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Office of Pollution Prevention and Toxics

Document Control Office (7407T)

Environmental Protection Agency

1200 Pennsylvania Ave., NW

Washington, DC 20460-0001

Submitted via electronic mail: *oppt.ncic@epa.gov*

Dear Sir or Madam:

These comments are submitted on behalf of the National Association of Clean Water Agencies (NACWA) in support of the Information Collection Request (ICR) for the Safer Detergent Stewardship Initiative that the Environmental Protection Agency (EPA) has forwarded to the Office of Management and Budget. NACWA represents the interests of nearly 300 publicly owned wastewater treatment works (POTWs) nationwide. NACWA's members serve the majority of the sewered population in the United States, and collectively treat and reclaim more than 18 billion gallons of wastewater each day.

As stewards of the water environment, NACWA's members support efforts to reduce pollution at its source, preventing the discharge of pollutants into the wastewater system. Sustainable environmental protection cannot be achieved solely through end-of-pipe wastewater treatment. The increasing number of chemicals used in commercial and consumer products and the technical challenges associated with removing these chemicals from wastewater make source control the best option. Programs like the Safer Detergent Stewardship Initiative that seek to decrease the amount of potentially harmful chemicals from entering the sewer system and encourage businesses and other entities to transition to alternative ingredients and products are critical to addressing the environmental impacts from the diverse range of substances in commercial and consumer products. NACWA therefore supports the ICR submitted by EPA for the Safer Detergent Stewardship Initiative.

If you have any questions, please contact me at 202/296-9836 or *cfinley@nacwa.org*.

Sincerely,



Cynthia A. Finley

Director, Regulatory Affairs