

September 5, 2024

The Honorable Bruno Pigott
Acting Assistant Administrator
Environmental Protection Agency
Office of Water 4101M
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**RE: Proposed Organic Chemicals, Plastics and Synthetic Fibers Effluent
Limitation Guidelines (ELG)**

Dear Acting Assistant Administrator Pigott:

The undersigned organizations urge EPA to engage with the business community regarding the development and implementation of the proposed ELG for the Organic Chemicals, Plastics and Synthetic Fibers sectors.

Our members support accelerating cleanup of PFAS in the environment based on the best available and peer reviewed science and risk management. We are concerned that communication from EPA on this issue has been limited thus far. The Clean Water Act requires EPA to implement the best available technology that is economically achievable for each relevant industry sector. While we believe a feasible solution between the regulated industry and EPA is attainable, active engagement among all stakeholders is essential.

As a product of this insufficient engagement with regulated entities, we are concerned that EPA intends to finalize ELGs that are unattainable and based on the flawed science from the final PFAS drinking water rule. Such an outcome would have a severe and drastic impact on domestic manufacturing across many sectors, including automakers, national defense, the semiconductor industry, and others.

To improve engagement, we believe EPA should consider:

- Convening a series of informal dialogues among the agency, companies, wastewater operators, and other water and technology experts.
- Communicating with individual manufacturers, processors, and suppliers on specific issues and challenges posed by the proposed rule.
- Providing a platform to discuss various nascent innovations, such as the adoption of water reuse.
- Investigating with industry experts and the water sector, the latest types of treatment technologies that are currently feasible and achievable.

- Collaborating with National Science Foundation (NSF), academia, and industry experts from the recently held NSF-sponsored workshop on PFAS detection, capture, and concentration workshop.
- Staging roundtables with the Small Business Office of Advocacy.
- Weighing impacts to critical industries, including the recent [U.S. Chamber of Commerce study](#) that highlights the economic impacts of PFAS regulation across states and sectors.

Your team has very kindly suggested that we follow up once the proposal is released with underlying data and rationale for why or why not particular concepts should or should not be pursued. We plan to take them up on this offer and believe EPA will make more effective public policy by considering concerns of the regulated community before a final ELG is crafted.

Please feel free to contact us with questions or concerns.

Sincerely,

American Chemistry Council
American Apparel and Footwear Association
Council of Industrial Boiler Owners
Fuel Cell & Hydrogen Energy Association
Fluid Sealing Association
National Association for Surface Finishing
National Council of Textile Organizations
SEMI
TRSA – The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce

cc: Deborah Nagle, Director, Office of Science and Technology
Tim Del Monico, Associate Administrator, Congressional and Intergovernmental Relations
Grant Cope, Senior Counselor to the Administrator