



July 31, 2023

Ms. Carolyn Hoskinson
Office of Land and Emergency Management
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Via electronic submission

Re: Docket ID No. EPA–HQ–OLEM–2023–0228; Draft National Strategy to Prevent Plastic Pollution

Dear Ms. Hoskinson,

The Association of Metropolitan Water Agencies (AMWA) and Clean Water Action/Clean Water Fund appreciate the opportunity to comment on EPA’s draft National Strategy to Prevent Plastic Pollution. Our organizations have a particular interest in keeping the nation’s waterways clean and free of pollution. We particularly support Objective C, which focuses on utilizing existing programs and authorities to prevent micro/nanoplastic pollutants from entering waterways and on closing knowledge gaps about the sources, fate, and impact that plastic pollutants have on human health and the environment. We also appreciate the draft plan’s emphasis on reducing plastic pollution in communities already over-burdened by pollution from numerous sources.

Safeguarding our drinking water sources is of utmost importance because drinking water source contamination can lead to elevated public health risk and to increased treatment costs for water systems and their customers. EPA has long recognized that pollution should be handled at its source, rather than allowing the burden to be passed “downstream.” It is more efficient and cost effective to prevent pollution from entering the nation’s waterways than trying to remediate pollution downstream via water treatment plants.

AMWA and Clean Water Action/Clean Water Fund have consistently shown strong support for leveraging the full extent of EPA authorities to prevent water pollution. Specifically, we are pleased to see that objective C1.2 focuses on harnessing Clean Water Act programs to address the issue of micro/nanoplastic pollution. For this to be successful, the Office of Resource Conservation and Recovery will need to work closely with the Office of Water and actively engage stakeholders.

Section A2.4 is also relevant to protecting drinking water sources, particularly as it relates to Clean Water Act programs that can reduce drinking water source contamination by facilities in the plastic sector and facilities producing inputs used by the plastic sector. Analysis and evaluation should prioritize discharges impacting drinking water sources. This should include an

assessment of how to ensure that permits for discharges that include contaminants of concern in drinking water are up to date, and that pollution is restricted to the greatest extent possible. EPA seeks input regarding actions that can best protect public health, the environment, and address environmental justice concerns. We appreciate EPA's intention to incorporate consideration of communities that are disproportionately affected by pollution into a national plastic pollution strategy. Engagement by these communities will be essential to the strategy's success. And while plastic pollution is not solely a water issue, engaging the water sector community is essential. Progress toward a circular economy can have multiple benefits for our nation's drinking water and wastewater systems and for overall public health and water quality protection.

AMWA and Clean Water Action/Clean Water Fund strongly endorse objective C5, which focuses on enhancing and coordinating research efforts on micro/nanoplastics in waterways and oceans. Gaining a comprehensive understanding of the sources, transportation, fate, health implications, and remediation techniques regarding microplastic pollution is essential in determining the most effective actions to safeguard public health and the environment. EPA needs to act aggressively to assist communities and local governments with these issues and do everything in its power to avoid the potential problem being left for drinking water and wastewater systems to handle. In addition to promoting a robust research agenda, EPA will need to provide support for guidance around prevention, remediation, and other best practices.

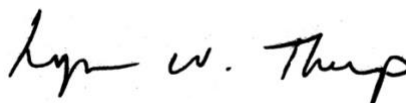
EPA asks if organizations are willing to participate in implementation of these actions outlined in the draft document. AMWA and Clean Water Action/Clean Water Fund are always willing to collaborate with EPA, other federal agencies, and stakeholder groups on actions to facilitate pollution prevention programs and educate the public around them. We urge EPA to prioritize drinking water source protection where appropriate in this strategy and to prevent additional burden on already over-burdened communities.

AMWA and Clean Water Action/Clean Water Fund appreciate the opportunity to comment on the draft National Strategy to Prevent Plastic Pollution. If you have any questions, please contact Lynn Thorp (lthorp@cleanwater.org) or Brian Redder (redder@amwa.net), AMWA's Manager of Regulatory Affairs.

Sincerely,



Tom Dobbins
CEO
Association of Metropolitan Water Agencies



Lynn Thorp
National Campaigns Director
Clean Water Action/Clean Water Fund