



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

LEADERS IN WATER

1620 I Street, NW, Suite 500
Washington, DC 20006

P 202.331.2820
amwa.net

April 8, 2024

Dr. Jennifer McLain
Director
Office of Ground Water and Drinking Water (OGWDW)
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Submitted Electronically

Re: Docket number EPA-HQ-OW-2023-0469 Unregulated Contaminant Monitoring Rule;
Methods Request and Webinar

Dear Jennifer McLain,

The Association of Metropolitan Water Agencies (AMWA) is pleased to have the opportunity to inform EPA’s development of the sixth Unregulated Contaminant Monitoring Rule (UCMR 6) by commenting on proposed drinking water analytical methods for emerging contaminants listed on the agency’s fifth Candidate Contaminant List (CCL 5). AMWA represents the largest metropolitan, publicly owned drinking water systems in the nation. AMWA members serve communities of over 100,000 people, and collectively our members serve more than 160 million Americans. As representatives of publicly owned water systems, AMWA supports the thoughtful, timely, and cost-effective implementation of the UCMR, as national occurrence data of contaminants is critical to inform EPA regulations under the Safe Drinking Water Act (SDWA). The association, therefore, is pleased to provide the following feedback.

First, while the association appreciates the opportunity to provide stakeholder input on the development of UCMR 6 through this public comment and webinar period, AMWA encourages EPA to consider more thorough stakeholder engagement opportunities throughout UCMR 6’s development. It is essential to provide experts in technical analysis and occurrence, as well as potentially regulated communities, the opportunity to provide genuine input on the development of the UCMR. AMWA urges EPA to convene at least one in-person public meeting, as it has in past iterations of UCMR and CCL. In-person meetings allow opportunity for laboratory experts

BOARD OF DIRECTORS

| PRESIDENT | VICE PRESIDENT | TREASURER | SECRETARY | CHIEF EXECUTIVE OFFICER |
|---|---|--|---|--|
| John Entsminger Las Vegas Valley Water Dist. | Jeffrey Szabo Suffolk County Water Authority | Calvin Farr Prince William County Service Authority | Lindsey Rechtin Northern Kentucky Water District | Tom Dobbins |
| Julie Anderson Denver Water | Verna Arnette Beaufort-Jasper Water & Sewer Authority | Cathy Bailey Greater Cincinnati Water Works | Tad Bohannon Central Arkansas Water | Chris Browning Oklahoma City Water Utilities Trust |
| Edward Campbell Portland Water Bureau | Shane Chapman Metropolitan Water District of Southern California | Scott Dewhirst Tacoma Water | Randy E. Hayman Philadelphia Water Department | Ghassan Korban Sewerage and Water Board of New Orleans |
| Yann Le Gouellec Newport News Waterworks | Angela Licata Ann York City Department of Environmental Protection | Holly Rosenthal Phoenix Water Services Department | Brian Steglitz Ann Arbor Water | John P. Sullivan, Jr. Boston Water and Sewer Commission |
| Todd Swingle Toho Water | Timothy Thomure Tucson Water | | | |

Ms. Jennifer McLain

April 8, 2024

Page 2

with differing analytical method expertise for various unregulated substances nationwide to have a fruitful technical dialog regarding the available methods for each substance as well as the rationale for listing certain substances on the UCMR and CCL. One public comment and webinar period alone is likely not sufficient for the level of depth required to provide input on the development of key analytical methods. AMWA therefore encourages EPA to consider providing additional input sessions to gather robust technical input.

AMWA next encourages EPA to continue to align efforts between the Office of Ground Water and Drinking Water (OGWDW) and the Office of Research and Development (ORD) for the development of CCLs and UCMRs. It is vital that the work included in ORD's multiyear strategic research action plan be in concert with the current CCL and UCMR to best prioritize research needs and utilize agency resources efficiently. OGWDW relies on ORD to perform the research needed to support its mission. AMWA encourages ORD to clearly identify how it intends to support the CCL and UCMR process. Listing contaminants on the CCL should provide all offices in EPA responsible for supporting regulatory determinations with the ability to focus limited research dollars on chemical and microbial contaminants that are a potential health risk to drinking water consumers.

Finally, as EPA considers drinking water analytical methods for emerging contaminants to inform UCMR 6, AMWA asks EPA to mindfully consider and develop risk communication guidance for the UCMR. In its advocacy, AMWA has continually highlighted the difficulties utilities – and the public – experience from being able to identify an unregulated substance in drinking water without being able to provide context for public health implications or the availability of methods to remove or treat the substance from drinking water. As EPA begins development of UCMR 6 and consideration of analytical methods for CCL 5, AMWA encourages the agency to prioritize the development of comprehensive risk communication tools. These tools will provide all drinking water systems with consistent messages to provide the concerned public when or if utilities identify unregulated emerging contaminants in their drinking water.

AMWA thanks EPA for the opportunity to comment on approaches to developing UCMR 6 monitoring methods. If you have questions, please contact Jessica Evans (evans@amwa.net), AMWA's Senior Manager of Government Affairs and Sustainability.

Sincerely,



Thomas Dobbins
Chief Executive Officer

cc: Bruno Pigott, EPA OW
Eric Burneson, Director, Standards and Risk Management Division

Ms. Jennifer McLain
April 8, 2024
Page 3

Brenda Bowden, Standards and Risk Management Division
Will Adams, Standards and Risk Management Division