

May 30, 2023

U.S. Environmental Protection Agency
Office of Ground Water and Drinking Water
Mail Code 2822IT
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OW-2022-0114—PFAS National Primary Drinking Water
Regulation

To Whom It May Concern:

On behalf of our 159,000 members, we would like to comment on the Environmental Protection Agency's proposal to reduce exposure to several per- and polyfluoroalkyl substances (PFAS) in drinking water. We offer these comments in response to your Federal Register notice of March 29, 2023 (88 FR 18638).

EPA has determined that several PFAS—colloquially termed “forever chemicals”—pose serious health risks at currently regulated exposure levels. These chemical compounds, which are exceedingly slow to degrade, are commonly found in everyday products (e.g., clothing, cosmetics, toilet paper) or are the unintended byproducts of certain manufacturing processes. Their widespread use has led them to now be found in blood, air, fish, soil, and other places, including drinking water.

EPA is proposing to reduce the maximum allowable concentration of these PFAS in public drinking water—from 4.0 nanograms per liter (ng/L) to 1.0 ng/L—based on a determination that no adverse effects are known or anticipated to occur at that exposure level. This goal would be achieved, in part, by requiring water control authorities to install new filtration technologies at their public water distribution system's point of entry.

EPA has identified “compatibility with other water treatment processes” as one of its criteria for recognizing the best available PFAS removal technologies.¹ However, the PFAS-removing technologies EPA is currently proposing* have the potential to undermine a water treatment process that has advanced the public's oral health for more than 75 years: community water fluoridation.

Community water fluoridation is the controlled adjustment of the natural fluoride content in water to 0.7 mg/L, which is the level recommended by the U.S. Public Health Service to help prevent tooth decay.² For more than 75 years, it has been a safe and inexpensive way to reduce tooth decay in children and adults by at least 25 percent.³ In fact, the CDC hailed it as one of ten great public health achievements of the 20th century.⁴

* EPA has identified granular activated carbon (GAC), anion exchange resin (AIX), reverse osmosis (RO), and nanofiltration (NF) as the best available technologies to achieve a PFAS concentration level of 1.0 ng/L or less in public drinking water.

In 2018, 73 percent of the U.S. population on community water systems—207,426,535 people—had access to fluoridated water.⁵ The national health objectives in *Healthy People 2030* aim to increase that number to over 77 percent.⁶

As you continue exploring the best available PFAS removal technologies, we urge you to consider equipment location and laboratory certification standards that will not inadvertently remove fluoride from public water systems. It may be valuable to speak with the Centers for Disease Control and Prevention about options for removing PFAS from drinking water without removing fluoride in the process.

Thank you for providing us the opportunity to comment. If you have any questions, please contact Mr. Robert J. Burns at 202-789-5176 or burnsr@ada.org.

Sincerely,

/s/

George R. Shepley, D.D.S.
President

/s/

Raymond A. Cohlmiya, D.D.S.
Executive Director

GRS:RAC:rjb

¹ 88 FR 18684

² U.S. Department of Health and Human Services. Federal Panel on Community Water Fluoridation. U.S. Public Health Service recommendation for fluoride concentration in drinking water for the prevention of dental caries. *Public Health Rep.* 2015 Jul-Aug; 130(4): 318–331. doi:10.1177/003335491513000408

³ American Dental Association, *Fluoridation Facts*, 2018. Available at www.ada.org/resources/community-initiatives/fluoride-in-water/fluoridation-facts (accessed May 30, 2023)

⁴ Centers for Disease Control and Prevention. Ten Great Public Health Achievements – United States, 1900-1999. *MMWR* 1999; 48 (12): 241-243. Available at: www.cdc.gov/mmwr/preview/mmwrhtml/00056796.htm (accessed May 30, 2023)

⁵ Based on water system data reported by states to the CDC Water Fluoridation Reporting System as of December 31, 2018. Available at www.cdc.gov/fluoridation/statistics/2018stats.htm (accessed May 30, 2023)

⁶ Office of Disease Prevention and Health Promotion. (n.d.). Oral Conditions. *Healthy People 2030*. U.S. Department of Health and Human Services. Available at www.health.gov/healthypeople/objectives-and-data/browse-objectives/oral-conditions (accessed May 30, 2023)