

October XX, 2021

Sent via Email

Administrator Michael Regan  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460  
[Regan.Michael@epa.gov](mailto:Regan.Michael@epa.gov)

Dear Administrator Regan:

Thank you for making a commitment to aggressively address per-and polyfluoroalkyl substances (PFAS) contamination as Administrator of the Environmental Protection Agency.

On behalf of our members, partners, and community advocates across the country, we urge you to include strong commitments to curb industrial releases of the toxic “forever chemicals” known as PFAS in the upcoming PFAS Road Map being developed by the EPA. Our groups are on record strongly supporting the Clean Water Standards for PFAS Act of 2021, a bill that would establish deadlines for EPA to determine how to address industrial discharges of PFAS under the Clean Water Act, which was included the bipartisan PFAS Action Act of 2021 and PFAS Action Act of 2020 as well as H.R. 3684, the INVEST in America Act, which have all passed the House.

As you know, PFAS are a family of over 5,000 synthetic compounds used in a variety of industrial processes and consumer products from non-stick cookware to stain-resistant coatings and grease-proof packaging. Often referred to as “forever chemicals,” PFAS chemicals are extremely persistent in the environment and the human body, and many have been linked at very low doses to serious health harms, including cancer, damage to the reproductive and immune system, reducing the efficacy of vaccines, and thyroid and kidney disease.

According to recent [analysis](#), nearly 30,000 industrial facilities could be discharging PFAS into the air and water. Industrial discharges of PFAS waste threaten the drinking water for millions of Americans, including vulnerable communities in Latino, low-income, rural and [environmental justice](#) communities who are already overburdened by pollution. While some states like [Michigan](#) have taken steps to curb industrial discharges, most have not. Unfortunately, recent action by EPA [falls short](#) of what is needed to sufficiently address industrial discharges of PFAS both in terms of scope and urgency.

As Secretary of the North Carolina Department of Environmental Quality, you took enforcement action against The Chemours Company to compel them to control their PFAS discharges. Now we urge you to protect communities across the country just as you did for communities in North Carolina.

Your enforcement action was based on a simple premise—PFAS dischargers must disclose their pollution to permitting agencies before they can be allowed to contaminate our streams and rivers. If EPA made clear that this existing legal requirement applies to PFAS,

dischargers across the country would be forced to take responsibility for their pollution. EPA should also learn from the cleanup happening under the [Chemours Consent Order](#). The technology that Chemours has applied to nearly eliminate PFAS discharges in many instances can be used in case-by-case technology-based effluent limit determinations to clean up rivers across the country while EPA prepares nationwide effluent limitation guidelines. EPA should require use of these tools across the country.

Earlier this month, EPA released its Preliminary Effluent Guidelines Program Plan 15. While we recognize that this is a positive first step, Plan 15 excludes most of the industry categories that are making the PFAS pollution challenge even bigger—despite the well documented risks posed by PFAS exposure in humans and our environment. Plan 15 also fails to set deadlines for new standards. We find this extremely disappointing.

By contrast, the U.S. House of Representative has twice passed bipartisan legislation that would require the EPA to set PFAS standards for nine industry categories within four years. We believe that anything less ambitious than the standards endorsed by the House would fall short of what communities struggling with PFAS pollution expect from EPA.

We urge you to finalize a robust PFAS Road Map that shifts responsibility for stopping the ongoing PFAS crisis to polluters. We encourage EPA to use existing authorities to require disclosure of PFAS and use of technology to control discharges, set a PFAS drinking water standard, quickly set nationwide standards to restrict industrial releases of PFAS, designate PFAS as hazardous substances, end needless uses of PFAS, and ensure that PFAS wastes are properly disposed.

Thank you for your ongoing leadership in addressing the PFAS contamination crisis, and we hope the EPA's upcoming PFAS Road Map will include a commitment to expand efforts to curb industrial releases of PFAS.

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Sincerely,

Groups that signed 9/27 letter:

*Advance Carolina*  
*Advocates for a Clean Lake Erie*  
*Alabama Rivers Alliance*  
*Alabama State Association of Cooperatives*  
*Alaska Community Action on Toxics*  
*Alianza Nacional de Campesinas*  
*Alliance for the Great Lakes*  
*American Sustainable Business Council*  
*Anthropocene Alliance*  
*Black Warrior Riverkeeper*  
*Breast Cancer Prevention Partners*

*Cahaba River Society*  
*Cahaba Riverkeeper*  
*Cape Fear River Watch*  
*Catawba Riverkeeper Foundation*  
*Center for Biological Diversity*  
*Center for Environmental Health*  
*Center for Progressive Reform*  
*Center for Public Environmental Oversight*  
*Charleston Waterkeeper*  
*Children's Environmental Health Network*  
*Choctawhatchee Riverkeeper*

*Choices Interlinking*  
*Church of the Living God*  
*Citizens for Safe Water Around Badger*  
*(CSWAB)*  
*Clean Cape Fear*  
*Clean Water Action*  
*Coalition on the Environment and Jewish*  
*Life*  
*Common Ground Consulting, LLC*  
*Community Action Works Campaigns*  
*Community Water Center*  
*Congaree Riverkeeper*  
*Consumer Reports*  
*Coosa Riverkeeper*  
*Crawford Stewardship Project*  
*Defend Our Health*  
*Delaware Riverkeeper Network*  
*Duke University*  
*Earthjustice*  
*Eastern Panhandle (WV) Green Coalition*  
*Ecology Center*  
*Endangered Habitats League*  
*Environment America*  
*Environmental Justice Task Force in Tucson*  
*Environmental Protection Network*  
*Environmental Working Group*  
*Family Farm Defenders*  
*Fannie Lou Hamer Center for Change*  
*Fight For Zero*  
*Food & Water Watch*  
*For Love of Water (FLOW)*  
*Friends of the Detroit River/Detroit River*  
*Public Advisory Council*  
*Friends of the Rivers of Virginia*  
*Friends of Toppenish Creek*  
*Gas Free Seneca*  
*Great Lakes PFAS Action Network*  
*Green Science Policy Institute*  
*GreenCAPE*  
*GreenLatinos*  
*Gunpowder RIVERKEEPER*  
*Harpeth River Conservancy*  
*Haw River Assembly*  
*Healthy Gulf*  
*Hometown Action*  
*Illinois Council of Trout Unlimited*

*Kentucky Resources Council*  
*Kootenai Environmental Alliance*  
*League of Conservation Voters*  
*League of United Latin American Citizens*  
*(LULAC)*  
*Living Rivers & Colorado Riverkeeper*  
*Los Angeles Waterkeeper*  
*Louisiana Green Corps*  
*Lynnhaven River NOW*  
*Massachusetts Rivers Alliance*  
*Merrimack Citizens for Clean Water*  
*Miami Waterkeeper*  
*Michigan League of Conservation Voters*  
*Midwest Environmental Advocates*  
*Military Poisons*  
*Milwaukee Riverkeeper*  
*Mississippi Rising Coalition*  
*Mississippi River Collaborative*  
*Missouri Confluence Waterkeeper*  
*Missouri NAACP*  
*Moms for a Nontoxic New York*  
*Mountain Watershed Association*  
*MountainTrue*  
*Nantucket Land Council, Inc.*  
*National Latino Farmers & Ranchers Trade*  
*Association*  
*National Wildlife Federation*  
*Natural Resources Defense Council*  
*NC Conservation Network*  
*NJ Audubon*  
*Ogeechee Riverkeeper*  
*Oregon Environmental Council*  
*OVEC-Ohio Valley Environmental Coalition*  
*Pax Christi USA, New Orleans*  
*Peconic Baykeeper*  
*Pennsylvania Council of Churches*  
*People's Justice Council*  
*PfoaProjectNY*  
*Physicians for Social Responsibility*  
*PolicyLink*  
*Potomac Riverkeeper Network*  
*Public Interest Research Group*  
*Puget Soundkeeper*  
*Rachel Carson Council*  
*River Network*  
*Riverkeeper*

*Rockbridge Area Conservation Council*  
*Rogue Riverkeeper*  
*Rural Advancement Fund of the National*  
*Sharecroppers Fund, Inc*  
*Rural Coalition*  
*Safer States*  
*San Antonio Bay Estuarine Waterkeeper*  
*Satilla Riverkeeper*  
*Save RGV*  
*Save The Sound*  
*SC Idle No More, SCIAC*  
*Science and Environmental Health Network*  
*Seneca Lake Guardian*  
*Sierra Club*  
*Social Science Environmental Health*  
*Research Institute (Northeastern University)*  
*Southeast Rural Community Assistance*  
*Project*  
*Southern Environmental Law Center*  
*SouthWings*  
*St. Johns Riverkeeper*  
*Steps Coalition*  
*Suncoast Waterkeeper*  
*Surfrider Foundation*  
*Sustain Charlotte*  
*Sustainable Agriculture of Louisville*  
*Tennessee Riverkeeper*

*TerraScapes Environmental*  
*Testing for Pease*  
*The Downstream Project*  
*The People's Justice Council*  
*The Rising Youth*  
*The Water Collaborative of Greater New*  
*Orleans*  
*Three Rivers Waterkeeper*  
*Tip of the Mitt Watershed Council*  
*Tree Fredericksburg*  
*Turtle Island Restoration Network*  
*Twin harbors waterkeeper*  
*Union of Concerned Scientists*  
*Verde*  
*Vermont Conservation Voters*  
*Waterkeeper Alliance*  
*Waterkeepers Chesapeake*  
*Waterway Advocates*  
*WE ACT for Environmental Justice*  
*West Virginia Rivers Coalition*  
*Winyah Rivers Alliance*  
*Wisconsin EcoLatinos*  
*Women's Voices for the Earth*  
*WV Citizen Action Group*  
*Your Turnout Gear and PFOA*  
*Zero Waste Washington*