



July 11, 2022

V. Khanna Johnston, Deputy Director
EPA Science Advisory Board Staff Office
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Review of EPA's Analyses to Support EPA's National Primary Drinking Water Rulemaking for PFAS, and Review of the EPA's Draft Fifth Contaminant Candidate List (CCL 5).

Dear Deputy Director Johnston,

On behalf of the Water Quality Association (WQA), we would like to express our support and appreciation to the Environmental Protection Agency (EPA) Science Advisory Board (SAB) in their review of analyses to support EPA's National Primary Drinking Water Rulemaking for PFAS and the Fifth Contaminant Candidate List (CCL 5). We applaud the agency's actions to research and regulate drinking water health contaminants and welcome any opportunity to serve as a resource to the SAB and the agency.

WQA along with the broader scientific community and SAB have raised concerns over the long-term health and environmental impact PFAS has on drinking water and the public. Considering the June 15th updated Health Advisories, we would like to reiterate the role of Point-of-Use (POU) and Point-of-Entry (POE) water treatment systems in the reduction of PFAS from drinking water. These final barrier technologies are already being utilized by many individuals, households, and businesses to improve their drinking water quality. There is consensus based American National Standards (ANS) to which these technologies are tested and certified for PFAS reduction specifically, along with many other drinking water contaminants. It is vital for the agency to understand the practicality of these water treatment systems that are ready to be deployed immediately in response to this public health concern. The EPA should also encourage the use of certified products in order to help ensure these systems function as intended and are considered as part of the solution when developing EPA rulemakings for PFAS.

Regarding the review of EPA's Analyses to Support EPA's National Primary Drinking Water Rulemaking for PFAS, WQA has the following recommendations:

1. We encourage the EPA SAB to meet with stakeholders to understand the feasibility of currently available POU/POE technologies in remediating PFAS in drinking water.



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2. We urge the agency to deliberate amongst stakeholders in the water treatment industry and specifically work in conjunction with the NSF International Joint Committee on Drinking Water Treatment Units (DWTU) Task Group on PFAS.

In reference to the agency's actions on the Draft Fifth Contaminant Candidate List (CCL 5), WQA endorses the EPA in its efforts to build a comprehensive understanding of health contaminants and the relationship to drinking water. The association would like to echo our earlier comments on final barrier technologies. Many of the 66 chemicals referenced in the CCL 5 including Bisphenol A, Manganese, Methyl tert-butyl ether (MTBE), and PFAS can and are currently remediated by certified POU and POE water treatment systems.

As the EPA increases water testing and monitoring for these drinking water contaminants, the next step of remediation is more difficult since there is not a "one-size fits all" approach. By implementing final barrier technologies tailored to the specific needs of a community along with other proposed solutions, the EPA and water treatment industry in partnership, can help ensure the health and safety of all Americans.

Thank you for your consideration of these recommendations and we hope to be a valuable resource to the SAB and EPA in the future.

Sincerely,

Jeremy Pollack
Director of Government Affairs
Water Quality Association



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