



March 14, 2024

Michal Freedhoff, Ph.D., Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Initiation of Prioritization Under the Toxic Substances Control Act (TSCA)

Docket ID: EPA-HQ-OPPT-2023-0601

Dear Dr. Freedhoff,

The Association of State Drinking Water Administrators (ASDWA) is the professional association that serves the leaders (and their staff) of the 57 state and territorial drinking water programs. ASDWA's members are co-regulators with EPA in implementing the Safe Drinking Water Act (SDWA), ensuring safe drinking water, and improving public health protection every day. ASDWA appreciates the opportunity to comment on EPA's "Initiation of Prioritization Under the Toxic Substances Control Act (TSCA)."

ASDWA has provided multiple comment letters to EPA on TSCA and consistently supports the Agency's actions to keep harmful chemicals out of the environment and protect drinking water sources. These comments have consistently recommended that the Agency use a holistic lifecycle approach when managing the production and use of new and existing chemicals. ASDWA has also recommended that EPA closely coordinate with other Federal agencies to administer all possible federal regulatory authorities to assess, address, and remove or prevent new and existing chemicals from entering the environment (and drinking water sources) from any source to protect public health.

ASDWA supports EPA's prioritization process under TSCA as a crucial first step in determining if substances "may present an unreasonable risk of injury to health or the environment because of a potential hazard and a potential route of exposure under the conditions of use." Sound science and peer-reviewed data are critical to support any future regulatory actions for the five substances included in this *Federal Register* notice. The prioritization process will help ensure that the Agency's limited resources are directed to where they are needed most to address the contaminants of greatest public health concern.

ASDWA particularly supports EPA's inclusion of vinyl chloride in this notice. Vinyl chloride is regulated under the SDWA and, as the Agency has noted, is used in the manufacturing and processing of plastic materials like polyvinyl chloride that may be used for pipes that provide drinking water. The Agency must ensure that vinyl chloride does not leach from these pipes,

which would become a significant concern to the public. Therefore, reliable, peer-reviewed data to understand exposure and public health risks is vital to ensure appropriate regulatory actions are taken in the future.

Thank you again for the opportunity to provide input on this critical work. If you have questions or want to discuss these comments in more detail, please contact Stephanie Schlea at sschlea@asdwa.org or me at aroberson@asdwa.org.

Sincerely,



J. Alan Roberson, P.E.
Executive Director

Cc: Jennifer McLain – EPA OGWDW
Eric Burneson – EPA OGWDW
Colleen Flaherty – EPA OST

