compliance efforts. The final guidance should acknowledge this distinction and avoid language that could inadvertently categorize small-scale drinking water treatment solutions alongside primary PFAS waste streams.

Risk-Based Framework

WQA supports the Agency's intent to highlight "effective PFAS destruction and disposal technologies to prevent or minimize environmental releases". From a risk-based framework, we urge the EPA to recognize that many water treatment technologies effectively sequester PFAS providing reasonable assurance against environmental release into the groundwater or surrounding environment when these products are disposed of as solid waste in landfill environment.

Research by Purdue University has demonstrated that exhausted ion-exchange media and activated carbon used in water treatment retain greater than 99% of the PFAS they have captured when disposed of in a landfill environment.

Reverse osmosis (RO) drinking water treatment devices are also used to remove PFAS from drinking water. RO systems divert PFAS and other contaminants away from the water that is used for drinking and cooking, but do not capture PFAS, and are not a disposal concern at end-of-life.

Recognizing the Role of Drinking Water Treatment Technologies

EPA's national PFAS strategy relies heavily on the deployment of effective treatment technologies to reduce human exposure. POU and POE systems

often provide the most immediate and cost-effective means of addressing PFAS contamination, particularly for private well owners, small systems, schools, childcare facilities, and communities awaiting longer-term infrastructure improvements.

EPA should ensure that destruction and disposal guidance does not inadvertently discourage the use of technologies that are helping consumers comply with drinking water standards and reduce exposure to PFAS.

Avoiding Unintended Consequences on Passive Receivers

Although EPA appropriately notes that the guidance is non-binding and does not create new legal obligations, guidance documents often influence future regulatory interpretations, waste management decisions, procurement practices, and state implementation activities.

WQA is concerned that references to disposal practices, treatment preferences, or management approaches for PFAS-containing materials could be interpreted in a manner that extends beyond EPA's intended scope. In particular, broad references to PFAS-containing materials without adequate differentiation could result in residential and commercial drinking water treatment products becoming subject to requirements or expectations designed for significantly different waste streams.

WQA's mission is to promote sustainable technologies and services that improve water quality, thereby enhancing quality of life. The water treatment technologies used to treat PFAS-contaminated drinking water serve an important role in protecting public health. In fulfilling this role, the drinking water treatment industry is a passive receiver of PFAS that should not be forced to bear the burden of PFAS remediation.

Recommendation

WQA respectfully recommends that EPA incorporate additional language clarifying that:

1. Small-scale POE and POU drinking water treatment should be distinguished from industrial PFAS source materials and manufacturing wastes;
2. Management recommendations should be applied using a risk-based framework that considers concentration, volume, exposure pathways, and site-specific circumstances; and
3. Drinking water treatment technologies are a passive-receiver of PFAS while serving an important public health function and should not be inadvertently disincentivized through interpretations of the guidance; and
4. EPA should explicitly state that the guidance is not intended to establish new regulatory expectations for POU, POE, or other small-scale drinking water treatment applications and that management decisions should account for the nature, concentration, volume, and risk profile of the material at issue.

WQA appreciates EPA's consideration of these comments and looks forward to continued engagement on PFAS treatment, management, and public health protection.

Sincerely,

Eric Yeggy

Technical Affairs Director,
Water Quality Association