



March 30, 2023

Michael S. Regan
Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Via electronic submission

Re: Extension request of comment period for Docket ID #: EPA-HQ-OW-2022-0114; PFAS National Primary Drinking Water Regulation Rulemaking

Dear Administrator Regan,

The Association of Metropolitan Water Agencies (AMWA), an organization representing the largest publicly owned drinking water utilities in the United States, welcomes the opportunity to provide comments on the proposed National Primary Drinking Water Regulation of PFOA, PFOS, PFBS, GenX, PFNA, and PFHxS. AMWA was supportive of the determination to regulate certain PFAS and has repeatedly called for a regulation based on sound science and the most up-to-date data available. Due to the vast complexity of the rule and the effect it will have on AMWA members, the association respectfully requests at least a 30-day extension to the comment period to ensure useful and meaningful feedback.

A crucial step of the regulatory process is the public comment period. Feedback and recommendations from impacted stakeholders and the regulated community provide a unique perspective that often strengthens and improves a proposed rule. AMWA believes it is in the interest of EPA to provide an adequate comment period for such an important and consequential rule. AMWA will be able to provide much more insightful and helpful comments if given the time to review the many pages of documents and supporting materials provided by EPA.

At the time of the creation of this letter, there are 1,241 supporting or related material provided in the rulemaking docket to review. It is also unreasonable to expect a meaningful comment letter in 60 days when the Office of Management and Budget needed five months to conclude its own review. AMWA understands the agency cannot allow the same period for public comment but believes more time is a fair ask, given the rule's complexity.

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While AMWA and its members will be diligently working to provide thoughtful comments on this proposed rule, it is important to remind EPA that this is not the only rulemaking being proposed with an open public comment period that will impact drinking water utilities. Contaminant Candidate List 6, Consumer Confidence Reports, ANPRM for additional PFAS CERCLA designations, and Steam Power ELGs are all in the process, or will be shortly, of soliciting public comments simultaneously with this proposed rule. A condensed period for public comment on this rule only diverts resources from providing robust comments to other notices currently open in the Federal Register.

While AMWA understands the importance of finalizing this rule in a timely manner, the association believes thoughtful public comments will only strengthen the final rule and ultimately provide more protections for public health. Therefore, AMWA respectfully requests EPA extend the comment period by at least 30 days. AMWA also asks EPA to respond to this request in a timely manner so comments can be developed with an accurate due date in mind.

AMWA appreciates EPA giving this request consideration. If you have any further questions, please contact Brian Redder (Redder@amwa.net), AMWA's Manager of Regulatory and Scientific Affairs.

Sincerely,



Tom Dobbins
Chief Executive Officer

cc: Radhika Fox, OW
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