Water & Health Advisory Council

June 02, 2026

U.S. Environmental Protection Agency
EPA Docket Center, Water Docket, Mail code: 28221T
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Draft Sixth Drinking Water Contaminant Candidate List (CCL 6)
Docket ID No. EPA-HQ-OW-2022-0946

Thank you for the opportunity to comment on EPA's Draft Sixth Drinking Water Contaminant Candidate List (CCL 6). The Water & Health Advisory Council is a multidisciplinary group of professionals with expertise in drinking water regulation, water utility management and finance, water treatment, toxicology, public health, and risk analysis.

We appreciate the important role the Contaminant Candidate List plays as the starting point for the Safe Drinking Water Act (SDWA) regulatory development process. The contaminants included on a CCL, as well as those excluded, serve as important indicators for future research priorities, occurrence monitoring, treatment planning, and potential regulatory development.

EPA's overall approach for developing CCL 6, including the structured screening and scoring framework used to narrow the broader contaminant universe into a more focused list for further evaluation, is a reasonable starting point. However, the process has become increasingly expansive and insufficiently prioritized. The number of contaminants on CCLs has steadily increased over time, from 60 contaminants on CCL 1 and 51 on CCL 2 to more than 100 contaminants on both CCL 3 and CCL 4. Although CCL 5 and the draft CCL 6 reduced the overall count somewhat, inclusion of broad contaminant groups such as PFAS, microplastics, and pharmaceuticals effectively expands the list to hundreds or potentially thousands of substances.

This scale risks undermining the purpose of the CCL process and exceeds the practical capacity of the broader SDWA regulatory development framework. Future CCLs should be substantially narrower and more focused on contaminants with a plausible pathway toward regulatory determination under SDWA. Prioritization should be driven by demonstrated occurrence in drinking water, meaningful potential for public health risk reduction, and the availability or development of reliable health effects and occurrence data.

The Federal Register notice appropriately states that CCL 6 is intended to help prioritize research and data collection efforts. However, EPA has not clearly articulated how contaminants included on recent CCLs will be prioritized for research, occurrence

monitoring, health assessments, and potential regulatory determinations. Public water systems and states have devoted substantial resources to multiple cycles of Unregulated Contaminant Monitoring Rules (UCMRs), including monitoring for more than 140 contaminants over five UCMR cycles. A more focused and transparent research agenda would help ensure that future monitoring efforts are aligned with a realistic and achievable regulatory development strategy.

Streamlining and prioritizing the CCL process is increasingly important given current resource constraints at the federal and state levels. In the absence of timely national regulatory decisions, states are increasingly being pressured to develop their own drinking water standards and regulatory frameworks. This results in duplication of effort and diversion of limited resources away from core drinking water program implementation.

Microplastics present a particularly challenging example. As EPA acknowledges in the draft notice, major data gaps still exist regarding health-based definitions, validated analytical methods, occurrence characterization, and interpretation of results. Current analytical methods continue to face challenges associated with contamination control, reproducibility, particle characterization, and distinguishing plastic particles from other environmental particulates. Without standardized and validated methods, occurrence data generated through future monitoring efforts may have limited regulatory or public health utility.

The health significance of ingested microplastics through drinking water also remains uncertain. Additional targeted research focused on exposure characterization, treatment efficacy, and analytical method development would likely be more informative at this stage than broad national monitoring requirements.

A shorter, more focused CCL process would strengthen the credibility, efficiency, and scientific integrity of the SDWA regulatory framework while helping ensure that limited federal, state, and utility resources are directed toward contaminants presenting the greatest potential public health concern.

Thank you for the opportunity to comment. Our Council stands ready to provide additional expertise, technical insight, or testimony as this important process moves forward.

Respectfully submitted,

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