



June 3, 2020

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

SENT VIA ELECTRONIC MAIL

Subject: Regulation of PFOS, PFOA and other PFAS in drinking water

Dear Mr. Wheeler:

We appreciate the U.S. Environmental Protection Agency (EPA) acting on its Per- and Poly-fluoroalkyl Substance (PFAS) Action Plan and proposing positive regulatory determinations for perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA). We ask that EPA move expeditiously to prepare the requisite analyses critical to proposing sound drinking water standards. The implications of regulating these substances will be far-reaching. A well-timed decision, based on sound science and robust analyses, is necessary to ensure effective protection of human health.

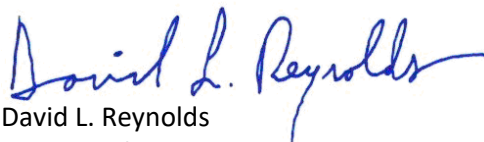
We recognize that the Environmental Protection Agency finds that there is sufficient information to meet the requirements of 42 U.S. Code § 300g-1(b)(1)(B) to make a positive regulatory determination for PFOA and PFOS. Based on our collective concern and interest in timely regulatory decisions regarding PFAS by EPA under the Safe Drinking Water Act (SDWA) and other statutes, we, the undersigned, urge the Agency to:

1. Provide the resources required to complete the technical and economic analyses necessary to support a proposed SDWA action for PFOA and PFOS.
2. Begin engagement with outside experts to develop and review a public health risk assessment for PFAS beyond PFOA and PFOS to guide determining which PFAS or groups of PFAS should be targeted for data collection and risk management measures.
3. Actively engage water systems, local government, state agencies, and other key stakeholders in the practical implementation of PFAS risk management including establishing the adequacy of analytical methods and capacity, effective risk communication, and sustainable treatment options, among other important factors.
4. Accelerate research on water treatment, occurrence, and health effects to support future decision making and contaminant prioritization.
5. Leverage available regulatory tools in other statutes to gather occurrence and health risk assessment data and organize them to support research and decision making, using regulatory tools that include the Toxics Release Inventory, Sections 4 and 8 of the Toxic Substances Control Act, and the Unregulated Contaminant Monitoring Rule.

America's water supply should not be the primary line of defense against pollutants that pose a serious public health risk. EPA should proactively utilize TSCA, the Resource Conservation and Recovery Act, and other existing authorities to protect drinking water supplies. EPA must use these authorities to ensure safe and controlled use of chemicals that pose a risk to human health and the environment. A holistic regulatory approach is needed not only to address public health concerns but also to ensure public confidence.

Thank you for your consideration. Please contact any of the undersigned organizations if we can be of assistance.

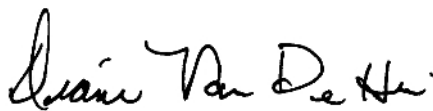
Sincerely,



David L. Reynolds
Director of Federal Relations
Association of California Water Agencies



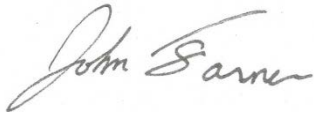
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Sam Wade
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Robert F. Powelson
President and Chief Executive Officer
National Association of Water Companies



Ian Lyle
Executive Vice President
National Water Resources Association



Terry S. Morse, CAE, CIC
Chief Executive Officer
National Ground Water Association

Signatories to this letter represent:

Association of California Water Agencies

ACWA is the largest statewide coalition of public water agencies in the country. Our more than 455 public agency members collectively are responsible for 90% of the water delivered to cities, farms and businesses in California. For more than a century, our mission has been clear: to help members promote the development, management and use of good quality water at the lowest practical cost and in an environmentally responsible manner.

Association of Metropolitan Water Agencies

The Association of Metropolitan Water Agencies is an organization of the largest publicly owned water utilities in the United States. AMWA's membership serves more than 156 million people – from Alaska to Puerto Rico – with safe drinking water. AMWA is the nation's only policy-making organization solely for metropolitan drinking water suppliers. The association was formed in 1981 by a group of general managers of metropolitan water systems who wanted to ensure that the issues of large publicly owned water suppliers would be represented in Washington, D.C. Member representatives to AMWA are the general managers and CEOs of these large water systems.

American Water Works Association

The American Water Works Association is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes over 3,900 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our nearly 50,000 total memberships represent the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.

The Ground Water Protection Council

The GWPC's membership consists of representatives of state water quality and underground injection control (UIC) regulatory agencies that mutually work toward the protection of groundwater nationwide. Our focus is specifically on protecting groundwater supplies, conserving groundwater resources for all beneficial uses, and recognizing groundwater as a critical component of the ecosystem. The GWPC is unique among state associations in that its members are the state officials who set and enforce regulations for groundwater protection and underground injection control.

Irrigation Association

With a mission "to promote efficient irrigation," the Irrigation Association is the leading membership organization for irrigation equipment and system manufacturers, dealers, distributors, designers, consultants, contractors and end users. The association serves its members and the irrigation industry by educating the public on sound practices and water management, serving as a centralized

clearinghouse for research and innovation, improving industry proficiency through continuing education, recognizing and promoting experience and excellence with professional certification, and lending expertise to water-use public policy at the local, state, regional and national levels.

National Association of Water Companies

Every day, private water service companies help provide essential water and wastewater services to nearly 73 million people in the United States. That's almost one quarter of our nation's population. The National Association of Water Companies is the voice of the private water industry—the organization exclusively representing this group of quality service providers, innovation drivers and responsible partners. We are an association defined by our members, and by working together we can leverage our strengths to more effectively address the opportunities and challenges facing our nation. We serve as a credible resource and qualified professional partner for anyone who cares about safe and high-quality water.

National Ground Water Association

The National Ground Water Association, the largest trade association and professional society of groundwater professionals in the world, represents groundwater professionals within the United States and internationally. NGWA represents four key sectors: scientists and engineers, employed by private industry, by the consulting community, by academic institutions, and by local, state, and federal governments, to assess groundwater quality, availability, and sustainability; water-well contractors responsible for developing and constructing water-well infrastructure for residential, commercial, and agricultural use; manufacturers responsible for manufacturing and providing the equipment needed to make groundwater development possible; and the suppliers responsible for supplying water handling equipment, rigs, and tools, or rendering specialized services to the groundwater industry. NGWA's mission is to advocate for and support the responsible development, management, and use of

National Rural Water Association

The National Rural Water Association is the country's largest public water utility organization with over 30,000 members. Safe drinking water and wastewater service are generally recognized as the most essential public health, public welfare, and civic necessities.

Headquartered in Duncan (Oklahoma), the National Rural Water Association (NRWA) is the non-profit association of the federated state rural water associations with a combined membership of over 30,000 small and rural communities. NRWA is the country's largest water utility association and the largest community-based environmental organization. State Rural Water Associations are non-profit associations governed by elected board members from the membership. Our member utilities have the very important public responsibility of complying with all applicable U.S. Environmental Protection Agency (EPA) regulations and for supplying the public with safe drinking water and sanitation every second of every day.