



December 16, 2019

Re: EPA-HQ-OW-2019-0174

The Association of Public Health Laboratories (APHL) appreciates the opportunity to comment on the draft *National Water Reuse Action Plan*. We commend the stated goal of a final plan that includes clear action commitments to help assure the nation's water resources sustainability, security, and resilience by furthering water reuse. We are encouraged to see the provision to consider establishing public health benchmarks and guidelines to ensure any reused water is fit for purpose. Clear EPA guidance and tools will assist water testing laboratories to bring water reuse safely, consistently and expeditiously into state, local, tribal and territorial water plans.

The draft plan compiles many interesting examples of water reuse, however the EPA's action commitments are unclear. Of particular relevance to water testing laboratories, Action 2.2 - *Compile and Refine Fit-for-Purpose Specifications* provides examples of microbial and chemical constituents of potential concern, but not the degree of guidance laboratories can expect from EPA. A list of suggested constituents and testing values and ranges would help jurisdictions develop monitoring plans. The docket document package also frequently references the need for risk assessments, however the action plan does not yet point to where the responsibility for these should lie. APHL encourages EPA to include its plans for performing these risk assessments in the final action plan or at a minimum, plan to provide examples and toolkits to help jurisdictions perform this task.

The EPA has provided leadership through outlining this ambitious water reuse agenda. In the final plan, we ask that the agency commit to developing the resources it has suggested, providing a clearer path from plan to action. APHL looks forward to working with EPA and other stakeholders to help develop this important water resource.

Sincerely,

Handwritten signature of Scott J. Becker in black ink.

Scott Becker

Executive Director

Handwritten signature of Kathryn Wangness in black ink.

Kathryn Wangness

Chair, Environmental Laboratory Sciences Committee

The Association of Public Health Laboratories (APHL) represents state and local governmental health laboratories that monitor and detect public health threats.