



November 17, 2023

Mr. Marc Houyoux  
Office of Air Quality Planning and Standards  
Air Quality Assessment Division  
Emission Inventory and Analysis Group  
Environmental Protection Agency  
Research Triangle Park, NC 27711  
**ELECTRONICALLY TRANSMITTED**

RE: Proposed Revisions to the Air Emissions Reporting Requirements (Docket ID: EPA-HQ-OAR-2004-0489)

Dear Mr. Houyoux,

The American Water Works Association (AWWA), Association of Metropolitan Water Agencies (AMWA), and Association of State Drinking Water Administrators (ASDWA) appreciate the opportunity to comment on the U.S. Environmental Protection Agency (EPA)'s recently proposed "Revisions to the Air Emissions Reporting Requirements." The Associations hope that these comments will assist EPA in finalizing the reporting requirement revisions.

The proposed revisions request public comment on the inclusion of air emission reporting requirements for per- and polyfluoroalkyl substances (PFAS). PFAS air emissions have been associated with contamination of communities downstream of facilities and can be a source of PFAS to drinking water sources. EPA's Office of Water recently proposed drinking water standards for six PFAS at as low as single-digit nanogram per liter levels. As drinking water systems work towards addressing PFAS in water sources, it will be imperative that these systems and states be capable of identifying potential sources of PFAS to enhance protection efforts.

The associations support EPA's overarching interest in addressing PFAS holistically to "get upstream of the problem" and "hold polluters accountable" as laid out in the Agency's PFAS Roadmap. Ensuring that EPA is utilizing all of its regulatory authorities to tackle PFAS contamination is paramount to the long-term protection of both surface and ground water sources of drinking water. With this in mind, AWWA, AMWA, and ASDWA support EPA's interest in requiring air emission reporting for PFAS under the Clean Air Act (CAA). According to the proposal, EPA is considering requiring reporting of PFAS when more than 0.05 tons per year (tpy) are released based on the Toxics Release Inventory's (TRI) reporting requirements. The associations collectively agree that this reporting threshold is too high, as even small releases of PFAS can cause widespread environmental contamination above state and/or federal PFAS regulatory levels - currently proposed at 4 parts per trillion for PFOA and PFOS. Therefore, a reporting threshold of 0.005 tpy is more appropriate to accurately compile an inventory of

facilities that have either manufactured, processed, or otherwise used PFAS and released these chemicals into the environment, potentially contaminating drinking water sources.

AWWA, AMWA, and ASDWA also recommend that the Office of Air Quality Planning and Standards coordinate with the Office of Chemical Safety and Pollution Prevention to ensure that the proposed air emissions reporting requirements are aligned with recently revised reporting requirements under the TRI program and the recently finalized data reporting requirements under the Toxic Substances Control Act (TSCA) for manufacturers and users of PFAS.

EPA recognizes, and the associations agree, that there are still many knowledge gaps in our understanding of PFAS in the environment. Limits to measurement methods and toxicity data of individual compounds hinder the Agency's ability to adequately protect drinking water sources. AWWA, ASDWA, and AMWA urge EPA to continue to work expeditiously to close these knowledge and data gaps to better protect source waters and assist in holding polluters accountable for releasing PFAS into the environment. It is also important that EPA offices coordinate PFAS actions as the Agency advances several actions in parallel for drinking water, data reporting under TSCA and TRI, and under the Clean Water Act program (e.g., effluent limitation guidelines, biosolids assessments, etc.).

The Associations look forward to the EPA's attention and response to these comments. If you have any questions regarding these comments, please contact Chris Moody with AWWA ([Cmoody@awwa.org](mailto:Cmoody@awwa.org)), Stephanie Schlea with ASDWA ([Sschlea@asdwa.org](mailto:Sschlea@asdwa.org)), or Brian Redder with AMWA ([Redder@amwa.net](mailto:Redder@amwa.net)).

Best Regards,



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