

## **Intro:**

Good morning. My name is Julia Li and I am a legal fellow at the Natural Resources Defense Council. Thank you for your actions to make drinking water safer for New Yorkers.

The proposed regulation for PFOA and PFOS is a critical step in getting rid of the toxic chemicals in our drinking water. But there is more to be done.

### **1) Opposition to deferral provision**

First, we oppose the provision that allows water systems to request deferrals from compliance with the MCLs (maximum contaminant levels). Deferring treatment will only slow the installation of treatment technology, leaving toxic chemicals in our water for longer.

We have the technology now, and the technology is feasible, taking cost into consideration. Granular Activated Carbon is widely used to treat PFOA and PFOS. For example, this treatment has been installed in Petersburg, NY, and it is effectively removing PFOA from the town's water supply to non-detectable levels.

### **2) Combined standard**

Second, the Department should set the maximum contaminant level for PFOA and PFOS at a combined standard, rather than the individual standards currently proposed.

It is the combined level of PFOA and PFOS in drinking water that is most predictive of serious health risks. Therefore, it is the combined level that the Department needs to target.

### **3) MCL at 2 ppt**

Finally, even extremely low levels of exposure may cause serious health effects. We urge the Department to finalize MCLs (maximum contaminant levels) for PFOA and PFOS at a combined concentration of

2 ppt. The weight of the evidence demonstrates that this standard is not only more protective of human health, but it is also feasible. Technology has been demonstrated to both detect and treat PFOA and PFOS to below 2 ppt.

**Conclusion:**

We urge the Department to take these actions to ensure that drinking water protection is moving in the right direction. Remove the deferral provision and set the MCL at a combined standard of 2 ppt for PFOA and PFOS. This ensures the best possible protection of health using the most feasible methods available. Thank you for your time.