



September 26, 2017

***SUBMITTED VIA EMAIL***

Mr. Samuel Hernandez  
U.S. Environmental Protection Agency  
Office of Ground Water and Drinking Water  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

**RE: Request for comment period extension on the draft report titled, "Proposed Approaches to Inform the Derivation of a Maximum Contaminant Level Goal for Perchlorate in Drinking Water" (draft MCLG Approaches Report; 82 FR 43354; EPA-HQ-OW-2016-0438)**

Mr. Hernandez:

The American Chemistry Council (ACC) 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. We appreciate EPA's responsiveness in addressing the recommendations made by the first peer review panel in January 2017. However, given the complexity and length of the revisions in the Biologically Based Dose-Response (BBDR) model and supporting documentation being used to develop the MCLG, a 90-day comment period is necessary to allow sufficient time for public review and comment.

All parties, but especially the second peer review panel, will benefit from additional time to evaluate the changes and technical assumptions in the updated BBDR model.

We would appreciate a response to this request at your earliest convenience. Should you have questions or would like to discuss this request, please contact me at [judith\\_nordgren@americanchemistry.com](mailto:judith_nordgren@americanchemistry.com) or Mark Gibson at [mark\\_gibson@americanchemistry.com](mailto:mark_gibson@americanchemistry.com).

Sincerely,

A handwritten signature in black ink that reads "Judith Nordgren".

Judith Nordgren  
Managing Director  
Chlorine Chemistry Division

cc:

Michael Shapiro – EPA, OW  
Lee Forsgren – EPA, OW  
Peter Grevatt – EPA, OGWDW  
Eric Burneson – EPA, OGWDW

