



**American Water Works
Association**

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Comments to
U.S. Environmental Protection Agency Science Advisory Board Drinking Water Committee
on the
EPA's Draft Fourth Drinking Water Contaminant Candidate List
by the
American Water Works Association
April 29, 2015

Thank you for the opportunity to comment to the Committee on behalf of the American Water Works Association. AWWA appreciates the Committee's work reviewing U.S. EPA's fourth Contaminant Candidate List proposal and is looking forward to hearing your advice.

AWWA has commented on the current CCL proposal and previous proposals. Our comments on the latest proposal are available at www.regulations.gov as docket item [EPA-HQ-OW-2012-0217-0059](https://www.regulations.gov/document/EPA-HQ-OW-2012-0217-0059). I mention previous CCL proposals because several of your charge questions relate to revisions in U.S. EPA's approach, which the Agency made in crafting the third CCL. As noted in the [SAB's January 2009 comments](#), the current CCL process is an improvement over past practice and, we like the SAB, expect that the process will continue to improve with each iteration.

With the vision of timely risk management of contaminants posing significant public health concerns through continued improvement of the CCL process, AWWA has several comments for the Committee. These comments are relevant to charge questions 4 and 5, *"... are there any contaminants currently on the Draft CCL 4 that you think do not merit inclusion ... [and] ... are there any contaminants which are currently not on the Draft CCL 4 that should be listed?"*

Lack of resources to gather data and make risk management decisions on CCL contaminants is a central challenge for EPA. Consequently, the Agency must prioritize contaminants for research and information gathering by shortening the CCL to 20 - 50 contaminants in length. The fourth CCL can be shortened by focusing on contaminants that have the moderate to high toxicity, recognized occurrence, and occurrence at levels that may pose a risk to public health.

1. Seven contaminants warrant priority inclusion based on available prevalence and potency, and/or magnitude information.¹
2. There are an additional eleven compounds with sufficient information to list on CCL4 but for which available information is less complete than for the first seven priority chemicals.²

Using these same criteria, it is possible to eliminate a large number of chemicals on the proposed CCL:

1. Currently, there is sufficient national data for USEPA to determine that 32 chemicals on the proposed CCL4 list are not present nationally at levels of concern.³
2. An additional 51 chemicals could be eliminated from the CCL based on available potency, observed concentrations, and prevalence of occurrence.⁴

Three CCL microbes are harbored in premise plumbing systems and distribution system biofilms: *Legionella pneumophila*, *Mycobacteria avium*, and *Naegleria fowleri*. Recent events warrant placing a high priority on understanding the potential risks posed by these three CCL4 pathogens.

In today's resource constrained environment, USEPA must work with stakeholders to develop an open and collaborative process for both prioritizing and subsequently collecting the information needed to advance contaminants from the CCL4 to regulatory determinations. The process should identify high priority contaminants, assess information

¹ Group 1-- two industrial chemicals, 1,1-dichloroethane and 1,4-dioxane; chlorate and a super-group disinfection byproducts as a whole; two inorganic chemicals: molybdenum and strontium; and two pharmaceuticals: fluoxetine and gemfibrozil.

² Group 2 -- seven cyanotoxins: five microcystins, anatoxin a, and cylindrospermopsin; three pesticides: 3-hydroxycarbofuran, azinphos-methyl, and Chlorpyrifos; and the inorganic, manganese.

³ Group 3 -- acrolein, RDX, PFOA, PFOS, Diuron, Linuron, molinate, Acetochlor, Acetochlor ESA, Acetochlor OA, Alachlor ESA, Alachlor OA, Metolachlor, Metolachlor ESA, Metolachlor OA Deg, Aldicarb, alpha-hexachlorocyclohexane, dimethoate, disulfoton, Terbufos, Terbufos sulfone, erythromycin, sulfamethoxazole, Triclosan, progesterone, testosterone, 1,1,1,2-tetrachloroethane, 1,2,3-trichloropropane, methyl bromide, methyl chloride, MTBE, and nitrobenzene.

⁴ Group 4 -- i.e., one VOC (1,3-dinitrobenzene); 16 additional industrial chemicals (seven phthalates (benzyl butyl, dibutyl, dicyclohexyl, diethyl, di-isononyl, dimethyl, di-n-octyl), two alkylphenol (octyl and nonyl), two alkylphenol ethoxylates (octyl and nonyl), bisphenol a (BPA), butylated hydroxyanisole (BHA), n-propylbenzene, perchlorate, sec-butylbenzene); four inorganics (cesium 137, radon, tellurium, vanadium); 16 pharmaceuticals, including three pain relievers (acetaminophen, ibuprofen, naproxen); 13 antibiotics (amoxicillin, bacitracin, ciprofloxacin, linezolid, methicillin, oxacillin, penicillin, spiramycin, sulfamethazine, triclocarban, tylosin, vancomycin, virginiamycin); and 15 pesticides (bentazone, carbaryl, chlorothalonil, dicamba, dichlorvos, dicofol, endosulfan, ethoprophos, fluometuron, malathion, methyl parathion, permethrin, phosmet, bromoxynil, trichlorfon).

needs, and result in a contaminant-specific research plan for high priority contaminants on the final CCL4. To be effective, the research needs assessment must be developed through a process that is timely, open to the public, actively engages experts from outside the Agency, and results in publicly available work products.

Links to relevant publications

- 2007, Rosen, J.S. and Roberson, J.A., *A simplified approach to developing future contaminant candidate lists*. Journal AWWA, 99:3:66 (<http://www.awwa.org/publications/journal-awwa/abstract/articleid/15621.aspx>).
- 2009, Roberson, J.A., *Risk indexes for draft CCL3 chemicals*, Journal AWWA, 101:9:64, (<http://www.awwa.org/publications/journal-awwa/abstract/articleid/21770.aspx>).
- 2009, Hoffman et al., *Prioritizing Pathogens for Potential Future Regulation in Drinking Water*, Environ. Sci. Technol. 43, 5165–5170, (<http://pubs.acs.org/doi/pdf/10.1021/es803532k>)
- 2012, Roberson, J.A., *Informing regulatory decisions using national occurrence data*, Journal AWWA, 104:3:55, (<http://www.awwa.org/publications/journal-awwa/abstract/articleid/30331651.aspx>).
- 2015, Roberson, J.A., Bench, R., Adam, C., and Rosen, J. *Development of AWWA's Contaminant Candidate List 4 (CCL4) Recommendations*, (<http://www.awwa.org/Portals/0/files/legreg/documents/2015CCLAWWAReport.pdf>).

What is the American Water Works Association?

The American Water Works Association is an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our membership includes over 3,900 utilities that supply roughly 80 percent of the nation's drinking water and treat almost half of the nation's wastewater. Our nearly 50,000 total memberships represent the full spectrum of the water community: public water and wastewater systems, environmental advocates, scientists, academicians, and others who hold a genuine interest in water, our most important resource. AWWA unites the diverse water community to advance public health, safety, the economy, and the environment.