



Originally Sent: December 22, 2023
Updated as of: March 18, 2024

Michael S. Regan
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Mail Code: 4607M
Washington, DC 20460

RE: EPA PFOS AND PFOA CERCLA DESIGNATION

Dear Administrator Michael Regan,

I am writing this letter on behalf of the below listed Mayors that are concerned regarding the proposed United State Environmental Protection Agency rules related to Per- and Polyfluoroalkyl Substances (PFOS) (PFOA).

The health, well-being and safety of residents and communities are of utmost importance to each of us, as local leaders we face our citizens every day and consume the very water in which we are referencing.

For the past several years, state and local governments, alongside industry, have become increasingly concerned about emerging contaminants in drinking water, including PFAS & PFOA. Through our local leaders' efforts and well-developed regulation, we have been able to significantly decrease the exposure to these chemicals. Local governments across the country serve as co-regulators in implementing and enforcing many federal laws with states, including Safe Drinking Water Act and Clean Water Act programs.

The U.S. Environmental Protection Agency (EPA) has proposed stringent drinking water standards for six PFAS and to designate two PFAS as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act (Superfund). While mayors share the concern about these chemicals in municipal water and wastewater systems, the EPA has not adequately considered the cost, legal, and other impacts around implementation and compliance of the Proposed Rule. The American Water Works Association (AWWA) estimates that the drinking water standards alone will cost \$3.8 billion annually, a number significantly higher than US EPA's estimate of \$771 million per year.

The White House Office of Management and Budget (OMB) has deemed both proposals to be economically significant, which requires executive agencies to provide a

more detailed assessment of the likely benefits and costs of the regulatory action, including a quantification of those effects, as well as a similar analysis of potentially effective and reasonably feasible alternatives. The implementation of these proposals represents an unfunded mandate that will require significant modifications of public works operations in many communities in America to implement.

Therefore, we are urging the US EPA to withdraw and reconsider both proposals and conduct a complete cost-benefit and public health analysis based on more thorough scientific data. We are also offering our support in this evaluation process, evaluating best methods of moving forward, and ask that Congress and the EPA work to identify methods for decreasing the burdensome costs associated with complying with these mandates once implemented.

Thank you for your time and consideration.

Sincerely,

Christina M. Muryn
Mayor

Dan Horrigan
Fmr. Mayor of Akron, Ohio

Mayor Justin Bibb
Cleveland, Ohio

Mayor David Holt
Oklahoma City, Oklahoma

Mayor Deborah Robertson
Rialto, California

Mayor Daniel Rickenmann
Columbia, South Carolina

Mayor Bryan Barnett
Rochester Hills, Michigan

Mayor Lou Pauly
Issaquah, Washington

Mayor Quentin Hart
Waterloo, Iowa

Mayor Danene Sorace
Lancaster, Pennsylvania

Mayor Timothy McDonough
Hope, New Jersey

Mayor Steve Williams
Huntington, West Virginia

Administrator Chris Barnett
Orion Township, Michigan

Mayor Vince Williams
Union City, Georgia

Mayor Scott Singer
Boca Raton, Florida

Mayor Acquanetta Warren
Fontana, California

Mayor Kim Norton
Rochester, Minnesota

Mayor Mark Myers
Greenwood, Indiana

Mayor Steve Patterson
Athens, Ohio

Mayor Shawyn Patterson-Howard
Mount Vernon, New York

Cc:

The Honorable Emilia Sykes (D-OH-13)

The Honorable Brad Finstad (R- MN-1)

The Honorable Tom Cole (R-OK-4)

The Honorable Troy Balderson (R- OH-12)

The Honorable James E. Clyburn (D-SC-6)

The Honorable Shontel Brown (D-OH-11)

The Honorable Kim Schrier (D-WA-8)
The Honorable Lloyd Smucker (R-PA-11)

The Honorable Carol Miller (R-WV-1)

The Honorable David Scott (D-GA-13)

The Honorable Norma J. Torres (D-CA-33)

The Honorable Greg Pence (R-IN-6)

The Honorable Pete Aguilar (D-CA-35)

The Honorable Mark Tisdell (R-MI-55)

The Honorable Lois Frankel (D-FL-22)

The Honorable Lisa McClain (R-MI-9)

The Honorable Thomas Kean Jr. (R-NJ-7)

The Honorable Ashley Hinson (R-IA-2)