Clean Water Services

To: Chair Lively; Vice-Chair Gamba; Vice-Chair Levy; Members of the House Committee on Climate, Energy & Environment

From: Tracy Rainey, Clean Water Services (raineyt@cleanwaterservices.org)

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RE: Testimony on HB 3512 – Benefits of PFAS Source Reduction for Wastewater Treatment

Thank you for the opportunity to provide testimony on HB 3512.

Clean Water Services is a local government and public utility that provides sanitary sewer and stormwater services to over 610,000 residents and businesses within urbanized portions of Washington County, including within 12 cities. We own, operate and maintain over 1400 miles of sanitary sewer line, 44 pump stations and four water resource recovery facilities.

The services that we provide are driven by our National Pollutant Discharge Elimination System (NPDES) Permit. This permit is required by the federal Clean Water Act and establishes specific water quality standards and criteria that must be met. Our water resource recovery facilities discharge treated industrial, commercial and residential water into the Tualatin River which is a relatively small and slower-moving waterbody. As a result, the river requires both a high level of wastewater treatment and innovative approaches in order to meet specific water quality standards.

We are fortunate to employ a highly-skilled workforce that includes scientists, engineers, wastewater operators and many others who take great pride in the work we do to remove harmful pollutants, protect public health and to ensure water quality standards are met for the Tualatin River and its tributaries.

One of the more significant and daunting challenges we face is the presence of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in the wastewater influent that we receive at our water resource recovery facilities. Currently, there are no viable, scalable wastewater treatment technologies available to remove and safely dispose of PFAS through the wastewater treatment process. While there are currently no water quality limits for PFAS in NPDES permits, we know that the U.S. Environmental Protection Agency has been working to develop human health water quality and criteria that will likely result in specific limits for PFAS in NPDES permits; representing significant impacts for wastewater utilities and their ratepayers in the future.

Clean Water Services has done considerable work to better understand and address sources of PFAS that are entering our system and facilities. Through sampling and lab analysis, we have been able to trace many sources of PFAS within our service territory. This effort has allowed us to trace sources back to specific industries that may be using PFAS in their processes, and to engage in conversations about voluntary product substitutions and pre-treatment options that can reduce the occurrence of PFAS in industrial wastewater. These strategies have been effective in reducing certain sources of PFAS that would otherwise come into our facilities. We were fortunate to be invited to provide information on these efforts during an informational hearing before the House Agriculture, Land Use, Natural Resources and Water Committee in September of 2024.

However, through our sampling and analysis efforts, we have also unfortunately determined that the majority of the PFAS entering our facilities is coming from domestic sources (i.e., residential households within our service territory). This is particularly concerning as we know that human exposure to PFAS has already occurred prior to the contaminants reaching our facilities. In addition, these domestic sources are much more difficult to control from a pollution reduction perspective as they are coming from thousands of homes where people are likely unaware of the presence of PFAS in common household products.

Water utilities do not have the ability to regulate consumer products containing PFAS or the use of the products by domestic sources. We engage in water utility customer education and have done so in the past to address other challenging issues including disposal of pharmaceuticals, fats/oils/grease and wipes. Unfortunately, addressing PFAS exposure and its impacts to water will require more than education and outreach on proper disposal methods. Removing the intentional use of PFAS in domestic products could help to reduce the domestic sources of PFAS that enter our water treatment facilities.

While Clean Water Services is neutral on HB 3512 and the specific products identified for phaseout, we are supportive of thoughtful source reduction policies and recognize the importance of such policies for the protection of water quality, the environment and human health.

Thank you for your consideration of our testimony. Please reach out if you have any questions or if we can provide additional information.