

# A Letter to our Customers

#### Dear Valued Customer:

Recently, Middlesex Water Company was notified that a regulated contaminant — Perfluorooctanoic Acid (PFOA) was detected in groundwater samples from our Park Avenue Treatment Plant. Because we exceeded a standard, we were required to provide notice to customers served by that plant, which includes specific language set forth by the United States Environmental Protection Agency (USEPA) and the New Jersey Department of Environmental Protection (NJDEP). PFOA is one of a number of molecular compounds under the broader category of Per- and Polyfluoroalkyl Substances (PFAS) you may have heard about in the news in recent months. These emerging compounds have recently been regulated by the NJDEP with those regulations first applicable to public water systems this year.

For the sake of this letter, we will refer to PFOA as opposed to the larger family of PFOS compounds.

We understand that you may be concerned about PFOA and, because of public health perceptions surrounding PFOA, we are too. Drinking water systems like ours are not producers or users of PFOA, instead, they are potential receivers of these chemical compounds used by manufacturers and consumers. As a result, we must now implement costly solutions to remediate PFOA from our groundwater supplies. Middlesex Water is not alone in battling this contaminant. PFOA has been detected in drinking water supplies throughout our state and across the country. But for our part, we have initiated litigation in U.S. District Court against the party we believe is responsible for the presence of PFOA in our groundwater.

### No MCL Standard for PFOA Prior to 2020

Like many other water systems in the U.S., Middlesex Water had been required to test for some PFAS compounds as part of the USEPA's Unregulated Contaminant Monitoring Rule. Well before there was any standard even set for PFOA, the Company had been reporting these detections in its annual Consumer Confidence Report (CCR) also known as its Annual Water Quality Report since 2008.

The USEPA has established what is called a lifetime of exposure health advisory guideline (not a regulatory requirement) at 70 parts per trillion (ppt) for both PFOA and PFOS in drinking water. This health advisory level of 70 ppt was established to provide a margin of protection to all Americans as well as those who are immuno-compromised or in special populations (elderly, children). Until recently, the NJDEP had its own guideline of 40 ppt, with which our system was well in compliance. Last year, the NJDEP adopted an enforceable regulation or Maximum Contaminant Level (MCL) which significantly lowered the limit to 14 ppt, which is effective for the first time this year. The limit is applied on the basis of a "Running Annual Average" (RAA).

#### Notice is a Tier 2 Violation – Not an Immediate Health Risk or Acute Threat

Middlesex Water received notice in early September that its Park Avenue system exceeded the new PFOA limit based on Quarterly RAA from samples collected from our treatment Plant in the 1st, 2nd, and 3rd quarters of 2021. Results were 25 ppt, 23 ppt, and 36 ppt respectively. The current QRAA for PFOA is 21 ppt, which is above the MCL. Once the 4<sup>th</sup> Quarter results are averaged into the QRAA, we

can expect the water supply to continue to exceed the MCL until the new treatment is in operation. This exceedance required us to issue public notification.

Some customers have questioned why the delay in notification. This instance is considered a Tier 2 Violation -- meaning that it is not considered an immediate health risk or acute threat and, as per regulations, notification is not required immediately. To prepare for this, language for the violation notice must also be approved by the NJDEP. Since not all customers are affected, the actual street list and recipients for this notice had to also be determined via hydraulic studies and that methodology approved by NJDEP. We also needed time for printing and mailing. Despite the perception of a delay, the notice was sent within the regulatory notification period required by the NJDEP. In addition, Middlesex has been sharing information regarding PFAS annually with customers through its Annual Water Quality Reports, also known as Consumer Confidence Reports, since 2008.

## Implementing a Solution to meet the New Standard

It's important to note that the significant tightening of the MCL standard is what triggered the violation notice, not a change in the water quality. Prior to the new standard, the treatment facility had been in compliance. This is not an emergency nor is it an immediate health concern or acute threat. To put the risk in perspective, the newly established MCL is based on a 1 in a million chance of becoming ill by drinking water above the MCL over a period of 70 years.

In anticipation of the new MCL, Middlesex began exploring and designing treatment to remove PFOA from ground water. We are constructing upgrades to our plant, at an estimated cost of \$47 million, which will utilize Granulated Activated Carbon (GAC) filtration to remove PFOA. We expect the plant to be in service by mid-2023. In the interim, we advise all sensitive populations to consult their health care provider if they ever have any concerns with their water supply or about PFOA in their environment in general.

#### Learn More About PFOA so You can Make Informed Choices

We encourage you to review all of the information available on our website and make informed choices for yourself and your family members. Middlesex Water has served this region and earned the trust and confidence of its customers for 124 years. Our employees are your neighbors and your friends who drink the same water. We are working as quickly as possible to expedite the construction of the treatment facilities to remediate and remove these contaminants.

Please view additional information that is available on our website under <a href="https://www.middlesexwater.com/alerts/">https://www.middlesexwater.com/alerts/</a>

Sincerely,

Dennis W. Doll

Chairman, President and CEO Middlesex Water Company

Dennie W. Doll

October 22, 2021