



EWG urges the EPA's National Environmental Justice Advisory Council to focus on drinking water quality concerns in communities across the country

Submitted for the March 24, 2021, NEJAC public meeting

The Environmental Working Group, or EWG, a nonprofit research and policy organization with offices in Washington, D.C., Minneapolis, Minn., San Francisco and Sacramento, Calif., submits comments for the public meeting of the Environmental Protection Agency National Environmental Justice Advisory Council, or NEJAC. EWG urges NEJAC to provide advice and guidance for the EPA to ensure that communities across the country have access to clean, reliable drinking water at the tap.

Problems with drinking water quality have affected many communities across the country, because of the toxic legacy of systemic racism, as well as the inexcusable failure of the federal government to protect the public from contaminated water. Research published by EWG, many public interest advocacy organizations, academic researchers and investigative reporters shows that the nation's water supply is under assault from a toxic stew of pollutants: the harmful fluorinated chemicals known as PFAS, lead from older pipes, runoff from farmland that carries agricultural chemicals such as pesticides and nitrate into surface and groundwater, and many others.

Additionally, there are no legal limits for more than 160 unregulated contaminants in U.S. tap water. The EPA has not updated the maximum contaminant levels for drinking water in decades, even though new scientific research has shown that these contaminants, such as volatile organic chemicals can harm human health at levels much lower than what the EPA previously considered acceptable.

For example, a recent investigation published by The Guardian reported that access to clean drinking water is highly unequal, based on race, income and geography, with poorer counties and counties with a greater Latinx population generally having worse water quality than the national average.¹ Research published by University of Oregon sociologists found that in Flint, Mich., city blocks that were exposed to lead service lines, or LSLs, had, on average, higher concentrations of single-parent white, Black, and Latinx families. When accounting for blocks' socioeconomic status and the spatial clustering of LSL exposure, blocks with higher concentrations of single-father Black and single-mother Latina families were most significantly at risk of exposure to LSLs.² Similar

¹ Holden E, Enders C, Kommenda N, Ho V. More than 25m drink from the worst US water systems, with Latinos most exposed. Guardian February 26, 2021. <https://www.theguardian.com/us-news/2021/feb/26/worst-us-water-systems-latinos-most-exposed>

² Liévanos RS, Evans CR, Light R. An Intercategorical Ecology of Lead Exposure: Complex Environmental Health Vulnerabilities in the Flint Water Crisis. Int J Environ Res Public Health. 2021; 18(5):2217. <https://doi.org/10.3390/ijerph18052217>



concerning findings were found in a Government Accountability Office report, which found that areas with older housing and vulnerable populations were more likely to have lead service lines.³ And in March of this year, National Public Radio reported that residents of Jackson, Miss., have not had usable running water for over a month, following water service disruptions due to water main breaks caused by an unprecedented winter storm.⁴

These stories from across the country underscore the environmental and social injustice of the unequal drinking water quality across communities. EWG urges NEJAC to provide advice and guidance for the EPA to ensure that communities that have experienced discrimination in the past – or continue to experience it today – receive the resources necessary to protect their drinking water.

Submitted on behalf of the Environmental Working Group,

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³ U.S. Government Accountability Office. Drinking Water: EPA Could Use Available Data to Better Identify Neighborhoods at Risk of Lead Exposure. GAO-21-78, December 18, 2020.

<https://www.gao.gov/products/gao-21-78>

⁴ Schimmel B. Jackson, Mississippi, Residents Enter 4th Week Of Water Crisis. National Public Radio, March 12, 2021. <https://www.npr.org/2021/03/12/976342939/jackson-mississippi-residents-enter-fourth-week-of-water-crisis>