

## **AMWA Statement for EPA's Listening Session to Gather Input for EPA's Development of a Strategic Plan for Assessing and Managing Risks Associated With Algal Toxins in Drinking Water**

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The Association of Metropolitan Water Agencies (AMWA) represents large publically owned water systems from across the country. AMWA appreciates the technical and implementation challenges EPA faces in addressing the risks posed by harmful algal blooms (HABs) and potential associated algal toxin exposure via drinking water sources. However, plans for addressing these challenges must be carefully crafted and implemented to achieve optimal public risk reduction and public health benefits.

The congressionally-mandated strategic plan required under the Drinking Water Protection Act (H.R. 212) presents an important opportunity to set the path for a thoughtful, collaborative approach for addressing the challenges posed by algal toxins in drinking water. Within the plan, the process that is established for further evaluation – and reevaluation - of algal toxin risks is of vital importance to assuring optimal risk reduction. This process must include continuous, in-depth consultation with stakeholders to ensure that all necessary expertise and practical experience is brought to the table.

Based on the information gathered leading up to the establishment of cyanotoxin health advisories earlier this year (and the feedback gathered as part of that process), EPA should already have a good handle on the nature of the additional information needed and research gaps to be filled in order to better assess next steps for further reducing algal toxin risks. Within this context, AMWA would like to reiterate several broader points that should receive emphasis within the strategic plan.

- 1) The best, and most cost-effective, long-range strategy to protect the public from algal toxins is to prevent bloom-causing nutrients from entering waterways in the first place. In that regard, any meaningful reduction in algal blooms must begin with the agricultural sector. The development of a bolder, more innovative strategy for managing nonpoint source water pollution, particularly from the agricultural sector, must be a part of the strategic plan.
- 2) The strategic plan needs to place an emphasis on developing sufficiently robust analytical methods in time for the agency to include appropriate algal toxins on EPA's list for monitoring under the Fourth Unregulated Contaminant Monitoring Rule (UCMR 4). Collection of occurrence data under the UCMR can fill key information gaps related to algal toxins and provide a vital foundation for the additional risk analyses that must be performed in

accordance with Safe Drinking Water Act mandates. These analyses will, in turn, properly inform future stakeholder discussions and policy decisions from EPA and other local, state and federal agencies intended to ensure algal toxins do not pose human health risks if they reach drinking water supplies.

- 3) The assessment of existing guidance and support documents, including all existing health criteria documents, should be identified as an iterative process within the strategic plan, drawing on lessons learned and new data as they become available to make appropriate and timely updates. With a summer algal bloom season under the new cyanotoxin health advisories now behind us, it is a particularly good time to reengage stakeholders to evaluate how to best address algal toxin challenges.
- 4) Additional consideration of communication challenges regarding algal toxin health risks should be an area of focus in the strategic plan. The setting of the cyanotoxin health advisories based on a 10-day exposure and at two different age-based levels poses a unique public communication challenge. Further guidance must offer a robust interpretation of how to evaluate the health advisory levels within this time 10-day time frame that corresponds to the actual risks involved.

Going forward, it will be the strength of the collaborative processes put in place to support and augment existing programs and processes that will determine how efficiently and effectively any data and information gaps are filled, and help in identifying the actions that will most effectively manage algal toxin risks. Combined with the already robust process for evaluating contaminant risks and evaluating the need for further regulation required under the Safe Drinking Water Act, such evaluations will ensure sound policies are developed and implemented.

In closing, AMWA and its member drinking water utilities would like to thank EPA for its initial efforts in getting ahead of algal toxin issues and looks forward to further collaboration on its next steps.