

April 4th, 2025

Christine Bergeron
U.S. Environmental Protection Agency
Office of Water
Health and Ecological Criteria Division
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Draft National Recommended Ambient Water Quality Criteria for the Protection of Human Health for Perfluorooctanoic Acid, Perfluorooctane Sulfonic Acid, and Perfluorobutane Sulfonic Acid.


Dear Ms Bergeron,

The Arizona Department of Environmental Quality (ADEQ) appreciates the opportunity to review the Draft National Recommended Ambient Water Quality Criteria for the Protection of Human Health for Perfluorooctanoic Acid (PFOA), Perfluorooctane Sulfonic Acid (PFOS), and Perfluorobutane Sulfonic Acid (PFBS). ADEQ supports EPA's leadership in PFAS research, method development, and standard setting, which are vital to protecting human health and the environment.

ADEQ has concerns regarding the proposed criteria, as the recommended limits for PFOA and PFOS fall below the detectable thresholds of currently available laboratory methods (ADEQ recognizes PFBS laboratory methods are sufficient to detect the proposed levels). ADEQ depends on EPA to provide standardized testing methods to ensure consistency across laboratories. However, the development of advanced analytical techniques require substantial investment in research, instrumentation, and laboratory capabilities, which often surpass the financial and technical resources available to regulatory agencies. Without widely accessible, sensitive and validated testing methods, compliance with the draft criteria will remain uncertain, hindering proactive water quality management.

While ADEQ recognizes and thanks you for your efforts to include best management practices to protect the natural and cultural resources of water quality and your willingness to engage with the community, we encourage EPA to establish testing methods to the detectable limit prior to finalizing PFOA and PFOS criteria.

Please feel free to contact us if you have any questions or need further information.

DocuSigned by:

A5AF6048FAC8426...

Josephine Maressa
Deputy Director, Water Quality Division
Arizona Department of Environmental Quality