



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

November 21, 2016

Mr. Ron Joyner
Air Force Civil Engineer Center/CZPE
1492 First Street
Building 922, 2nd Floor
Dobbins ARB GA 30069

New Jersey Drinking Water Quality Institute

Subject: Department of Defense (DoD) Comments on New Jersey Drinking Water Quality Institute's Maximum Contaminant Level Recommendation for Perfluorooctanoic Acid (PFOA) in Drinking Water

Dear Drinking Water Quality Institute:

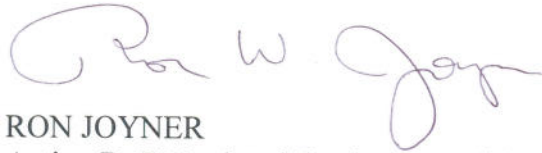
Thank you for the opportunity to comment on the Drinking Water Quality Institute's (DWQI) draft recommendation of 14 parts per trillion (ppt) as the maximum contaminant level (MCL) for perfluorooctanoic acid (PFOA) in drinking water in New Jersey. I serve as the Department of Defense (DoD) Regional Environmental Coordinator for Federal Region 2, which includes the state of New Jersey. My responsibilities include coordinating responses to state environmental legislative and regulatory matters that have a potential for adversely impacting one or more of the military services. Accordingly, I submit the following comments on behalf of DoD.

As you know, on May 25, 2016, the U.S. Environmental Protection Agency issued health advisories of 70 parts per trillion (ppt) for PFOA and perfluorooctane sulfonate (PFOS). The health advisories, which are based on the latest peer-reviewed science, were established to provide a margin of protection for Americans, including the most sensitive populations, from a lifetime of exposure to PFOS and PFOA in drinking water. The health advisories were developed to assist states and public water systems in taking appropriate steps to protect residents from drinking water that may become contaminated with PFOS and PFOA. EPA issued a clarification about the application of the PFOA and PFOS drinking water advisories on November 15, 2016. The clarification states that a concentration of 70 ppt of PFOA and PFOS in drinking water is the identified limit below which health effects are not anticipated to occur over a lifetime.

The DWQI's draft recommendation for an MCL of 14 ppt for PFOA significantly exceeds EPA's health advisory, and fails to adequately explain why EPA's conclusions are defective. DoD is concerned that setting an MCL at such a drastically lower level could result in significant costs, while failing to provide any measurable health benefit beyond that already provided by the 70 ppt limit that EPA deemed safe only six days ago in their clarification memo.

Thank you for your attention to these comments. Regardless of how DWQI's recommendations are resolved, DoD remains committed to stewardship of the environment and to protecting the safety and health of the people of New Jersey. If you or your staff has questions concerning DoD's position, please contact me at (678) 655-9532 or at ronald.joyner@us.af.mil.

Sincerely,

A handwritten signature in blue ink that reads "Ron W. Joyner". The signature is fluid and cursive, with the first name "Ron" being the most prominent.

RON JOYNER
Acting DoD Regional Environmental Coordinator
Federal Region 2