



January 16, 2025

Comment Clerk
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 2046

Delivered Electronically

Re: Preliminary Effluent Guidelines Program Plan 16 [Docket# EPA-HQ-OW-2024-0158](#)

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. Formed in 1984 to address a growing need for state administrators to have national representation, ASDWA has become a respected voice for states with Congress, EPA, other Federal agencies, and professional organizations in the water sector. These comments do not represent the specific views and concerns of individual states or consensus from all states. We encourage EPA to consider individual state comments, in addition to ASDWA's, to gain further perspective.

ASDWA appreciates the opportunity to provide these comments on Preliminary Effluent Guidelines Program Plan 16. ASDWA commends EPA for its continued commitment to conduct annual reviews of Clean Water Act (CWA) effluent limitation guidelines (ELGs) and pretreatment standards and publish Preliminary Plan 16. The plan provides a comprehensive outline of EPA's various actions to conduct and improve data collection, undertake studies and sampling analysis, and quantify wastewater treatment technology performance for the broad range of contaminants and categories of dischargers. EPA's efforts to identify, plan for, and provide updates on current CWA National Pollutant Discharge Elimination System (NPDES) permit actions and improvements will inform better decision-making and help reduce impacts to public health and the environment.

State and territorial drinking water programs are particularly interested in parts of the plan that aim to address and provide more data and information about contaminants in NPDES permits that impact downstream drinking water sources and increase treatment costs for drinking water utilities, such as PFAS and nutrients. In this regard, ASDWA supports EPA's initiation of a detailed study of PFAS processors and continued efforts to evaluate and assess opportunities for limiting PFAS discharges from multiple industrial categories, per the [2021 EPA PFAS Strategic Roadmap](#).

ASDWA [submitted joint comments](#) in May 2021 with the Association of Clean Water Administrators (ACWA), the Association of State and Territorial Solid Waste Management Officials (ASTSWMO), and the Environmental Council of the States (ECOS) on the [Organic Chemicals, Plastics and Synthetic Fibers \(OCPSF\) Point Source Category Advanced Noticed of Proposed Rulemaking](#). In those comments, the Associations recommended that EPA undertake actions and initiate rulemakings for all PFAS industrial categories in an urgent and expeditious manner. ASDWA recommends that EPA also prioritize its commitment for delivering rules per the timeline in the plan. To date, EPA’s intent to publish the proposed rule by Fall 2024 has not been met.

ASDWA emphasizes that EPA must engage and coordinate directly with states on the actions outlined in Plan 16 for data collection, sampling analysis and methods, treatment options, and prioritization and ranking of industrial discharger categories for future studies and rulemakings. These collective efforts provide an opportunity to reduce the current and future burden of cleanup and treatment on drinking water and wastewater utilities, and across all environmental media.

In closing, ASDWA continues to recommend that EPA use a holistic lifecycle and integrated water management approach to work across programs and with other federal agencies to ensure complete consideration of potential impacts from contaminants to drinking water, human health, aquatic life, the environment, and the economy.

If you have questions or would like to discuss these comments in more detail, please contact Deirdre White at dwhite@asdwa.org or myself at aroberson@asdwa.org.

Sincerely,



Alan Roberson
Executive Director