



March 20, 2025

The Honorable Catherine Blakespear, Chair
Senate Environmental Quality Committee
1021 O Street, Room 3230
Sacramento, CA 95814

Subject: SB 682 (Allen): Support

Dear Senator Blakespear and Members of the Committee,

The California Association of Sanitation Agencies (CASA) is proud to co-sponsor and strongly support SB 682 (Allen), which seeks to eradicate harmful forever chemicals from products unwittingly used by consumers in their daily lives. The undersigned coalition strongly endorses this vital policy effort to reduce human health impacts and environmental exposure to these chemicals. Consistent with our coalition's core missions of both protecting public health and the environment and maintaining affordable essential public services, SB 682 is the most cost-efficient method for reducing baseline concentrations of PFAS in our water, wastewater and waste management processes.

In recent years, Per- and Polyfluoroalkyl substances (PFAS) have become a topic of public concern due to their high mobility and resistance to breaking down naturally as well as the persistent detection of PFAS compounds in people's bodies and in the environment. A statewide source control approach is necessary to systematically remove PFAS from the stream of commerce, including in products which have a direct pathway to our watersheds and waste management systems.

Often referred to as "forever chemicals," PFAS chemicals are both ubiquitous and indestructible. Removing PFAS at the end of their life cycle does not address the problem of ongoing exposure to the general public to PFAS from everyday products. In limited cases, PFAS can be removed from water and wastewater through advanced treatment technology. However, there is currently no technologically feasible method for the large-scale destruction of PFAS compounds. Instead, once removed, PFAS residuals are merely displaced to another waste stream to cycle back through the waste management process or transferred to a different environmental media. This is why SB 682's focus on stopping PFAS at its source is vital.

While in some very limited cases, the source of PFAS contamination can be identified and addressed through industrial pre-treatment programs or other similar mechanisms, this is not generally the case. In 2020, the State Water Resources Control Board issued a statewide monitoring and reporting order that required wastewater agencies to monitor

and report for PFAS in influent, effluent and biosolids. Monitoring data from this effort demonstrates that domestic discharges (residential and commercial influent) is the predominant pathway of PFAS entering wastewater systems, meaning that products people are using in their homes and businesses are contributing PFAS to wastewater systems through everyday uses that are not controllable through local enforcement or industrial pretreatment programs.

Moreover, regulatory efforts are underway that could have serious consequences for clean water agencies and their ratepayers. Last year, USEPA adopted Maximum Contaminant Levels (MCLs) for 6 PFAS chemicals in drinking water, and the State Water Resources Control Board has stated its intent to begin a proceeding this year to adopt a statewide MCL for PFAS consistent with the adopted Federal MCL. Drinking water MCLs are highly consequential for the regulated water community, including wastewater agencies, as they are often incorporated “by reference” into existing Basin Plans, thus imposing de facto limits for discharges to certain bodies of water. Removing PFAS from the stream of commerce before it enters our waterways and waste treatment systems is the most cost-effective way to address this issue.

Finally, as local public agencies begin the process of preparing for implementation of new and proposed PFAS regulations, affordability of essential services is a critical consideration. USEPA estimates that for drinking water systems to comply with the newly imposed Maximum Contaminant Level (MCL) for a handful of PFAS chemicals will result in annual cost impacts surpassing \$1 billion. Water industry leaders contend these costs are likely much higher and could surpass \$3 billion annually, and do not account for financial impacts beyond the drinking water system requirements. These are all costs that will be borne by California utility ratepayers.

For these reasons, the meaningful and comprehensive source control and pollution prevention strategy presented in SB 682 is the most cost effective and appropriate approach to reducing PFAS pollution in the environment.

CASA strongly supports SB 682 and urges your support when it is heard in the Senate Environmental Quality Committee.

Sincerely

Jessica Gauger
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and Public Affairs
California Association of Sanitation Agencies