



Illinois Association of Wastewater Agencies

Position on PFAS

Per- and poly-fluoroalkyl substances (PFAS) are a group of compounds that are ubiquitous in the environment; from urban to remote rural areas, including surface water, groundwater, soil, and air. Exposure at certain levels to some PFAS such as the two most widely studied compounds, PFOA and PFOS, may adversely impact human health and the environment. Illinois Association of Wastewater Agencies (IAWA) members support policies and actions that protect the health and safety of Illinois water through the following guiding principles regarding PFAS.



IAWA Position	Description
Follow Sound Science	There are many headlines, sound bites, and sources of information with a wide array of perspectives regarding PFAS. The potential for misinformation is high. It is critical that policies and actions follow sound science. To address PFAS effectively, policies, regulations and guidelines must be developed based on data and science such as risk assessments, defensible analytical methods, and phase out of PFAS production and use.
Implement Polluter Pays Policies	Wastewater agencies neither manufactured nor profited from PFAS – they are passive receivers. Also, wastewater treatment plants were neither designed for, nor easily adaptable to treat for PFAS. Ratepayers and the public at large should not bear the cost for addressing PFAS. Those who manufactured or sold these substances should be held responsible for cleanup costs.
Utilize Existing Source Control Regulatory Frameworks	Federal industrial pretreatment regulations, implemented decades ago, have successfully ensured pollutant reduction and source control for many other contaminants. These regulations should be utilized in coordination with the municipal clean water agency community and other stakeholders, such as industries and the agricultural sector, to properly address PFAS concerns.
Ensure Adequate Funding For Any Mandates	Regulations to address PFAS should consider the costs, funding sources, and logistics. Regulators may prematurely recommend and implement requirements that have no proper funding source for implementation or are impractical. For example, the cost and the logistics for sampling and analysis of PFAS are significantly greater than for typical analyses of wastewater and biosolids. Through forums such as committees, municipal clean water agencies should be given the opportunity to participate in the development of federal and state regulations and permit conditions.
Beware of Unintended Consequences	It is imperative that regulators and lawmakers consider the potential for unintended legal liability and other consequences. For example, laws and regulations, such as designation of PFAS as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), may impose unintended liability and burdens on municipal clean water agencies and biosolids users, such as the agricultural community.
Continue Beneficial Use of Biosolids that Meet Health and Safety Standards	The agricultural community relies on biosolids as a valuable source of nutrients, yet some states have implemented drastic restrictions with limited scientific basis or consideration of unintended consequences. Blanket restrictions such as the 2022 ban on land application of biosolids in the state of Maine should be avoided. There should be a scientific basis and careful consideration regarding restrictions on beneficial use of biosolids. For example, the State of Michigan has developed regulatory frameworks to place some restrictions on land application of biosolids when warranted.

IAWA has a PFAS Committee comprised of clean water experts. The Committee keeps track of developments and provides guidance regarding PFAS and utilizes other technical experts when needed. Please send any inquiries to info@ilwastewater.org.