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## Comment submitted by Arkansas Department of Health (ADH)

Posted by the **Environmental Protection Agency** on Jun 4, 2023

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Comment

Thank you for the opportunity to comment on the Proposed PFAS National Primary Drinking Water Regulation (Rule Docket EPA-HQ-OW-2022-0114). The Engineering Section of the Arkansas Department of Health (ADH) is the primacy agency in Arkansas. As such, we work to ensure compliance with federal and state drinking water standards under the Safe Drinking Water Act. We support the proposal to regulate levels of PFAS chemicals in the National Primary Drinking Water Standards under the Safe Drinking Water Act. The proposed monitoring and corrective actions to identify and reduce PFAS exposure in drinking water will provide additional protections to public health.

The Association of State Drinking Water Administrators (ASDWA) provided comprehensive comments for this proposed Rule on behalf of all member Drinking Water Primacy Agencies. The Arkansas drinking water program fully supports the comments provided by ASDWA. It is imperative that the final Rule provides clear and achievable requirements for PFAS levels in drinking water without being overly burdensome on public water systems and the users they serve. We offer the following comments regarding the proposed Rule in addition to those provided by ASDWA.

We recommend that further evaluation be conducted regarding the costs and potential adverse impacts with compliance with other existing drinking water requirements and water system viability, especially for small water systems. In Arkansas, 94.3% of our 703 public water systems subject to this proposed Rule serve fewer than 10,000 people, with half of those systems serving communities with fewer than 1,100 people. These small water systems currently use minimal or conventional treatment processes and struggle to find properly qualified water treatment operators and adequate funding for their operations.

The capital and operation costs of installing treatment for PFAS are very high compared to the conventional water treatment processes currently being used. Additional treatment processes will require additional electrical and labor resources to operate properly compared to conventional treatment. In addition, these processes will require proper disposal of waste streams that contain concentrated levels of PFAS and other chemicals. The financial capacity of these water systems will be at significant risk to address the financial

burden related to the installation of special treatment equipment, increased costs of labor, power, and waste disposal for operation of the treatment.

The treatment processes for PFAS are more complex than existing drinking water treatment processes and require additional training and certifications for drinking water operators. There is currently a shortage of qualified drinking water operators, especially with operators that have advanced training and certifications that PFAS treatment will require. This lack of qualified drinking water operators will create a significant risk to the operational capacity of these systems.

Engineering Section  
Arkansas Department of Health

See attached file for full letter.

Attachments **1**



Comment

Download ([https://downloads.regulations.gov/EPA-HQ-OW-2022-0114-1821/attachment\\_1.pdf](https://downloads.regulations.gov/EPA-HQ-OW-2022-0114-1821/attachment_1.pdf))

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