



STATE OF CONNECTICUT

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March 14, 2025

Honored Co-Chairs Sen. Lopes and Rep. Parker, Vice Chairs Sen. Hochadel and Rep. Bumgardner, Ranking Members Sen. Harding and Rep. Callahan, Distinguished Members of the Environment Committee,

Re: Raised Senate Bill No. 1494 – An Act Concerning Testing for PFAS in Certain Water Supplies.

The Council on Environmental Quality (Council) is a nine-member board that works independently of the Department of Energy and Environmental Protection (DEEP) to assess the condition of Connecticut's environment and report its findings annually to the Governor; recommend actions to improve state environmental programs; advise other state agencies on the environmental impacts of proposed projects; and investigate citizens' complaints and allegations of violations of environmental laws.

The Council supports the concepts identified in the proposed bill that would require public water systems to monitor for Per- and polyfluoroalkyl substances (PFAS) more regularly and implement some action that would eliminate or minimize their impact to public health. According to the Connecticut Department of Public Health (DPH), 76 percent of Connecticut's population relies on public water systems to provide them safe and clean drinking water.

The Council notes that the proposed bill does not specify which of the PFAS chemicals should be tested for. Furthermore, the Environmental Protection Agency (EPA) has set different, and in most cases, much lower maximum contaminant levels (MCLs) for certain PFAS chemicals, as well as a hazard index for mixtures containing two or more PFAS chemicals. Research has shown that mixtures of PFAS can have additive health effects, even if the individual chemicals are present at different levels.¹ DPH has set "action levels" (AL) for ten PFAS chemicals, with six of them having ALs below 20 parts per trillion.² As such, the Council suggests that the proposed legislation be refined to 1) specify the PFAS chemicals for testing, and 2) bring the proposed criteria concentration(s) in congruence with either EPA's or DPH's MCLs and ALs.

Thank you for consideration of the Council's comments.

Sincerely,

Paul Aresta
Executive Director

¹ https://www.epa.gov/system/files/documents/2024-04/pfas-npdwr_fact-sheet_general_4.9.24v1.pdf

² <https://portal.ct.gov/dph/drinking-water/dws/per--and-polyfluoroalkyl-substances>