November 9, 2018

Mr. Bob Hirst
Vice President - Education, Science, and Technical Relations
International Bottled Water Association
1700 Diagonal Road, Suite 650
Alexandria, Virginia 22314

Dear Mr. Hirst:

I would like to commend you and the entire International Bottled Water Association (IBWA) membership for the proactive manner in which your organization has addressed the issue of emerging contaminants. The IBWA has a long history of taking on issues well before regulatory mandates require action.

As you may be aware, per and polyfluoroalkyl substances (PFAS) has become a very important regulatory concern in Michigan, which led to the creation of the Michigan PFAS Action Response Team (MPART). Agencies representing health, environment, and other branches of state government are working together to investigate sources and locations of PFAS contamination in the state, to protect Michigan’s drinking water, and to keep the public informed as we learn more about this emerging contaminant.

One of the many activities of MPART is conducting a statewide sampling of all community water supplies and schools that have their own water supply to determine the extent to which PFAS is present. Once a supply is tested, the results are provided to the supply in a customized letter which provides recommendations based on the PFAS levels found.

Currently, the State of Michigan does not have a regulatory standard for water supplies or bottled water. We have relied on creating partnerships with communities to address the issue of PFAS proactively while formal regulatory paths are developed. The city of Parchment (Parchment), Michigan, is an excellent example of the positive change that can take place when all levels of government work together for the common good of residents.

When the PFAS levels in Parchment were found to be approximately 20 times higher than the Lifetime Health Advisory level (LHA), an emergency declaration was issued at the state and local level. Parchment was then hooked up to the city of Kalamazoo’s water supply within a matter of hours. A Do Not Drink Advisory was put in place while robust testing was conducted to ensure that PFAS levels dropped to levels below the LHA. While the testing was being conducted, residents were provided with bottled water. Due to the efforts in Parchment, one of the questions residents often ask is whether bottled water contains PFAS. While our conversations with individual bottlers so far...
indicate this does not appear to be an issue, that statement is only true of those specific bottlers. It is critical for residents to know that should they choose to use bottled water for consumptive purposes, they can go to any store and know the water they are purchasing is free of PFAS.

I would like to strongly encourage the IBWA to incorporate the testing of PFAS into the testing requirements for bottlers. This type of proactive leadership will go a long way in helping purchasers of bottled water to do so in confidence.

Once again thank you for your continued leadership. If you need further information, please contact Mr. George L. Krisztian, Assistant Director, Drinking Water and Municipal Assistance Division, Michigan Department of Environmental Quality (MDEQ), at 517-284-6544, krisztiang@michigan.gov; or MDEQ, P.O. Box 30817, Lansing, Michigan 48909-8311.

Sincerely,

Carol Isaacs,
Director
Michigan PFAS Action Response Team

cc: Ms. C. Heidi Grether, Director, MDEQ
Mr. Aaron B. Keatley, Chief Deputy Director, MDEQ
Mr. Steve Sliver, PFAS Executive Lead, MDEQ
Ms. Mel Brown, Public Engagement Coordinator, MDEQ
Ms. Amy Peterson, MDEQ
Mr. Eric J. Oswald, MDEQ
Mr. George L. Krisztian, MDEQ
Mr. Aaron B. Keatley, Chief Deputy Director, DEQ