



**ASSOCIATION OF  
METROPOLITAN  
WATER AGENCIES**

**LEADERS IN WATER**

1250 I Street, NW, Suite 350  
Washington, DC 20005

P 202.505.1565  
amwa.net

July 20, 2026

The Honorable Lee Zeldin  
Administrator  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

*Submitted electronically.*

**Re: EPA-HQ-OW-2025-1742 Extending the Compliance Deadline for the PFOA and PFOS  
Maximum Contaminant Levels**

Dear Administrator Zeldin:

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to provide comments on EPA's proposed "national exemption framework" to allow for an extension of the compliance deadline for the perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) maximum contaminant levels (MCLs) under the per- and polyfluoroalkyl (PFAS) National Primary Drinking Water Regulation (NPDWR). AMWA is an organization representing the largest publicly owned drinking water systems in the United States. Our member utilities collectively provide clean drinking water to over 160 million people from coast to coast. Many of our member utilities are already in compliance with state regulations limiting PFAS in drinking water, and others are developing plans, piloting treatment, and working to comply with this NPDWR.

AMWA strongly supports regulations that follow the letter and spirit of the Safe Drinking Water Act (SDWA) and protect public health. The Association believes that the national exemption framework more adequately reflects the time that many water systems will need to fully meet the standard and provides flexibility that is necessary for major treatment or infrastructure investments. AMWA supports EPA's proposed two-year extension of the compliance deadline and recommends the Agency work to develop clear assurances that primacy agencies will consistently implement the extension, giving eligible water systems the regulatory certainty needed to plan, finance, and complete compliance with the rule.

**BOARD OF DIRECTORS**

**PRESIDENT**

Jeffrey Szabo  
Suffolk County Water  
Authority

Julie Anderson  
Denver Water

Shane Chapman  
Metropolitan Water District  
of Southern California

Rachel Murphy  
Contra Costa Water District

Kenneth Waldrup  
Cape Fear Public Utility  
Authority

**VICE PRESIDENT**

Calvin Farr  
Prince William Water

Verna Arnette  
Beaufort-Jasper Water &  
Sewer Authority

Alex Chen  
Seattle Public

Craig Palmer  
Erie Water Works

**TREASURER**

Lindsey Rehtin  
Northern Kentucky Water  
District

Cathy Bailey  
Greater Cincinnati Water Works

Randy E. Hayman  
Sewerage and Water Board of  
New Orleans

Will Pickering  
Pittsburgh Water

**SECRETARY**

Chris Browning  
Oklahoma City Water Utilities  
Trust

Tad Bohannon  
Central Arkansas Water

Matthew Jalbert  
Trinity River Authority of  
Texas

Shaun Pietig  
WaterOne

**EMERITUS**

John P. Sullivan, Jr.  
Boston Water and Sewer  
Commission

Jeff Brown  
Onondaga County Water  
Authority

Yann Le Gouvellec  
Newport News Waterworks

Todd Swingle  
Toho Water

**INTERIM CHIEF EXECUTIVE  
OFFICER**

Dan Hartnett

Spencer Bruce  
Louisville Water Company

Angela Licata  
New York City Department of  
Environmental Protection

Jeffrey Thompson  
Central Alabama Water

**I. The two-year compliance deadline extension provides water systems with the necessary flexibility for major infrastructure development needed to meet the standard.**

AMWA supports EPA's proposal to extend the compliance deadline for the PFOA and PFOS MCLs for eligible water systems by two years through the national exemption framework. The proposed extension appropriately recognizes that, even for water systems that have acted proactively to assess PFAS occurrence, evaluate treatment alternatives, and begin designing compliance strategies, additional time may be necessary to complete the complex planning, permitting, financing, procurement, and construction activities required to achieve compliance. While many utilities have made significant progress, the development of new treatment facilities and associated infrastructure is subject to numerous factors outside a water system's direct control. These steps include but are not limited to gaining approvals from governing boards, meeting procurement requirements, securing financing and navigating rate-setting processes, obtaining permitting, siting, and zoning approvals, overcoming supply chain constraints, and confirming contractor availability.

Compliance with the PFAS NPDWR represents one of the most significant drinking water infrastructure investments many water systems have undertaken in recent years, requiring substantial commitments of time, technical expertise, and financial resources from both water systems and the communities they serve. EPA's recognition of these implementation realities is an important step toward ensuring that utilities can achieve compliance in a manner that protects public health while supporting the realities of infrastructure development.

**a. Development of PFAS treatment options and infrastructure require extended timelines with many steps being beyond the control of the water system.**

The proposed two-year compliance extension reflects the significant planning and implementation efforts required for water systems to develop, construct, and commission PFAS treatment infrastructure while continuing to provide reliable drinking water service. Developing and implementing PFAS treatment infrastructure is a complex, multi-year undertaking that extends well beyond the installation of treatment equipment. From evaluating treatment alternatives and conducting pilot studies to securing regulatory approvals, completing engineering design, navigating procurement requirements, and constructing new facilities, each phase requires careful coordination among technical experts, regulators, governing bodies, and utility staff.

Water systems have begun assessing their anticipated compliance with the MCL, identifying sources of PFAS, and considering non-treatment alternatives, such as blending or abandoning contaminated sources. If installation of treatment is necessary, water systems are working closely with engineering consultants and technical experts to identify the most effective and feasible treatment technologies. Common options include granular activated carbon (GAC), ion exchange resins, and membrane filtration, all of which are costly in installation, training, and maintenance. Many water systems, including AMWA's members, are currently undergoing pilot testing to verify the appropriateness of different treatment technologies performance under site-specific and different seasonal conditions. At the same time, internal coordination is essential to assess staff capacity and training needs for operating new infrastructure.

Regulatory approvals, including state plan reviews and construction permits, also contribute to extended project timelines. Many water systems are required to navigate local land use or zoning approvals prior to constructing new facilities. This zoning process typically lasts between six and eighteen months and is often preceded by a minimum of six months dedicated to preliminary engineering and the preparation of application materials, including an alternatives analysis. The zoning approval is distinct from and must be secured before advancing to site plan approvals and building permits, which themselves can take an additional six to twelve months. Between the zoning and site permitting stages, detailed engineering design and the development of bidding documents take place, a phase that may extend twelve to eighteen months depending on the complexity of the chosen treatment technology.

When new treatment facility construction is necessary, water systems must carefully balance different considerations that take time. Foremost, phasing construction at a time that maintains plant operations and ensures an adequate supply of drinking water to the public is critical. It is necessary for water systems to integrate the newly constructed treatment into existing treatment infrastructure, and this process must occur during low-demand periods, like wintertime or other low-use times based on location, to ensure sufficient water production capacity is available to meet community needs. These construction staging intricacies further lengthen the time to construct PFAS treatment improvements. Construction and commissioning timeframes are project and site-specific, but in some cases could take three years.

Additionally, public water systems are required to comply with established public procurement regulations, which add considerable time to the overall design and construction timeline. The preparation of a request for proposals (RFP) for project design services, followed by the receipt and evaluation of proposals, consultant selection, negotiation, and finally contract award typically requires six months or longer. Subsequently, the process of soliciting bids for construction and awarding construction contracts generally takes an additional three to six months. While certain public water systems may have the option to utilize alternative procurement methods, such alternatives are not universally available and, even when employed, tend to reduce the duration of the design and construction phases only modestly.

Finally, planning for capital investment is a critical component of the process, and a longer timeline will allow water systems the time that is necessary to evaluate funding mechanisms, distribute those costs, and thoughtfully communicate any changes to customers. Utilities may explore funding options such as federal assistance programs, including the Drinking Water State Revolving Fund (DWSRF) and the Water Infrastructure Finance and Innovation Act (WIFIA) loans, grants, municipal bonds, or rate increases to cover the significant costs associated with PFAS treatment. Developing a long-term financial strategy may require approval from governing bodies, community engagement, and financial modeling to ensure the solution is both affordable and sustainable. Because each step involves coordination among stakeholders, technical professionals, and sometimes regulatory agencies, it is common for these projects to take several years to reach full implementation.

Establishing a realistic and achievable compliance timeline is essential to the successful implementation of this rulemaking. Adhering to the current deadlines, when it may result in widespread noncompliance because of practical limitations, would place undue strain on state

primacy agencies and EPA, while eroding public confidence in the safety of drinking water. It is not practical to enforce an unworkable compliance deadline that will leave communities with violations, lead customers to question the quality of their drinking water, and deliver no meaningful health improvements to the public in communities that cannot meet the compliance deadline due to practical delays outside of the water system's control. Instead, it is in the public's best interest to have assurance that compliance with new standards is attainable, rather than being repeatedly told that their water system fails to meet regulatory requirements. Persistent notifications of noncompliance are likely to increase reliance on bottled water, which is not subject to the same PFAS monitoring and treatment standards as public water systems.

**b. The proposed compliance extension supports water systems that are already taking action to achieve compliance.**

The experiences of proactive water systems that face significant challenges in meeting the April 2029 compliance deadline demonstrate the need for EPA's proposed two-year compliance extension. Many water systems have already invested substantial resources to characterize their systems' PFAS occurrence, evaluate treatment alternatives, secure funding for treatment or infrastructure projects, and advance engineering and construction activities as quickly as practicable. Despite these early efforts, several high-performing water systems have indicated that they intend to seek a compliance extension because factors such as permitting timelines, procurement requirements, infrastructure complexity, financing approvals, and construction schedules may prevent full compliance by the 2029 deadline. These instances underscore that water systems' need for additional time does not reflect a lack of diligence or commitment to public health but instead reflect the practical realities of implementing large-scale drinking water infrastructure projects while maintaining continuous, reliable service to the communities they serve.

AMWA supports EPA's proposed national exemption framework because it recognizes that many water systems are making persistent, good-faith efforts to achieve compliance with the PFAS NPDWR but may nonetheless require additional time to complete the necessary infrastructure improvements. By providing a targeted two-year extension for eligible systems, EPA acknowledges the practical realities of implementing complex treatment projects while maintaining reliable drinking water service. This approach supports timely compliance with the rule without compromising the careful planning, engineering, and construction processes necessary to deliver long-term public health protection.

**II. AMWA Feedback on National Exemption Framework and Implementation**

AMWA supports EPA's proposed national exemption framework under §1416 of SDWA as it provides a practical and efficient mechanism for implementing the two-year compliance extension. The proposed approach appropriately streamlines the application process while maintaining sufficient oversight to ensure that eligible water systems continue making progress toward compliance. AMWA does not believe the proposed eligibility criteria, including compelling factors, and application processes are unnecessarily burdensome, and appreciates EPA's efforts to establish a clear and administratively workable framework for water systems.

**a. Exemption Requirements, Process, and Timing**

AMWA supports EPA's proposed eligibility criteria and exemption requirements as reasonable, appropriate, and consistent with the intent of §1416 of SDWA. The proposed framework appropriately requires water systems seeking an exemption to certify that they cannot achieve compliance by the April 26, 2029, compliance deadline due to economic or other compelling factors, that alternative compliance pathways are not reasonably available, and that they are taking all practicable steps to meet the PFOA and PFOS maximum contaminant levels. These requirements provide an appropriate balance between ensuring accountability and recognizing the practical challenges associated with implementing complex drinking water infrastructure projects.

In particular, AMWA appreciates that EPA's proposed streamlined approach focuses on the information necessary to evaluate whether a water system qualifies for an exemption while avoiding unnecessary administrative burdens for systems and primacy agencies. The requested information, including system identification details, compliance monitoring results, justification for the exemption request, documentation of ongoing compliance efforts, and implementation of interim control measures where necessary, provides a reasonable basis for demonstrating that an eligible system is actively pursuing compliance. The proposed framework therefore provides the regulatory certainty necessary for water systems to complete the significant capital investments required to achieve long-term compliance while maintaining protections for public health during the exemption period.

AMWA appreciates EPA's comprehensive evaluation of the compelling factors that may prevent some water systems from achieving compliance with the PFOA and PFOS maximum contaminant levels by the April 26, 2029, compliance deadline. EPA appropriately recognizes that, while treatment technologies necessary to address PFOA and PFOS are available, implementing these technologies at the scale necessary to achieve national compliance requires substantial capital improvements, operational planning, and long-term resource commitments. The Agency appropriately identified several factors in the preamble to the proposed rule that may affect a water system's ability to complete these efforts within the current timeframe, including the complexity of approving, designing, and constructing treatment infrastructure, increasing construction and equipment costs, supply chain constraints, workforce limitations, and the significant financial impacts associated with funding major capital investments while maintaining affordability for ratepayers.

These factors represent legitimate and compelling circumstances under the SDWA §1416 framework because they affect water systems that are taking all practicable steps to achieve compliance. AMWA agrees that EPA's evaluation appropriately accounts for the cumulative nature of these challenges and recognizes that additional time may be necessary to ensure that PFAS treatment projects are successfully designed, constructed, staffed, and operated over the long term. Providing eligible systems with the proposed two-year extension will allow utilities to complete these critical implementation steps in a manner that supports reliable drinking water service, protects public health, and results in sustainable compliance with the PFOA and PFOS maximum contaminant levels.

AMWA recommends that, if EPA intends to develop a draft application template, electronic submission portal, or other standardized materials to support implementation of the national exemption framework, the Agency make these materials available for stakeholder review and

comment prior to finalizing the rule, to the extent practicable. Providing early visibility into these implementation tools would allow water systems and other stakeholders to identify potential administrative challenges and ensure that the exemption process is clear, efficient, and workable when finalized. Given that the proposed exemption process must be initiated within 180 days following promulgation of the final rule, timely development and availability of these materials will be critical to ensuring that eligible water systems can submit complete exemption requests within the required timeframe. Additionally, AMWA recommends that EPA develop corresponding templates or model implementation materials that states can use to adopt and administer the extension framework once they receive primacy for the PFOA and PFOS MCLs. Consistent and coordinated implementation across primacy agencies will be essential to ensuring that eligible water systems receive the regulatory certainty intended by EPA's proposed national exemption approach.

#### **b. Control measures**

AMWA recognizes that the interim control measures required under the proposed exemption framework are intended to provide continued public health protection during the exemption period and supports their inclusion as part of a balanced approach to granting additional compliance time. AMWA anticipates that relatively few large public water systems will need to rely on these provisions, as many larger systems have not identified PFOA and PFOS concentrations above 12 ppt, or have otherwise begun to plan for treatment and advance compliance strategies. Accordingly, AMWA believes the proposed control measures are reasonable and appropriate for systems that require additional time to achieve compliance. However, AMWA encourages EPA to carefully consider the challenges that smaller systems, particularly those facing financial constraints or limited technical capacity, may encounter in implementing these measures. For some systems, the proposed control measures for systems with samples exceeding 12 ppt PFOA and/or PFOS may create additional financial and administrative burdens. Furthermore, the Agency must address stakeholder concerns that NSF and ANSI certified PFAS-removing filters are only certified to remove PFOA and PFOS concentrations to 20 ppt at the time of the proposed rulemaking. EPA should therefore ensure that implementation of these requirements is consistent with current treatment science and remains achievable for all eligible systems. The Agency should also consider providing additional technical assistance or implementation guidance to support systems with limited resources.

AMWA recommends that EPA clarify the applicability and duration of interim control measures for systems that experience changes in PFOA and PFOS concentrations during the exemption period. Specifically, EPA should clarify whether a system that implements treatment or other interim control measures during the extension period may discontinue those measures if subsequent monitoring demonstrates that PFOA and PFOS concentrations have fallen below 12 ppt. As currently written, the proposed rule could require systems granted an exemption to continue implementing the prescribed control measures throughout the entire exemption period, even if subsequent monitoring results demonstrate reduced concentrations below the specified 12 ppt PFOA and/or PFOS threshold. EPA should clarify in the final rule that systems may submit updated monitoring data demonstrating concentrations below 12 ppt and, where appropriate, discontinue interim control measures after treatment or other actions have successfully reduced PFOA and PFOS levels. Providing this clarification would ensure that the exemption framework appropriately reflects changing water

quality conditions and avoids imposing unnecessary operational or financial burdens on systems that have achieved lower contaminant levels during the extension period.

**c. Public notification requirements**

AMWA supports EPA's proposed designation of systems operating under an exemption from the PFOA and PFOS maximum contaminant levels as Tier 3 public notification violations. AMWA believes this designation appropriately reflects the unique circumstances associated with the exemption framework and distinguishes these systems from those that are not taking action to address a regulatory exceedance. A Tier 3 designation appropriately recognizes that eligible systems have demonstrated compelling circumstances preventing compliance by the established deadline, have submitted the required information to obtain an exemption, and are taking all practicable steps to achieve compliance while implementing any required interim control measures.

AMWA agrees that a Tier 2 designation would not appropriately characterize the circumstances of systems operating under a valid exemption. Tier 2 public notification requirements are generally intended to address situations where consumers may need more immediate awareness of a violation that presents a potential health concern and requires corrective action within a defined timeframe. In contrast, systems granted an exemption under SDWA §1416 would be operating pursuant to an EPA-approved regulatory mechanism that provides additional time to complete necessary compliance activities while maintaining appropriate safeguards. A Tier 3 designation appropriately communicates that additional time has been granted through an established regulatory process and avoids creating unnecessary confusion among customers regarding a system's compliance status. This approach also supports the intent of the exemption framework by recognizing the distinction between a system making diligent progress toward compliance and one that has failed to take required actions to address an MCL exceedance.

**III. For this rulemaking to be effective, water systems need regulatory certainty that the proposed compliance deadline extension will be recognized and implemented consistently by primacy agencies.**

**a. Practical needs for assurance that the proposed compliance extension will be recognized and implemented consistently by primacy agencies**

As states pursue primacy on this rule, it is essential that public water systems can, with confidence, rely on the preservation of any extended compliance deadline granted by EPA. Over the past two years, systems have moved at an unprecedented pace to prepare for PFAS regulation, including conducting initial monitoring, integrating large-scale treatment technologies, and evaluating disposal methods. Although extending the compliance deadline provides more flexibility in terms of implementation, the current iteration of the proposed extension holds potential for primacy agencies to set aside EPA-granted compliance extensions and reimpose the 2029 deadline.

Public water systems plan years in advance to effectively balance emerging regulations, infrastructure investment, and day to day operations. As systems develop plans for the coming decade, it is essential they are given a clear, unchanging date by which they are required to be compliant. When systems are

unsure of whether they will be eligible for extension under their primacy agency, they are then unable to benefit from any potential flexibility and must default to the pre-existing timeline despite their capability level. If primacy agencies hold water systems to a stricter date or do not offer the deadline extension in any form, the required pace of investment in PFAS control efforts could lead to deprioritizing other essential projects.

Under EPA's proposal, a water system could be granted a compliance extension by EPA, thereby allowing it to move forward with a plan to comply with the PFAS NPDWR by April 29, 2031. However, should that water system's state achieve primacy over the rule after EPA grants the extension, the state would have full discretion to decide whether to honor the extension. This puts a water system at risk of suddenly going into non-compliance due to administrative changes – a scenario that would be detrimental for systems and could substantially erode the trust between a water system and their customers. Public water systems are not privy to primacy negotiations and are therefore unable to prepare themselves or their customer base for potential changes in compliance requirements. As EPA continues to work with states to grant primacy on this rule, it is essential that the Agency address these concerns and that any compliance extensions granted by EPA are honored and respected by states that are subsequently granted primacy over the rule.

**b. Recommendations for strengthening primacy agency implementation of the compliance extension**

AMWA appreciates EPA's recognition of the need for a streamlined national exemption framework; however, the Association is concerned that the preamble appears to acknowledge that primacy agencies may choose not to recognize the two-year compliance extension. Allowing inconsistent implementation across primacy agencies could create significant and unnecessary uncertainty for water systems that have relied on the federal extension framework and undertaken substantial planning, financial commitments, and infrastructure investments in pursuit of compliance. A water system that has acted diligently and in accordance with the exemption process should not be placed in a position of noncompliance solely because the extension is not implemented consistently at the state level.

To ensure that the proposed extension achieves its intended purpose, AMWA believes EPA should consider all available mechanisms to ensure primacy agencies honor exemptions granted under the national framework. Providing clear implementation direction, standardized materials, and additional guidance to states will be critical to ensuring that eligible water systems can reliably utilize the additional time provided by the exemption. AMWA offers the following recommendations for EPA's consideration to promote consistent implementation and provide the regulatory certainty necessary for water systems to successfully complete PFAS compliance activities.

First, AMWA recommends that EPA clearly communicate to states the importance of recognizing and honoring compliance extensions granted by EPA under the national exemption framework. EPA should provide states with clear direction regarding the intended scope and effect of the extension, including standardized templates or model language that states may use to incorporate and adopt the extensions into their primacy programs. Providing these resources would promote consistent implementation across jurisdictions, reduce administrative burdens for primacy agencies, and provide

water systems with greater certainty that an approved extension will be recognized and honored. Given the importance of a predictable compliance framework for planning and executing large-scale PFAS infrastructure projects, EPA's active support in facilitating consistent state implementation will be essential to achieving the goals of the proposed exemption approach.

Second, AMWA recommends that EPA incorporate greater transparency regarding state implementation of the exemption framework into the process for approving state primacy packages for the PFAS NPDWR. Under SDWA §1413, states seeking and maintaining primary enforcement responsibility must demonstrate that their regulatory programs are at least as stringent as the federal requirements, have adequate enforcement authority, and possess the necessary legal and technical capabilities to implement the federal drinking water program. As part of the primacy revision process for the PFAS NPDWR, EPA should require states to clearly identify whether and how they intend to recognize and implement the federal exemption framework established under SDWA §1416. While EPA's proposal appropriately encourages states to notify water systems of their intentions, AMWA believes additional transparency is necessary to ensure that water systems have certainty regarding whether an approved federal exemption will continue to apply after a state assumes primacy or to have knowledge about any new compliance deadline extension requirements. EPA should consider using the primacy revision process to obtain this information and ensure that states' implementation approaches are clearly documented before approving revisions to their programs. Such an approach would promote consistent implementation, avoid unnecessary compliance uncertainty, and ensure that water systems can reasonably rely on the compliance extension framework established by EPA.

Furthermore, AMWA believes EPA is justified in considering requiring states to affirmatively address their implementation of the federal exemption framework as part of their SDWA §1413 primacy revision submissions. Because the ability to rely on the extension is central to water systems' compliance planning and infrastructure investment decisions, a state's intent to recognize or decline recognition of the exemption should be transparent and evaluated as part of EPA's review of whether the state program is adequate to implement the PFAS NPDWR.

Third, AMWA recommends that EPA consider whether conditions associated with primacy approval could provide an appropriate mechanism to ensure continuity of the federal exemption framework during the transition of implementation authority to states. Under §1413 of the Safe Drinking Water Act, EPA is responsible for ensuring that states seeking primary enforcement responsibility possess the legal authority and program capability necessary to adequately administer and enforce the NPDWRs. As part of that responsibility, EPA may attach conditions to primacy approvals that are reasonably related to the statutory criteria for an adequate state program. AMWA believes EPA should evaluate whether ensuring continuity of federally granted exemptions during the transition from federal to state implementation is an appropriate exercise of that authority. Requiring states to recognize existing federal exemptions for their approved duration would promote consistent program administration, provide regulatory certainty to public water systems, and protect the substantial planning, financing, and infrastructure investments made in reliance on EPA's nationally established exemption framework.

Accordingly, AMWA encourages EPA to evaluate whether primacy approvals for implementation of the PFAS NPDWR should include a transition condition requiring states to recognize federally

granted exemptions through the duration of the approved extension period, unless and until a state determines that renewal or continuation of the exemption is appropriate under its own authorities. Such a condition would not establish a new regulatory obligation unrelated to the requirements for primacy; instead, it would support the orderly transition of implementation authority and help ensure adequate and consistent administration of the drinking water program. This approach would also be consistent with the overall structure of SDWA, as §1415 and §1416 authorize both EPA and states with primary enforcement responsibility to administer variances and exemptions using the same statutory criteria established by Congress. The use of the same criteria reflects that Congress intended for implementation authorities to continue seamlessly as primacy responsibility transitions from EPA to a primacy agency. Conditioning primacy approval on recognition of federally granted exemptions for their approved duration would therefore promote continuity in the administration of SDWA, rather than creating differing compliance obligations based solely on the timing of a state's assumption of primacy.

Ultimately, while AMWA supports and appreciates EPA's efforts to establish a national exemption framework, any water system granted a compliance extension must have complete confidence and certainty that it will not be later rescinded by their state. AMWA encourages EPA to use all appropriate mechanisms available under SDWA to promote consistent state implementation of the exemption framework. These mechanisms may include providing clear guidance and implementation materials to primacy agencies, incorporating transparency regarding state recognition of exemptions into the primacy revision process, and considering appropriate conditions or transition requirements to ensure continuity between federal and state implementation of the PFAS NPDWR. Taking these steps will help ensure that the proposed exemption framework functions as intended and provides water systems with the certainty necessary to complete complex, multi-year compliance efforts while continuing to protect public health.

#### **IV. Advancing Holistic Approaches to Managing PFAS Sources**

AMWA appreciates EPA's continued efforts to address PFAS contamination through a comprehensive, science-based approach that considers the full lifecycle of these chemicals, including efforts to reduce PFAS releases from industrial sources, destroy or dispose of PFAS-containing materials, and provide guidance to communities and regulated entities on biosolids. In particular, AMWA recognizes the importance of EPA's ongoing work to address PFAS through initiatives related to biosolids management, effluent limitations guidelines (ELGs) for industrial dischargers, and other actions identified in the Agency's regulatory agenda. These efforts are critical components of a broader strategy to reduce PFAS exposure and prevent continued introduction of these persistent chemicals into the environment.

AMWA encourages the Agency to maintain a comprehensive approach that addresses PFAS sources upstream while supporting effective treatment and management solutions for public water systems. The responsibility for addressing PFAS contamination should be shared across the full lifecycle of PFAS production, use, release, and management, rather than relying solely on public water systems and their ratepayers to remediate contamination they did not create. Continued coordination among EPA, industry, states, and water systems will be essential to achieving meaningful and lasting reductions in PFAS exposure. Advancing regulatory actions that provide source water protection will

also reduce the number of systems with PFAS contamination above the proposed drinking water standards. EPA should also work to collaborate with other agencies to address other pathways of public exposure to PFAS, such as food and household products.

## **V. Conclusion**

AMWA supports EPA's proposed two-year compliance deadline extension for the PFOA and PFOS MCL, through a national exemption framework within the authority of SDWA §1416. This proposal recognizes the robust measures water systems must take to pilot, select, and install adequate treatment technologies or other measures, while providing a streamlined method for facilitating the compliance extension requests. Consistency and certainty in compliance expectations are necessary for water systems to fully and effectively fulfill the NPDWR, so AMWA urges the Agency to further consider methods to encourage primacy agencies to honor EPA's compliance deadline extensions once states receive primacy status for the PFAS NPDWR. This will ensure that water systems working in earnest to achieve compliance with the NPDWR are not unnecessarily burdened or penalized in the future.

AMWA welcomes the opportunity to engage in continued dialogue regarding the effective implementation of this proposed rulemaking. If you have any questions, please contact Jessica Evans, AMWA's Director of Regulatory Affairs, at [evans@amwa.net](mailto:evans@amwa.net).

Sincerely,



Dan Hartnett  
Interim Chief Executive Officer

cc:        Jess Kramer, Assistant Administrator, OW  
             Peggy Brown, OW  
             Jennifer McLain, OGWDW  
             Eric Burneson, OGWDW  
             Ryan Albert, OGWDW