

April 8, 2024

Bruno Pigott  
Acting Assistant Administrator  
Office of Water U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Re: Comments on Revisions to the Unregulated Contaminant Monitoring Rule (UCMR 5);  
Methods and Webinar of UCMR 6; EPA-HQ-OW-2023-0469; FRL-10857-04-OW

Dear Acting Assistant Administrator Pigott:

We, the undersigned organizations representing a coalition of companies, trade associations, and other stakeholders from across the economy, appreciate the opportunity to provide comments on the proposed revisions to the Unregulated Contaminants Monitoring Rule test methods. We support gathering additional scientifically valid data on the national occurrence of select PFAS in drinking water. Ensuring the validity and appropriateness of the analytical methods used should be of the highest importance. Our customers, employees, and communities depend on clean water for a better quality of life and economic growth. This information is a critical input in determining whether and how EPA should regulate particular contaminants for treatment.

The following are our priorities for your consideration:

- Ensure that costs are included and considered when developing and approving targeted test methods as required under the Safe Drinking Water Act.
- Focus resources on developing validated analytical methods for detecting PFAS chemistries included in current and ongoing regulatory actions in drinking water for this and future monitoring efforts (e.g., TRI and TSCA requirements).
- Analyze each PFAS chemistry or subcategory using targeted analysis<sup>1</sup> given variations in physical, chemical, and toxicological properties.
- Ensure that the method performance sensitivity, selectivity, accuracy, and precision attainable for each contaminant meets the highest standards. These analytical methods will likely be used to support potentially costly rulemaking efforts and the analytical methods must be appropriate.
- Provide detailed evaluation of laboratory capacity to complete needed testing under agreed methods.

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<sup>1</sup> "Non-target analysis may be useful for screening purposes but is not suitable for establishing regulatory requirements. Available non-target analytical methods have accuracy limitations, and do not distinguish among different types of PFAS and may also capture non-PFAS fluorinated compounds."

The business community supports appropriate water monitoring data collection to assess unregulated contaminants. Such information remains essential to ensuring that federal interventions are prioritized appropriately and are based on the best science and risk.

Sincerely,

Alliance for Chemical Distribution  
American Chemistry Council  
American Petroleum Institute  
TRSA - The Linen, Uniform and Facility Services Association  
U.S. Chamber of Commerce