



March 17, 2025

Dr. Jennifer McLain
Director
Office of Ground Water and Drinking Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Via electronic submission

RE: Comments on Docket ID EPA-HQ-OW-2024-0456, Announcement of Preliminary Regulatory Determinations for Contaminants on the Fifth Drinking Water Contaminant Candidate List

Dear Dr. McLain,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) request for public comment, *Announcement of Preliminary Regulatory Determinations for Contaminants on the Fifth Drinking Water Contaminant Candidate List (CCL)*. AMWA is an organization composed of the largest publicly-owned drinking water systems in the United States, providing drinking water to more than 160 million people.

AMWA supports the regulatory approach of the Safe Drinking Water Act Amendments of 1996 (SDWA). The statute takes into account lessons learned from past drinking water laws and focuses on contaminants that actually occur in drinking water at levels of public health concern as understood by the best available science. The law provides a sound scientific basis for regulations and appropriately considers the benefits the public may receive from regulatory efforts against the costs they will be asked to bear to achieve those benefits. EPA must faithfully follow the new contaminant regulatory process as established by the 1996 amendments for the establishment of National Primary Drinking Water Regulations (NPDWR).

AMWA believes following the process outlined in the SDWA remains the best way to prioritize the agency's limited resources by focusing on those contaminants most likely to present human

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health risks through drinking water while also being conscious of the finite resources available to public water systems across the country. With this consideration, AMWA supports EPA's negative determinations for the proposed nine contaminants from CCL 5: 2-aminotoluene, cylindrospermopsin, ethoprop, microcystins, molybdenum, permethrin, profenofos, tebuconazole and tribufos.

AMWA encourages EPA to continue to ensure that the best available science is leveraged in making its regulatory determinations, and to offer transparency as appropriate as to what steps are being taken to evaluate and mitigate risk for contaminants for which determinations are not yet appropriate. AMWA comments the lack of a regulatory determination for the Phase 3 contaminants still in evaluation, with consideration of the specific population impacted by each contaminant of concern. Given the lack of determinations for these additional contaminants, AMWA asks for the following:

- 1,2,3-Trichloropropane: Updates on the status of analytical method updates to address the discrepancies between the Health Reference Level and the higher Minimum Reporting Level.
- 1,4-Dioxane: In a memo dated November 5, 2024, the agency indicated a joint approach would follow to address the "unreasonable risk" posed by 1,4-dioxane, and indicated regulation under SDWA may be necessary. AMWA asks for continued updates on the status of risk management efforts of 1,4-dioxane from polluters before managing any remaining risk through SDWA.
- Manganese: Transparency regarding what research is being completed to address health effects and occurrence gaps and a timeline for these analyses.
- Quinoline: Updates on any ongoing actions to improve the analytical method and what additional analyses are being performed.
- Strontium: Transparency in the evaluation of treatment methods and health benefits.

EPA should continue with its thorough approach of ensuring that strong health and occurrence data support the decision of whether a meaningful opportunity exists for health risk reduction. If there is any additional information needed on these comments, please contact AMWA's Manager of Regulatory and Scientific Affairs, Kaline Gabriel, at gabriel@amwa.net.

Respectfully,



Thomas Dobbins
Chief Executive Officer
Association of Metropolitan Water Agencies

CC: George Gardenier, Office of Water
Eric Burneson, Office of Water