



**ASSOCIATION OF
METROPOLITAN
WATER AGENCIES**

LEADERS IN WATER

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

P 202.331.2820 F 202.785.1845
amwa.net

August 19, 2020

The Honorable David P. Ross
Assistant Administrator
Office of Water
Environmental Protection Agency

Re: Docket ID: EPA–HQ–OW–2019–0675, *Draft Ambient Water Quality Criteria Recommendations for Lakes and Reservoirs of the Conterminous United States: Information Supporting the Development of Numeric Nutrient Criteria*

Dear Assistant Administrator Ross,

The Association of Metropolitan Water Agencies (AMWA) appreciates the opportunity to comment on Environmental Protection Agency’s request for public comment, *Draft Ambient Water Quality Criteria Recommendations for Lakes and Reservoirs of the Conterminous United States: Information Supporting the Development of Numeric Nutrient Criteria* (EPA–HQ–OW–2019–0675). AMWA is an organization representing the largest publicly owned drinking water utilities in the United States. Increasing nutrient loads can have significant impacts on a public drinking water system’s ability to provide safe and reliable drinking water to the customers they serve.

AMWA supports and is encouraged to see EPA prioritizing drinking water uses within these draft recommendations. AMWA has consistently advocated for EPA to use a holistic approach for addressing public health issues and basing these initiatives on sound science. Utilizing the agency’s authorities under the Clean Water Act in order to best protect source waters used by drinking water systems is critical to avoiding the more costly solutions needed to tackle problems that arise when contaminated source waters reach a system and must now be addressed under the Safe Drinking Water Act (SDWA).

Regarding drinking water impacts, EPA’s draft recommendations focus solely on microcystins. However, as noted by the agency, increased nutrient loads can cause a variety of other issues for drinking water systems including: the formation of several other cyanotoxins other than microcystins, increases in disinfection by-products (DBPs) due to higher loads of organic matter, and unpleasant tastes and odors. Within the document, EPA states that continental-scale data was not available for these endpoints and while this statement may be true for the models the agency has developed to formulate these recommendations, AMWA feels it is important to note that there are large sources of data related to nitrite, nitrate, DBPs, and cyanotoxins through already existing SDWA compliance monitoring programs.

BOARD OF DIRECTORS

PRESIDENT

Steve Schneider
Saint Paul Regional Water
Services

Mike Armstrong
WaterOne

Yvonne Forrest
Houston Public Utilities
Division

Ron Lovan
Northern Kentucky Water
District

VICE PRESIDENT

Angela Licata
New York City Department of
Environmental Protection

Shane Chapman
Metropolitan Water District of
Southern California

Richard Harasick
Los Angeles Department of
Water and Power

Sue McCormick
Great Lakes Water Authority

TREASURER

John Entsminger
Las Vegas Valley Water
District

Rudy Chow
City of Redlands Municipal
Utilities and Engineering
Department

Robert Hunter
Municipal Water District of
Orange County

Jeffrey Szabo
Suffolk County Water Authority

SECRETARY

Kathryn Sorensen
Phoenix Water Services

Robert L. Davis
Cleveland Department of Public
Utilities

Ghassan Korban
New Orleans Water and Sewer
Board

John P. Sullivan, Jr.
Boston Water and Sewer
Commission

**CHIEF EXECUTIVE
OFFICER**

Diane VanDe Hei

Scott Dewhirst
Tacoma Water

Carrie Lewis
Portland Water District

Steve Edgemon
Fairfax Water

James S. Lochhead
Denver Water

Assistant Administrator Ross

August 19, 2020

Page 2

In particular, AMWA encourages EPA to utilize the data from the Fourth Unregulated Contaminant Monitoring Rule (UCMR4). UCMR4 required a nationally representative subset of drinking water utilities to monitor for a variety of contaminants in source water, including four types of cyanotoxins and three types of DBPS.

AMWA understands that these datasets may not be appropriate contributors to EPA's current models as the agency's data focused solely on a subset of lakes with apparently no correlation to drinking water sources. However, the association believes that meaningful associations could still be made in future modeling efforts which could help relate nutrient loads to the negative impacts that drinking water systems are experiencing. AMWA encourages EPA to utilize the data mentioned above and prioritize a broader scope of drinking water impacts in future initiatives. Such work would be immensely valuable to helping drinking water systems provide safe, reliable, and affordable drinking water to their customers.

AMWA thanks EPA for the opportunity to provide input. If you would like to further discuss this issue, please contact Stephanie Hayes Schlea, AMWA's Director of Regulatory and Scientific Affairs, at schlea@amwa.net.

Sincerely,

A handwritten signature in blue ink that reads "Diane VanDe Hei".

Diane VanDe Hei
Chief Executive Officer

cc: Jennifer McLain, Office of Ground Water and Drinking Water
Eric Burneson, Office of Ground Water and Drinking Water