Pew

August 31, 2026

Submitted via regulations.gov

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

RE: Revisions To Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems (EPA-HQ-OW-2023-0469)

Dear Administrator Zeldin:

On behalf of The Pew Charitable Trusts (Pew), thank you for the opportunity to provide comments on the Environmental Protection Agency's (EPA) proposed revisions to establish the sixth Unregulated Contaminant Monitoring Rule (UCMR 6) under the Safe Drinking Water Act (SDWA).[1]

Pew is a non-profit, nonpartisan research and policy organization dedicated to informing the public, improving public policy, and invigorating civic life with several initiatives related to the health and well-being of American communities, including Pew's safer chemicals project focused on reducing Americans' exposures to endocrine-disrupting chemicals (EDCs) and Pew's preventing plastic pollution project.

[1] U.S. Environmental Protection Agency (EPA), Revisions to Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems, 91 Fed. Reg. (July 1, 2026), https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf.

Overview

- Pew strongly supports the inclusion of a set of seven ultrashort-chain per- and polyfluoroalkyl substances (PFAS), including trifluoroacetic acid (TFA), on the list of contaminants selected for data collection under the sixth round of the UCMR. Research has shown that their presence in the environment, in drinking water, and in people is rising,[2] presenting concerns for associated health impacts.[3,4]
- We encourage EPA to set the lowest achievable Minimum Reporting Levels (MRLs) for the ultrashort-chain PFAS in the finalized UCMR 6 to ensure comprehensive assessment of occurrence.
- Earlier this year Pew supported the inclusion of micro- and nanoplastics (MNPs) in EPA's proposed Contaminant Candidate List 6 (CCL 6). We again emphasize the urgent need for validated EPA analytical methods and national occurrence data to better understand MNP exposures and ensure health-protective policies keep pace with the best available science. We urge EPA to promptly develop a time-bound strategy for the approval and deployment of MNP analytical methods and to include technical and other relevant support to public water utilities.
- We recommend that EPA update its Information Compendium in the final UCMR 6 to include a complete set of health effects information developed by EPA and other regulatory bodies.
- Finally, we recommend that EPA commit sufficient resources and staffing to ensure robust training, monitoring, and communications for the duration of the final UCMR 6.

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[2] Hans Peter H Arp et al., "The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid (TFA)," *Environ Sci Technol,* 58, no. 45 (2024): 19925-19935. https://doi.org/1021/acs.est.4c06189.
[3] Martina Iulini et al., "Decoding PFAS Immunotoxicity: A NAMs-Based Comparison of Short Vs. Long Chains," *Frontiers in Toxicology,* Volume 7 - 2025 (2025): https://www.frontiersin.org/journals/toxicology/articles/10.3389/ftox.2025.1665163.
[4] "CLH Report Proposal for Harmonised Classification and Labelling Based on Regulation (EC) No 1272/2008 (Clp Regulation), Annex VI, Part 2 International Chemical Identification: Trifluoroacetic Acid … %," European Chemicals Agency, 2025, https://echa.europa.eu/documents/10162/0dae2d2a-2b4c-b63e-c669-bd3a76197aa1.

UCMR 6 Can Improve Understanding of the Occurrence of Contaminants, Including EDCs, in Drinking Water

Under the Safe Drinking Water Act (SDWA), EPA is required to update the Unregulated Contaminant Monitoring Rule (UCMR) every five years.[5] The UCMR provides for critical data collection on the occurrence of legacy and emerging contaminants in public drinking water on a national scale.

In tandem with work carried out under EPA's Candidate Contaminant List, UCMR 6 contributes key exposure information, allowing EPA to take steps toward regulating harmful contaminants, including endocrine-disrupting chemicals (EDCs) like per- and polyfluoroalkyl substances (PFAS) and micro- and nanoplastics (MNPs). Given the five-year cycles of UCMR and the importance of EPA's UCMR occurrence data set for making regulatory determinations under the SDWA, the rigorous and thorough implementation of UCMR 6 through 2031 is imperative to inform evidence-based, health-protective drinking water regulations.

The value of UCMR data has been particularly pronounced for PFAS in drinking water. EPA added a group of six PFAS, including two of the most well-studied PFAS, perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), to UCMR 3 in 2012,[6] providing the first national dataset on their occurrence and subsequently best available science to inform drinking water limits via national primary drinking water regulations (NPDWR). EPA's UCMR 5 included a group of 29 PFAS, including PFOA and PFOS, and incorporated improvements in analytical capabilities that allowed for lower MRLs and thus more sensitive detection compared with the earlier UCMR effort.[7,8] In the notice for EPA's 2024 PFAS NPDWR for six PFAS, EPA relied on the complete set of occurrence data from UCMR 3 as well as data already collected under the

[5] Safe Drinking Water Act (SDWA) Amendments of 1996, Pub. L. No. 104–182, 110 Stat. 1613 (1996) §1445(a)(2)
[6] U.S. EPA, Revisions to the Unregulated Contaminant Monitoring Regulation (UCMR 3) for Public Water Systems, 77 Fed. Reg. 85 (May 2, 2012): 26099, https://www.govinfo.gov/content/pkg/FR-2012-05-02/pdf/2012-9978.pdf.
[7] U.S. EPA, Revisions to the Unregulated Contaminant Monitoring Rule (UCMR 5) for Public Water Systems and Announcement of Public Meetings 86 Fed. Reg. 245 (December 27, 2021), https://www.govinfo.gov/content/pkg/FR-2021-12-27/pdf/2021-27858.pdf.
[8] U.S. EPA. "Per- and Polyfluoroalkyl Substances National Primary Drinking Water Regulation," Federal Register 89, no. 82 (April 26, 2024):32532, https://www.govinfo.gov/content/pkg/FR-2024-04-26/pdf/2024-07773.pdf.

UCMR 5 which was still in progress during rule development.[9] This data was also supplemented with state-led monitoring data where available.[10]

EPA Should Continue to Prioritize Drinking Water Method Development and Additional Research for MNPs

The lack of inclusion of MNPs in the proposed UCMR 6 is unfortunate, and we regret that water systems and laboratories do not yet have access to EPA-validated methods necessary to meet the UCMR 6 implementation timeline. Pew recommended EPA include MNPs in the CCL 6[11] as they are pervasive in the environment[12] and animal studies reveal associated health effects including altered cell growth, altered cell survival, and impaired reproduction.[13] Based on this and other data, effects on human reproductive and digestive systems are also suspected.[14,15]

Our comments on the CCL 6 proposal noted that the Agency should include MNPs on the final CCL 6 and develop a robust readiness action strategy for MNPs, setting clear time-bound milestones including the approval of a drinking water detection method for MNPs. That work would allow that much-needed monitoring for MNPs in the next UCMR round, UCMR 7, at the very latest.

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[9] *Ibid.*
[10] *Ibid.*
[11] Jennifer McPartland, Director, Safer Chemicals, The Pew Charitable Trusts. Comment to Lee Zeldin, Administrator, US Environmental Protection Agency RE: Drinking Water Contaminant Candidate List - Draft; Notice of Availability (EPA-HQOW-2022-0946), Jun 8, 2026, https://www.regulations.gov/comment/EPA-HQ-OW-2022-0946-0137.
[12] Albert A. Koelmans et al., "Microplastics in Freshwaters and Drinking Water: Critical Review and Assessment of Data Quality," *Water Research* 155 (2019): 410-22, https://www.sciencedirect.com/science/article/pii/S0043135419301794.
[13] Richard C. Thompson et al., "Twenty Years of Microplastic Pollution Research—What Have We Learned?" *Science* 386, no. 6720eadl2746, https://doi.org/10.1126/science.adl2746.
[14] "Microplastics Occurrence, Health Effects, and Mitigation Policies an Evidence Review for the California State Legislature," California State Policy Evidence Consortium (CalSPEC) 2023, https://uccs.ucdavis.edu/sites/g/files/dgvnsk12071/files/media/documents/CalSPEC-Report-Microplastics-Occurrence-Health%20Effects-and-Mitigation-Policies.pdf.
[15] Nicholas Chartres et al., "Effects of Microplastic Exposure on Human Digestive, Reproductive, and Respiratory Health: A Rapid Systematic Review," Environmental Science & Technology 58, no. 52 (2024): 22843-64, https://doi.org/10.1021/acs.est.3c09524.

As the urgency to understand MNP exposures through drinking water is felt across the country,[16] there is already work underway by academic researchers and state agencies to identify and monitor these contaminants.[17,18,19]

California is the first state to adopt a statewide testing program for MNPs[20] impacting drinking water systems, and the California State Water Resources Control Board (SWRCB) has published its own preferred methods to detect MNPs in water.[21] The California MNP monitoring program for selected large community water systems began with testing of source water in 2023. A second phase involving monitoring in treated drinking water will begin in late 2026.[22] Similarly, New Jersey has passed a law that requires the New Jersey Department of Environmental Protection to develop MNP detection methods and to study removal technologies for microplastics in drinking water.[23] EPA should closely engage with California and New Jersey on method development and monitoring approaches to inform and accelerate the approval of a drinking water detection method for MNP and national monitoring efforts.

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[16] Governor Phil Murphy et al. "Request of the Governors of New Jersey, Delaware, Illinois, Maryland, Michigan, Wisconsin, and Connecticut under 42 U.S.C. § 300j-4(a)(2)(B)(ii) that EPA Include Microplastics in the Forthcoming Unregulated Contaminant Monitoring Rule 6 List," Letter to Lee Zeldin, Administrator, U.S. EPA, Nov 26, 2025, https://d31hzlhk6di2h5.cloudfront.net/20251126/24/85/ad/24/77a93608fa1b601e94b31756/Microplastics_Petition.pdf.

[17] California State Water Resources Control Board (SWRCB), "Legislative Requirements for Microplastics in Drinking Water," 2025, https://ftp.sccwrp.org/pub/download/MICROPLASTICS_WORKSHOP_DRINKING_WATER/MPDW%20workshop%20materials/Presentation%20slides/1.%20MP%20Legislative%20Requirements_SWRCB-DDW.pdf.

[18] New Jersey, Assembly Committee Substitute for Assembly, Nos. 4821 and 4823, A4821 (2023), https://www.njleg.state.nj.us/bill-search/2022/A4821/bill-text?f=A5000&n=4821_R2.

[19] National Institutes of Health (NIH), "Plastic Particles in Bottled Water," January 23, 2024, https://www.nih.gov/news-events/nih-research-matters/plastic-particles-bottled-water.

[20] California SWRCB, "Adoption of Definition of 'Microplastics in Drinking Water," 2020, https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2020/rs2020_0021.pdf.

[21] Scott Coffin et al., "Development and Application of a Health-Based Framework for Informing Regulatory Action in Relation to Exposure of Microplastic Particles in California Drinking Water," *Microplastics and Nanoplastics* 2, no. 1 (2022): 12, https://doi.org/10.1186/s43591-022-00030-6.

[22] California SWRCB, "Legislative Requirements for Microplastics in Drinking Water," 2025, https://ftp.sccwrp.org/pub/download/MICROPLASTICS_WORKSHOP_DRINKING_WATER/MPDW%20workshop%20materials/Presentation%20slides/1.%20MP%20Legislative%20Requirements_SWRCB-DDW.pdf.

[23] New Jersey, Assembly Committee Substitute for Assembly, Nos. 4821 and 4823, A4821 (2023), https://www.njleg.state.nj.us/bill-search/2022/A4821/bill-text?f=A5000&n=4821_R2.

EPA Should Consider Health Effects Data and Emerging Health Standards for Ultrashort-Chain PFAS in UCMR 6

The proposed UCMR 6 lists 30 contaminants for public water systems to monitor between 2028 and 2031, including seven ultrashort-chain PFAS (perfluoropropanesulfonic acid (PFPrS), perfluoroethanesulfonic acid (PFEtS), trifluoromethanesulfonic acid (TFMS), trifluoroacetic acid (TFA), perfluoropropanoic acid (PFPrA), perfluoro-2-methoxyacetic acid (PFMOAA), and bistriflimide (TFSI)).[24] Pew is encouraged by and supports EPA's decision to include ultrashort-chain PFAS in this sixth round of unregulated contaminant monitoring, as discussed in our comments on the proposed CCL 6.[25] The rise of ultrashort-chain PFAS in the environment and in people[26] and the incomplete removal of these hydrophilic substances through treatment methods frequently used for other PFAS, such as Granular Activated Carbon (GAC) and Ion Exchange (IX) Resins, make a national occurrence dataset particularly important.[27]

Further, we commend EPA for including three chemicals (TFA, TFSI, and TFMS) that are not covered currently by the structural definition of PFAS under the Toxic Substances Control Act (TSCA),[28] under CCL 5,[29] and in the proposed CCL 6.[30] Inclusion of these chemicals aligns with the 2021 Organization for Economic Co-operation and Development (OECD) approach, defining PFAS as any compound that contains at least one fully fluorinated methyl or methylene carbon

[24] U.S. EPA, Revisions to Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems, 91 Fed. Reg. (July 1, 2026), https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf.
[25] Jennifer McPartland, Director, Safer Chemicals, The Pew Charitable Trusts, Comment to Lee Zeldin, Administrator, US Environmental Protection Agency, Jun 8, 2026, https://www.regulations.gov/comment/EPA-HQ-OW-2022-0946-0137.
[26] Hans Peter H. Arp et al., "The Global Threat from the Irreversible Accumulation of Trifluoroacetic Acid (TFA)," *Environmental Science & Technology* 58, no. 45 (2024): 19925-35, https://doi.org/10.1021/acs.est.4c06189.
[27] MK Björnsdotter et al., "Challenges in the Analytical Determination of Ultra-Short-Chain Perfluoroalkyl Acids and Implications for Environmental and Human Health," no. 1618-2650 (Electronic).
[28] U.S. EPA, Toxic Substances Control Act Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl Substances 88 Fed. Reg. 195 (October 11, 2023), https://www.govinfo.gov/content/pkg/FR-2023-10-11/pdf/2023-22094.pdf.
[29] U.S. EPA, Drinking Water Contaminant Candidate List 5—Final 87 Fed. Reg. 218 (November 14, 2022), https://www.govinfo.gov/content/pkg/FR-2022-11-14/pdf/2022-23963.pdf.
[30] U.S. EPA, Revisions to Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems, 91 Fed. Reg. (July 1, 2026), https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf.

atom (i.e., without any H/Cl/Br/I atom attached to it).[31] As noted in our CCL comments, we strongly recommend that EPA continue to broaden the scope of PFAS considered in the Agency's monitoring efforts.

Given the unique nature of ultrashort-chain PFAS, we understand that there are notable and appropriate differences between the analytical testing methods used in prior UCMRs and the method proposed for UCMR 6.

The extraction methods used in previous UCMRs, EPA Method 537.1[32] and EPA Method 533,[33] were not designed for ultrashort-chain PFAS and would likely reduce recovery for these highly polar and hydrophilic compounds. Thus, Pew is supportive of EPA's decision to utilize direct aqueous injection in EPA Method 563 in place of the SPE process. We have concerns, however, with EPA's proposal to allow each laboratory to select the injection volume that meets their quantitative objectives when performing LC-MS/MS.[34] Pew recommends that EPA carefully consider the potential influence that injection volume or other parameters could play on method sensitivity for ultrashort-chain PFAS.[35]

We also recommend the Agency revisit the proposed MRLs to assure that the levels selected reflect the most recent data on laboratory capabilities. We are hopeful that this reconsideration will allow the Agency to lower the selected MRLs as demonstrated by recent analytical

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[31] Zhanyun Wang et al., "A New OECD Definition for Per- and Polyfluoroalkyl Substances," *Environmental Science & Technology* 55, no. 23 (2021): 15575-78, https://doi.org/10.1021/acs.est.1c06896.
[32] U.S. EPA, "Method 537.1 Determination of Selected Per- and Polyfluorinated Alkyl Substances in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS)," 2020, https://www.epa.gov/pfas/epa-pfas-drinking-water-laboratory-methods.
[33] U.S. EPA, "Method 533: Determination of Per- and Polyfluoroalkyl Substances in Drinking Water by Isotope Dilution Anion Exchange Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry," 2019, https://www.epa.gov/pfas/epa-pfas-drinking-water-laboratory-methods.
[34] U.S. EPA, "Method 563: Determination of Selected Ultrashort Organofluorine Compounds in Drinking Water by Liquid Chromatography/Tandem Mass Spectrometry," Jul 1, 2026, https://www.regulations.gov/document/EPA-HQ-OW-2023-0469-0136.
[35] Maho Ota, Ikuro Kasuga, and Futoshi Kurisu, "Sensitivity and Quantitativeness of Large-Volume Injection Combined with Liquid Chromatography/High-Resolution Mass Spectrometry for Target Screening Analysis of Emerging Contaminants," Environmental Pollution 355 (2024): 124180, https://www.sciencedirect.com/science/article/pii/S0269749124008947.

experience.[36,37] In doing so, EPA would strengthen its exposure data sets and avoid incidentally misleading drinking water utilities and the public about the possible presence of harmful contaminants.[38,39,40] In particular, Pew recommends that EPA lower the MRL for TFA, and we call attention to the fact that EPA's new method for ultrashort-chain PFAS, Method 563, cites a method MRL for TFA (50 ng/L) that is four times more sensitive than the MRL of 200 ng/L selected in the proposed UCMR 6.[41] The UCMR 6 Laboratory Approval Manual shows that 3 of the 4 laboratories reviewed for the purposes of setting the MRL were able to achieve detections below the proposed MRL.[42] EPA's proposed TFA MRL[43] is also considerably higher than the MRLs set for the other six ultrashort-chain PFAS.[44] This information and the potential health risks associated with TFA justify a re-review of this particular MRL.

We recognize that there are several limitations associated with the analytical testing of TFA, including the various sources of TFA contamination within laboratories, differentiating true TFA signal from background noise, and variations between lab instrumentation. We echo the recommendation previously offered by the Government Accountability Office (GAO). GAO, in 2011 called on the Agency to "select minimum reporting levels that are sufficiently sensitive to detect the presence of contaminants in public water systems at levels of public health

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[36] Guomao Zheng, Stephanie M. Eick, and Amina Salamova, "Elevated Levels of Ultrashort- and Short-Chain Perfluoroalkyl Acids in Us Homes and People," *Environmental Science & Technology* 57, no. 42 (2023): 15782-93, https://doi.org/10.1021/acs.est.2c06715.
[37] Wendy Lenck, "PFAS DAC Community Water System Sampling Project" March 25, 2025, https://biomonitoring.ca.gov/sites/default/files/downloads/Linck_032525.pdf.
[38] "Lowest Concentration Minimum Reporting Level (LCMRL) Calculator," US EPA, https://www.epa.gov/dwanalyticalmethods/lowest-concentration-minimum-reporting-level-lcmrl-calculator.
[39] U.S. EPA, "UCMR 6 Laboratory Approval Manual," 2026, https://www.regulations.gov/document/EPA-HQ-OW-2023-0469-0140.
[40] Donald B. Rubin, "The Bayesian Bootstrap," *The Annals of Statistics* 9, no. 1 (1981): 130-34, http://www.jstor.org/stable/2240875.
[41] U.S. EPA, "Method 563: Determination of Selected Ultrashort Organofluorine Compounds in Drinking Water by Liquid Chromatography/Tandem Mass Spectrometry," Jul 1, 2026, https://www.regulations.gov/document/EPA-HQ-OW-2023-0469-0136.
[42] U.S. EPA, "UCMR 6 Laboratory Approval Manual," 2026, https://www.regulations.gov/document/EPA-HQ-OW-2023-0469-0140, See Table 17.
[43] U.S. EPA, Revisions to Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems, 91 Fed. Reg. (July 1, 2026), https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf.
[44] *Ibid.*

concern…."[45] Indeed, EPA itself explains it is reproposing the inclusion of 1,2,3-trichloropropane for the UCMR 6, because the chemical's MRL under UCMR 3 was insufficiently sensitive to capture the chemical's potential risk.[46] The agency indicates that setting MRLs substantially higher than the levels of concern "…presents uncertainty when characterizing exposure and a potential meaningful opportunity for health risk reduction…"[47]

Again, we believe this caution is relevant to TFA and call on the Agency to consider the most recent performance data indicating that external researchers and laboratories have been able to detect TFA concentrations in U.S. drinking water at levels below the proposed MRL for UCMR 6.

For example, a 2023 study reported a median concentration of 79 ng/L for TFA in drinking water sampled from Indiana.[48] Preliminary data from the California SWRCB showed TFA detected in all 237 groundwater wells sampled in 2023 and 2024 at a minimum concentration of 49 ng/L.[49]

While toxicological studies to date have evaluated the effects of TFA at relatively high concentrations, the potential effects of low dose exposures on human and animal health should also be considered, particularly since PFAS may induce non-linear responses or low-dose responses like other endocrine disrupting chemicals.[50]

As researchers continue to study potential health effects of TFA, EPA should consider existing findings related to disruption of thyroid hormone levels. EPA should update its information profile for TFA to include the European Chemicals Agency's (ECHA) 2024 designation of TFA

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[45] U.S. Government Accountability Office (GAO), "EPA Should Improve Implementation of Requirements on Whether to Regulate Additional Contaminants," May 2011, https://www.gao.gov/products/gao-11-254.
[46] U.S. EPA, Revisions to Establish the Sixth Unregulated Contaminant Monitoring Rule (UCMR 6) for Public Water Systems, 91 Fed. Reg. (July 1, 2026), https://www.govinfo.gov/content/pkg/FR-2026-07-01/pdf/2026-13263.pdf.
[47] *Ibid.*
[48] Guomao Zheng, Stephanie M. Eick, and Amina Salamova, "Elevated Levels of Ultrashort- and Short-Chain Perfluoroalkyl Acids in Us Homes and People," *Environmental Science & Technology* 57, no. 42 (2023): 15782-93, https://doi.org/10.1021/acs.est.2c06715.
[49] Wendy Lenck, "PFAS DAC Community Water System Sampling Project" March 25, 2025, https://biomonitoring.ca.gov/sites/default/files/downloads/Linck_032525.pdf.
[50] U.S. GAO, "EPA Has Improved Its Unregulated Contaminant Monitoring Program, but Additional Action Is Needed," January 2014, https://www.gao.gov/assets/gao-14-103.pdf.

as a reproductive toxicant[51] and the July 2026 European Food Safety Authority (EFSA) revised acceptable daily intake (ADI) for TFA, lowering the original ADI from 0.05 milligrams per kilogram of bodyweight per day (mg/kg/day) to 0.014 mg/kg/day.[52] The revision stems from a recent study in rats that showed that maternal exposure to TFA led to reduced thyroid hormone levels, particularly thyroxine (T4), in offspring.[53] The study also showed that TFA exposure led to reduced sperm count and quality in male offspring. Taken together, the data suggests that TFA exposure *in utero*, a critical window of susceptibility, alters endocrine function in offspring and underscores the importance of considering and addressing the potential reproductive and developmental toxicity effects of TFA.

EPA Should Support States, Water Systems, and Communities Throughout Implementation of UCMR 6

In every UCMR cycle, EPA provides important services to state, local, and tribal governments; water systems managers; laboratories, community members; and other stakeholders not only to accurately test for the specific unregulated contaminants but also to share information regarding findings. This is important work that can inform future Agency rulemakings to protect the public but will require federal resources. As the Agency indicates in the UCMR 6 proposal, the extent of testing coverage relies to a considerable extent on the availability of federal assistance for the small- and medium-sized systems, so we are hopeful that EPA will work with the relevant Congressional appropriators to provide funding for an extensive national sampling effort.

In preparing for implementation of UCMR 6, the EPA should develop robust risk communication guidance and tools to equip drinking water providers with credible information

[51]Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on Classification, Labelling and Packaging of Substances and Mixtures, Amending and Repealing Directives 67/548/EEC and 1999/45/EC, and Amending Regulation (EC) No 1907/2006 (Text with EEA Relevance), OJ L 353, 31.12.2008, pp. 1–1355, European Union, 2026,
[52] European Food Safety Authority (EFSA), "EFSA Lowers Safe Level for Exposure to Tfa," (22 July 2026): https://www.efsa.europa.eu/en/news/efsa-lowers-safe-level-exposure-tfa#links-to-science.
[53] EFSA et al., "Scientific Report on Consumer Health-Based Guidance Values for Trifluoroacetic Acid," *EFSA Journal* 24, no. 7 (2026): e10227, https://doi.org/10.2903/j.efsa.2026.10227.

to use in public communications related to detected, unregulated contaminants.[54] Water systems, state, local, and Tribal governments may be challenged to communicate risks from ultrashort-chain PFAS because, while existing scientific evidence reveals they are highly persistent and present health concerns,[55] they have been less studied than long chain PFAS. At a minimum, for each UCMR contaminant, EPA should add health-based reference doses developed by other jurisdictions, including state environmental or health departments, and other agencies to its 'Information Compendium.'[56] Such information would help utilities to contextualize and communicate the presence of contaminants.[57,58]

Specifically, the Agency should partner with and provide guidance to states and water systems on how to interpret detections and how best to communicate that information to consumers. While the mandated annual Consumer Confidence Reports can be powerful tools for public communication,[59] finding additional pathways for sharing accurate information with consumers who may be impacted by unregulated contaminants would enhance trust and spur useful engagement.

Again, following finalization of CCL 6 and leading into UCMR 6, EPA should promptly develop a readiness action strategy for MNPs. This strategy could be informed by interested experts, organizations, laboratories, and consumers and establish clear, time-bound milestones toward the approval and deployment of a method for MNPs. As MNP occurrence in the environment is

[54] Association of State Drinking Water Administrators, "2019 Analysis of State Drinking Water Programs' Resources and Needs," 2020, https://www.asdwa.org/wp-content/uploads/2020/07/2019-Analysis-of-State-Drinking-Water-Programs-Resources-and-Needs.pdf.
[55] U.S. EPA, "EPA's Per- and Polyfluoroalkyl Substances (PFAS) Action Plan," 2019, https://www.epa.gov/sites/default/files/2019-02/documents/pfas_action_plan_021319_508compliant_1.pdf.
[56] U.S. EPA, "Information Compendium for Candidate Contaminants for the Proposed Sixth Unregulated Contaminant Monitoring Rule (UCMR 6)," Jul 1, 2026, https://www.regulations.gov/document/EPA-HQ-OW-2023-0469-0139.
[57] The American Water Works Association, Letter to U.S. EPA RE: Unregulated Contaminant Monitoring Rule; Methods Request and Webinar (Docket ID No. EPA–HQ–OW–2023–0469), April 8, 2024, https://www.regulations.gov/comment/EPA-HQ-OW-2023-0469-0092.
[58] Association of Metropolitan Water Agencies, Letter to U.S. EPA RE: Re: Docket number EPA-HQ-OW-2023-0469 Unregulated Contaminant Monitoring Rule; Methods Request and Webinar, April 8, 2024, https://www.regulations.gov/comment/EPA-HQ-OW-2023-0469-0091.
[59] Jessica Evans and Adam T. Carpenter, "Utility Approaches to Evaluating the Effectiveness of Consumer Confidence Reports," *Utilities Policy* 58 (2019): 136-44, https://www.sciencedirect.com/science/article/pii/S095717871930030X.

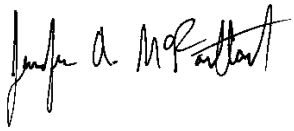
expected to increase,[60] the Agency should be planning for and deploying adequate resources to ensure labs, state agencies, and water systems are prepared to test drinking water and implement any necessary mitigation efforts.

Conclusion

In summary, we support the Agency's important decision to include the problematic short-chain PFAS in the UCMR 6; we recommend caution on selection of MRLs and a serious effort to assure that testing and reporting levels do not mislead the public about the possible presence of contaminants below those levels; and we urge the Agency to quickly develop a strategy to characterize the occurrence of MNPs in the nation's drinking water.

We appreciate the opportunity to provide these comments. Please contact Velma Smith, Senior Officer, Government Relations (vsmith@pewtrusts.org) for additional information or questions.

Sincerely,



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[60] The Pew Charitable Trusts, "Breaking the Plastic Wave 2025," 2025, https://www.pew.org/en/research-and-analysis/reports/2025/12/breaking-the-plastic-wave-2025.