



February 12, 2019

Senator Martha Fuller-Clark, Chair  
Energy and Natural Resources Committee  
New Hampshire Senate  
State House  
Concord, New Hampshire 03301

**RE: SB 287 Setting PFAS Standards**

Dear Senator Fuller-Clark and Members of the Committee,

For the record I am Barbara Reid with the New Hampshire Municipal Association and I am here to testify in opposition to **SB 287** dealing with statutory water quality standards for perfluorochemicals (PFCs).

First let me begin by saying we all recognize that clean, safe water is critical to our citizens, businesses, economy, and quality of life. NHMA, along with our affiliate member organizations, represent professionals in the water quality field in New Hampshire who work on drinking water, wastewater, and wastewater residuals management. Our members include environmental stewards working every day on the front lines to protect both public health and the environment.

For those reasons, NHMA supported **SB 309** last year which required the New Hampshire Department of Environmental Services (NHDES) to initiate rulemaking for PFC standards by January 1, 2019. These standards are required to be based on health risk assessments and to consider the ability to detect and remove the contaminant along with the costs and benefits to affected parties. NHMA and many others supported the standard-setting process contemplated in **SB 309** along with the necessary resources the bill provided to NHDES to establish standards based on peer-reviewed scientific data regarding health risks and a comprehensive understanding of the impact and practicality of the recommended standards. NHDES met the January 1, 2019 requirement for proposed PFC standards, and is now in the early stages of the rulemaking process enacted in **SB 309**, a process we continue to support.

The fiscal note for **SB 287** indicates that the increased costs associated with the bill are indeterminable. However, NHDES was able to estimate some potential impacts of the bill, providing low and high estimates for both capital and operational costs for treatment, wastewater disposal to groundwater, landfill sites, and hazardous waste sites. The total of these estimates for local governments ranges from a low of \$79 million to a high of \$138 million – with

Sen. Fuller Clark, Re: SB 287

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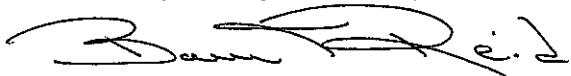
Page 2 of 2

even the high end likely to be a conservative estimate in our opinion. However, the bill is silent on how those costs are to be funded.

We certainly recognize the concerns that elevated levels of PFC's have raised in the vicinity of numerous contaminated sites around the state and agree that such sites should receive the highest level of focus and priority for remediation from the state and federal governments, and ultimately a responsible party if one exists. However, we are very concerned that broad, overly conservative standards such as those proposed in **SB 287** will result in significant costs to implement and maintain, but will provide only marginal, if any, benefit to public health.

Therefore, we support continuing the rulemaking process currently in place utilizing the experience and expertise at the NHDES based on the criteria outlined in **SB 309** for establishing water quality standards for PFC's and ask the committee to recommend ITL on **SB 287**.

Respectfully Submitted,

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

Barbara Reid

NHMA Government Finance Advisor