



North American Metals Council
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October 7, 2019

Via E-Mail

Ms. Erica Fleisig
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Proposed Rule to Withdraw Certain Water Quality Criteria
Applicable to Washington; Docket Number EPA-HQ-OW-2015-
0174

Dear Ms. Fleisig:

The North American Metals Council (NAMC)¹ is pleased to submit this letter in support of the comments submitted by the International Antimony Association (i2a) regarding the U.S. Environmental Protection Agency's (EPA) proposed rule for the Withdrawal of Certain Water Quality Criteria Applicable to Washington (Proposed Rule). NAMC appreciates this opportunity to comment.

NAMC commends EPA for its efforts to ensure regulatory decisions are transparent and based on the best available science. In particular, NAMC agrees with and supports i2a's comments endorsing the Proposed Rule's increase of the allowed antimony levels in water and organisms.

We thank EPA for considering the science developed within the last decade on antimony, data and information that provide compelling evidence that antimony and its

¹ NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American "metals industry") on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.



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compounds are not environmentally toxic substances. Please contact me at kroberts@namc.org with any questions.

Sincerely,

Kathleen M. Roberts
NAMC Executive Director