



CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT

A project of the Pacific Studies Center

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September 28, 2026

Tess Richman
Engineering & Science Division
Office of Water (4504-T)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Submitted via regulations.gov

Attn: Docket ID No. EPA-HQ-OW-2026-2509

Dear Ms. Richman:

Thank you for the opportunity to comment on U.S. EPA's "Draft Guidance for Reducing Risk from Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) in Biosolids."¹ Our organization has signed on to and wholeheartedly supports the comments submitted by the Natural Resources Defense Council.

We are submitting these additional comments to reinforce the urgency of resolving this significant and growing threat to public health and the natural environment. Every day, industrial users of PFAS "forever chemicals" discharge vast volumes of these chemicals to wastewater plants. A large share of the PFAS is collected as sewage sludge and released into the environment, including application to agricultural lands. While the forms of PFAS chemicals may change, once in the environment—land, surface water, groundwater, even air—they build up continuously.

¹ <https://www.epa.gov/biosolids/draft-guidance-reducing-risk-perfluorooctanoic-acid-pfoa-and-perfluorooctane-sulfonic>

It will take years to conduct risk assessments and establish effluent limit guidelines for even the small set of compounds measured by EPA's standard method 1633A.

Therefore, to protect public health and the environment, I urge EPA to issue guidance immediately authorizing and encouraging publicly owned treatment works to require industrial dischargers to conduct pre-treatment designed to remove and destroy all PFAS from their wastewater. The best way to reduce the risk of PFAS exposure is to cut it off at the source.

Sincerely,

A handwritten signature in black ink, reading "Lenny Siegel". The signature is fluid and cursive, with the first name "Lenny" and last name "Siegel" clearly distinguishable.

Lenny Siegel
Executive Director