



September 14, 2022

SUBMITTED VIA E-MAIL

Mr. Michael S. Regan, Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Proposed Rule - Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances (EPA-HQ-OLEM-2019-0341; FRL-7204-02-OLEM)

Dear Administrator Regan:

The undersigned organizations respectfully request that the comment period for the above referenced rulemaking be extended by 60 days.

EPA requests comment on a number of important issues relating to the proposed designations of PFOA and PFOS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Given the magnitude and complexity of the proposed rule and its potential impact on the water sector, we believe that a 120-day comment period is necessary to adequately respond to EPA's request for comment and provide a reasonable opportunity for public review.

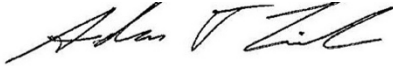
Furthermore, it is imperative that regulated entities – especially those in the water sector – have time for a thorough examination of the Economic Assessment of the Potential Costs and Other Impacts for the proposed rule. This document has not been previously seen by the public, and our organizations have serious concerns that the assessment significantly underestimates the potential economic costs on the water sector from the proposed rule. It is critical that the water sector have time to accurately determine the potential economic impacts of the proposal and provide that information to EPA so that the rulemaking record is as complete as possible.

We would appreciate a response to this request as soon as possible. Should you have questions or would like to discuss this matter, please contact Kristina Surfus at 202-833-4655 or ksurfus@nacwa.org.

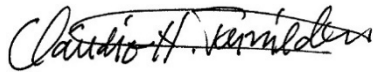
Sincerely,



Kristina Surfus
Managing Director, Government Affairs
National Association of Clean Water Agencies (NACWA)



Adam D. Link
Executive Director
California Association of Sanitation Agencies (CASA)



Claudio H. Ternieden
Chief Policy Officer
Water Environment Federation (WEF)



G. Tracy Mehan, III
Executive Director of Government Affairs
American Water Works Association (AWWA)



Tom Dobbins
CEO
Association of Metropolitan Water Agencies (AMWA)