



STATE OF WASHINGTON
WASHINGTON STATE BOARD OF HEALTH

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May 30, 2023

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
EPA Docket Center
Office of Ground Water and Drinking Water Docket
Mail Code 2822IT
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Public Comment on PFAS National Primary Drinking Water Regulation,
Docket ID No. EPA-HQ-OW-2022-0114

Dear Mr. Regan,

Thank you for the opportunity to comment on the proposed National Primary Drinking Water Regulation for per- and polyfluoroalkyl substances (PFAS). The Washington State Board of Health (Board) is submitting the following comments in strong support of this proposed action.

In Washington State, the Board serves as the rulemaking authority and the Washington Department of Health serves as the regulatory agency administering the rules for Group A public drinking water systems under chapter 246-290 WAC, Group A Public Water Supplies.

In the absence of national primary drinking water standards for PFAS, the Board adopted State Action Levels (SALs) for five PFAS analytes that took effect January 1, 2022. Implementation of the rule's monitoring requirements coupled with past voluntary monitoring for PFAS is providing valuable insights and detections of PFAS drinking water contamination in many water supplies across the state.

National maximum contaminant levels (MCLs) are essential for protecting public health and creating greater regulatory certainty for drinking water systems, local communities, and other parties. Adoption of national primary drinking water standards for PFAS will help set a level playing field for this national drinking water problem that involves significant financial, emotional, and public health effects on communities served by public water systems. Sadly, these same

effects extend to people and businesses served by small drinking water systems and private wells in impacted areas.

Early experience implementing the state's Group A rules for PFAS drinking water contamination suggests that agencies, water systems, communities, elected officials, and other interests will need significant technical and financial assistance navigating this complex, long-term public health crisis. Please couple action on this rulemaking with follow up on these diverse needs.

We encourage you to work with Congress and other interests to help marshal the needed resources to manage and, to the extent feasible, mitigate the public health effects and concerns associated with PFAS drinking water contamination. We also encourage the U.S. Environmental Protection Agency to continue to apply a broad set of strategies to preventing and reducing PFAS contamination and exposure on all fronts in keeping with the agency's PFAS Strategic Roadmap.

Thank you for your consideration of our comments. If you have questions or need additional information from the Board, please contact Stuart Glasoe, Board Health Policy Advisor, at stuart.glasoe@sboh.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Grellner', with a long horizontal flourish extending to the right.

Keith Grellner, Chair
Washington State Board of Health