

December 17, 2025

Electronic Submission via Email

Veronica Craw, Chief
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Georgia Department of Natural Resources
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Re: PFOA & PFOS Drinking Water Rule Updates

Dear Chief Craw:

Thank you for the opportunity to submit comments on EPD's proposed drinking water updates to finalize drinking water regulations for two specific PFAS: perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS). While we appreciate EPD's work to protect our drinking water supplies from these two harmful compounds, the rule should be—and must be—more stringent. As discussed in more detail below, EPD is obligated to adopt drinking water regulations that are just as stringent as federal law; the proposed rule falls short. Moreover, EPD has sampling data showing that public drinking water systems are contaminated with other federally regulated PFAS compounds that pose significant threats to human health and the environment. By choosing not to regulate these other PFAS compounds, EPD is putting the health of Georgians at serious risk.

These comments are submitted on behalf of Altamaha Riverkeeper, Chattahoochee Riverkeeper, Coosa River Basin Initiative, Environment Georgia, Flint Riverkeeper, Georgia Interfaith Power & Light, Ogeechee Riverkeeper, One Hundred Miles, Satilla Riverkeeper, Savannah Riverkeeper, Science for Georgia, Sierra Club Georgia Chapter, Suwannee Riverkeeper, and Southern Environmental Law Center.

I. Introduction

As EPD is aware, PFAS are a group of man-made chemicals manufactured and used broadly by industry since the 1940s.¹ Seemingly every day, new data confirms that PFAS pose a significant threat to human health at extremely low concentrations. Two of the most studied PFAS—PFOA and PFOS—are bioaccumulative and highly persistent in humans.² These

¹ *Lifetime Drinking Water Health Advisories for Four Perfluoroalkyl Substances*, 87 Fed. Reg. 36,848, 36,849 (June 21, 2022); *Our Current Understanding of the Human Health and Environmental Risks of PFAS*, U.S. ENV'T PROT. AGENCY, <https://perma.cc/V6PX-2PNK> (page saved Mar. 8, 2023).

² 87 Fed. Reg. at 36,849; U.S. Env't Prot. Agency, Interim Drinking Water Health Advisory: Perfluorooctanoic Acid (PFOA) CASRN 335-67-1 (June 2022), at 3–4, <https://perma.cc/F89R-PJUV>; U.S. Env't Prot. Agency, Interim