

**Submission by the Endocrine Society to the U.S. Environmental Protection Agency regarding proposed rule “Per- and Polyfluoroalkyl Substances National Primary Drinking Water Regulation” to regulations.gov docket EPA-HQ-OW-2022-0114-0027.**

May 25, 2023

The Endocrine Society appreciates the opportunity to comment on the proposed National Primary Drinking Water Regulation for Per- and Polyfluoroalkyl Substances (PFAS). Founded in 1916, the Endocrine Society is the world’s oldest, largest, and most active organization of scientists and healthcare professionals dedicated to research on hormones and the clinical treatment of patients with endocrine diseases. Our membership includes 18,000 clinicians and scientists from over 120 countries, including many researchers engaged in the study of the adverse effects of per- and polyfluoroalkyl substances (PFAS) on endocrine systems.

In general, we are encouraged by the strong standards for the six PFAS established by this new regulation. We welcome and support the proposed maximum contaminant level goal (MCLG) of zero, as well as the enforceable maximum contaminant level (MCL) standards of 4.0 ng/L for PFOA and PFOS. We also support the approach for the other PFAS covered by the regulation based on the limits proposed. We commend EPA for recognizing the effects of these persistent and bioaccumulative chemicals on endocrine systems at biologically relevant levels of exposure, with adverse effects on thyroid hormone levels, metabolic systems, reproduction, development, and others. We also appreciate the agency’s recognition of the effects of mixtures of these chemicals.

The proposed regulation represents an important step towards more comprehensive protections addressing PFAS, which as described in the supporting documentation for the regulation are an increasingly large class of chemicals with preliminary data indicating similar hazards across many members of this class. To improve the public health protection of the regulation, we recommend that the EPA:

- Ensure the availability of sufficient funds to assist in remediation efforts; funds should be generated through fees on the manufacturers of PFAS, and not rate payers and/or homeowners;
- Establish a process to include private well owners in assistance funding to prevent further impacts; and
- Work with other agencies to prevent further contamination by advancing additional strong regulations that prevent all non-essential uses of PFAS.

The Endocrine Society enthusiastically supports the proposed National Primary Drinking Water Regulation for PFAS, with modifications as described above. This regulation is consistent with the accumulating evidence demonstrating that these chemicals act as endocrine disruptors, can



accumulate in the environment and in the human body, and can result in adverse health effects in humans and wildlife. However, we note that there are thousands of other chemicals with similar structure, and presumably the same function, that will remain unregulated. We urge the EPA to build on the proposed regulation to advance more comprehensive solutions that regulate PFAS as a class of chemicals for the protection of public health and the environment. Thank you for considering our comments; if we can be of further assistance, please contact Joseph Laakso, PhD, Director of Science Policy at [jlakso@endocrine.org](mailto:jlakso@endocrine.org).