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PERDIDO BAY
WATER, SEWER AND FIRE PROTECTION DISTRICT

28171 FRESHWATER LANE * ELBERTA, AL 36530

Phone (251) 987-5816 * Fax: (251) 987-5836

March 18th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Perdido Bay Water, Sewer and Fire Protection District we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our system serves 4231 connections or a population of 12,693 people in Baldwin County AL and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, we will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark D. Bohlin". The signature is fluid and cursive, with a horizontal line extending from the end.

Mark D. Bohlin
General Manager
Perdido Bay Water, Sewer and Fire Protection District



Geneva Water Works and Sewer Board

Philip Carter, Chairman
Randall Meeks, Member
Rufus Lee, Member
Shelia Davidson, Clerk

Charlie Fleming, Vice-Chairman
David Hayes, Member
James Dixon, Manager
Kayleigh Austin, Office Manager

March 18th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the GENEVA WATER WORKS, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our system serves 2850 people in GENEVA COUNTY, GENEVA, AL. and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, we will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink that reads "James Dixon". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

JAMES DIXON

MANAGER
GENEVA WATER WORKS



Greene County Water and Sewer Authority

P.O. Box 751 • 253 Harris Avenue

Eutaw, Alabama 35462

Phone: 205-372-1662 • 205-372-1661 • Fax: 205-372-1660

March 18th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Greene County Water & Sewer Authority, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our system serves 5,684 people in Greene County, AL and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, we will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to be 'V. Atkins', is written over a solid horizontal line.

Vincent Atkins,
Manager / Operator
Greene County Water & Sewer Authority



RUSSELLVILLE WATER AND SEWER BOARD

**P.O. BOX 1148
RUSSELLVILLE, AL 35653
PHONE 256-332-3850
FAX 256-332-3027**

March 18th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of Russellville Water & Sewer Board, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our system serves 19,533 people in Lawrence County, Colbert County, Franklin County, and The City of Russellville Alabama. We are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, we will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Hill". The signature is fluid and cursive, with the first name "Eric" and last name "Hill" clearly distinguishable.

Eric Hill
General Manager
Russellville Water & Sewer Board



Executive Director, Rob White IV
Office Manager, Jerena Webb
Program Manager, Derek Pierce
Circuit Rider, Darrell Brewer
Circuit Rider, Justin Gardner
Circuit Rider, Michael Spence
Office Assistance, Cameron Blackwell

STAFF

USDA-FSA Sourcewater Specialist, Mike Rief
Wastewater Technician, Steve Berry
Wastewater Specialist, Mike Baumgartner
Energy Efficiency Technician, Robert Newton
Training Specialist, Keith Hester
Water Quality Assurance Specialist, Tyler Grant
Operations Consultant, Bill Messick
Human Resources, Troy Mance



March 18th, 2024

The Honorable Thomas Carper
 Chairman
 Committee on Environment and Public Works
 United States Senate
 Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Alabama water and wastewater utility members of the Alabama Rural Water Association (ARWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, ARWA’s water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources.

2576 BELL ROAD | MONTGOMERY, ALABAMA 36117
 Office: 334.396.5511 EMAIL: arwa@alruralwater.com Fax: 334.396.7090
 Visit our website at www.alruralwater.com

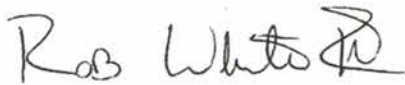
DEDICATED TO IMPROVING THE QUALITY OF LIFE FOR RURAL ALABAMIANS

Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Rob White IV". The signature is written in a cursive style with a stylized "R" and "W".

Rob White IV
Executive Director
Alabama Rural Water Association



West Morgan - East Lawrence Water and Sewer Authority

P. O. Box 2254 ■ Decatur, Alabama 35609 ■ Phone (256) 355-3746

March 18th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the West Morgan East Lawrence Water and Sewer Authority, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our system serves 100,000 people in Morgan and Lawrence Counties and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, we will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeaniece Slater", is written over a faint, larger version of the signature.

Jeaniece Slater | General Manager
West Morgan-East Lawrence
Water & Sewer Authority
T (256) 355-3771



3/6/24

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 1,600 water and wastewater utility members within the state Arizona that are served by Rural Water Association of Arizona (RWAAZ) we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, RWAAZ's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.



Thank you for your time and attention to this very important request.

Sincerely,

RWAAZ Board President

Ronny Deming



California

Rural Water Association

March 13, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the California water and wastewater utility members of the California Rural Water Association (CRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, CRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan DeMoss". The signature is fluid and cursive, with the first name "Dan" and last name "DeMoss" clearly distinguishable.

Dan DeMoss
Executive Director
California Rural Water Association

FLORIDA RURAL WATER ASSOCIATION

2970 WELLINGTON CIRCLE • TALLAHASSEE, FL 32309-7813

(850) 668-2746

March 6, 2024

BOARD of DIRECTORS

PATRICIA CICHON
Monticello
President

BRUCE MORRISON
Niceville
Vice President

WILLIAM G. GRUBBS
Tallahassee
Secretary/Treasurer

ROBERT MUNRO
Orlando
National Director

JOHN BOSTIC III
Zephyrhills

POONAM KALKAT
Boynton Beach

SCOTT KELLY
Atlantic Beach

Executive Director

GARY WILLIAMS
Tallahassee



EMAIL
frwa@frwa.net

WEBSITE
www.frwa.net

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Florida water and wastewater utility members of the Florida Rural Water Association (FRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, SRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Gary Williams
Executive Director
Florida Rural Water Association



3/7/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Iowa water and wastewater utility members of the Iowa Rural Water Association (IRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, IRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink that reads "Scott Shover". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Shover
Executive Director/CEO
Iowa Rural Water Association



March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 875 water and wastewater utility members of the Illinois Rural Water Association (IRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state of Illinois and are very concerned about the implications of potential CERCLA liability on our utilities and their ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of their own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, IRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources.

Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Frank R. Dunmire
Executive Director
Illinois Rural Water Association

Public Water Supply District No. 1 of DeKalb County

P.O. Box 79

Clarksdale, Missouri 64430

Phone: (816) 393-5311

Fax: (816) 393-5313

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply District No 1 of DeKalb County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Burris", written in a cursive style.

Rob Burris,
District Manager



P.O. Box 226 • Seneca, KS 66538 • 785/336-3760
FAX 785/336-2751 • <http://www.krwa.net>

March 8, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito:

On behalf of the 775 water and wastewater utility members of the Kansas Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state, and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities, which serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, we urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Elmer Ronnebaum
General Manager
Kansas Rural Water Association



Kentucky Rural Water Association

Helping water and wastewater utilities help themselves

March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 356 water and wastewater utility members of the Kentucky Rural Water Association (KRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, KRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Respectfully,

A handwritten signature in blue ink, appearing to read "S. Young". The signature is stylized with a large initial "S" and a long horizontal stroke.

Scott Young
Executive Director



Louisiana Rural Water Association

PO Box 180 ♦ Kinder, LA 70648

Toll Free: (800) 256-2591 ♦ Phone: (337) 738-2896 ♦ Fax: (337) 738-5620

E-Mail: lrwa@lrwa.org ♦ Website: lrwa.org

Patrick Credeur, Executive Director

"LRWA provides our water and wastewater utility members with the highest quality of leadership, representation, support services, and Emergency Response services in the event of a natural or man-made disaster".

March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 709 water and wastewater utility members of the Louisiana Rural Water Association (LRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, LRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment

and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Patrick Credeur, Executive Director
Louisiana Rural Water Association
Email: pcredeur@lrwa.org
Cell: (337) 230-8446

March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the hundreds of water and wastewater utility members of the Maine Rural Water Association (MRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWA’s water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA’s “polluter pays” principle and protect water systems and

the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirsten Hebert". The signature is stylized and somewhat cursive.

Kirsten Hebert
Director
Maine Rural Water Association



MARYLAND

RURAL WATER ASSOCIATION

March 13, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 276 water and wastewater utility members of the Maryland Rural Water Association (MRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state, and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with



MARYLAND

RURAL WATER ASSOCIATION

limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Sue H. Houghton
Executive Director & CEO
Maryland Rural Water Association



Michigan Rural Water Association
2127 University Park Dr. Suite 340
Okemos, MI
Phone (517) 657-2601
E-mail: mrwa@mrwa.net
Website: www.mrwa.net

March 12, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 581 water and wastewater utility members of the Michigan Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

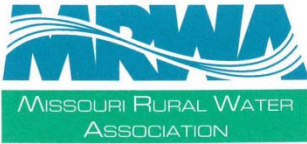
As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Neumann". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tim Neumann
Executive Director
Michigan Rural Water Association



901 Richardson Drive
Ashland, Missouri 65010
(573) 657-5533 (800) 232-6792
Fax (573) 657-0533
www.moruralwater.org

February 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Missouri water and wastewater utility members of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in cursive script, appearing to read "Howard Baker".

Executive Director
Missouri Rural Water Association

City of Ellington
100 Tubbs Avenue
Ellington, MO 63638

3-17-24

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Ellington Water and Wastewater System and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Garett DeMent
Public Works Director

Public Water Supply District #17
Of Jackson County, Missouri

102 E 3rd St, P.O. Box 256

Grain Valley, MO 64029

Phone: 816-229-3838 Fax: 816-229-5304

Email: publicwatersupply@comcast.net

March 8, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water and or wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant

financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Jason Herman

General Manager/Clerk
P.W.S.D. #17



Excellence in Training and Technical Assistance

March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 742 water and wastewater utility members of Minnesota Rural Water Association (MRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state of Minnesota and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Lori Blair".

Lori Blair, Executive Director
Minnesota Rural Water Association



391 North Rangeline Road
Columbia MO 65201
Voice (573) 474-9521
Fax (573) 474-4347
Website: www.pwsd9.com

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of Public Water Supply District 9 of Boone County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger Ballew', written over a horizontal line.

Roger Ballew
District Manager

Ward I Alderman
Justin Edwards
Ward I Alderman
Nancy Riechmann
Ward II Alderman
Ronnie Fields
Ward II Alderman
Whitney Pool

City of Paris

Chris Popkes, Mayor
Barb McCall, City Superintendent

• Paris, Missouri 65275-1397
Phone (660) 327-4334 • Fax (660) 327-4280
E-mail: superintendent@parismo.net

City Clerk
Mary McGee
Assistant Clerk
Annette Bell
Attorney
Cydney Mayfield
Cemetery Manager
Jim Reinhard

March 14th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Paris water and or wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in cursive script that reads "Barb McCall". The signature is written in black ink and is positioned below the word "Sincerely,".

Barb McCall
Superintendent of Operations



Public Water Supply District No. 2 Of Cole County

1944 Vieth Drive
PO Box 104238
Jefferson City MO 65110-4238

Date: 3/14/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply Dist. 2 of Cole Co. and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Jamie Wineland
District Manager
Cole County PWSD #2
1911 Vieth Drive
Jefferson City MO 65109
Phone: 573-635-7011 Fax: 573-635-5332



CONSOLIDATED WATER

Boone County, Missouri

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Consolidated Public Water Supply District # 1 of Boone County Mo. and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Tanner Crane
General Manager

PUBLIC WATER SUPPLY DISTRICT NO. 4

03/15/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Cole County Public Water Supply District #4 and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.


To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS

contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Gary Van De Velde

Gary VanDeVelde

President



Cole County Public Water Supply District No. 4

7712 Route M
Jefferson City, MO 65101

PHONE 573.395.4578
FAX 573.395.3324
E-MAIL will@colepsd4.com

PUBLIC WATER SUPPLY DISTRICT NO. 2
OF JOHNSON COUNTY, MISSOURI

920 SW State Route 58
Holden, Missouri 64040
(816) 732-6658

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply District #2 of Johnson County, MO and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Mary Christian". The signature is written in a cursive, flowing style.

Mary Christian
District Manager

March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington DC 20510

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

Dear Chairman Carper and Ranking Member Capito:

On behalf of the City of New Hampton and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden on to the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Kerri Peters
City Clerk / Water & Wastewater Operator

CITY OF NEW HAMPTON

PO BOX 283, NEW HAMPTON MO 64471 • 660-439-4315 • cityofnh@grm.net

The City of Calhoun

201 E Main, PO Box 97

Calhoun, MO 65323

660-694-3634

*Fire Department
660-264-0008*

*Police Department
911*

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Calhoun Water and Wastewater Facilities and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant

financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in cursive script that reads "Audrey Osborne".

AUDREY OSBORNE
Mayor



Thomas Hill Public Water Supply

DISTRICT 1 OF RANDOLPH COUNTY MISSOURI

1005 GILLAN ROAD • P.O. BOX 250 • MOBERLY, MISSOURI 65270 • 660 263-6603 • FAX 660 263-1181

March 18, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Thomas Hill Public Water Supply District and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Travis Ginter
General Manager

CITY OF RICHLAND

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water and wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.



PO Box 798
204 E Washington
Richland, Missouri
65556

PHONE (573) 765-3532
FAX (573)-765-5750
EMAIL ddecker@richlandmo.info
WEB SITE: <http://www.richlandmo.info>

CITY OF RICHLAND

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Don Decker
Utility Supervisor



PO Box 798
204 E Washington
Richland, Missouri
65556

PHONE (573) 765-3532
FAX (573)-765-5750
EMAIL ddecker@richlandmo.info
WEB SITE: <http://www.richlandmo.info>

Laclede County PWSD #2
279 E. Maple St.
P.O. Box 86
Stoutland, MO 65567
Phone: 417-286-3622 FAX: 417-286-3622
lcpwsd.2@gmail.com

3/13/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Laclede County PWSD#2 and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

April Jeter
Office Administrator



*City of Trenton
Trenton Municipal Utilities
Water Treatment Plant
1043 W. Crowder Rd.
Trenton MO 64683
660-359-3211
Fax: 660-339-7612
wtp@trentonmo.com
www.trentonmo.com*

15 March 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water treatment utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state, and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

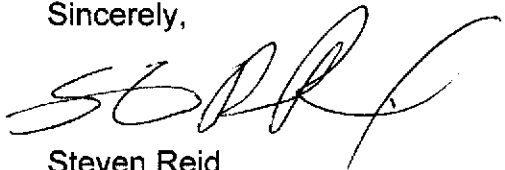
In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Reid', written in a cursive style.

Steven Reid
Trenton Municipal Utilities
Water Treatment Plant Manager

CITY OF NORTHMOOR

4907 NW WAUKOMIS DRIVE NORTHMOOR, MISSOURI 64151 PHONE: 816-741-6071 FAX 816-587-5129

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the **water and or wastewater utility** and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

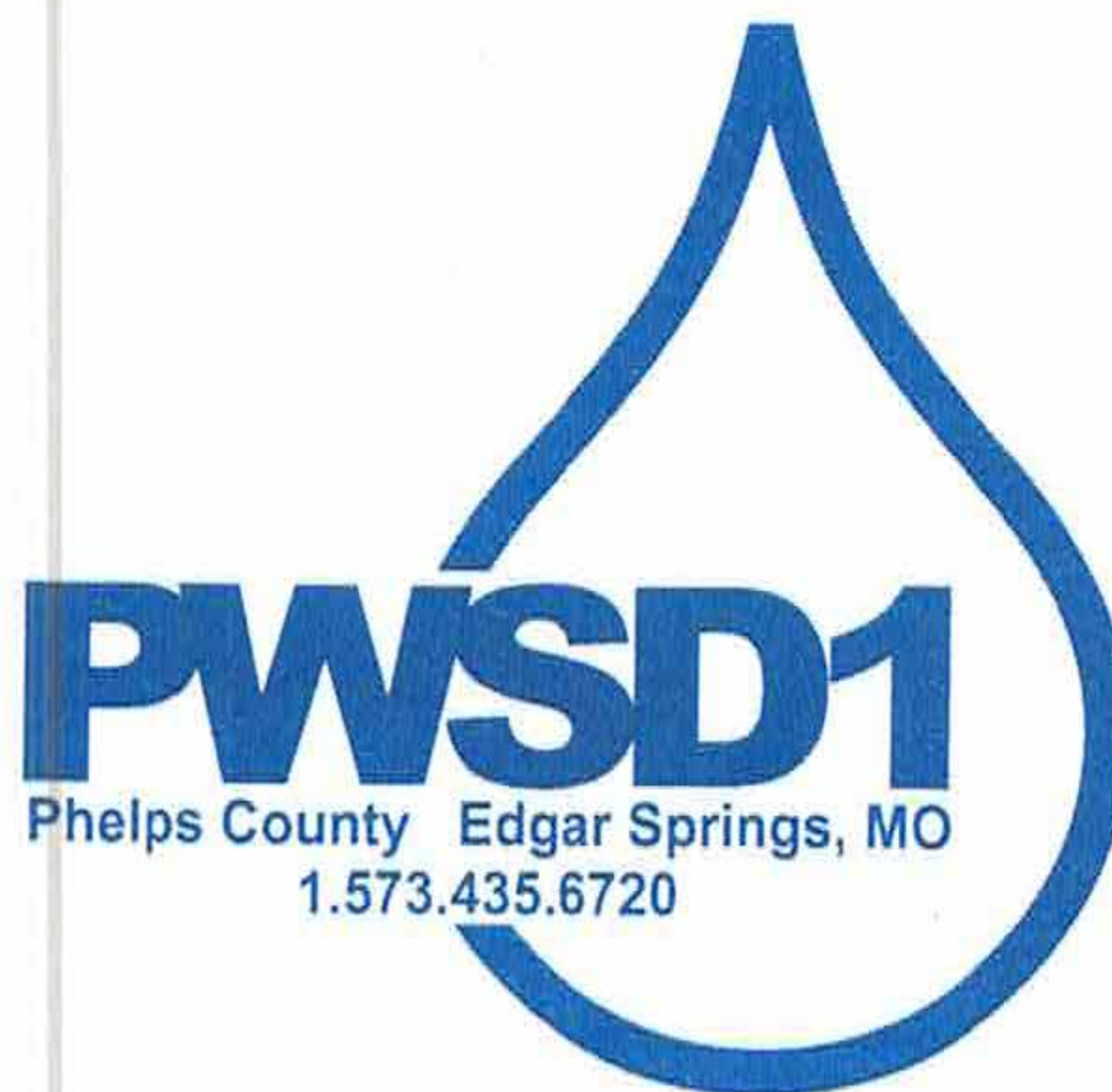
water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Lynda Wilson". The signature is written in a cursive, flowing style.

Lynda Wilson
Mayor



March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

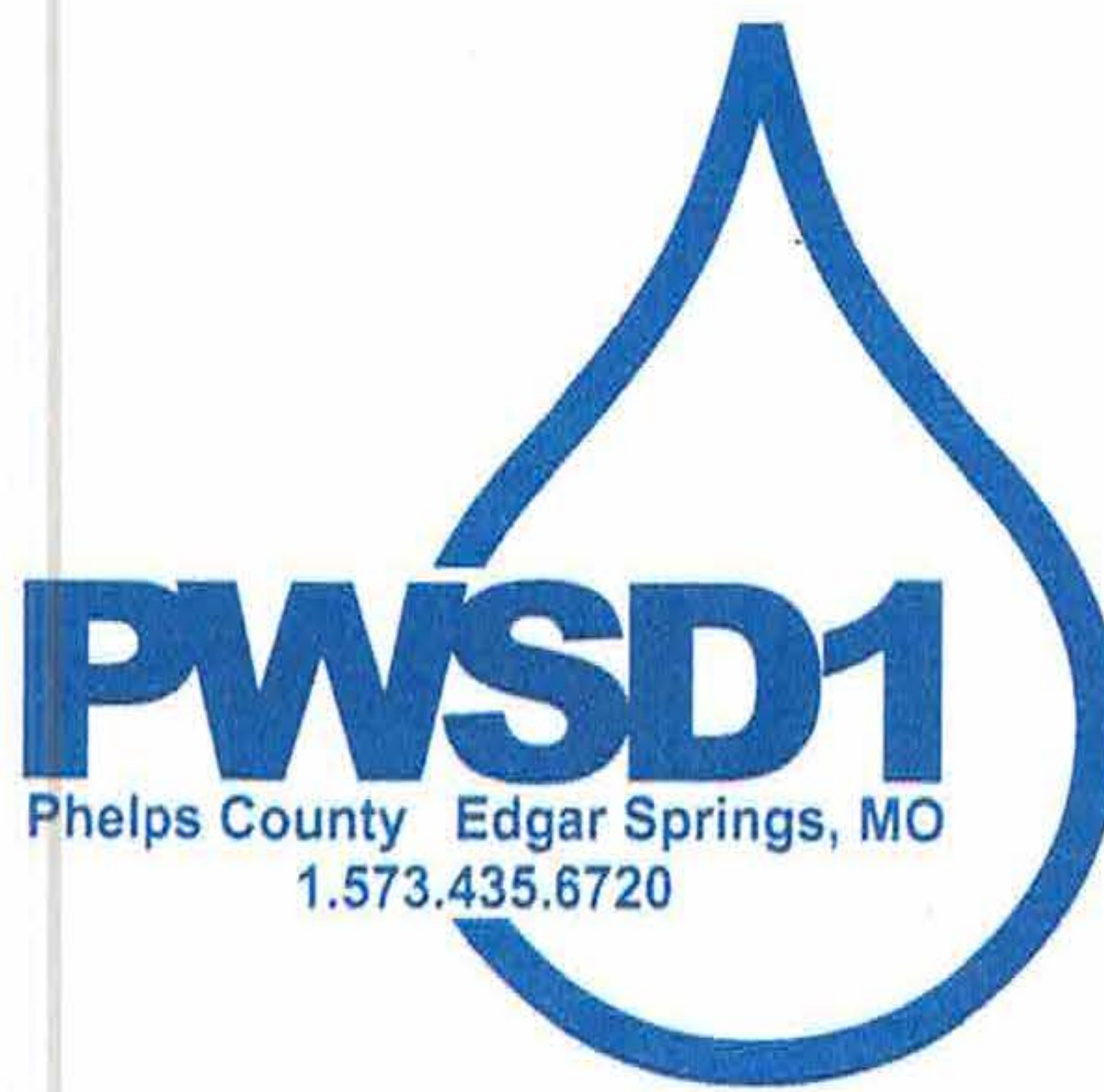
To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Rondelle Williams
General Manager, PWSD #1, Phelps Co.



March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Wesley Williams
Chief Operator, PWSD #1, Phelps Co.

CITY OF KEYTESVILLE
404 WEST BRIDGE STREET
KEYTESVILLE MO 65261
660-288-3745

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Keytesville and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Julia McKenzie
Mayor

PUBLIC WATER SUPPLY DISTRICT NO. 7

MON- FRI. 8:00-4:30
POST OFFICE BOX160
MAPAVILLE, MISSOURI 63065
(636)-479-5593

3/14/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply District #7 of Jefferson County Missouri and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Cody Mills
Field Supervisor/
District Manager

Adair County Public Water Supply District No. 1

Post Office Box Q
Kirksville, Missouri 63501
Phone (660) 665-8378

03/15/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Adair County PWSD 1 and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Tim S. Cuculcih

A handwritten signature in black ink that reads "Tim S. Cuculcih". The signature is written in a cursive style with a large, stylized initial "T".

General Manager

The Village of Theodosia

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Village of Theodosia sewer and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Thank You,
Rachel Amos
Theodosia Village Clerk

Cass County Public Water Supply District No.10

530 S. Peculiar Drive

P.O. Box 482

Peculiar, MO 64078

Phone – (816) 779-5381

Fax – (816) 817-9473

www.pwsd10cass.com

March 8, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply District #10 of Cass County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

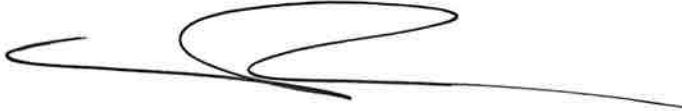
In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Cody Parris
District Manager
Cass County PWSD #10



CITY OF APPLETON CITY

114 EAST 4TH STREET, APPLETON CITY, MISSOURI 64724

660-476-2631 - 660-476-2651 FAX

3/15/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Appleton City water and wastewater and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

TOM HOLT
MAYOR

acmayorholt23@gmail.com

CHERYL LIKES
CITY COLLECTOR

accollector114@gmail.com

CARRIE EMERSON
CITY CLERK

clerkappletoncity@gmail.com

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Tom Holt,
Mayor



March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City Utilities of Springfield, MO, and as a member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our customers and neighbors.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS compounds – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Gary Gibson
President-CEO
City Utilities of Springfield



P.O. Box 157
216 Kentling Avenue
Highlandville, MO 65669
Phone: (417) 443-2326 Fax: (417) 443-6096
www.highlandvillemo.com

03/14/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Highlandville and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clint Ellingsworth". The signature is fluid and cursive, with the first name "Clint" being more prominent and the last name "Ellingsworth" following in a similar style.

Clint Ellingsworth, Mayor

Public Water Supply District 1

OF PIKE COUNTY MISSOURI

March 11, 2024

1106 WEST ADAMS
BOWLING GREEN, MISSOURI 63334
PHONE: (573) 324-3221

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply Dist. #1 of Pike County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to **uphold CERCLA's "polluter pays"** principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,


Janice Luebrecht
Office Manager



City of Clarksdale

114 N. Main PO Box 47
Clarksdale, Missouri 64430

cityofclarksdale@yahoo.com

816-393-5363

clarksdale-mo.com

3-12-2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Clarksdale, MO water and or wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our small and rural community serves people of the city and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Charles D. Keenan

Alderman

John P. ...

Alderman

Michael T. ...

Mayor

Tina Coord
City Clerk

MARION COUNTY PUBLIC WATER SUPPLY DISTRICT #1

**2375 Highway 168
Philadelphia, Missouri 63463
Phone-573.439.5548**

Date March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water and or wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA’s “polluter pays” principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely, Herman Yoder

Board Members:
Tim O’Brien
Mark Lovelace

Dennis Martin
Travis Cunningham
Keaton Kendrick

District Manager: Herman Yoder
Office Manager: Jessica Donath

Consolidated Public Water Supply District #1
Of
Barton, Dade, Cedar and Jasper Counties
P.O. Box 586, 1009 E. 11th Street, Lamar, MO 64759
417-682-3401
Fax 417-682-3038

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of our water system and a member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and

the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "MP", with a long horizontal flourish extending to the right.

Melinda Piper
General Manager

◆CONSOLIDATED PUBLIC WATER
◆SUPPLY DISTRICT NO. 2 OF
◆LAFAYETTE, JOHNSON
◆AND SALINE COUNTIES

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of Consolidated Public Water Supply District No. 2 of Lafayette, Johnson and Saline Counties and a member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Tammie Winter". The signature is fluid and cursive, with a large initial "T" and "W".

Tammie Winter, Manager
Consolidated Public Water
Supply District No. 2 of Lafayette
Johnson and Saline Counties



3-15-2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of PWSD #1 of Jefferson County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Erin DeVore

Executive Director
Public Water Supply District No. 1 of Jefferson County, Missouri



**LAKE FOREST ESTATES
CLEAN WATER DISTRICT**

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of Lake Forest Estates Clean Water District and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

13767 Lakewood Drive, Ste. Genevieve, MO 63670
lfecwd.office@gmail.com 573-483-9833

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Julie Orrick
Director



PUBLIC WATER SUPPLY DISTRICT #1

COLE COUNTY

4346 RAINBOW DRIVE JEFFERSON CITY, MO 65109

PHONE: 573-893-2848 FAX: 573-893-5754

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capitol,

On behalf of the Public Water supply District No 1 of Cole County, Missouri and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,
Ruth Winters, District Manager

James R. Richardson
801 Sunvalley Dr
Columbia, MO 65201
Richjrjr@centurytel.net

03/15/2023

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the **water and or wastewater utility** and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



James R. Richardson
President
Water Dist #9 Boone County
Columbia MO 65201



CONSOLIDATED PUBLIC WATER SUPPLY DISTRICT NO. C-1 OF JEFFERSON COUNTY, MISSOURI

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of Consolidated Public Water Supply District No. C-1 and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

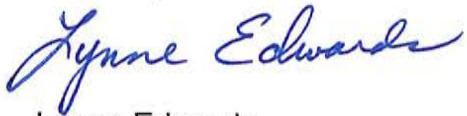
To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.



As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,



Lynne Edwards
District Manager

cc: C-1 Board of Directors
Howard Baker, MRWA

City of Pilot Grove, Missouri 65276
213 College Street, PO Box 122
1-660-834-3551
cityofpilotgrove@gmail.com

March 18, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Pilot Grove, Missouri and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and rate payers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

D L Knipp
Mayor



Public Water Supply District No. 8

P.O. Box 170 • CEDAR HILL, MISSOURI 63016
636-274-3125 • FAX 636-274-3126

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Jefferson County Public Water Supply District #8, and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Annette Bonacker

Annette Bonacker
Manager



Date: 3/14/24

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Berger PWS and WWTF and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Eaklor".

Jason Eaklor
City Clerk

CITY OF GOODMAN

203 W. Barlow, Goodman, MO 64843
Phone: 417-364-7316 Fax: 417-364-7314
Email: wwtp@goodmanmo.net

March 15, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Goodman Water and Wastewater Departments and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

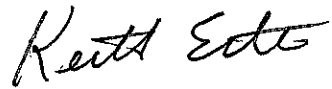
In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Keith Estes". The signature is written in a cursive style with a large, prominent "K" and "E".

Keith Estes
Public Works Manager
City of Goodman
203 W. Barlow
Goodman, MO 64843
417-364-7316



132 West 10th Street
LAMAR, MO 64759-1454
Telephone (417) 682-5554
Facsimile (417) 682-3288

March 14, 2024

The Honorable Thomas Carper Chairman Committee on Environment and Public Works United States Senate Washington, DC 20510 The Honorable Shelley Moore Capito Ranking Member Committee on Environment and Public Works United States Senate Washington, DC 20510

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Lamar water and wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

Rick Oeltjen, Mayor
Russ Worsley, City Administrator
Felicia Costley, City Clerk
Steven H. Kaderly, City Attorney

**MUNICIPALLY-OWNED ELECTRIC,
WATER AND SEWAGE SYSTEMS**



To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russ Worsley". The signature is fluid and cursive, written over a white background.

Russ Worsley

City Administrator



Discover.

3/14/2024

The Honorable Thomas Carper
Chairman
Committee on Environment and
Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

I am writing on behalf of the City of St. Charles, Missouri, and as a member of the Missouri Rural Water Association, to seek your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that adhere to all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our association, which comprises small and rural communities, serves people across the state, and we are deeply concerned about the potential implications of CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to classify two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. The EPA is also currently seeking public input on the designation of additional PFAS chemicals as hazardous substances under CERCLA. While CERCLA is designed to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly safeguard passive receivers like water and wastewater systems that merely transport PFAS without any fault of their own. Civil enforcement and CERCLA liability are not suitable federal solutions for addressing PFAS contamination in our communities.

In the interest of public health, our water and wastewater system may soon be tasked with treating and disposing of PFAS chemicals. Without a clear exemption from liability under CERCLA, water and wastewater systems could face devastating CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite never having manufactured, used, or profited from PFAS. The costs associated with testing, treatment, and disposal related to PFAS contamination will impose a significant financial burden on us. Manufacturers and polluters should not be allowed to transfer their financial responsibilities onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works deliberates on legislation to address PFAS, I implore you to maintain CERCLA's "polluter pays" principle and safeguard water systems and the ratepayers we serve by endorsing a narrowly defined legislative exemption for water and wastewater utilities from PFAS-related liability.

I appreciate your time and consideration of this critical request.

Best regards,
John Phillips - Utilities Superintendent of the City of St. Charles, Missouri

**Department of
Public Works**

City of Saint Charles
2871 Elm Point Industrial Dr.
Saint Charles, MO 63301
636.949.3237
www.stcharlescitymo.gov



CITY OF WHEATLAND
PO BOX 187
WHEATLAND, MO 65779
PHONE (417) 282-6552, FAX (417) 282-7026

March 8, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water and or wastewater utility and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,


Sonia Kennedy
City Clerk

**PUBLIC WATER SUPPLY DISTRICT #3
DAVIESS COUNTY**

Lake Viking
116 Waterworks St
Gallatin, MO 64640
Phone: 660.663.2771
FAX: 660.663.2771

<https://pwsd3daviess.azurewebsites.net>

March 18, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Public Water Supply District #3 of Daviess County and member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS.** The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

Zack Morrison
Water Supt./Manager

City of Versailles

Home of the Olde Tyme Apple Festival



JAMIE MORROW
Mayor

LIBBY WEBB
City Clerk
City Collector

CHARLES HIBDON
Public Works
Superintendent

DUANE MILLER
Fire Chief

CHAD HARTMAN
City Marshal

ANDREW HARDWICK
City Attorney

DAVID VOGT
Parks and
Recreation
Superintendent

COUNCILMEN:
South Ward
Kriston Bentch
Chuck Pryor

North Ward
Dina Dunklee
Brian Bias

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the City of Versailles, Missouri water and wastewater facilities and as member of the Missouri Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

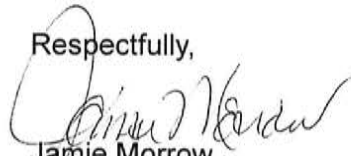
To protect public health, our water and or wastewater system could soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, **despite having never manufactured, used, or profited from PFAS**. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us and other small communities. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

104 N. Fisher, Versailles, MO 65084
P. 573-378-4634 F. 573-378-4059
www.cityofversaillesmo.com
cityversailles@sbcglobal.net

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this extremely important request.

Respectfully,



Jamie Morrow
Mayor, City of Versailles



Mississippi Rural Water Association, Inc.

March 7, 2024

The Honorable Thomas Carper, Chairman
The Honorable Shelley Moore Capito, Ranking Member
Committee on Environments and Public Works
United States Senate
Washington, DC 20510

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 1,088 water and wastewater utility members of the Mississippi Rural Water Association, Inc., we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, Mississippi Rural Water Association's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

172 Country Place Parkway, Pearl, MS 39208-6675
PH: 601.857.2433 FAX: 601.857.2434
Website: www.msrrwa.org Email: msrrwa@msrrwa.org

Page 2.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink that reads "Kirby Mayfield". The signature is written in a cursive, flowing style.

Kirby Mayfield
CEO
MsRWA

PRESIDENT
Lytle E. "Bud" Gillin
30820 Atwen Lane
Polson, MT 59860

VICE-PRESIDENT
Julie Spencer
189 Browns Gulch Rd.
Kalispell, MT 59901

MONTANA RURAL WATER SYSTEMS ASSOCIATION, INC.

9 Third St N, Ste. 304
Great Falls, MT 59401
Phone (406) 454-1151
[MTRuralWater@mrws.org](mailto:MRuralWater@mrws.org)

EXECUTIVE DIRECTOR
John Camden
9 Third St N, Ste.304
Great Falls, MT 59401

NRWA DIRECTOR
Allen Kelm
511 S. Cottage
Miles City, MT 59301

SECRETARY
Mandi Nay
PO Box 276
Circle, MT 59215

TREASURER
Kevin Duocher
1250 Old S Hwy 91
Cascade, MT 59421

March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Montana water and wastewater utility members of the Montana Rural Water Systems (MRWS), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serves people across the state, and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly release these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems, which merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, MRWS's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment, and disposal costs related to PFAS contamination will place a significant financial burden on the ratepayers. This dynamic is especially problematic in our economically disadvantaged communities, which serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their financial burden onto the ratepayers (your constituents) we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this important request.

Sincerely,



John W. Camden
Executive Director
Montana Rural Water Systems Association



March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the nearly 300 water and wastewater utility members of the North Dakota Rural Water Systems Association (NDRWSA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across North Dakota and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, NDRWSA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

Chairman Carper and Ranking Member Capito
March 11, 2024
Page 2

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

On September 7, 2023, I had the honor and privilege to testify in front of your committee to give a small state and rural perspective on the Implementation of the Drinking Water and Wastewater Infrastructure Act. Part of my testimony centered on PFAS and certain protections for our water systems. The only viable solution to this issue remains the same today, **our water systems and ultimately the public should have a statutory exemption from PFAS liability under CERCLA.** It is imperative to hold responsible parties (manufacturers and polluters) accountable for the remediation, treatment, and provision of alternative sources of safe drinking water for the affected communities. They should bear the responsibility for the consequences of their actions, rather than shifting the burden onto innocent parties (our water systems).

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Volk". The signature is stylized and cursive.

Eric Volk
Executive Director
North Dakota Rural Water Systems Association



PO Box 596
47 Main Street, Suite 206
Walpole, NH 03608
Tel 603-756-3670
info@granitestatewater.org
www.granitestatewater.org

March 12, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Granite State Rural Water Association (GSRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, GSRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tony Cavaliere", with a long, sweeping flourish extending to the right.

Tony Cavaliere

President

Granite State Rural Water Association



PO Box 596
47 Main Street, Suite 206
Walpole, NH 03608
Tel 603-756-3670
info@granitestatewater.org
www.granitestatewater.org

March 14, 2024

The Honorable Thomas Carper Chairman
Committee On Environment and Public Works
United States Senate
Washington, DC 20510

The Honorable Shelley Moore Capito RM
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

Dear Chairman Carper and Ranking Member Capitol,

On behalf of the Canaan New Hampshire water and wastewater facility and acting as a board member for Granite State Rural Water and a board member for National Rural Water, I write to request your support for liability protection under the Comprehensive Environmental Response, Compensation and Liability Act, (CERCLA) for water and wastewater system that follow all laws and regulations in the treatment and disposal of perfluoro and Polyfluoralkyl, (PFAS)(PFOS). Our members here in New Hampshire consisting of small rural communities are deeply concerned about the implications of potential CERCLA liability on our towns, utilities and their rate payers.

In August of 2022 the EPA proposed to designate PFAS, PFOS and PFOA as a hazardous substance under CERCLA. Though CERCLA is intended to target polluters who knowingly release these chemicals into the environment, the law/rule does not protect the passive receivers, the water and wastewater systems that end up with it in their water and sludge. What is going to happen when the law passes and takes effect, the traditional disposal outlets recycling centers and non-hazardous landfills will no longer be able to handle sludge. The markets will lock up and the cost of disposal will increase ten-fold when utilities have to package and ship their sludge and ship their sludge either via truck or train to a hazardous waste landfill in Arizona, Utah and Ohio. We are going to see another PooPoo Choo Choo the Baltimore Sludge train that traveled around the country looking for a home in the late 80's after the EPA passed the paint filter test. This time we are going to end up with the PFAS Choo Choo when hazardous waste landfills start receiving wet goeey sludge, much different than the loads of dry soil that they regularly receive.

My thought and suggestion to you is exempt utilities for a set period of time, (3 to 5 years) until the consumer and industrial markets discontinue the use of PFAS and PFOS in their products and their processes. We saw the same thing with PCBs, as soon as they were regulated and controlled under TSCA the use of PCBs in products stopped all together and as time went by, we stopped seeing the contamination that we saw in the late 80s. When the law goes into effect, we are going to see the same result with PFAS and PFOS.

As the Senate Committee on the Environment and Public works considers legislation to address PFAS and PFOS, I urge you to uphold that the polluter pays principle and protect water and wastewater systems. Remember the little guy running the plant and his customers who pay the bills.

Thank You. John J. Coffey

Operator Canaan Water and Wastewater
Granite State Rural Water Board Member
National Rural Water Board Member



March 7, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

The Entranosa Water Association requests your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Entranosa serves 3721 households and small businesses in unincorporated and rural areas of eastern Bernalillo County and southwest Santa Fe County in New Mexico. While we have not detected PFAS in our testing, we remain seriously concerned about the implications of potential CERCLA liability on our association and our ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, Entranosa Water will soon be responsible for regular testing, and in the event PFAS are detected - treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, we could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial

burden on us. This dynamic is especially problematic in our customers who are economically disadvantaged and have limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers and members of Entranosa that we serve.

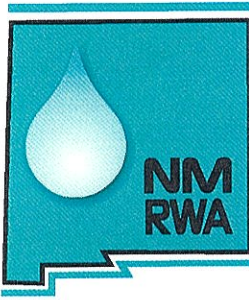
As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers nationwide by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Crider". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Jack Crider
CEO



New Mexico Rural Water Association

PO Box 92738 • ALBUQUERQUE, NM 87199

505.884.1031 • 800.819.9893 • FAX 505.884.1032

www.nmrwa.org

March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 404 water and wastewater utility members of the New Mexico Rural Water Association (NMRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, NMRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink that reads "Bill Conner". The signature is fluid and cursive, with the first name "Bill" being larger and more prominent than the last name "Conner".

Bill Conner
Executive Director
New Mexico Rural Water Association



North Carolina Rural Water Association

Post Office Box 540 ♦ Welcome, NC 27374 ♦ Telephone (336) 731-6963 ♦ Fax (336) 731-8589 ♦ www.ncrwa.com

March 14, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the water and wastewater utility members of the North Carolina Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, North Carolina's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities which serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their financial burden onto the ratepayers. These costs will never be recouped through the minimum water and wastewater bills, paid by your constituents, which are often the only source of revenue for small rural systems.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in cursive script that reads "Heather Somers".

Heather Somers
Executive Director
North Carolina Rural Water Association



ORWA.ORG | 405-672-8925 | 1410 S.E. 15th Street, Oklahoma City, OK 73129

March 11, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 440 water and wastewater utility members of the Oklahoma Rural Water Association (ORWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, ORWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Seago", with a stylized flourish at the end.

Jimmy E. Seago, CEO
Oklahoma Rural Water Association



55 Whites Road
Zanesville, Ohio 43701
www.ohioruralwater.org

740.455.3911
800.589.7985
FAX 740.455.3899

March 11th, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 358 water and wastewater utility members of the Ohio Rural Water Association, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, Ohio Rural Water Association's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Joseph Pheil". The signature is written in a cursive, flowing style.

Joseph Pheil - Executive Director
Ohio Rural Water Association



March 08, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the South Carolina Rural Water Association water and wastewater utility members, we respectfully request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities and may lead to some unintended negative consequences for public water and wastewater providers.

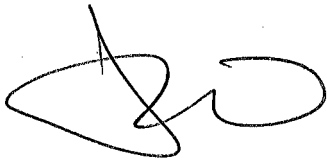
To protect public health, South Carolina Rural Water Association water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will potentially place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with

limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Miller". The signature is stylized with a large loop at the beginning and a smaller loop at the end.

Jill Miller
Executive Director
SCRWA



MADISON
203 Center Street West
PO Box 287
Madison, SD 57042
605-556-7219

SPEARFISH
301 Seaton Circle
PO Box 815
Spearfish, SD 57783
605-642-4031

March 7, 2023

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the South Dakota water and wastewater utility members of the South Dakota Association of Rural Water Systems, we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities provide services to people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, South Dakota's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers

we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

SOUTH DAKOTA ASSOCIATION OF RURAL WATER SYSTEMS



Kurt Pfeifle
Executive Director

Cc: The Honorable John Thune, United States Senate
The Honorable Mike Rounds, United States Senate

TENNESSEE ASSOCIATION OF UTILITY DISTRICTS

Phone: (615) 896-9022
Fax: (615) 898-8283
Web: www.taud.org



Post Office Box 2529
Murfreesboro, TN 37133-2529

840 Commercial Court
Murfreesboro, TN 37129

March 13, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 400 water and wastewater utility members of the Tennessee Association of Utility Districts (TAUD), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

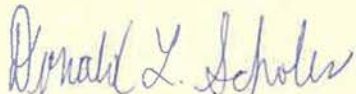
To protect public health, TAUD's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

Page 2

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink that reads "Donald L. Scholes". The signature is written in a cursive style with a large initial "D".

Donald L. Scholes, Interim Executive Director
Tennessee Association of Utility Districts



RURAL WATER ASSOCIATION OF UTAH

14572 S 790 W Unit A203 • Bluffdale, UT 84065 • Phone: 801-756-5123

March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public
Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Utah water and wastewater utility members of the Rural Water Association of Utah (RWAU), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, RWAU's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.



RURAL WATER ASSOCIATION OF UTAH

14572 S 790 W Unit A203 • Bluffdale, UT 84065 • Phone: 801-756-5123

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dale Pierson".

Dale Pierson, Executive Director
Rural Water Association of Utah



20 Susie Wilson Rd, Suite B
Essex Junction, VT 05452

VTruralwater.org
802.660.4988

March 8, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of over 300 water and wastewater utility members of the Vermont Rural Water Association (VRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per-and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

Since 2020, Vermont systems have been testing over 600 drinking water sources in Vermont for five PFAS. Seventeen systems have found PFAS over the state limit, including several schools and one very small, rural municipal system. While investigations are still pending in many cases, results are showing that for the schools, they will be considered their own potentially responsible party. They are not the source of PFAS contamination, but have been blamed for aquifers contaminated by firefighting training exercises and build-up in septic tanks and leachfields from cleaning products. The school janitor who has waxed the floors for decades is now being blamed instead of the chemical manufacturers. This is unacceptable.

The Vermont Rural Water Association is a nonprofit providing training and support to drinking water and wastewater systems to promote clean water and healthy communities.

In addition, these same small water and wastewater systems are struggling to find a way to treat and dispose of the PFAS. A recent Vermont study found that PFAS in residential wastewater inputs exceeded that of industrial and commercial discharges for two representative communities. Disposal options are limited with incineration not reaching high enough temperatures to destroy PFAS and the only landfill in Vermont having very limited capacity for disposal. With no good options, costs are likely to continue to skyrocket.

For these reasons, on behalf of Vermont's small drinking water and wastewater systems, we urge you to carefully consider the economic and social impacts of blaming schools and other small municipal systems. The chemical manufacturers who created PFAS should be held liable for its proliferation in the environment, included in our water and soil.

Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink, appearing to read "Liz Royer".

Liz Royer
Executive Director
Vermont Rural Water Association

Evergreen Rural Water of Washington

An **NRWA** Affiliate

PO Box 2300 • Shelton, WA 98584
(360) 462-9287 • Fax (360) 462-9289 • www.erwow.org

March 7, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the 653 water and wastewater utility members of the Evergreen Rural Water of Washington Association (ERWoW), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

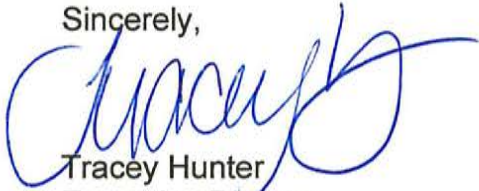
In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, ERWoW's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on us. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tracey Hunter", with a large, stylized flourish extending to the right.

Tracey Hunter
Executive Director



Wisconsin Rural Water Association
350 Water Way Plover, Wisconsin 54467
715-344-7778 Fax: 715-344-5555 E-mail: wrwa@wrwa.org

March 13, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of the Wisconsin water and wastewater utility members of the Wisconsin Rural Water Association (WRWA), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve over 4.5 million people across the state and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, WRWA's water and wastewater utility members will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on rural Wisconsin. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect water systems and the ratepayers we serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in black ink that reads "Christopher J. Groh". The signature is written in a cursive, flowing style.

Chris Groh

Executive Director

Wisconsin Rural Water Association

cgroh@wrwa.org

(715) 340-2055



PO Box 1750 - Glenrock, WY 82637
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TDD 1-800-877-9965

March 6, 2024

The Honorable Thomas Carper
Chairman
Committee on Environment and Public Works
United States Senate
Washington, DC 20510

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

Dear Chairman Carper and Ranking Member Capito,

On behalf of all the community water and wastewater utilities in Wyoming who are all members of our Association (320+), we write to request your support for liability protections under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) for water and wastewater systems that follow all laws and regulations in the treatment and disposal of per- and polyfluoroalkyl substances (PFAS). Our membership of small and rural communities serve people across the state, and we are seriously concerned about the implications of potential CERCLA liability on our utilities and ratepayers. We collectively are in support of Sen. Lummis's S. 1430 on this topic.

In August 2022, the Environmental Protection Agency (EPA) proposed to designate two PFAS – PFOA and PFOS – as hazardous substances under CERCLA. EPA is also in the process of soliciting public feedback to designate additional PFAS chemicals as hazardous substances under CERCLA. Though CERCLA is intended to target manufacturers and polluters who knowingly released these chemicals into the environment, the law does not explicitly protect passive receivers like water and wastewater systems who merely convey PFAS through no fault of our own. Civil enforcement and CERCLA liability are inappropriate federal solutions for addressing PFAS contamination in our communities.

To protect public health, water and wastewater utilities will soon be responsible for treating and disposing of PFAS chemicals. Without an explicit exemption from liability under CERCLA, water and wastewater systems could incur catastrophic CERCLA legal defense fees and liability costs for the cleanup of PFAS contamination, despite having never manufactured, used, or profited from PFAS. The testing, treatment and disposal costs related to PFAS contamination will place a significant financial burden on all systems. This dynamic is especially problematic in our economically disadvantaged communities who serve populations with limited resources. Manufacturers and polluters should not have the opportunity to shift their own financial burden onto the ratepayers (your constituents) that we serve.

As the Senate Committee on Environment and Public Works considers legislation to address PFAS, I urge you to uphold CERCLA's "polluter pays" principle and protect

water systems and the ratepayers they serve by supporting a narrowly tailored legislative exemption for water and wastewater utilities from PFAS-related liability.

Thank you for your time and attention to this very important request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Pepper", is written in a cursive style.

Mark Pepper
Executive Director