



December 30, 2021

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Designated Federal Officer (DFO)
Science Advisory Board PFAS Review Panel
U.S. Environmental Protection Agency

RE: Science Advisory Board's Review of EPA's Draft Framework for Estimating Noncancer Health Risks Associated with Mixtures of Per- and Polyfluoroalkyl Substances (PFAS)

The Association of State Drinking Water Administrators (ASDWA) is the professional association representing the collective interests of the 57 state and territorial drinking water programs serving as the primacy agencies who administer the Safe Drinking Water Act (SDWA). ASDWA's members are co-regulators with EPA for ensuring safe drinking water and continuing to improve public health protection every day. ASDWA appreciates the opportunity to provide comments that address state needs and challenges as EPA engages with the Agency's Science Advisory Board (SAB). It should be noted, however, that these comments do not necessarily represent the specific views and concerns of individual states or consensus from all states. We encourage EPA to consider individual states' comments, in addition to ASDWA's, to gain further perspective.

ASDWA is providing these overarching comments to help optimize the value of the Draft Framework for Estimating Noncancer Health Risks Associated with Mixtures of Per- and Polyfluoroalkyl Substances (PFAS), hereinafter referred to as the framework, to state drinking program administrators (as co-regulators). As EPA works to finalize this framework, the Agency should be mindful that this document sets a significant precedent for the future evaluation and assessment of chemical mixtures. The final framework will likely have a considerable impact on the methodology used to assess any chemical mixtures, not just PFAS mixtures, and on EPA's regulatory development process within the Safe Drinking Water Act (SDWA).

ASDWA is appreciative of EPA's continued engagement with the Agency's SAB. It is crucial for EPA to rely on the most robust and scientifically sound information and data to inform both regulatory and non-regulatory actions. Keeping this in mind, ASDWA recommends that the Agency ensures the SAB is provided the appropriate resources and time to provide EPA with the best possible feedback. ASDWA is cognizant of the tight deadline that the Agency has set to develop a SDWA standard for PFOA and PFOS, but this should not compromise the valuable insights the SAB can provide, nor constrain EPA from fully incorporating the board's recommendations.

Additionally, ASDWA recommends that EPA be more transparent and precise with the Agency's intentions regarding the framework. Within the draft framework, EPA states that it "is purely intended for demonstration of methodological application and is not intended to be used directly in risk assessment or remediation, or in a regulatory context." However, as this framework is being developed to support EPA's development of drinking water standards for PFOA and PFOS, ASDWA recommends that EPA provide further context as to how this framework should, or could, be used to inform SDWA actions.

Similarly, the Agency states that this proposed framework "does not supersede previously published EPA guidance on mixtures [such as the 1986 Chemical Mixtures Guidelines and the 2000 Supplementary Chemical Mixtures Guidance] or longstanding EPA approaches used to assess cumulative effects of chemical mixtures

under various environmental statutes.” These caveats make it unclear as to the Agency’s objectives for this document. For the sake of transparency and clarity, EPA should clearly state this document’s intended use for the Agency’s work to address PFAS moving forward, whether it be in a regulatory or non-regulatory context.

Within the draft framework, EPA makes note of the already ongoing actions of states to address PFAS through state-specific drinking water standards, particularly those states which are regulating groups of PFAS. However, it is less clear how the Agency intends to engage these states as EPA moves forward with the development of this framework. As EPA notes, this framework may help inform PFAS evaluation at the state level, and ASDWA recommends that the Agency directly engage and coordinate with state drinking water programs to ensure that the framework considers current state approaches for regulating groups of PFAS and/or state hazard index approaches for additive health effects of multiple PFAS.

ASDWA recommends that EPA provide additional information and risk communication messaging in conjunction with the further development of the final framework. ASDWA recommends that EPA directly engage with states and water systems to develop clear and consistent messaging regarding the Agency’s intention for the framework. The resultant risk communication messages should clearly explain what is known and unknown about the specific PFAS the Agency uses within the framework and acknowledge that states and water systems may be addressing additional PFAS. ASDWA also recommends that EPA ensure that this messaging works in tandem with the risk communication materials being developed ahead of the Fifth Unregulated Contaminant Monitoring Rule (UCMR5) PFAS sampling that will start in 2023.

ASDWA has continually outlined recommendations for actions the Agency should take in communicating the risk of PFAS to the public. Any risk communication materials used by the Agency for the development of this framework should coincide with ongoing initiatives that:

- Provide specific information and messaging for water systems to share with their customers and with the public if they find PFAS in their drinking water.
- Provide context for the public as to why there may be different requirements and actions by different states and water systems, especially for the various PFAS included within the framework’s examples.
- Provide clear direction for consumers to reduce their risk from PFAS in drinking water, if necessary, as well as reducing exposure via other pathways.
- Provide information about EPA’s role and what the Agency is doing to assess and address PFAS in drinking water and other media, and to keep it out or remove it from the environment.

Thank you for your consideration of the recommendations provided in this letter. ASDWA believes these steps will help ensure that EPA’s actions are based on sound and transparent science while continuing to expand public health protection. We welcome your continued engagement with state drinking water programs in the development of EPA plans for assessing and addressing PFAS that have the potential to cause significant health impacts. If you have questions or would like to discuss these comments in more detail, please contact Stephanie Schlea at sschlea@asdwa.org or Alan Roberson at aroberson@asdwa.org or (703) 812-9507.

Sincerely,



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