

## Robin Lowder

I have two major sources of concern regarding the terms of the proposed permit.

First, whereas no safe concentration of PFAS has been established, and their damaging effects on health and the environment are not well understood, no detectable concentration of these substances should be permitted in discharge.

Second, the infrequent monitoring schedule as described in this draft, which relies on quarterly reporting and annual averages, would enable the permittee to release significantly more pollution than permitted simply by scheduling operations such that the greatest release of waste chemicals occurs just after a sample is taken. Significantly more frequent and strict testing requirements, including random, unscheduled tests conducted by state regulators, are essential to achieving the intended pollution limits.

Thank you for considering these issues and implementing the appropriate modifications to the permit.