American Water Works Association

The Authoritative Resource on Safe Water®

UCMR4 Stakeholder Meeting

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Major Points for UCMR4

- Lower reporting limits should not be the only way to increase detections
- Limit number of single analyte methods
- Consider
  - Alternative sampling schedules (outside of quarterly) need to be considered
  - Alternative methods (outside of EPA's) need to be considered
 - Collecting some limited treatment data and more relevant QC data

Lower Reporting Limits

- The lower reporting limits in UCMR3 has led to a larger percentage of detections
  - Some larger gaps between reporting limits and reference concentrations?
    - What is the health relevance?
- Detections have to be reported in following year's CCR
  - Makes it difficult to put data in context.

UCMRs Comparison
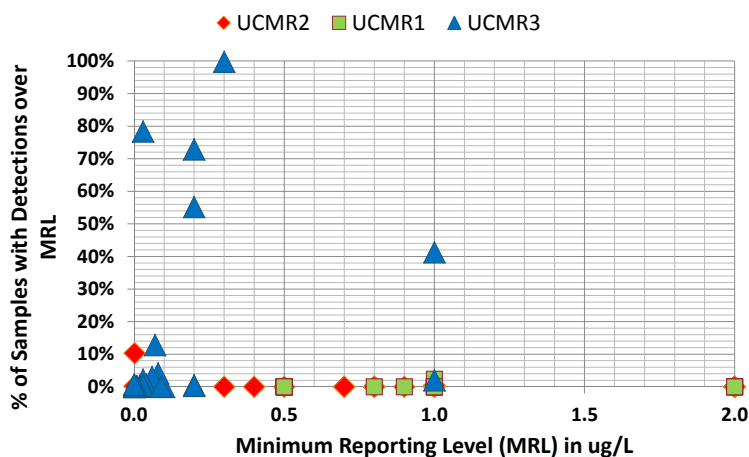
Single Analyte Method

- Limit the number of single analyte methods
    - Somewhere in the range of 8-10 methods total is acceptable

Alternative Sampling Schedules

- Quarterly sampling on a fixed schedule will not work for algal toxins
    - Maintain four total samples
- Sample four consecutive months during highest potential occurrence makes sense
    - Triggered samples are a possibility, but based on what??

Alternative Methods

- Analytes should have the highest regulatory relevance
  - Highest toxicity with the greatest occurrence potential
  - Not just what comes out of EPA methods
- Need to cast a wider net for alternative analytical methods
  - Example: WaterRF 4167 evaluated multiple PPCP methods, but EPA started with something completely different.
  - Involve the analytical community much earlier in the process

Limited Treatment Data

- Lack of treatment data inhibits data analysis for regulatory development process
  - Don't repeat the Information Collection Rule (ICR) from 1996-1997
    - But limited treatment data such as pH, alkalinity, disinfectant used, etc., can be very useful for data analysis

Capture More Relevant QC Information

- UCMR3 has no mechanism for knowing how often resamples were required due to failed QC or failed field blanks.
- This kind of information can help EPA with evaluating data and method ruggedness.
- Evaluate correlated parameters to assess ruggedness (e.g. for UCMR3 Cr(VI) vs Cr)