

EPA National Drinking Water Advisory Council

Carrie M. Lewis,
Chairperson
Portland, ME

William Alley
San Diego, CA

Jeanne-Marie Bruno
Downey, CA

Ann Marie Chischilly
Flagstaff, AZ

Marilyn Christian
Pasadena, TX

Cathy P. Kellon
Portland, OR

James McCauley
Lower Brule, SD

Wilmer Melton, III
Kannapolis, NC

Randy A. Moore
Davenport, Iowa

Howard M. Neukrug
Philadelphia, PA

Sarah Pillsbury
Concord, NH

James Salzman
Santa Barbara, CA

Mark S. Sanchez
Albuquerque, NM

June Anne Swallow
Providence, RI

Chris J. Wiant
Denver, CO

April 9, 2018

Mr. Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Pruitt:

On behalf of the National Drinking Water Advisory Council (NDWAC or Council), I am pleased to provide the Council's recommendations to the U.S. Environmental Protection Agency (EPA or Agency) for the Health Advisory (HA) process.

At the request of EPA, the NDWAC addressed this charge:

1. What information should EPA consider when determining when to develop or revise a Health Advisory?
2. What factors should EPA consider when prioritizing HAs?
3. What factors should EPA consider when developing HAs? How and when is status communicated to key stakeholders, including states and utilities?
4. What are core components that EPA can consider including in the HA?

A subgroup of nine NDWAC members deliberated on the charge and reported back to the full Council. It was noted that Health Advisories (HAs) provide valuable information for state drinking water administrators, water systems and consumers of drinking water (both public systems and private wells). For states, HAs are important for addressing the safety of public drinking water and in waste site clean-up programs to determine who receives alternate water and what the goals are for remediation. The importance of HAs to public water systems includes research on treatment techniques, planning for process upgrades and working with local health partners to develop risk communication messages for their customers. There were concerns that the difference between a HA and a regulation is not generally understood by the public, and that the risk messaging provided has not adequately communicated the subtle differences between "risk" and "safety". The discussion highlighted the critical importance of how risk messaging about HAs is provided to the public in order to avoid eroding the public's trust in their water suppliers.

The Council provided some overarching insights that added great value and context to the work of the subgroup.

- The Council strongly supported the EPA’s commitment to strengthen transparency and offered that updating and sharing the steps in the HA process, communicating the status of development of HAs in progress, and allowing review by and input of stakeholders at milestones in HA development are consistent with this commitment. It was pointed out that such review opportunities by stakeholders would also strengthen the basis of sound science used in EPA’s decision-making and would provide the opportunity for states and utilities to be better prepared for HA issuance.
- The Council cautioned that it is important to consider the “real world” impact of HAs on the public’s trust in their drinking water. Effective risk communication, delivered consistently between all agencies—states, communities and utilities-- is key to maintaining trust. EPA was strongly encouraged to increase public communication and risk communication to help the public understand what a HA level represents and how it is different from a Maximum Contaminant Level (MCL).

The document covering the NDWAC’s response to the charge is attached. The NDWAC attempted to be sensitive to EPA’s constraints in terms of resources and legal requirements and strived to make recommendations that would improve transparency and opportunity for input without interfering with or slowing down EPA’s ability to produce HAs.

On behalf of the members of the National Drinking Water Advisory Council, thank you for the opportunity to provide these recommendations. We look forward to providing further assistance as EPA considers these and other important issues.

Sincerely,



Carrie M. Lewis, Chair
National Drinking Water Advisory Council

cc: David P. Ross, Assistant Administrator for Water
Peter C. Grevatt, Director, Office of Ground Water and Drinking Water

Attachment