

Critically, numerous public drinking water systems have yet to be tested for PFAS, so the true scope of the problem is unclear. By adopting a rule that regulates more than just two types of PFAS, EPD will ensure that the public knows whether their drinking water systems are contaminated with the most commonly used PFAS chemicals. EPD does a disservice to the people it serves if it allows drinking water systems to turn a blind eye and refrain from monitoring broadly for all six PFAS contaminants.

Furthermore, the proposed rule does nothing to incentivize industry to stop using harmful PFAS compounds like PFHxS, PFBS, PFNA, and HFPO-DA. The best way to stop PFAS contamination is to stop it at the source, but if industrial users know that drinking water utilities will not have to meet MCLs for these chemicals, they will continue to discharge PFAS-contaminated wastewater to publicly owned treatment works, emit PFAS into the air, and otherwise send these chemicals into our homes in household products. Stringent drinking water regulations would send a strong signal to industries operating in Georgia that they too need to play a role in fixing the problem they helped create.

In sum, why should Georgia residents be left with no choice but to drink contaminated water just because their drinking water did not have the “correct” type of PFAS contamination? We don’t believe they should. Accordingly, we urge EPD to promulgate MCLs for all six of the federally regulated PFAS compounds that are at least as stringent as the April 10, 2024 federal regulations.

If you have any questions or wish to discuss these comments further, please reach out to the undersigned at 404-521-9900 or jdegaetano@selc.org or alipscomb@selc.org.

Sincerely,

/s/ Joe DeGaetano
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