



**ASSOCIATION OF  
METROPOLITAN  
WATER AGENCIES**

**LEADERS IN WATER**

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July 1, 2022

Radhika Fox  
Assistant Administrator, Office of Water  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

**Re: Docket ID Numbers EPA-HQ-OW-2022-0365 and EPA-HQ-OW-2022-0366, Comments on recommended aquatic life ambient water quality criteria: PFOA and PFOS.**

Dear Assistant Administrator Fox,

The Association of Metropolitan Water Agencies (AMWA) is pleased to have the opportunity to provide comments on recommended aquatic life ambient water quality criteria for perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS). AMWA is an organization of the general managers and CEOs of large publicly owned drinking water utilities. Members serve communities of more than 100,000 people and work hard to provide safe, clean drinking water to the public. AMWA supports EPA's efforts to reduce PFAS in source waters but urges the agency to go further by using the full extent of its authorities to holistically address PFAS contamination and hold polluters accountable.

Under the Clean Water Act (CWA), states and Tribes can adopt water quality criteria to protect designated uses such as aquatic life, recreation, and human consumption. CWA recommended criteria provide guidance to these entities in adopting water quality standards that ultimately provide a basis for controlling discharges of pollutants. While the proposed ambient water quality standards for PFOA and PFOS may be protective of aquatic life, the proposed standards can have significant impacts on downstream water utilities. PFAS compounds, including PFOA and PFOS, remain persistent in surface waters and can travel hundreds of miles downstream, potentially impacting drinking water quality.

EPA's recommended criteria levels are several orders of magnitude higher than those needed to protect drinking water sources. EPA's recently announced interim health advisories (HAs) for PFOA (0.004 ppt) and PFOS (0.02 ppt) are well below current detection limits. In comparison, the recommended ambient water quality standards for chronic water column are 94,000 ppt for PFOA and 8,400 ppt for PFOS. These are approximately 23.5 million and 420,000 times more, respectively, than the HAs EPA recommends for protection of human health. Even further, values for the acute water column, 49 ppm (PFOA) and 3 ppm (PFOS), are 12.25 billion and 150 million times more than the HAs. EPA's recently released HAs make it nearly impossible to assure customers their drinking

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water is safe to drink. Given this stark disparity and the role that the proposed ambient water quality standards play in guiding regulation and discharge limits, the proposed standards are already sowing confusion among state and Tribal regulators and the communities they are charged with protecting. Similarly, downstream public water systems and their customers will be left to fund expensive treatment to reduce levels of PFOA and PFOS to meet expectations created by HAs, even though the levels are not regulatory standards.

The agency also plans to propose national primary drinking water regulation for PFAS, particularly PFOA and PFOS. It is crucial that EPA develop strong risk communication materials to reduce mounting public confusion arising from having different recommended “safe” levels of PFAS in our waters and interim HAs being released at levels below the detection limit of 4 ppt under UCMR 5.

AMWA strongly urges the agency to quickly move forward with other feasible actions under other authorities that are measurable, obtainable, and protective of human health. These include developing achievable human health criteria recommendations for source waters and revising the steam electric effluent limitation guidelines to ensure polluters are held responsible for discharge reductions and clean-up efforts. The association urges EPA to collaborate among line offices and other federal agencies to be united in addressing PFAS issues.

As EPA works to reduce PFAS in the environment, it is imperative that all costs and responsibilities are passed to polluters rather than at the expense of water utilities and, by extension, ratepayers. It is more effective to control point source pollutants at the discrete conveyance, where they are highly concentrated, than it is to remove them at the consumer’s expense after they have entered a water body or supply source.

EPA should ensure that actions are representative of the most up-to-date science and data. Research into the most effective means of controlling PFAS is needed to assure removal is accomplished as reliably, efficiently, and economically as possible. AMWA strongly supports the continued research on PFAS topics including human health risks, improved analytical techniques, removal technology, and sources of contamination.

AMWA appreciates the opportunity to provide comment on the recommended aquatic life ambient water quality criteria for PFOA and PFOS. The association continues to stress the importance of acting expeditiously to address PFAS contamination at the source. If you have any questions, please contact AMWA’s Manager of Regulatory and Scientific Affairs, Brian Redder ([Redder@amwa.net](mailto:Redder@amwa.net)).

Sincerely,



Thomas Dobbins  
Chief Executive Officer

cc: James Justice, OW