

July 20, 2018

Mr. Eric Burneson
Director, Standards and Risk Management
Office of Groundwater and Drinking Water
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-001

**Re: EPA's Request for Comment on Per- and Polyfluoroalkyl Substances (PFAS)
(Docket ID No. EPA-HQ-OW-2018-0270)**

Dear Mr. Burneson:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to provide written comments on the U.S. Environmental Protection Agency's (EPA) recent request for input on per- and polyfluoroalkyl substances (PFAS) (EPA-HQ-OW-2018-0270) published in the Federal Register on Monday, May 21, 2018.

NACWA represents the interests of over 300 municipal clean water utilities across the country that provide an essential public service managing billions of gallons of wastewater and stormwater every day to ensure the protection of human health and the environment. NACWA's members are also actively engaged in resource recovery, including the treatment and management of nutrient-rich biosolids for use on farmlands and other soil applications.

Recently, EPA hosted the *PFAS National Leadership Summit and Engagement* in Washington, DC and is exploring options to address potential PFAS impacts. NACWA and its members were grateful to participate in this important dialogue and will continue to engage with the Agency as it works to address the growing concerns regarding these chemical compounds. PFAS contamination has become a national issue because of its impacts on drinking water, but local, state and federal efforts to address the issue are already impacting the municipal clean water community under the Clean Water Act (CWA). These efforts could ultimately have major impacts on wastewater treatment operations and the way clean water utilities manage their biosolids for decades to come.

Addressing any adverse impacts on human health and the environment from PFAS and the family of over 3,000 similarly related chemical constituents is essential, and we strongly support federal leadership and guidance from the Agency in developing an appropriate response that reflects the risk posed by PFAS.

Per- and polyfluoroalkyl substances can be found ubiquitously in the environment and in our water resources. These substances are found over a range of concentrations and their persistence and chemical stability in the environment make them very difficult to address, even if their original source can be eliminated. As analytical techniques become more advanced and

can detect these compounds at exceedingly small levels, NACWA urges EPA and the states to carefully consider and balance how the mere presence of PFAS in the environment relates to actual risks.

The peer-reviewed scientific literature discussing PFAS occurrence, characteristics, and behavior is ample. However, there are also many pivotal questions remaining, the answers to which will be needed to inform EPA's Action Plan and any regulatory pathway moving forward. Generally, not only is more peer-reviewed research on PFAS necessary, but research that is specifically tailored to better understanding PFAS and the similarly related chemical constituents, including their fate, transport, and toxicity in the environment, the exposure routes of these chemicals and the risks associated, consistency in detecting these ultratrace levels, and bioaccumulation in the food web among others. This is where EPA should work to support and/or conduct research to develop the limited information we currently have as well as help to standardize the approaches used nationwide.

We must work to comprehensively assess the immediate public health and environmental concerns involving major PFAS contamination events and at sites where we know significant levels of contamination have occurred in the past. In doing so, it is imperative that any policy decisions specifically ensure those responsible for the contamination and endangerment of public health bear the burden of cleanup costs and other related expenses.

Once we understand these immediate concerns, the next logical step is to address the long-term response issues of how to deal with the presence of PFAS in the environment and how to remove and dispose of these chemical constituents in the best manner. This could be done through heightened source control efforts and certain, specifically tailored regulatory standards that are considered carefully and fully reflect the wide-range of potential impacts those decisions will have over the long-term.

As EPA works toward developing its Action Plan, it is essential that the Agency works closely with those who are responsible for managing our nation's drinking water systems to ensure they have the guidance they need, and that communication about the risks is not only coordinated but also earns the public's trust.

Municipal wastewater and biosolids are not 'sources' of PFAS but can act as the pathway through which the original sources of PFAS contaminate the environment. As with any of the long list of emerging contaminants, efforts to control levels in the environment must start at and focus on the original source of the chemical. Conventional wastewater treatment plants are not designed to remove these synthetic industrial chemicals, and communities could face considerable operational and technical challenges as well as substantial costs if required to treat for or otherwise address the presence of these substances in wastewater effluent and biosolids. Because PFAS are not a product of the wastewater treatment process and originate from outside POTWs, solutions for addressing PFAS contamination must focus on their original source.

Although PFOA and PFOS compounds have been largely phased out on a voluntarily basis in the United States, the extended family of PFAS constituents still manufactured and produced is concerning. As noted above, NACWA urges EPA to support efforts to increase scientific research that assesses the public health risks and environmental fate and transport of these chemical constituents.

NACWA believes that federal leadership on PFAS is necessary—most importantly to ensure that there is an open and consistent dialogue among all of the stakeholders to ensure informed decision making—and looks forward to engaging with the Agency on how to best manage these compounds when present in wastewater effluent and biosolids.

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Thank you for your consideration of these comments. Please contact me by phone at 202/533-1839 or by email at eremmel@nacwa.org with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Rimmel". The signature is fluid and cursive, with a large loop at the end.

Emily Rimmel
Director of Regulatory Affairs