



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF WATER RESOURCES

**Response to Comments on the
Proposed Amendments to the Groundwater Quality Rules (250-RICR-150-05-3)**

November 20, 2023

The Rhode Island Department of Environmental Management (RIDEM) received one comment on the proposed revisions to the “Groundwater Quality Rules,” also known as 250-RICR-150-05-3, that address the groundwater quality standards for PFAS compounds. One organization submitted written comments during the public comment period from October 3, 2023 to November 3, 2023. No comments were offered during the public hearing held on October 19, 2023. Comments paraphrased below are followed by RIDEM’s response. Copies of all comments are on file and available for public review at the RI Department of Environmental Management, Office of Water Resources, 235 Promenade Street, Providence, RI 02908.

1. Comment received via email from Jordan Kari

Jordan Kari, on behalf of the Water Quality Association (WQA), American Supply Association (ASA), the International Association of Plumbing and Mechanical Officials (IAPMO), and NSF, submitted written comments on October 31, 2023. The comment letter discussed the potential role of point-of-use and point-of-entry drinking water treatment systems in providing safe drinking water in cases where groundwater PFAS contamination occurs. The comment requests that the proposed rules include citations for two third-party standards for water filtration systems, specifically *NSF/ANSI 53: Drinking Water Treatment Units – Health Effects* and *NSF/ANSI 58: Reverse Osmosis Drinking Water Treatment Systems*.

Response:

As suggested by the commenters, RIDEM agrees point-of-use and point-of-entry drinking water treatment systems will likely have a role in ensuring that drinking water meets the 20 parts per trillion (ppt) standard for PFAS. However, the Groundwater Quality Rules are applicable to regulation of the quality of ambient groundwater resources. RIDEM lacks the legal authority to regulate specifications for drinking water treatment systems; e.g. end-of-pipe treatment systems. That authority rests with the Rhode Island Department of Health. DEM notes that the RIDOH Public Drinking Water regulations (216-RICR-50-05-1) include citations of the NSF/ANSI standards 53 and 58 for point-of-entry treatment systems. In summary, while RIDEM recognizes the potential role of point-of-use and point-of-entry drinking water treatment systems, there will be no change to the proposed Groundwater Quality Rules in response to this comment.