



**American Water Works
Association**

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September 20, 2017

SUBMITTED VIA E-MAIL

Mr. Michael H. Shapiro,
U.S. Environmental Protection Agency
Office of Water
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

RE: Request for Comment Period Extension on the draft report entitled, "Proposed Approaches to Inform the Derivation of a Maximum Contaminant Level Goal for Perchlorate in Drinking Water (82 FR 43354; EPA-HQ-OW-2016-0438)

Dear Mr. Shapiro:

The American Water Works Association (AWWA) respectfully requests that EPA extend the comment period on the draft report, "Proposed Approaches to Inform the Derivation of a Maximum Contaminant Level Goal for Perchlorate in Drinking Water", by 45-days to December 14, 2017. Given the complexity of the revisions in the Biologically Based Dose-Response (BBDR) model, we believe that a 90-day comment period is necessary to provide a reasonable opportunity for public review and comment.

We support EPA's responsiveness to evaluating the recommendations made by the peer review panel in January 2017. Both the public and the next peer review panel will benefit from additional time to examine the modifications and technical assumptions embedded in the new BBDR model. We respectfully request a 45-day extension to support the public's consideration of the BBDR models scientific rigor and efficacy.

We would appreciate a response to this request as soon as possible. Should you have questions or would like to discuss this matter, please contact me (tmehan@awwa.org) or Kevin Morley (kmorley@awwa.org).

Yours Sincerely,

G. Tracy Mehan, III

Executive Director – Government Affairs

cc: Lee Forsgren – EPA, OW
Peter Grevatt – EPA, OGWDW
Eric Burneson – EPA, OGWDW
Samuel Hernandez – EPA, OGWDW