

**Summary of Comments from DWC Members  
on the June 30, 2015 Committee draft report on CCL 4--  
For Discussion on the August 3, 2015, DWC Teleconference**

**3.1 Clarity of the CCL 4 Documents**

p. 5, line 20: Recommended Action 4: Clarify that the concern over removing contaminants from prior lists applies only if the list is being carried forward. [Korrick]

“Clearly describing and improving the process for removing contaminants from prior CCLs where appropriate, when such lists serve as the basis for a new CCL.”

p. 5, lines 22: Recommended Action 5: It could be useful to add a section (and recommendation) about the “limitations” of the CCL process. These are implicit in all of the DWC comments but never explicitly enumerated. The current fifth action could be listed as part of the “limitations.” [Korrick]

Specifically, one “limitation” is that the process is not intended to (and therefore is not designed to) allow for definitive determination of contaminant status. A much more rigorous review is only invoked at the time of regulatory determination. Making that clear and explaining the nature of the regulatory review process (as a complement to the CCL process) would be a helpful component of the documentation of the CCL process. It is critical to the context in which the CCL occurs and therefore what can and cannot be accomplished with the CCL process. Other relevant limitations include: (1) available exposure/health data may be old and not necessarily reflective of current conditions; (2) the timing of the UCMR data collection does not align with the CCL process; (3) quantifiable exposure/health indicators are not available for a large number of contaminants; (4) the contribution of water to human exposure risk is uncertain for a number of potentially relevant contaminants; (5) these limitation conspire to give certain types of data more play in the process (e.g., WBDO information, carcinogenicity risk) which may or may not be optimal for many contaminants.

p. 5, lines 1-5: Clarify the SAB’s conclusions about the overall clarity of the process. [Korrick]

“Overall, ~~T~~the SAB concluded that the overarching principles used to evaluate overlying process for evaluating candidate contaminants ... are well-described ~~is conceptually clear, but not transparent.~~”

p. 6, Section 3.1.2: Scoring and Selection Criteria: the section is missing a discussion of data variability and the sensitivity of the models used to classify contaminants. [Korrick]

There are 4 attributes that the models used for contaminant classification (i.e., potency, severity, magnitude and prevalence). However, the quality/nature of the data used to assign attribute scores varied widely across contaminants and it was not clear how or if EPA accounted for this data variability. And, the basis for assignment of attribute scores was semi-arbitrary as there are probably no standards for such assignments. As such, it is likely that a different set of scoring criteria might have changed some contaminant classifications. Here is where the model

“sensitivity” analysis discussed at the DWC meeting could have been done. In other words, how sensitive are the models’ classification of contaminants to alternative scoring schemes?

### **3.2 Additional Data Sources**

p. 11, lines 25-31: Several members found this language confusing with respect to the role of states in providing data. Clarify the intention. Is the recommendation that EPA should be less reliant on public nominations and more proactive in seeking data on potential contaminants to include on the CCL (including reaching out to states and seeking data)?

p. 11, lines 25-31: Is the suggestion that EPA implement a strategy to seek additional occurrence data, with an emphasis on contaminants related to water reuse, recommended for CCL 4 or for future CCLs?

### **3.3 Contaminants That Do not Merit Listing or that Should Be Added**

p. 13 line 16 says, “Recommendation: Exclude from the CCL those pathogens that are addressed with conventional drinking water treatment.” and a variant of this is on p. 2 line 20 (Executive Summary), “In contrast, the SAB recommends that the CCL not include pathogens that are addressed with conventional drinking water treatment.”

I think this statement/position goes too far. I think it is a very good reason to minimize or lessen the priority for such a contaminant, but to summarily exclude in one aspect is not even consistent with current drinking water regulations. Monitoring for total coliform for which conventional treatment is effective is a cornerstone of the monitoring done by public water systems. I understand that this monitoring is done as an indicator of a general problem, but I think for the SAB to make a recommendation to exclude all for which conventional treatment is effective is a little problematic. Also, there is the recommendation that contaminants that are in the biofilms of distribution systems be a priority. I could see this stipulation being at odds with excluding one that is summarily dismissed because conventional treatment is effective. Also, conventional treatment may have different meanings to different people. Lastly, to be consistent with the rest of our recommendations, I would not make this as an absolute for they are not either. So for all of these reasons I would state that this be a criteria for lower prioritization. [Wilson]

p. 14, line 11-20: Should EPA prioritize contaminants on CCL? The draft report discusses prioritizing, but if CCL ranks contaminants and then regulatory determinations are not done in rank order, EPA might have to spend considerable effort defending why they are not regulating #1 etc. [Steinmaus]

p. 14, line 25: Language implies that chemicals with <1% occurrences should be removed from the list. However, 1 percent of the U.S. population is >3.5 million people. Suggest not giving an actual number for prevalence and just say “prevalence can be considered.” [Steinmaus]

p. 14, line 37: provide reference for the rodent study mentioned

p.15, lines 5-7: “the SAB recommends that EPA consider the addition of more disinfection byproducts...and other emerging disinfection byproducts considering their toxicity and that drinking water is (in most cases) the sole source of exposure.”

Recommend that the sentence say “potential human toxicity” [Randtke]

What about DBP exposure in swimming pools? Should this be modified to say “considering their toxicity and frequency of occurrence in drinking water”? [Roberts]

#### **4. Recommendations for Future CCLs**

p. 16, line 8: Clarify the intent of the sentence, ““Thinking ahead to the next CCL, the SAB recommends that the agency implement a system that integrates data collection and curation and uses a broader range of the best available data on drinking water contaminants.”

In particular, what is meant by the term “curation”? e.g., does it mean means data referenced and cited in the peer reviewed literature, that has undergone rigorous QA/QC review, has been reproduced or consistent over time, and has general acceptance by the scientific community? I do not support use of this term without further definition and find the statement as a whole unclear. [Wilson]

p. 16, lines 14-15: Clarify what is meant by “the expert system used to weight criteria for CCL determinations” [Korrick]

p. 16: Does this section give an accurate sense of changes in the CCL process that the DWC’s would like to see for the next list? [Jones]