

Administrator Michael S. Regan
U.S. Environmental Protection Agency
EPA Docket Center, OW Docket
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

May 30, 2023

Dear Administrator Regan,

Re: Per- and Polyfluoroalkyl Substances (PFAS): Proposed National Primary Drinking Water Regulations (Docket ID: EPA-HQ-OW-2022-0114)

The undersigned organizations strongly support the regulation of per- and polyfluoroalkyl substances (PFAS) in drinking water under the authority of the federal Safe Drinking Water Act, as proposed by the Environmental Protection Agency (EPA) and published in the Federal Register on March 29, 2023. EPA's proposal to set strong, scientifically supported drinking water standards for six PFAS is an important step toward fulfilling the Biden Administration's commitment to tackle these toxic forever chemicals. We commend EPA's recognition that both individual PFAS and chemical mixtures of PFAS can threaten human health. We urge you to finalize the standards as quickly as possible.

National standards to limit the concentration of PFAS in drinking water are long overdue. For decades, PFAS have been used in thousands of applications, and a peer-reviewed study estimates that PFAS may be present in the drinking water of more than 200 million Americans. EPA's proposal for six PFAS would set the national standard for PFOA and PFOS at the lowest detection level approved by the agency, and would establish limits on GenX, PFBS, PFNA, and PFHxS using a hazard index. EPA estimates that 94 million Americans currently receive drinking water contaminated by one or more these PFAS chemicals at levels above the limits proposed by EPA. The regulation of PFAS will improve drinking water safety for millions of Americans.

Not only are PFAS widespread in drinking water, these "forever chemicals" persist throughout the environment and pose risks to public health even in trace amounts. They are found in the blood of virtually everyone on Earth, and build up in our organs. Very low doses of PFAS in drinking water have been linked to [suppression of the immune system](#) and are associated with an elevated risk of cancers and [reproductive and developmental harms](#), among [other serious health concerns](#).

Because drinking water is a significant pathway of PFAS exposure, addressing contamination before it reaches our taps is key to reducing associated health problems. The Safe Drinking Water Act requires that national drinking water standards present a meaningful opportunity to reduce health risks. EPA's proposal does just that – it would significantly reduce exposure to PFAS in drinking water and as a result, lower risks of related health impacts.

The PFAS addressed by EPA's proposal are among a class of thousands of forever chemicals. EPA's proposal to use a hazard index to address multiple co-occurring PFAS recognizes the risks associated with harmful chemical mixtures. Like many members of the PFAS class, PFBS, PFNA, GenX, and PFHxS have similar chemical structures and cause similar health effects. Many communities are exposed to, and harmed by, mixtures of those PFAS in their drinking water. EPA's approach provides a framework for addressing additional PFAS and mixtures of chemicals in the future, which would allow the Agency to move more rapidly to protect public health.

EPA's proposed drinking water standards also align with the Biden Administration's commitment to advance environmental justice. Communities of color and low-income communities have historically faced disproportionate exposure to pollution and cumulative adverse health effects from multiple co-occurring contaminants. Published research suggests that communities with higher populations of people of color may be especially impacted by PFAS. By regulating six dangerous PFAS in drinking water, EPA's proposal helps to reduce overall PFAS exposure, and improve drinking water safety in thousands of communities across the country.

Under EPA's proposal, drinking water utilities will be required to test water for PFOA, PFOS, GenX, PFBS, PFNA, and PFHxS and install treatment technologies to reduce the concentrations of these chemicals to the level of EPA's proposed "maximum contaminant levels" or lower. Fortunately, proven technology is available that will not only reduce the presence of the six PFAS in EPA's proposal, but will also improve protection against other PFAS compounds and common contaminants.

While some water utilities have already installed water treatment technology capable of reducing PFAS, many are not yet equipped to do so. To help communities, Congress passed the Bipartisan Infrastructure Law which provides \$9 billion in funding for drinking water treatment upgrades, and an additional \$11.7 billion for other necessary drinking water infrastructure needs. This funding will aid utilities in meeting EPA's proposed drinking water standards and improve drinking water safety.

In addition to swiftly finalizing drinking water standards for PFAS, we urge EPA to expedite efforts to prevent these forever chemicals from polluting the environment in the first place by: controlling industrial discharges of PFAS into water, and addressing PFAS in state- and federal-issued permits consistent with EPA's 2022 guidance under the Clean Water Act; reducing unnecessary uses of PFAS, and preventing the entry of dangerous new PFAS chemicals into commerce under the Toxic Substances Control Act; minimizing PFAS emissions under the Clean Air Act; cleaning up PFAS contaminated sites under the Comprehensive Environmental

Response, Compensation, and Liability Act; and regulating PFAS disposal under the Resource Conservation and Recovery Act.

The ubiquitous nature of PFAS contamination underscores the need to curb all pathways of PFAS exposure and sources of pollution. EPA's 2021 Strategic PFAS Roadmap outlined a broad suite of actions to address the PFAS crisis, and following through on Roadmap commitments is of the utmost importance.

Thank you for your consideration.

Sincerely,

7 Directions of Service
Active San Gabriel Valley
Air Alliance Houston
Alabama Rivers Alliance
Alaska Community Action on Toxics
Alaska Environment
Alliance of Nurses for Healthy Environments
Anacostia Riverkeeper
Arkansas Ozarks Waterkeeper
Ashgrove Farm
Assateague Coastal Trust
Ban SUP (Single Use Plastics)
Bayou City Waterkeeper
Belfast Adventure Education
Black Warrior Riverkeeper
Black-Sampit Riverkeeper
Breast Cancer Prevention Partners
Buxmont Coalition for Safer Water
Cahaba River Society
Cahaba Riverkeeper
California Environmental Voters
California Public Interest Research Group (CALPIRG)
Cape Fear River Watch
Catawba Riverkeeper Foundation
Cease Fire Campaign
Center for Public Environmental Oversight
Chautauqua-Conewango Consortium
Chesapeake Bay Foundation
Children's Environmental Health Network
Citizen of the USA
Clean Cape Fear
Clean Production Action
Clean Water Action/Clean Water Fund
Climate Action Alliance of the Valley

Community Action Works
Community Water Center
Congaree Riverkeeper
Connecticut Nurses Association
Connecticut River Conservancy
Conservation Alabama
Conservation Law Foundation
Conservation Voters of PA
Consumer Reports
Cook Inletkeeper
CT League of Conservation Voters
CT Nurse Association
Defend Our Health
Delaware Riverkeeper Network
Duxbury Safe Water
Earthjustice
Ecology Center
Endangered Species Coalition
Energy Justice Network
Environment America Research & Policy Center
Environment Arizona
Environment California
Environment Colorado
Environment Connecticut
Environment Florida
Environment Georgia
Environment Illinois
Environment Maine
Environment Maryland
Environment Massachusetts
Environment Michigan
Environment Minnesota
Environment Montana
Environment Nevada
Environment New Hampshire
Environment New Jersey
Environment New Mexico
Environment New York
Environment North Carolina
Environment Ohio
Environment Oregon
Environment Texas
Environment Virginia
Environment Washington
Environmental Defense Fund
Environmental Justice Task Force -Tucson

Environmental Protection Network
Environmental Stewardship
Environmental Working Group
Fight for Zero
Food & Water Watch
For Love of Water (FLOW)
Freshwater Future
Friends of Casco Bay
Friends of the Rivers of Virginia (FORVA)
George Washington University
Georgia Conservation Voters
GO FISH Coalition
Grand Traverse Baykeeper
Greater Edwards Aquifer Alliance
Green Newton
Green Science Policy Institute
Greenfire Law, PC
GreenLatinos
Greenpeace USA
Harpeth Conservancy
Heal the Bay
Hispanic Access Foundation
Houston Wilderness
JF Environmental Trust Foundation
Kirby Consulting
Lake Coeur d'Alene Waterkeeper
Lake Erie Waterkeeper
League of Conservation Voters
Louisiana Bayoukeeper
Lowcountry Environmental Action
Lower Susquehanna Riverkeeper Association
Lynnhaven River NOW
Maine Conservation Voters
Maine Organic Farmers & Gardeners Assoc.
Maryland Children's Environmental Health Coalition [MD CEHC]
Maryland Conservation Council
Maryland Pesticide Education Network
Maryland PIRG
Maryland Votes for Animals
Massachusetts Breast Cancer Coalition
MASSPIRG
Matanzas Riverkeeper
McDaniel Honey Farm
Merrimack Citizens for Clean Water
Mi Familia Vota
Michigan League of Conservation Voters

Mill River Wetland Committee (Fairfield, CT)
Milwaukee Riverkeeper
Milwaukee Water Commons
Missouri Confluence Waterkeeper
Montgomery Countryside Alliance
MUSC Health
My Neighbor's Voice
NCPIRG
Natural Resources Defense Council
North Carolina Coastal Federation
North Carolina League of Conservation Voters
Norwalk River Watershed Association
Norwalk Zero Waste Coalition
Ohio Environmental Council
Ohio River Foundation
Orange County Coastkeeper
Park Watershed
Peconic Baykeeper
PennEnvironment
Perfect Earth Project
PfoaProject NY
Planet Citizen
Portland Protectors
Progressives for Democracy in America
Rachel Carson Council
Raritan Riverkeeper
River Network
Rivers Alliance of Connecticut
Russian Riverkeeper
Safer States
San Diego Coastkeeper
San Francisco Baykeeper
Save Our Water (SOH2O)
Save the Sound, Inc.
SC Idle No More, SC Indian Affairs Commission
SC Native Plant Society
Seneca Lake Guardian
ShoreRivers
Slingshot
Snake River Waterkeeper
Social Science Environmental Health Research Institute
South Carolina Indian Affairs Commission, SC Idle No More
Southern Environmental Law Center
Spring Creek Coalition
Suncoast Waterkeeper
Sustainable Fairfield Task Force

Testing for Pease
Texas Campaign for the Environment
The Growing Solutions Fund
The Water Collaborative of Greater New Orleans
Toxic Free NC
Toxic-Free Future
Tualatin Riverkeepers
Tuolumne River Trust
UNC
University of South Carolina
Upper Allegheny Waterkeeper
Vermont Conservation Voters
Vermont Natural Resources Council
Villanova University, College of Nursing
Virginia Conservation Network
Waterkeeper Alliance
Waterkeepers Chesapeake
We the People of Detroit
West Virginia Rivers Coalition
Wild Virginia
Windsor Climate Action
Wisconsin Environment
Wisconsin Environmental Health Network
Yellow Dog Watershed Preserve

cc: Assistant Administrator Radhika Fox