

July 20, 2026

Jessica Kramer
Assistant Administrator, Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Assistant Administrator Kramer:

Water Quality Association Comments

EPA Docket IDs No. EPA-HQ-OW-2025-0654 and EPA-HQ-OW-2025-1742

Proposed PFAS Rescission Rule and Proposed PFOA and PFOS Compliance Extension Rule

The Water Quality Association (WQA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA's) proposals to rescind and extend compliance timelines for certain PFAS contaminant regulations. WQA respectfully recommends that EPA withdraw the proposal to rescind regulations related to PFHxS, PFNA, GenX, and Hazard Index mixtures of these three PFAS plus PFBS. While we are neutral on the proposal to extend the deadline for PFOA and PFOS compliance, we also wish to note that the industry is already producing cost-effective Point-of-Use and Point-of-Entry (POU/POE) products capable of meeting those requirements.

WQA is a not-for-profit 501(c)(6) association for the residential, commercial, and industrial water treatment industry. WQA represents more than 2,500 member companies, many of them small businesses that configure, install, service and maintain drinking water treatment systems in homes and businesses. Our membership also includes equipment manufacturers, suppliers and distributors of water quality improvement products and services. Throughout our comment we will collectively refer to these companies as "the industry".

WQA applauds the efforts by EPA to advance science-based regulations to protect consumers from PFAS in drinking water. EPA's national PFAS strategy relies heavily on the deployment of effective treatment technologies to reduce human exposure. POU/POE technologies are increasingly deployed in this critical role, often providing the most immediate, practical and cost-effective means of addressing PFAS contamination.

During the June 7th public hearings on these proposals, EPA stated this is not a re-evaluation of the science behind the current PFAS regulations and further acknowledged that a re-evaluation of the latest science might justify more stringent regulations. EPA went on to explain that the proposal to rescind regulations for PFHxS, PFNA, HFPO-DA or GenX, and Hazard Index mixtures of these three PFAS plus perfluorobutane PFBS is based on a procedural error which resulted in there being one combined public comment period for both the determination to regulate and the proposed regulation, instead of separate comment periods for each. EPA also explained that the proposal to extend the compliance deadline for PFOA and PFOS beyond the five-year statutory deadline is based on EPA's evaluation that public water supplies need more time to comply.

WQA is opposed to rescinding the regulations related to PFHxS, PFNA, GenX, and Hazard Index mixtures of these three PFAS plus PFBS without a scientifically supported basis for doing so. Rescinding these rules is likely to accelerate the development of inconsistent state requirements, creating regulatory uncertainty that makes it more difficult to develop, optimize, and deploy water treatment products efficiently.

Consumers benefit from a uniform federal regulatory framework that provides a consistent, science-based level of protection from PFAS exposure nationwide. In contrast, a patchwork of differing state requirements can lead to unequal levels of protection, complicated communication of risks and solutions, and undermine public confidence in drinking water protections. Federal PFAS standards promote clarity, consistency, and equitable access to safe drinking water for all communities.

WQA is neutral on the proposal to extend the compliance deadline for PFOA and PFOS but wishes to inform EPA that the industry is already offering POU/POE products that meet or exceed the current requirements.^{1,2} There are two national standards for testing and certifying POU and POE water filtration systems that offer elective claims to reduce PFAS chemicals, including PFOS and PFOA. These standards are NSF/ANSI 53-2025: *Drinking Water Treatment Units – Health Effects* and NSF/ANSI 58-2025: *Reverse Osmosis Drinking Water Treatment Systems*. Products certified to these standards can provide drinking water that meets EPA’s current MCLs of 4 ppt for PFOA and PFOS. It is also worth noting that these products are tested using an extremely high influent challenge level of a combined 500 ng/L for PFOA and 1000 ng/L for PFOS, demonstrating their ability to reduce PFAS at very high concentrations. For comparison, the EPA’s cost analysis uses significantly lower influent concentrations for small water systems, 70 ng/L and 264 ng/L.³ It’s conceivable that POU/POE products could reduce to even lower levels and possibly with larger treatment capacities if tested using lower influent concentrations.

WQA’s mission is to promote sustainable technologies and services that improve water quality, thereby enhancing quality of life. POU/POE water treatment technologies play an important role in reducing PFAS exposure and protecting public health.

¹ Hui, Wanyue, Youn Jeong Choi, Linda Lee, and George Zhou. *Retention of PFAS on Spent Filters*. Final Report, Purdue University, sponsored by Water Quality Research Foundation, 20 Jan. 2026.

² Zhou, George. *Emerging Contaminant Removal and Microbial Growth in Membrane Filtration and Activated Carbon Point-of-Use Technologies*. Final Report, Purdue University, sponsored by Water Quality Research Foundation, 4 Jan. 2022.

³ U.S. Environmental Protection Agency. *Best Available Technologies and Small System Compliance Technologies for PFAS in Drinking Water*. EPA-822-P-23-009, U.S. Environmental Protection Agency, 2023.

Summary

WQA respectfully recommends that EPA withdraw the proposal to rescind regulations related to PFHxS, PFNA, GenX, and Hazard Index mixtures of these three PFAS plus PFBS. While we are neutral on the proposal to extend the deadline for PFOA and PFOS compliance, we also wish to note that the industry is already producing cost-effective POU/POE products capable of meeting those requirements.

WQA appreciates EPA's consideration of these comments and looks forward to continued engagement on PFAS treatment, management, and public health protection.

Sincerely,



Richard A. Mest
Strategic Affairs Officer
Water Quality Association

