



**American Water Works
Association**

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Government Affairs Office
1300 Eye Street NW
Suite 701W
Washington, DC 20005-3314
T 202.628.8303
F 202.628.2846

March 30, 2023

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Mail Code: 4607M
Washington, DC 20460

RE: Request for Extension for Comment Period on EPA's Proposed Per- and Polyfluoroalkyl Substances National Primary Drinking Water Regulation ([Docket ID: EPA-HQ-OW-2022-0114](#))

Administrator Regan,

The comment period for EPA's proposed per- and polyfluoroalkyl substances (PFAS) drinking water regulation is only 62 days long. As of the writing of this letter, the docket contains nearly 1,300 supporting documents (26 of which total 5,000 pages) from the agency. These materials must be reviewed and considered in order for stakeholders to provide constructive feedback. There are multiple, key aspects of the proposed rule that will require extensive review, including but not limited to:

- The regulatory determinations for four additional PFAS
- An occurrence analysis, which relies on both a complex statistical approach and a novel national occurrence database that combines older data collected under the Unregulated Contaminant Monitoring Rule with a collection of state monitoring datasets
- Four Work Breakdown Structure-Based Cost models for PFAS treatment technologies which are newly published
- Updated support documents for maximum contaminant level goals (MCLGs) for perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS)
- Analysis to support an MCLG for a hazard index reflecting a mixture of four PFAS
- An updated approach for evaluating health risk reduction associated with cardiovascular disease and decreased birth weight
- An approach for evaluating reduced disinfection byproduct formation and associated health risk reduction benefits of the proposed rulemaking
- A novel drinking water regulatory approach utilizing a general hazard index

The American Water Works Association (AWWA) requests that EPA provide an extension of the comment deadline by 59 days to July 28, 2023. This extension would provide a total of 121 days for public comment. AWWA is requesting this extension to ensure that the proposed rule and supporting documents can be reviewed fully and considered in providing feedback to the agency. Your response by April 14, 2023, is necessary for stakeholders to successfully balance available resources within the time the agency affords the public to draft comments.

AWWA appreciates your attention to this matter. If you have any questions we encourage you to reach out to either myself at TMehan@awwa.org or Chris Moody at cmoody@awwa.org or (202) 326-6127.

FOR THE AMERICAN WATER WORKS ASSOCIATION,



G. Tracy Mehan, III
Executive Director – Government Affairs

cc: Radhika Fox, EPA/OW
Jennifer McLain, EPA/OGWDW
Eric Burneson, EPA/OGWDW
Ryan Albert, EPA/OGWDW

Who is AWWA

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 more than 4,500 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our 50,000-plus total membership represents 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.