



March 14, 2024

The Honorable Tom Carper
Chairman
Committee on Environment and Public Works
Washington, DC 20510

The Honorable Shelley Moore Capito
Ranking Member
Committee on Environment and Public Works
Washington, DC 20510

Dear Chairman Carper and Ranking Member Capito:

American Water appreciates the Committee convening this hearing to explore solutions for addressing harmful PFAS, commonly known as "forever chemicals". We commend the Committee's interest in assuring that the American people have access to safe, clean, affordable water and wastewater services.

American Water is committed to being a leader in the U.S. water and wastewater industry. Providing safe and reliable water service is American Water's business and we support governmental efforts to set national drinking water standards for PFAS to protect public health. We work cooperatively with the U.S. Environmental Protection Agency so that implementation of existing drinking water standards and development of new regulations will protect and produce benefits for our customers.

PFAS contaminants are among the multiple important challenges the water industry faces regarding water quality, quantity, and reliability. Knowing that, American Water – leveraging our extensive expertise and experience in designing and installing treatment for groundwater and surface water, including treatment for PFAS – carefully reviewed and submitted comments regarding the U.S. EPA's proposed drinking water regulation to assess the 4.0 parts per trillion (ppt) requirements for PFOA and PFOS and the application of the Hazard Index approach for PFNA, PFBS, PFHxS, and HFPO-DA chemicals.

Addressing PFAS will be expensive for customers. The estimated national cost to install treatment facilities and processes to remove PFOA and PFOS at drinking water facilities to levels required by the U.S. EPA's proposal exceeds \$47 billion. This figure is approximately \$35 billion above what would be required to meet current state-established PFAS limits. (Data and approach as presented in a recent study conducted by Black & Veatch on behalf of American Water Works Association.) At American Water, we are projecting approximately \$1 billion of PFAS related investments as part of our five-year capital plan.

It will require, on a national basis, more than \$700 million annually for operating costs, approximately \$500 million more than what would be required to meet current state-established PFAS limits. These figures are significantly higher than EPA's cost estimates. (Data and approach as presented in a recent study conducted by Black & Veatch on behalf of American Water Works Association.)

Sound governmental policies should ensure compliance by all water utilities—whether privately or municipally owned—while also protecting customers and communities from the high cost of monitoring and mitigating PFAS. This must include policies that hold polluters accountable.

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We are strongly advocating for funds to reduce the compliance costs to be incurred by our customers from both those who created the problem and with government funding.

American Water's operating utilities in most of our states are currently plaintiffs in the Multi-District Litigation against multiple PFAS manufacturers because we firmly believe that the ultimate responsibility for the cleanup of these contaminants should fall to those who created the problem.

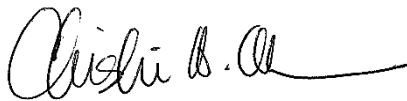
American Water joins other water organizations in urging the EPA, Congress, and other decision makers to implement policies that will:

- keep harmful PFAS out of our drinking water supplies and our communities;
- exempt all water and wastewater systems from financial liability for PFAS under CERCLA;
- ensure all water and wastewater utility providers, regardless of ownership, have equal access to any and all federal and/or state funding related to treating PFAS; and
- establish a permanent federally funded water and wastewater low-income customer assistance program.

Providing safe, reliable, and affordable water and wastewater service is American Water's business, and we look forward to working cooperatively and collaboratively with this Committee, Congress, EPA and other regulators, and policymakers at all levels to ensure that the implementation of these proposed water standards protects customers, communities, and the general public.

Thank you,

M. Susan Hardwick
M. Susan Hardwick
President and Chief Executive Officer



Christine Keck
VP National Government and Regulatory Affairs