



Oral Comments on Revising PFAS Drinking Water Standards July 28, 2025

My name is Betsy Southerland. I am a member of the Environmental Protection Network, an organization of former EPA career staff and confirmation-level appointees, and a former manager in EPA's national Water and Superfund programs. I am providing these comments for the Environmental Protection Network.

EPN strongly disagrees with EPA's plan to delay compliance with PFOA and PFOS MCLs for seven years. Since the 2013-2015 UCMR3 monitoring program, the American people have known that millions of people are exposed to these carcinogenic compounds in their drinking water. UCMR5, which covers many more small systems with much lower detection limits, is finding thousands more systems with detectable levels of PFAS. EPA already provided the maximum 5 year compliance period allowed under SDWA, and there is no justification for a nationwide extension of 2 more years. EPA should encourage states to adopt the 1998 Variance and Exemptions Regulation and grant exemptions from the 2029 compliance date for individual systems that have compelling circumstances requiring more time.

EPN urges EPA not to rescind the MCLs for PFHxS, PFNA, GenX, and the Hazard Index. These three chemicals and PFBS have adverse effects on thyroid hormone levels, lipid synthesis and metabolism, infant development, immune effects, and liver function. While production of PFHxS and PFNA has been phased out in the U.S., legacy stocks in firefighting foam and other products are still in use and imports of these chemicals continue from other countries. GenX and PFBS continue to be actively produced and used in the U.S., so contamination from these chemicals will continue and may increase due to disposal and breakdown in the environment. In addition, GenX and PFBS are short chain PFAS chemicals that are surrogates for the thousands of other short chain PFAS chemicals currently in production and use in the U.S. Treatment of those two chemicals will result in reductions in the many unregulated short chain PFAS in public drinking water systems throughout the country. It is critical that EPA retain the 2029 compliance date for treatment of these toxic chemicals.

In conclusion, EPN urges EPA to retain and defend the 2024 PFAS drinking water standards. We have known for years that available treatment technology will reduce these risks, and Congress has made funds available to help pay for that treatment. It is unconscionable that EPA is now considering delaying critically needed health protections for years into the future without any legal or scientific justification for that delay.