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November 20, 2020

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HWTR-HQ

Ms. Irina Makarow
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: DRAFT PFAS Chemical Action Plan

Dear Ms. Makarow:

We appreciate the opportunity to comment on the Draft PFAS Chemical Action Plan (CAP). The Draft Plan reflects the tremendous amount of time and energy that Ecology and Health staff invested in producing a very thorough document.

As a water purveyor, our comments focus on the drinking water elements of the plan. Our primary (and significant) concern is that the Draft CAP grossly underestimates the costs that water purveyors face because of PFAS detected in drinking water sources. The Draft CAP (Section 1 and Appendix 10) presents incomplete examples of the capital costs required to either filter or replace sources that have been contaminated by PFAS.

Lakewood Water District (LWD) has been hard hit with PFAS contamination. PFAS has been detected in ten of the District's wells located in seven different wellfields. These detections impact more than 12 million gallons per day of drinking water supply.

To date, two wells located at the Ponders wellfield with PFAS have been addressed by adding a granular activated carbon (GAC) filtration system. LWD is currently in the process of designing another GAC filtration system for two more wells located at the Scott wellfields, and construction is slated for 2021. These four wells are major sources of supply producing more than 5,000,000 gallons per day. This water serves both the District as well as neighboring purveyors who purchase water on a wholesale basis from LWD.

The costs of PFAS contamination to be borne by water purveyors fall into three main categories.

1. Capital costs
2. Operating costs
3. Recovery costs

The following paragraphs breakdown these three cost components based on Lakewood Water District's experience and analysis.

Capital Costs

The capital costs associated with GAC filtration fall into two main categories—initial construction and replacement.

Initial Construction

For LWD, the initial construction cost to provide GAC filtration at all the wells currently impacted by PFAS contamination **exceeds \$21 million**.

Initial construction includes the cost to purchase additional property at some sites as well as the other typical capital costs of design, permitting, construction management, and the like.

Replacement Costs

As noted in the PFAS CAP, these compounds are extremely persistent. In addition, they have migrated and dispersed broadly across large aquifer systems making standard remediation impossible. This means the filtration systems will need to remain in service for decades. This reality imposes the fact that GAC systems installed now will need to be replaced, probably twice, over the next 50 years.

For LWD, the cost of replacing GAC filtration at all the wells currently impacted by PFAS contamination is **more than \$1.1 billion dollars** over the next 50-plus years.

Operating Costs

We have calculated the cost of operating GAC filtration at the wells currently impacted by PFAS over the next 50-plus years to be **more than \$340 million**.

Operating costs include:

1. Regulatory compliance costs,
2. GAC media replacement,
3. Maintenance and repairs,
4. Laboratory costs,
5. Labor costs, and
6. Power costs.

Recovery Costs

The Draft PFAS CAP alludes to the desirability of recovering the costs described above from responsible parties under the Model Toxics Control Act (MTCA) or other related Superfund statutes. Cost recovery under these statutes is an extremely long and expensive process.

The Draft PFAS CAP does not properly capture the magnitude of the upfront costs to be borne by purveyors pursuing recovery under MCTA. Purveyors pursuing cost recovery under MCTA must front all the legal and expert witness work required to be successful. These costs easily could approach **\$1 million per year** and could extend over a period of many years, perhaps more than a decade, before any recovery money materializes. These are significant costs that must be borne by a purveyor's rate payers and should be more explicitly recognized in the Draft PFAS CAP.


Summary

The Draft PFAS CAP presents well documented and thought-out issues and strategies to address the complex issues surrounding PFAS in our world; however, the Draft Plan grossly underestimates the costs water purveyors face dealing with PFAS contamination. Because of this underestimation, we believe the Draft Plan provides a misleading picture of the magnitude of the fiscal impacts on rate payers. For example, the present value of the costs of responding to PFAS contamination for Lakewood Water District **exceeds \$377 million** which, to anyone, is a lot of money. We are happy to provide more details relating to the District's current experience and future impact costs upon request.

Policy- and decision-makers **must** have an accurate understanding of these fiscal impacts to properly craft and prioritize responses. Accordingly, we request that Appendix 10 and Section 1 of the Draft PFAS CAP be updated with more accurate and representative cost estimates for responding to PFAS in drinking water.

Thank you very much.

Sincerely,



Randall M. Black
General Manager

GP/RMB:ckb