



**American Water Works  
Association**

## Utility Member Benefit

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## Regulatory Alert

**TO: AWWA Section Government Affairs Contacts  
All Utilities**

**FROM: AWWA Government Affairs Office**

**DATE: March 3, 2011**

**What: Revisions to the Unregulated Contaminant Monitoring Regulation  
(UCMR 3) for Public Water Systems**

**Who: US Environmental Protection Agency**

**When: Published TODAY in the Federal Register; comments due May 2**

The US Environmental Protection Agency (USEPA) today announced its proposed revisions to the Unregulated Contaminant Monitoring Regulation (UCMR 3) for public water systems. Comments on the revisions are due Monday, May 2.

Important aspects of the proposal include:

1. The pool of systems affected by UCMR 3 is expanded from UCMR 2. List 1 monitoring is expanded to include those systems that rely solely on purchased water.
2. Systems serving more than 10,000 persons based on their retail service populations must conduct UCMR monitoring and analysis at their own cost. A statistically derived sample of smaller systems will also conduct monitoring; EPA will cover the costs of sample shipping and analysis for these systems.
3. The proposed List 1 contaminants includes:
  - a. 7 Hormones / pharmaceuticals
  - b. 1,4-dioxane
  - c. 8 volatile organic compounds
  - d. 4 metals
  - e. Chlorate
  - f. PFOS, PFOA, and 5 other perfluorinated chemicals

The rule will be finalized in roughly one year, and monitoring will occur from 2013–2015.

A full copy of the posting in the Federal Register is available here:  
<http://frwebgate3.access.gpo.gov/cgi-bin/TEXTgate.cgi?WAISdocID=WTJ9nc/0/1/0&WALSaction=retrieve>

### **EPA requests comments on Hexavalent Chromium**

EPA has not included hexavalent chromium (Cr-6) in the proposed list of chemicals for UCMR 3 monitoring. However, is specifically requesting comment on whether the agency should include Cr-6 as one of the 30 contaminants for UCMR 3 Assessment Monitoring. EPA also requests comments on whether total chromium should also be measured concurrent with Cr-6.

**Note:** AWWA supports the UCMR as the right structure for data collection that informs regulatory decisions. In a January 28 letter, AWWA urged USEPA to use the established UCMR process in evaluating Cr-6, after the agency – responding to an environmental group’s report -- recommended utilities begin monitoring for the contaminant. AWWA wrote that “UCMR is a time tested process for obtaining a meaningful and actionable national occurrence dataset for contaminants of potential concern in drinking water.” AWWA also supports concurrent testing for total chromium, so that the agency can build a scientifically valid database concerning the relationship in the occurrence of these two substances.

AWWA’s letter to EPA is available at:

[www.awwa.org/files/GovtPublicAffairs/AdvisoriesAlerts/012811AWWALettertoJacksononCr6.pdf](http://www.awwa.org/files/GovtPublicAffairs/AdvisoriesAlerts/012811AWWALettertoJacksononCr6.pdf)

AWWA commented extensively as part of EPA’s stakeholder outreach in advance of the proposed UCMR 3 in August 2010. Those comments are available at:

[www.awwa.org/files/GovtPublicAffairs/GADocuments/AWWACommentsEPADraftUCMR38172010.pdf](http://www.awwa.org/files/GovtPublicAffairs/GADocuments/AWWACommentsEPADraftUCMR38172010.pdf)

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