

Comment — Docket ID EPA-HQ-OW-2025-1742

Re: Proposed 2-Year Extension of the PFOA and PFOS Compliance Deadline

Submitted via regulations.gov by July 20, 2026

By: Will Willauer, President, Nantucket Tipping Point, Nantucket, Massachusetts

Nantucket depends entirely on a single federally designated sole source aquifer (49 FR 2952, 1984). Our water shows a PFOS signal — the fingerprint of firefighting foam — and one of our supply wells has been offline for PFAS since 2022, with treatment still unbuilt.

We don't oppose giving cash-strapped systems more time. But this extension lets systems run until 2031 with PFAS as high as 12 ppt — three times the 4 ppt limit — and it relies on public notices to keep everyone honest. Our own experience says those notices don't do that job. We ask EPA to attach four conditions to any extension.

1. Tell people the real numbers. Report language is slippery. Our 2024 report calls the water safely under the "stringent" state standard — a 20 ppt total — without mentioning that the same sample is 72% of the stricter federal PFOS limit. Massachusetts hasn't adopted the federal per-chemical limits, so without a federal reporting floor, customers get told they're fine by choosing the easier yardstick. Notices should state the actual measured level against the 4 ppt federal limit.

2. Keep the reports available. Our town's website posts only the current year's report and takes down the prior one when a new report appears. You cannot track a six-year extension through a document that resets every year. Some systems keep a decade of reports online; the rule should require it for the length of any extension.

3. Require interim action, not just a final deadline. An extension shouldn't mean doing nothing until 2031. Where a system can lower PFAS sooner — blending sources, taking a bad well offline, adding partial treatment — the rule should require those achievable interim steps rather than allowing 12 ppt to stand for six years. Reducing exposure now, even before full compliance, is the whole point.

4. Set real deadlines along the way. Treatment for our shut-down well was promised for summer 2025 and still isn't done. A related town water study from 2022 has been pushed to 2027. Without enforceable milestones — including treatment designed to meet the 4 ppt limit — 2031 becomes a moving target. We're also under a state drought with mandatory water restrictions right now, so delay and water stress are piling up together.

We support keeping the 4 ppt limits. But an extension only works if people are told the truth, can check it year over year, keep reducing exposure in the meantime, and see real progress along the way.

Will Willauer

President, Nantucket Tipping Point

Nantucket, Massachusetts

will.willauer@nantuckettippingpoint.org/ July 15, 2026