



July 13, 2026

U. S. Environmental Protection Agency
EPA Docket Center
Office of Water Docket, Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Proposed Rule to Rescind Maximum Contaminant Levels for PFHxS, PFNA, HFPO-DA (GenX), and Hazard Index Mixtures

Docket ID No. EPA-HQ-OW-2025-0654

To whom it may concern:

Indiana Conservation Voters submits this comment in strong opposition to both proposed rules. We urge the EPA to withdraw the proposed rescission of the Maximum Contaminant Levels (MCLs) for PFHxS, PFNA, HFPO-DA, and the Hazard Index mixture.

I. Background and Indiana Context

Indiana Conservation Voters is a nonpartisan organization working to protect Indiana's air, water, land and public health. Our members and the communities we work in have a direct and urgent stake in federal PFAS drinking water protections.

The Indiana Department of Environmental Management has been conducting PFAS monitoring at public water systems statewide since 2021. Indiana communities are actively investing in treatment infrastructure: the state's first PFAS drinking water treatment system came online in Charlestown in late 2025, and a second is now under construction in Terre Haute at a projected cost of \$19 million. These investments were made in large part in anticipation of, and in reliance upon, enforceable federal standards. Rolling back those standards now undermines the regulatory certainty that communities need to plan and invest.

II. The Proposed Rescission Will Worsen Contamination For Longer

The EPA has framed the proposed rescission as a procedural correction with new rules to follow. We reject this framing. History is unambiguous: without enforceable legal standards, contaminated water systems do not get cleaned up. The chemical industry was aware of the health risks of PFAS for decades before public disclosure and took no voluntary corrective action. Voluntary approaches to PFAS remediation have consistently proven inadequate.

Rescinding the MCLs for four PFAS chemicals, even temporarily, removes the legal lever that compels water utilities, polluters, and state agencies to act. In the absence of source reduction requirements, these MCLs were an important tool to protect the health of our communities. The gap between rescission and any future reissuance will be measured not in months, but in continued human exposure to chemicals that the EPA's own science has linked to cancer, immune suppression, thyroid disease, and developmental harm in children.

This is not a procedural inconvenience. It is a public health emergency that the EPA is willingly extending.

III. The \$1 Billion Grant Fund Is Inadequate as a Substitute for Regulation

The EPA has announced approximately \$1 billion in national grant funding as part of this action, with just over \$13 million allocated to Indiana. We acknowledge that funding for infrastructure is valuable. We reject the suggestion that it is a substitute for enforceable standards.

The scale of the PFAS contamination crisis dwarfs the funding on offer. Approximately 176 million Americans live in communities with detected PFAS in drinking water. There are nearly 10,000 known contaminated sites nationally. A single treatment system in a mid-sized Indiana city costs \$6–19 million. One billion dollars distributed across thousands of communities, thousands of contaminated sites, and millions of affected Americans is a fraction of what remediation actually costs, especially given that it comes with no legal requirement attached.

Grant funding without regulatory mandate helps the most visible and politically connected communities; it leaves small, rural, and disadvantaged communities behind (as a 2025 Environmental Working Group study confirmed, most utilities lack advanced PFAS filtration, with rural communities at greatest disadvantage); and it leaves the underlying contamination sources unaddressed because there is no legal obligation to address them.

Enforceable MCLs and grant funding are not substitutes for one another. They serve very different, complementary functions. Grants support infrastructure. MCLs compel accountability. Both are necessary. Offering one while rescinding the other is not a balanced approach; it is a capitulation to polluters dressed up as generosity to communities.

IV. The Action Conflicts with the Administration's Stated Health Priorities

The administration has repeatedly invoked the Make America Healthy Again agenda as a rationale for various actions. We find this claim difficult to reconcile with the substance of the proposal. The MAHA promise includes reducing toxic chemical exposure, including in drinking water. Removing enforceable limits on cancer-linked forever chemicals and replacing them with inadequate grant funding flies in the face of that promise.

If the administration is genuinely committed to reducing toxic chemical exposure and protecting children's health, the path forward is clear: maintain and strengthen enforceable MCLs for all regulated PFAS, fund remediation adequately, and hold polluters accountable.

V. Requested Actions

Indiana Conservation Voters respectfully requests that the EPA:

1. Withdraw the proposed rule rescinding MCLs for PFHxS, PFNA, HFPO-DA, and the Hazard Index mixture.
2. Allow water utilities to opt-in to an extension of the compliance deadline, rather than a blanket extension.
3. Maintain the existing MCLs established in the April 2024 National Primary Drinking Water Regulation.
4. Commit to strengthening, not weakening, enforceable standards as the science on additional PFAS compounds continues to develop.
5. Ensure that any grant funding for PFAS remediation is distributed equitably, with priority given to small, rural, and disadvantaged communities that lack resources to pursue treatment independently.

Hoosiers deserve clean water. Indiana's communities have already begun making the investments to get there. The federal government should not pull the regulatory floor out from under them.

Respectfully submitted,
Indiana Conservation Voters
June 26, 2026