

**Allagash Brewing Company · Alliance Brewing Company · Appalachian Mountain Brewery
Birdsong Brewing Company · Blue Point Brewing Company · BrewDog · Brewery Techne
Brooklyn Brewery · Bull City Burger & Brewery · Cisco Brewers · Earth Bread + Brewery
Eastern Market Brewing Co. · Engrained Brewery & Restaurant · Fibonacci Brewing Company
Fiddlin' Fish Brewing Company · Flossmoor Station Brewing Company · Flying Fish Brewing Co.
Founders Brewing Company · Fremont Brewing · Grand Rapids Brewing Company
Greenstar Organic Brewing · Half Acre Beer · HopCat · Horse & Dragon Brewing Company
Kona Brewing Co. · Lakefront Brewery · Naked River Brewing Company · New Belgium Brewing
Redhook Brewery · Sailfish Brewing Company · Sanctuary Brewing Company
Sierra Nevada Brewing Co. · Starr Hill Brewery · Temperance Beer Co.
Widmer Brothers Brewing · Wild Wolf Brewing Company · Wynwood Brewing Co. · Zed's Beer**

June 6, 2019

Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Submitted online via regulations.gov

RE: Docket ID Number EPA-HQ-OW-2019-0166: Interpretive Statement on
Application of the Clean Water Act National Pollutant Discharge Elimination
System Program to Releases of Pollutants from a Point Source to Groundwater

Dear Administrator Wheeler:

We oppose your proposal not to require Clean Water Act permits for pollution discharges into waterways through groundwater. This policy change would endanger the water sources that our craft breweries depend on to brew our beer.

Beer is mostly water, so the quality of our source water significantly affects our finished product. Compounds present in brewing water can affect pH, color, aroma, and taste. Sulfates make hops taste astringent, while chlorine can create a medicinal off-flavor. The presence of bacteria can spoil a batch of beer. Even small chemical disruptions in our water supply can influence factors like shelf life and foam pattern.

Unexpected changes in water quality—due to pollution in our source water, or a change in the treatment process at our local drinking water plant—can threaten our brewing process and our bottom line. We need reliable sources of clean water to consistently produce the great beer that is key to our success. It is thanks in part to this important natural resource that the craft brewing industry contributes about \$76.2 billion to the U.S. economy each year, along with more than 500,000 jobs.¹

EPA's proposal to stop controlling pollution that flows through groundwater before entering a nearby waterway threatens our most important ingredient. The federal government and the states

¹ Brewers Association statistics from 2017. <https://www.brewersassociation.org/statistics/economic-impact-data/>.

have required permits for this type of pollution for decades—and for good reason. Sewage injection wells, mining activities, pipelines, coal ash dumps, and animal waste ponds can all pollute surface water bodies by way of groundwater. This contamination must be controlled to keep our water safe for drinking and brewing.

The goal of the Clean Water Act is to protect water quality. It makes no sense to regulate pollution discharged directly into a river while creating an exemption that freely allows polluters to dump waste into groundwater that flows into the same river. The end result is the same: contaminated water that puts public health, and our beer, at risk.

We ask you not to roll back clean water protections by creating this dangerous pollution loophole. Protecting clean water is central to our long-term business success. Moreover, it is vital to the health and the economy of the communities where we live and work. EPA should withdraw this policy change and continue to protect the water sources on which our businesses depend.

Thank you for considering our views on this important matter.

Sincerely,



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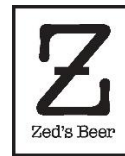
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