

Legislation and Communications Committee

# Quarterly State and Federal Regulatory Matrices

Item 6c July 8, 2024

### Quarterly Update on Regulatory Matrices

# Subject

Quarterly Update on State and Federal Regulatory Matrices

## Purpose

Provide update on state and federal regulatory matrices

# Next Steps

Regulatory matrices will be updated quarterly and posted on Metropolitan's website.

Key rules will be presented at their respective committees.

# Recently Adopted

Rules

#### Federal

- Consumer Confidence Reports
- Six PFAS MCLs
- PFAS and CERCLA

#### State

- Indoor Heat Illness Prevention Standard
- Hexavalent Chromium
- Zero-Emission Forklift Rule
- Conservation as a California Way of Life (pending)

# Metropolitan Comment Letters

# Recent Highlights

#### Federal

- PFAS and RCRA Part 1
- PFAS and RCRA Part II

#### State

Conservation as a California Way of Life



Submitted Electronically. eto: nun regulations cos

U.S. Environmental Protection Agency EPA Docket Center, OLEM Docket, Mail Code 28221T 1200 Pennsylvania Avenue NW Washington, DC 20480

Subject Docket ID No. EPA-HQ-OLEM-2023-0278-Listing of Specific PFAS as Hazardous

Dear Sir Madam:

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the United States Environmental Protection Agency's (EPA's) proposed assessements to EPA's asignificent under the Resource Conservation and Recovery Act (BCPA) to add nine specific per-and polyfluoroalkyl substances (PFAS), their saits, and their muchted moment, to its list of barardous constituents in 40 C F.R. part 261 Appendix VIII (Proposed Rule). The nme FFAS are perfluorooctanoic acid (PFOA), perfluorooctanesulfonic and (PFOS), perfluorobuttmentifonic acid (PFBS), hexafluoropropylene oxide-dimer acid (HFPO-DA or GeaN), perfluoronomnoic acid (PFNA), perfluorohexanevulfonic acid (PFHxS) perfluorodecanos: acid (PFDA), perfluorobexanoic acid (PFExA), and perfluorobutanoic acid (PFBA) EPA is proposing to designate these PFAS as hazardous constituents so that these PFAS would be among the countineurs expressly identified for consideration in RCRA facility assessments, and where necessary, further investigation and cleanup through the RCRA connective action process at RCRA treatment, storage, and disposal facilities (TSDFs).

As a strong proponent of source water protection. Metropolitan is aware of the unique, pervasive. and challenging problems that PFAS pose. While supportive of segulating PFAS, Metropolitan is concerned that this proposed relemaking under RCRA may have unintended consequences for the water industry. As such, Metropolitan offers the following comments on EPA's Proposed

1 EPA should hold off regulating the proposed sane PFAS, their salts, and their stactural isomers as RCRA hazardous constituents until such time that regulators. limits and adequate analytical methods for these PFAS are established.

128 Feel Reg. 3500 (Feb. 2, 2034).

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# Next Steps

 Regulatory matrices updated quarterly and posted publicly on Metropolitan's Legislative Services webpage

 Key rules presented at their respective Board Committees



Quarterly Update on Federal and State Regulatory Activities

Questions

