

Mayor Perry, Pittsboro Town Board of Commissioners, and Town of Pittsboro Staff,

The proposal to merge water distribution systems with the City of Sanford poses major threats for the health of the Pittsboro community. While we understand the need for expansion for wastewater services, we oppose the new proposal to receive treated drinking water from Sanford. The Town of Pittsboro has invested in treatment for PFAS, and has received funding for advanced treatment to address 1,4-dioxane. Through litigation and consent orders brought by Haw River Assembly, major sources of PFAS are being addressed. Sources of 1,4 dioxane are being thoroughly investigated with the goal of minimizing contamination. Upstream dischargers in the Haw River watershed have committed to extensive monitoring for these contaminants, and provide sampling results with rushed analysis to the Town of Pittsboro in order to prevent distribution of contaminated drinking water. The City of Sanford has not provided information on putting such measures in place. Drinking water supplies in Sanford have shown higher levels of PFAS and 1,4-dioxane than levels in the Haw at Pittsboro's drinking water intake.

Haw River Assembly and Clean Haw River submitted comments to the Pittsboro Town Board of Commissioners at the public hearing on this issue. We respectfully request the commission to thoroughly review this additional information we have provided here in order to make informed decisions that will adequately protect our community, which has already been exposed to some of the highest levels of contamination in the state.

### **Industrial Contamination Upstream**

The City of Sanford discharges their effluent upstream of their drinking water intake. Levels of total PFAS in the city's discharge have been as high as 4026 ppt. Further upstream, other industrial centers in Asheboro and High Point also send contaminated wastewater into the Deep River. In a 2021 [study conducted by NCDEQ](#), levels in Asheboro's discharge were detected at 121 ppt for total PFAS, and 105 ppt in High Point.

Sanford has not released conclusive results or conducted investigations into sources of 1,4-dioxane. Upstream on the Deep River, 1,4-dioxane levels of over 1000ug/L [were measured](#) in Asheboro as recently as 2022. Asheboro has been listed as one of the three major sources of 1,4 dioxane in the state. In the recently released NPDES permit, Asheboro does not have numeric limits for their 1,4-dioxane discharges, but instead has a 5 year compliance schedule to meet a monthly average of 21.6 ug/L in 2028. Additionally, DAK Americas has had levels of 1,4 dioxane in their discharges exceeding 10,000 ug/L. In the same study, levels of 1,4-dioxane exceeded 1000 ug/L in High Point. High Point has only begun to investigate potential sources. These drinking water supplies have also seen extremely high levels of contamination. In 2019, the UNC Policy Collaboratory [tested drinking water](#) supplies across the state. The City of Sanford was found to have some of the highest levels of PFAS in their finished drinking water at 192.3 ppt. Asheboro and High Point further upstream had levels of 40.5ppt and 17.5 ppt,

respectively. As recently as [2022](#), Sanford's average level for 17 measured PFAS in their drinking water supply averaged 78.12 ppt. On June 15, 2023 the Environmental Protection Agency (EPA) released updated health advisories warning that even tiny amounts of two types of man-made compounds, PFOS and PFOA, are harmful to humans. For PFOS the new advisory is 0.02 ppt and for PFOA 0.004 ppt.

### **Additional Toxins in Leachate**

Leachate collected from Charah's Brickhaven Coal Ash Landfill is sent to the Sanford WWTP. The 2022 Charah report to the state for the leachate collected shows the presence of antimony, arsenic, barium, beryllium, cadmium, cobalt, copper, fluoride, lead, lithium, mercury, molybdenum, selenium, thallium, and total radium. For one heavy metal, the level of mercury reported is .12.ug/l, 10 times the NC Water Quality standard for surface waters. How much of these metals from the leachate are removed in the WWTP, and how much are discharged downstream towards Sanford's intake for drinking water?

### **Other Concerns about Sanford and Drinking Water**

The proposed pipeline to carry finished drinking water from Sanford to Pittsboro will be roughly 15 miles long. This gives concerns for the buildup of trihalomethane, a problem Pittsboro has dealt with before. Trihalomethanes are already mismanaged in Sanford's drinking water supply and pose a cancer risk to water users. Trihalomethanes are cancer-causing contaminants that form during water treatment with chlorine and other disinfectants. The total trihalomethanes group includes four chemicals: chloroform, bromodichloromethane, dibromochloromethane and bromoform. In 2022 Sanford's water quality report showed Trihalomethanes were measured at 50 ppb where the concentration to remain at a one-in-one million risk is .15 ppb or less.

### **Committed Funding Discrepancies**

The Town of Pittsboro is now using GAC to remove PFAS and many other chemicals in its drinking water treatment of source Haw River water. The Drinking Water State Revolving Fund has approved loans to the Town of \$12,224,000 for the Ultraviolet-Advanced Oxidation Process (UV-AOP) to reduce 1,4-dioxane levels in the finished water, and an additional \$5,680,000 for additional GAC treatment. These advanced treatments will bring Pittsboro's drinking water to a safe level, something that is not ensured if the drinking water is from Sanford.

Due to the nature of this funding source, it may not be possible to change the designated use of those appropriations. A change in use of Drinking Water Revolving State Funds typically requires approval from the NC General Assembly, and may not be approved.

Giving over complete management of Pittsboro's drinking water to Sanford also means having complete confidence that issues such as advance treatment filter maintenance, and pipeline integrity will be dealt with properly. When there are water pipeline breakages in Sanford (such as the one that happened earlier this week) will water pressure to Pittsboro be compromised?

Given the information we have provided about the concerns about the safety of Sanford's drinking water quality, we urge you to reconsider what will be best for the Town of Pittsboro.

Respectfully,

Haw River Assembly  
Emily Sutton, Haw Riverkeeper  
Elaine Chiosso, Executive Director

Clean Haw River  
Dr. Jessica Merricks, Co-founder  
Katie Bryant, Co-founder