



WATERREUSE®

610 Madison Street, Suite 101, Box 621
Alexandria, VA 22314

President

Craig Lichty

Black & Veatch, CA

Vice President

Bart Weiss

Hillsborough County
Public Utilities, FL

Treasurer

Deven Upadhyay

Metropolitan Water
District of Southern
California, CA

Secretary

Pinar Balci

New York City
Department of
Environmental Protection,
NY

Past President

Gilbert Trejo

El Paso Water, TX

May 30, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Docket ID No. EPA-HQ-OW-2022-0114

Dear Administrator Regan:

On behalf of the WaterReuse Association (WaterReuse), I am pleased to submit our comments on EPA's preliminary regulatory determination and proposed rule to establish Maximum Contaminant Levels (MCLs) for certain per- and polyfluoroalkyl substances (PFAS).

The WaterReuse Association is a not-for-profit trade association for water utilities, businesses, non-profit organizations, and research entities that advocate for policies and programs to advance water recycling. WaterReuse and its state and regional sections represent nearly 250 water utilities serving over 60 million customers, and over 200 businesses and organizations across the country.

Water reuse, also known as water recycling, is the process of intentionally capturing wastewater, stormwater, saltwater or graywater and cleaning it as needed for a designated beneficial freshwater purpose, such as drinking, industrial processes, groundwater replenishment, and watershed restoration. The fundamental principle of water reuse is using the right water for the right purpose, everywhere and all the time. By advancing water reuse, we protect and enhance public health and the environment while helping communities build resilience to drought, flooding, and other impacts of climate change. Across the country, water, wastewater, and stormwater managers have shown that water recycling can be a central feature in innovative, integrated approaches to solving water management challenges.

One common application of water recycling is the production of drinking water, either through indirect potable reuse or through direct potable reuse. In both cases, advanced treatment is typically used to meet drinking water standards. Through the use of technologies such as reverse osmosis (RO) and granular activated carbon (GAC), advanced water recycling projects are helping to remove PFAS from drinking water.

While water recycling facilities are helping to address PFAS contamination through the use of advanced treatment such as RO and GAC, the ubiquitous nature of PFAS contamination necessitates a strong focus by EPA and other government agencies on source control. We recommend that EPA take more proactive measures to identify where PFAS are originating and to control their introduction into commerce, as prevention is more cost-effective than attempting to clean up pollution later. A source control approach also maintains the polluter pays principle.

Advancing regulatory actions that provide source water protection will reduce the number of systems with PFAS contamination above the proposed drinking water standards. We therefore urge EPA and other federal agencies to work toward limiting the production and introduction of PFAS into commerce.

Sincerely,



Patricia Sinicropi
Executive Director

