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Submitted electronically via: <https://www.regulations.gov>

Re: U.S. Environmental Protection Agency: Revisions To Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems — Docket ID No. EPA-HQ-OW-2023-0469

Dear Ms. Bowden and Ms. Kaiser:

The Association of California Water Agencies (ACWA) respectfully submits comments regarding the U.S. Environmental Protection Agency's (EPA) proposal for the sixth Unregulated Contaminant Monitoring Rule (UCMR 6).¹ ACWA appreciates EPA efforts to improve water quality through science-based occurrence data frameworks like the UCMR.

ACWA is the largest statewide coalition of public water agencies in the United States. ACWA represents approximately 470 member agencies that are responsible for delivering about 90 percent of the water to communities, farms, and businesses in California. ACWA represents water management entities in every sector of water supply, including municipal and agricultural water, water recycling, water reuse, flood control, wastewater management, and stormwater management. ACWA and its members are dedicated to providing a high-quality, reliable water supply in an environmentally sustainable and fiscally responsible manner.

EPA's UCMR 6 proposal would require public water systems to collect national occurrence data for certain PFAS, as well as organic compounds and pesticides, that may be present in drinking water but are not yet subject to federal standards under the Safe Drinking Water Act (SDWA). EPA will use the data collected through the final version of the UCMR 6 to inform its decision-making process on which contaminants to regulate under the SDWA.

¹ *Revisions To Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems*, 91 Fed. Reg. 39952 (July 1, 2026). <https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf>.

ACWA generally supports EPA's proposed UCMR 6 but urges EPA to consider the following comments.

I. Focus on the Most Prevalent PFAS

PFAS—short for per- and polyfluoroalkyl substances—are humanmade chemicals used since the 1940s in a wide-range of consumer, commercial, and industrial products because of their waterproof, stain-resistant, or non-stick properties. PFAS are commonly found in textiles, cookware, food packaging, cleaning products, electronics, firefighting foam, and more. Although certain PFAS chemicals are no longer manufactured in the United States, these chemicals are still produced internationally and imported into the country through various products. Because PFAS are highly resistant to natural degradation, they persist in the environment and can accumulate over time. For these reasons, PFAS have contaminated soil, water, wildlife, and humans. Water systems, including ACWA member agencies, are investing significant resources to remove PFAS from drinking water, despite not being the original source of these contaminants.

ACWA appreciates EPA's efforts to curb PFAS contamination in drinking water. In particular, ACWA applauds EPA setting national primary drinking water regulations for certain PFAS like perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS)², intent to hold polluters accountable³, and enhanced outreach to water systems through the RealWaterTA initiative⁴ and PFAS OUT.⁵

ACWA encourages EPA to work with water community professionals to continue gathering data on emerging contaminants like ultrashort organofluorine compounds, including PFAS, to obtain information for appropriate regulation. To further support EPA's PFAS efforts, ACWA urges EPA to focus on the most prevalent PFAS in public water systems that are not already subject to national drinking water regulations.⁶ For example, in California, unregulated PFAS that occur at a higher frequency (e.g. perfluorohexanoic acid (PFHxA), perfluoroheptanoic acid (PFHpA), perfluorodecanoic acid (PFDA), and 4,8-dioxo-3H-perfluorononanoic acid (ADONA))⁷ were listed in prior UCMRs⁸ that are not listed in EPA's proposed UCMR 6 that would require public water systems to perform sample collection and analysis of PFAS. It is unlikely EPA will choose

² *PFAS National Primary Drinking Water Regulation*, 89 Fed. Reg. 32532 (April 26, 2024).

<https://www.govinfo.gov/content/pkg/FR-2024-04-26/pdf/2024-07773.pdf>.

³ U.S. EPA: *EPA Announces It Will Keep Maximum Contaminant Levels for PFOA, PFOS* (May 14, 2025).

<https://www.epa.gov/newsreleases/epa-announces-it-will-keep-maximum-contaminant-levels-pfoa-pfos>.

⁴ U.S. EPA: *Real Water Technical Assistance (RealWaterTA)* (March 9, 2026). <https://www.epa.gov/water-infrastructure/real-water-technical-assistance-realwaterta>.

⁵ U.S. EPA: *PFAS OUT—Helping Communities Address PFAS in Drinking Water* (May 4, 2026). <https://www.epa.gov/water-infrastructure/pfas-out>.

⁶ See *PFAS National Primary Drinking Water Regulation*, 89 Fed. Reg. 32532 (April 26, 2024).

<https://www.govinfo.gov/content/pkg/FR-2024-04-26/pdf/2024-07773.pdf>, where EPA promulgated Maximum Contaminant Levels (MCLs) for PFOA and PFOS at 4.0 parts per trillion (ppt).

⁷ California State Water Resources Control Board: *CA PFAS Timeline* (February 4, 2026).

https://www.waterboards.ca.gov/pfas/ca_pfas_timeline.html.

⁸ *Revisions to the Unregulated Contaminant Monitoring Rule (UCMR 5) for Public Water Systems and Announcement of Public Meetings*, 86 Fed. Reg. 73131 (December 27, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-12-27/pdf/2021-27858.pdf>.

to regulate all PFAS proposed to be monitored under UCMR 6.⁹ By focusing on this smaller subset of PFAS, EPA can better implement prompt regulatory action and channel resources to effectively address PFAS contamination.

Additionally, ACWA suggests EPA fill existing data gaps with PFAS compounds using proven scientific processes. For example, as of January 2026, EPA reports that approximately 95 percent of the expected UCMR 5 results had been obtained, with the final dataset expected in fall 2026.¹⁰ EPA should use the final UCMR 5 dataset as a basis for identifying PFAS occurrence questions that remain unanswered before finalizing UCMR 6. EPA should also make greater use of existing state and local PFAS occurrence data when designing UCMR 6 when possible.

II. Provide Resources and Flexibility Regarding Allowable Testing Methods

EPA's proposed UCMR 6 provides certain analytical methods to measure contaminants listed, such as Methods 524.3, 525.3, 540, and 563. Regarding PFAS, EPA proposes the use of Method 563 for certified analytical drinking water laboratories to process, test, and report on PFAS included in the proposed UCMR 6.

ACWA recommends EPA provide more assistance and resources to public water systems interested in effectively using proposed testing methods. While experience with Methods 524.3 and 525.3 is common, the introduction of new methods, such as 540 and 563, will require laboratory downtime and resources to build capacity and secure formal EPA certification. Until then, many water labs may not be qualified to conduct newly proposed testing methods. Specifically, Method 563 is a newly developed testing method only formally posted on July 1, 2026, alongside the proposed UCMR 6.

ACWA reiterates its recommendation¹¹ for EPA to provide flexibility regarding allowable testing methods, including the ability to utilize Method 537.1 where applicable or until such time that experience with newer testing methods like 540 and 563 are more common and capacity has been developed. By providing this flexibility, EPA would allow more labs to qualify for certification to conduct the necessary testing.

III. Microplastics is More Appropriately Listed in EPA's CCL 6

ACWA appreciates EPA's action to not list microplastics in UCMR 6 and instead include it in the draft Contaminant Candidate List (CCL 6).¹² ACWA agrees with EPA that this approach will enable a microplastics listing in a future UCMR when more reliable, validated drinking water methodologies are available.

⁹ PFAS listed in EPA's UCMR 6 include Bistriflimide (TFSI), Perfluoro-2-methoxyacetic acid (PFMOAA), Perfluoroethanesulfonic acid (PFETs), Perfluoropropanesulfonic acid (PFPrS), Perfluoropropanoic acid (PFPrA), Trifluoromethanesulfonic acid (TFMS), Trifluoroacetic acid (TFA).

¹⁰ U.S. EPA: *Fifth Unregulated Contaminant Monitoring Rule Data Finder*. February 12, 2026.

<https://www.epa.gov/dwucmr/fifth-unregulated-contaminant-monitoring-rule-data-finder>.

¹¹ ACWA Comments to U.S. EPA regarding U.S. EPA's Proposed UCMR 5 (Docket ID No. EPA-HQ-OW-2020-0530. May 10, 2021. <https://www.acwa.com/wp-content/uploads/2021/05/Final-UCMR-5-ACWA-Comments-05-10-21.pdf>.

¹² *Drinking Water Contaminant Candidate List 6—Draft*, 91 Fed. Reg. 17186 (April 6, 2026).

<https://www.govinfo.gov/content/pkg/FR-2026-04-06/pdf/2026-06662.pdf>.

This is the first time EPA may be taking regulatory steps regarding microplastics as a contaminant group on a national scale. Since this carries the potential for regulation, there is a necessity for EPA to first conduct ongoing research to better understand microplastics in the environment and especially drinking water sources. EPA even acknowledged that significant data gaps for microplastics exist that will require further research before risks associated with these contaminants can be fully understood. EPA will also likely have to consider federal statutory definitions and size classifications, occurrence levels in drinking water systems, exposure pathways, detection technology, and appropriate and affordable treatment methods.

As EPA considers regulatory steps regarding microplastics, ACWA urges EPA to turn to California as a resource as the state is and has been conducting microplastics research. For example, California's State Water Board is in the process of implementing drinking water testing strategies focused on microplastics.¹³ Monitors include large community water systems and wholesale water systems that provide water to greater than 100,000 people, and a few select small number of public water systems. This will help obtain data to estimate general occurrence and potential human exposure through drinking water as well as aid efforts that minimize impacts to public water systems. Results from California's monitoring approach, informed by EPA's Unregulated Contaminant Monitoring Rule (UCMR) methodology, can also assist EPA with evaluating microplastic data that guides future federal regulatory efforts.

IV. Conclusion

ACWA appreciates the opportunity to comment and supports EPA efforts to improve water quality through science-based occurrence data frameworks like the UCMR. Please let us know if there are further opportunities for ACWA to collaborate on regulatory efforts or if we can provide additional information and resources. If you have any questions or would like to follow up on this matter, please contact ACWA Federal Relations Representative, Caleb Raspler, at calebr@acwa.com or (202) 434-4762.

Respectfully,

A handwritten signature in black ink, appearing to read "Caleb Raspler", with a stylized flourish at the end.

Caleb Raspler
Federal Relations Representative
Association of California Water Agencies

¹³ California State Water Resources Control Board: *Policy Handbook Establishing a Standard Method of Testing and Reporting of Microplastics in Drinking Water* (August 9, 2022).
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/docs/2022/mp-hndbk.pdf.