

July 16, 2019

STATEMENT ON DEVELOPMENT OF THE 5TH UNREGULATED CONTAMINANT MONITORING RULE

Thank you for the opportunity to provide input into development of the 5th Unregulated Contaminant Monitoring Rule (UCMR). The UCMR is a critical part of the Safe Drinking Water Act process for development of National Primary Drinking Water Regulations.

I'm here today on behalf of Clean Water Action and Clean Water Fund to urge EPA to include the most PFAS chemicals possible in UCMR5. The inclusion of 6 PFAS chemicals in UCMR3 provided valuable information on occurrence but that data, for several reasons, is not sufficient to guide EPA in making regulatory determinations and developing National Primary Drinking Water Regulations for the wide range of PFAS chemicals. Since UCMR 3 monitoring occurred, we have learned of fairly widespread occurrence of other PFAS chemicals in the environment, and in drinking water sources. Since UCMR3 monitoring, we have learned more about the number of PFAS chemicals and about their many uses. We have new information about a wide range of health effects, some of which occur at very low levels. We also have new laboratory methods and updated detection limits. Lastly, we have widespread concern among residents near contaminated sites, among policymakers and indeed upon the water drinkers whose confidence is important to all of us.

We urge EPA to include all PFAS chemicals for which there is an approved lab method at the time of promulgation of the UCMR5 rule. This information provided by such monitoring will help EPA understand the scope of contamination with a fairly wide range of chemicals and can direct both development of regulations and water system action. This action is also consistent with the February 2019 *PFAS Action Plan*.

We recognize that laboratory capacity and cost are critical to the success of such an undertaking. We urge all stakeholders to work with EPA to address these challenges so that the most comprehensive understanding of PFAS chemical occurrence possible can be undertaken.

We also urge EPA to explore how monitoring for the most PFAS chemicals possible can be accomplished without limiting UCMR5 to just PFAS chemicals. As we have seen in today's presentation, there are other contaminants for which a very good case can be made that it is time for them to be included in this programs. Absent statutory changes, which are on the table, we suggest that EPA should explore whether PFAS chemicals could be consider a "group" or a "class" on UCMR5, therefore leaving the possibility of including other contaminants from the group of 69 that the Work Group has developed, from the 4th Contaminant Candidate List, or from public comment provided by stakeholders.

We look forward to working with EPA and other stakeholders on development of UCMR5.

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