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June 5, 2026

The Honorable Jessica Kramer
Assistant Administrator
Office of Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Submitted electronically via regulations.gov.

Re: Docket ID No. EPA-HQ-OW-2022-0946 Drinking Water Contaminant Candidate List 6-Draft

Dear Assistant Administrator Kramer,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA)'s draft Sixth Contaminant Candidate List (CCL 6). AMWA represents the nation's largest publicly owned drinking water systems, and our members provide drinking water services to more than 160 million people. AMWA has consistently supported the scientific and data-driven processes used under the Safe Drinking Water Act (SDWA), including the CCL process, as a mechanism to help the agency effectively prioritize the use of limited resources to inform which unregulated contaminants to regulate. The Association has routinely provided feedback to EPA on past CCLs and related actions and has continuously emphasized the need for EPA to prioritize and categorize the substances included in each CCL to better accomplish the agency's goal of producing accurate and meaningful regulatory determinations for currently unregulated substances.

The Association believes that, in order to prioritize EPA's limited resources, the Agency should emphasize following the process outlined in SDWA and focus on the contaminants most likely to present human health risks due to exposure through drinking water. As the CCL remains a crucial first step to the process of regulating contaminants in drinking water, AMWA believes that a focused, transparent, and intentional CCL guided by the requirements for regulating a contaminant will deliver the best results to guide research and inform public policy. AMWA offers the following comments on various aspects of the development of the draft CCL 6, recommendations for the CCL process in general, and EPA's specific request for

comment on the chemical and microbial candidate contaminants and four chemical groups the Agency has proposed for inclusion in the draft CCL 6.

EPA should balance the ever-expanding CCL with transparent prioritization.

First and foremost, AMWA encourages EPA to develop approaches that better focus the CCL on identifying contaminants that pose the highest public health risk and maximizing the effective use of existing staff and funding resources. EPA has previously maintained that SDWA does not limit the number of contaminants that may be included in the CCL. While AMWA agrees with this assessment, it remains unclear how the Agency can best handle the contaminants with the greatest risks to human health when the list of contaminants continues to grow exponentially, and known research gaps on candidate contaminants does not decrease commensurately.

Over time, the number of contaminants on the CCL has continued to grow significantly while regulatory determinations or public information on research has not kept pace. Past CCLs have included between 51 and 116 total named chemical and microbial contaminants, but the use of chemical groups has greatly increased the total universe of contaminants under consideration. For example, CCL 4 included a total of 109 contaminants: 96 chemicals, 12 microbes, and one contaminant group, cyanotoxins, for which there was an unspecific amount. CCL 5 included 66 chemicals, 12 microbial contaminants, and three chemical groups: PFAS, which contained about 10,246 chemicals at the time of the final CCL5;[1] disinfection byproducts (DBPs), which included 23 named DBPs; and cyanotoxins, which again did not include a fixed number. This left the CCL 5 representing a total of at least 10,335 chemical substances, an unspecified number of cyanotoxins, and 12 microbes.

With this draft, the CCL would now balloon to include 75 chemicals, 9 microbes, and four chemical groups that capture a universe of over 45,000 additional individual chemicals. These include disinfectant byproducts, which includes 27 named DBPs; microplastics, which are difficult to enumerate as they vary in size, polymer type, and morphology; PFAS, for which there are now an estimated 21,028 chemicals according to the latest version of EPA's CompTox PFAS list;[2] and pharmaceuticals, including any substances defined as a "drug" under the Federal Food, Drug, And Cosmetic Act (1938), for which EPA did not include a total estimated number and no clearinghouse exists. Using EPA's suggested definition, the pharmaceutical category may total around 24,969 constituents or more when including FDA's estimates of about 24,000 approved prescription drug products for human use, approximately 1,650 products approved for animal use, and about 804 FDA-licensed biologics products.[3] This would bring the draft CCL 6 to a universe of roughly 46,108 contaminants and an impossible to quantify chemical group consisting of microplastics. It is difficult to imagine how EPA can balance this increasingly large list with the research needed to inform SDWA regulatory processes.

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[1] EPA. (October 2024). CompTox Chemicals Dashboard. WATER|EPA: Chemical Contaminants - CCL 5 PFAS subset. https://comptox.epa.gov/dashboard/chemical-lists/CCL5PFAS.
[2] EPA. (January 2026). CompTox Chemicals Dashboard. *PFASSTRUCTV6: PFAS structure list*. CompTox Chemicals Dashboard. https://comptox.epa.gov/dashboard/chemical-lists/PFASSTRUCTV6.
[3] Food and Drug Administration (FDA). (January 2026.) FDA at a Glance. https://www.fda.gov/media/154548/download.

AMWA therefore recommends that EPA reduce the total number of substances, including those captured within large chemical groups, on the CCL to keep the list at a level that supports EPA's research capacity and chemical prioritization. Doing so will ensure that the Agency can effectively and efficiently prioritize research on health effects, occurrence, and analytical methods for those chemicals maintained from previous lists and those deemed necessary to be added. Furthermore, the scope of the list should align with EPA's research plans for these unregulated contaminants and should work to inform regulatory determinations. Ultimately, a total number between 50 and 75 named chemical and microbial contaminants, and chemical group listings that are informative of regulatory determinations, is more effective for moving chemicals forward to regulatory determinations. Regardless of whether EPA narrows the list to 75 or fewer contaminants and includes narrower chemical groups, the Agency should, at a minimum, work to prioritize and transparently share its prioritization on different aspects of research and which contaminants it is considering for movement forward in the pre-regulatory determination process (e.g., through to the Unregulated Contaminant Monitoring Rule (UCMR)).

The CCL is an important screening tool that should directly inform SDWA requirements for regulating contaminants.

AMWA strongly supports the CCL as a scientific and data-driven process and believes Congress intended for the Agency to use it to inform regulatory determinations. SDWA Section 1412(b)(1)(B) requires EPA to publish a list of contaminants that "are not subject to any proposed or promulgated national primary drinking water regulation," that "are known or anticipated to occur in public water systems," and that "may require regulation under this title." This expressly ties inclusion on the CCL to the statutory standard for regulation, including the three-part test set out in Section 1412(b)(1)(A). The CCL's composition and relationship to informing regulatory determinations is also supported by the requirement that EPA periodically select contaminants from the CCL to make regulatory determinations, applying the three-part test that a contaminant may have an adverse effect on human health, occurs or is likely to occur at levels of public health concern, and presents a meaningful opportunity for health risk reduction through regulation.

These provisions together demonstrate that Congress intended for the CCL to be a list of contaminants that are potentially able to be situated within the requirements for regulation, rather than an ever-growing list of all contaminants of concern with varying degrees of related research on health effects, occurrence, and analytical methods. Therefore, the most accurate reading of §1412(b)(1) supports that EPA must include contaminants that are not only unregulated and occurring but also have the capacity to satisfy SDWA's health-based, occurrence-drive, and risk-reduction criteria. Only including contaminants that can fit into this framework, and a transparent prioritization of those contaminants, will ensure that the Agency can realistically advance contaminants through the regulatory determination process and, where appropriate, the promulgating of national primary drinking water regulations.

EPA could greatly improve the value of the CCL by transparently sharing its prioritization of contaminants and associated research efforts.

AMWA has long argued that EPA should utilize the CCL process as a method of prioritizing candidate contaminants based on data and research available on health effects, occurrence, and available analytical methods. While the CCL is an important tool for developing a universe of candidate contaminants, its value diminishes significantly if the list functions as a broad, undifferentiated inventory of contaminants without signaling the Agency's relative priority or urgency. Given that EPA and external researchers across the environmental health, water, and laboratory sectors, operate with limited resources, the absence of an explicit prioritization framework can lead to efforts dispersed across contaminants that may differ substantially in data maturity and regulatory relevance. A more structured CCL that reflects EPA's evaluations and prioritization of the strength of health effects evidence, frequency and concentration of occurrence, and readiness of analytical methods would better support strategic decision-making and improve transparency for stakeholders.

A transparent prioritization approach would also provide clearer signals to the greater scientific community, states, other federal health agencies, and water systems about where EPA believes additional health studies, data collection, or method development are necessary. Many states will move monitoring programs forward or regulate contaminants in drinking water before EPA issues regulatory determinations, providing an opportunity for shared information with the Agency. Research organizations dedicated to environmental health and water issues across the nation also provide funding to researchers focused on answering questions related to health impacts of contaminants, their occurrence, and the most accurate, cost-effective ways of sampling and measuring them. EPA's transparent prioritization of the CCL would help stakeholders use the CCL as a practical prioritization tool that aligns scientific capacity with developing EPA research.

Finally, EPA's transparent prioritization of contaminants in the CCL would ensure that the Agency dedicates research funds to chemicals that both present the greatest risk to human health and are most informative to potential regulatory determinations, rather than a those with high public interest that may not be ready for prioritization. As stakeholders review the current draft CCL 6, it is difficult to determine which among the over 46,000 named contaminants, microbes, and classes of contaminants the Agency may prioritize for inclusion in the UCMR, or might be the focus of research that leads to regulatory determinations.

EPA can improve the transparency of its CCL methods, and related research progress, through various measures.

AMWA encourages the Agency to return to a practice of sorting all listed contaminants and contaminant groups by availability of data and analytical methods. In earlier CCL cycles, including CCL 1, 2, and 3,[4] EPA included in the final notice a table that identified the availability, or lack, of sufficient data for the listed contaminants. Specifically, EPA previously characterized each chemical contaminant's data needs in three categories: health effects, occurrence, and analytical method. For each category, EPA identified whether enough research and data was available to inform a regulatory determination. AMWA appreciates

[4] EPA. (September 21, 2009). Exhibit 2. Regulatory Determination Data/Information Needs for CCL 3 Chemicals. https://www.federalregister.gov/d/E9-24287/p-161.

that EPA produced two tables reflecting data availability for the 75 chemical contaminants[5] and 9 microbial contaminants[6] in the Technical Support Documents for the draft CCL. However, no such tables were included for the chemical groups, and the data availability assessments for the chemical and microbial contaminants were embedded in long technical support appendices. AMWA encourages sharing this information for the chemical groups, including the individual 27 DBPs, major PFAS under consideration, microplastics as a class, and known pharmaceuticals of concern. This information will make clear to stakeholders the data gaps for listed contaminants related to needs for a regulatory determination. AMWA encourages EPA to continue this process in the CCL 6 as part of the final listing for all contaminants and contaminant groups to increase transparency with stakeholders and the public.

To further increase transparency, AMWA encourages EPA to expand upon the research needs table included in the final notices by using the CCL to thoroughly communicate the progress, results, and prioritization of research on CCL contaminants. The screening data that EPA releases for the development of the preliminary CCL provides more detailed information than is available for the draft CCL, and AMWA encourages EPA to continue to make these documents readily available on the Agency's CCL webpage. Including this information online informs the public about current research efforts and helps guide other experts in deciding where to focus research efforts. Furthermore, AMWA requests that EPA show documentation for the ongoing state of prioritization of contaminants that have been carried over from previous CCLs. This may be as simple as assigning a "high," "low," or "medium" priority for contaminants and including the agency's rationale behind the characterization. AMWA encourages EPA to make this information available online.

AMWA recognizes that the CCL requires concerted Agency research efforts and transparent engagement with external science advisors.

AMWA commends EPA for transparency efforts throughout the previous CCL processes when utilizing expert recommendations from the National Academy of Sciences' National Research Council (NRC), the National Drinking Water Advisory Council (NDWAC), and/or the Science Advisory Board (SAB). However, the preamble to this draft CCL contains only one reference to the SAB, which notes the Agency's use of the SAB's comments on the previous CCL 5. The Association encourages continued transparency in the CCL 6 process and future endeavors by publicly documenting when and how EPA expert advisors or authorities outside of the agency were consulted.

Also of relevance when considering the development of CCL 6 is the current state of EPA's Integrated Risk Information System (IRIS). Historically, IRIS has performed the necessary research and calculations to assess the toxicity of chemicals. The research done by this group, particularly in relation to carcinogenic materials, has been used extensively by EPA to inform health effects data for past CCLs. However, recent

[5] EPA. (February 2026). Technical Support Document for the Draft Sixth Contaminant Candidate List. Chapter 5 CCL 6 Data Availability Assessment. https://www.epa.gov/system/files/documents/2026-02/draft-ccl-6-chemical-tsd-02.26.26-508.pdf.
[6] EPA. (February 2026). Chapter 6. Data Availability for Draft CCL 6 Microbial Contaminants. Technical Support Document for the Draft Sixth Contaminant Candidate List. https://www.epa.gov/system/files/documents/2026-02/draft-ccl-6-microbial-tsd-02.26.26-508.pdf.

reporting[7] has indicated that EPA leadership has directed Offices within the Agency to re-evaluate their current use of IRIS assessments and to refrain from using them in future regulations. Additionally, it is anticipated that EPA will soon begin adding disclaimer language to the program's materials indicating that findings are not necessarily intended to be used in regulation. As EPA continues to evaluate contaminants through the CCL, EPA should provide clarity on the current state of IRIS and how that may impact chemical evaluation under the CCL process moving forward. It is essential that, should the Agency pivot to new methods of chemical evaluation, the Agency continue to provide transparency to the public on which frameworks are being used.

Finally, AMWA has long encouraged the Agency to ensure research being done in offices outside of the Office of Water (OW), such as the Office of Research and Development, informs the CCL where possible. In light of EPA's recent reorganization to align research staff with appropriate programmatic offices, like the OW, and the newly established Office of Applied Science and Environmental Solutions within the Office of the Administrator, AMWA offers the same recommendation. It is vital that the work included in these offices' multiyear strategic research action plans supports the current CCL to best prioritize research needs and to utilize the agency's resources.

Individual contaminant and chemical group listings should be informative for regulatory decision making under SDWA.

Chemical Contaminants Selected for the Draft CCL 6

Aligned with AMWA's concerns explained throughout these comments, AMWA encourages EPA to articulate its prioritization of these individual chemicals in terms of research prioritization, data needs, and potential to move forward in the SDWA regulatory process (e.g., for inclusion in the UCMR). AMWA appreciates the inclusion of Table 24. Data Availability for Draft CCL 6 Chemicals in the Technical Support Document, and we encourage the Agency to share this data availability information in the final CCL as described above in our letter.

Microbial Contaminants Selected for the Draft CCL 6

Similarly, AMWA appreciates that EPA developed and included Table 11. Data Availability for Draft CCL 6 Microbial Contaminants, which articulate the availability of occurrence data, health assessment, and analytical method availability. AMWA iterates that EPA should share this data availability, and its prioritization of research, in the final CCL.

Listing of Disinfection Byproducts Group on the Draft CCL 6

AMWA appreciates that EPA specifically lists the 27 individual chemicals that are part of the DBP group, which includes 23 that were listed under the DBP chemical in CCL and four unregulated DBPs

[7] Inside EPA, subscription. (May 4, 2026). https://insideepa.com/daily-news/epa-launches-agency-wide-overhaul-risk-methods-amid-iris-shutdown.

(bromochloroacetonitrile, chloral hydrate, chloronitramide anion, and trichloroacetonitrile) that were added based on input from Agency subject matter experts. DBPs can vary substantially in occurrence and concentration depending on source water characteristics, treatment methods, disinfectants, and distribution system conditions. Because individual DBPs may also differ in toxicity and associated health effects, evaluating them separately is important for informing determinations and prioritizing contaminants for potential regulation.

AMWA encourages EPA to develop similar data availability assessment tables to those included for the draft CCL 6 chemicals and microbes and to prioritize research efforts on addressing data gaps. Sharing more information about the status of health effects research can help stakeholders prioritize their own research efforts, and sharing the status of occurrence information can help water systems and other stakeholders prioritize research on occurrence, formation, and potential methods for preventing formation. This is particularly important as EPA works to develop the MDBP rule revisions due in summer of 2027.

Other Chemical Group Listings

While AMWA recognizes that group listing contaminants recognizes important chemical similarities between groups and provides the opportunity to consider chemical classes holistically, the Association also urges EPA to consider that group listings must be informative for EPA's own research and regulatory decision making under SDWA. Overly broad categories can undermine EPA's goals of establishing a universe of contaminants to prioritize and obfuscate which contaminants are a priority for EPA's research efforts.

Furthermore, AMWA appreciates EPA's clarification that including a set of substances as a group, such as PFAS, DBPs, microplastics, and pharmaceuticals, does not necessarily mean these substances will further advance through the SDWA process as a group. AMWA believes this is appropriate but asks EPA to include more information as to how the agency plans to prioritize substances within these groups, specifically related to EPA's research priorities.

Listing of Microplastics Group on the Draft CCL 6

AMWA recognizes that there is significant public concern on the human health effects associated with exposure to microplastics in drinking water and acknowledges the significant research gaps EPA, stakeholders, and the research community must fill to address the issue of microplastics before they are ready for further movement in the SDWA regulatory process. AMWA commends EPA for transparently identifying the myriad research gaps related to microplastics, their human health impacts, occurrence, and sampling and analytical methods, in the preamble to the draft CCL.

While the inclusion of microplastics in the draft Candidate Contaminant List (CCL) reflects growing scientific and public interest in the presence of plastic particles in drinking water supplies, substantial uncertainty remains regarding the relationship between microplastic exposure and specific human health outcomes. EPA correctly identified that a health-based definition of microplastics is a known data gap. Existing research has not established clear dose-response relationships for different particle sizes, polymer

compositions, morphologies, or surface chemistries of micro- and nanoplastics, and there is limited consensus regarding which characteristics of microplastics are most relevant to toxicity. While emerging studies have identified potential concerns associated with microplastic and nanoplastic exposure, the underlying health effects science is relatively immature.

Significant data gaps also remain regarding the collection and characterization of microplastics in environmental and drinking water samples, which EPA also aptly pointed out in the preamble. Sampling methods are highly susceptible to contamination from ambient plastic fibers, laboratory materials, clothing, and field handling procedures, thus creating substantial quality assurance and reproducibility challenges. In addition, there is no EPA-standardized or other universally accepted framework for defining the size ranges, particle types, or polymer categories that can inform nationwide comparable occurrence data. The absence of standardized definitions and collection protocols has been repeatedly identified as a major challenge in both academic and water system-focused research efforts, with the Water Research Foundation (WRF) currently researching different sampling methods.[8]

Limitations in analysis further complicate the evaluation of microplastics in drinking water, which the Agency also recognized in the preamble to the CCL 6 draft. Existing laboratory analytical methods vary substantially in their ability to detect, quantify, and identify particles across different size ranges and polymer types. Techniques such as Raman spectroscopy, Fourier-transform infrared spectroscopy (FTIR), pyrolysis-GC/MS, and microscopy-based approaches each possess distinct strengths and limitations, and no single method currently provides comprehensive characterization across all relevant particle classes. As a result, studies frequently produce inconsistent occurrence estimates and treatment performance data, limiting comparability across utilities and research programs.

Simultaneously, ongoing state research and policymaking efforts continue to reflect the gaps in sampling and analytical methods. California enacted Senate Bill 1422 in 2018, which directed the state to adopt a standard definition of microplastics in drinking water and develop analytical methods for monitoring by 2021. The state has continued to evaluate sampling and reporting methods through an ongoing phased implementation process led by the State Water Resources Control Board.[9] Similarly, New Jersey enacted legislation in 2023[10] directing the state to establish a definition of microplastics and develop standardized testing and monitoring approaches for drinking water systems. Both programs remain focused primarily on method development, occurrence characterization, and research coordination, rather than implementing comparable monitoring results, which demonstrates the developing nature of methods.

[8] WRF, subscriber. (May 7, 2026). Project 5185 Fate of Microplastics in Drinking Water Treatment Plants. https://www.waterrf.org/research/projects/fate-microplastics-drinking-water-treatment-plants.
[9] California State Water Resources Control Board. (December 26, 2025). Microplastics. https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/microplastics.html.
[10] New Jersey's Drinking Water Testing Act. Public Law 2023, Chapter 318. (January 16, 2024). https://pub.njleg.state.nj.us/Bills/2022/AL23/318_.HTM.

Listing of Pharmaceuticals Group on the Draft CCL 6

AMWA has significant concerns regarding EPA's listing of pharmaceuticals in the draft CCL 6, as the large chemical group listing is difficult to assess and cannot adequately inform regulatory determinations.

First, EPA must be clearer in the final CCL 6 about the total number of contaminants that it defines as "drugs" and include a link to a public clearinghouse of this list. As described in the preamble to this rule, EPA is proposing to include as pharmaceuticals all items defined as "drugs" under the Federal Food, Drug, and Cosmetic Act (FFDCA). Section 321(g)(1) of the Act defines "drugs" as:

> *"(A) Articles recognized in the official United States Pharmacopoeia, official Homoeopathic Pharmacopoeia of the United States, or official National Formulary, or any supplement to any of them; and (B) articles intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or other animals; and (C) articles (other than food) intended to affect the structure or any function of the body of man or other animals; and (D) articles intended for use as a component of any articles specified in clause (A), (B), or (C)."*[11]

The preamble to the rule contains no clearinghouse of contaminants that fit the definition of a drug, and the FDA does not appear to readily have one available either. If EPA intends to include for consideration all pharmaceuticals, EPA must develop an enumerated list of drugs that the Agency intends to include for consideration in the CCL 6.

Furthermore, pharmaceuticals as a class are inappropriate to include in the CCL, as the human health effects of exposure, occurrence, and analytical methods vary significantly with each individual substance, precluding the class's ability to inform regulatory determinations. Pharmaceuticals are widely varied in use and chemical structure, meaning that there are significantly different human health effects related to exposure from one drug to the next. There is also no practical way to construct a chemical definition that meaningfully encompasses pharmaceuticals as defined as drugs under the FFDCA because the definition is regulatory and use-based rather than tied to a single, stable chemical class or structural boundary. Finally, while there are standardized EPA methods available for many pharmaceuticals, there are not associated methods for all substances defined as a "drug" under the FFDCA. As a result, attempting to include all substances that meet the FFDCA definition of "drug" as a category within the CCL 6 would be operationally unworkable.

Additionally, such a large class of contaminants can obscure which specific contaminants are EPA priorities and ultimately delay research on contaminants that may occur at levels that could pose a risk to human health. While EPA did release in tandem with the draft CCL 6 related human-health benchmarks for 374 pharmaceuticals,[12] the Agency did not explicitly identify which of these 374 were Agency priorities.

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[11] Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 321(g)(1).
[12] EPA. (April 2, 2026). 2026 Human Health Benchmarks for Pharmaceuticals (HHB-Rx). https://www.epa.gov/sdwa/2026-human-health-benchmarks-pharmaceuticals-hhb-rx.

The Agency also did not rank any pharmaceuticals that fit the proposed definition, or the 374 for which it developed human health benchmarks, based on factors like availability of analytical methods at relevant levels of detection, known human health effects from exposure at levels reflecting actual occurrence, or nationwide occurrence data. These shortcomings in the subset of 374 pharmaceuticals EPA examined in human health benchmarks and the overall universe of substances that include pharmaceuticals highlight the numerous issues with including the category in the CCL 6.

There are also several limitations on the available research for pharmaceutical occurrence in drinking water sources that the Agency has provided in the preamble to the draft CCL 6. Pharmaceuticals are a diverse class of chemicals and can originate from a range of sources, including manufacturing, agriculture, and personal care products. As of now, the FDA has cited its oversight of over 24,000 drug products. Due to the varied makeup, reach, and health impacts of pharmaceutical products, the current body of research cannot accurately or comprehensively assess the extent of these chemicals in drinking water sources.

Within the rule's preamble, EPA cited two data sources to justify the inclusion of pharmaceuticals as a class in the CCL 6: a 2014 study from Battaglin et al. and a 2018 study from Schaider et al. Both studies are limited in their scope and do not represent a national sample. Battaglin et al. is geographically limited to Rocky Mountain National Park and only accounts for 149 pharmaceuticals. Additionally, the study is intended to represent the reach of these chemicals to remote aquatic environments and is therefore not framed to represent a human exposure perspective. Similarly, Schaider et al. is limited geographically, with the study taking place in Cape Cod, Massachusetts. The researchers chose this location in part because the many septic systems present would likely lead to increased pharmaceutical presence, indicating that their results cannot be extrapolated to include geographical areas with centralized sewage infrastructure. The data from these selected studies only represents limited geographic scopes and are in areas selected specifically for research on the issue. Citing these studies as indicative of national occurrence of pharmaceuticals in drinking water is inaccurate and fails to demonstrate regional or nationwide occurrence that warrant listing in a CCL.

Ultimately, AMWA believes EPA should eliminate pharmaceuticals as a category as it is currently defined, as the chemical listing group is too large and chemically varied of a category to inform regulatory determinations. Instead, the Agency could relist the 15 chemicals it previously listed in the CCL 5 but determined met the definition for inclusion in the pharmaceutical group, and include any additional pharmaceuticals that the Agency has evidence to suggest pose a risk to human health, such as a subset of the 374 pharmaceuticals for which the Agency developed human health benchmarks. Such a large category of chemicals with no binding chemical structure cannot comprehensively help EPA prioritize research and may instead obfuscate which specific contaminants are a priority to the Agency.

Conclusion

AMWA appreciates the opportunity to comment on the draft CCL 6. The Association believes that the CCL is an essential tool in SDWA's process of regulating contaminants in drinking water, and as such, believes EPA should prioritize including contaminants in the listing against a backdrop that can inform potential regulatory determinations. A focused, practical, and transparent CCL, along with tandem

prioritization of contaminant research status, can deliver the best results to guide research and inform public policy. If you have any questions about the contents of this letter, please contact Jessica Evans (evans@amwa.net), AMWA's Director of Regulatory Affairs.

Sincerely,

Tom Dobbins
Chief Executive Officer

cc: Jennifer McLain, OGWDW
Thomas Lombardi, Standards and Risk Management Division, OGWDW