

Evaluation of Existing Regulations: American Water Works Association May 15th Comments



Walter Wright, Jr.
wwright@mwlaw.com
(501) 688.8839

05/25/2017

The American Water Works Association ("AWWA") submitted May 15th comments on the United States Environmental Protection Agency's ("EPA") request for *Evaluation of Existing Regulations* ("Evaluation").

See 82 Fed. Reg. 17793.

AWWA describes itself as an international, nonprofit, scientific and educational society dedicated to providing total water solutions assuring the effective management of water and includes over 3,900 utilities supplying roughly 80 percent of the nation's drinking water.

AWWA states in support of its comments that it:

- Is committed to protecting health through safe and reliable drinking water
- Advocates for cost-effective regulations based on sound science
- Supports the regulatory principles and the processes established in the 1996 Amendments to the Safe Drinking Water Act
- Views the EPA Evaluation as "an opportunity to improve the effectiveness of our regulatory system and should not be used to eliminate important public health protections under SDWA or other statutes."

AWWA states its review focused on:

... opportunities for cost-savings, streamlining and efficiencies that reduce burden without adversely impacting public health.

AWWA identified the following regulations and major guidances that it wished EPA to consider:

- Risk Management Program Rule, 82 Fed. Reg. 4594, 40 CFR Part 68, January 13, 2017
- State Revolving Loan Fund Rule, 65 Fed. Reg. 48286, 40 CFR Subpart L, August 7, 2000
- Integrated Municipal Stormwater and Wastewater Planning Approach Framework, Office of Water Memo, June 5, 2012
- Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR), 71 Fed. Reg. 654, 40 CFR Parts 9, 141, and 142, January 5, 2006
- Drinking Water Health Advisories for Cyanobacterial Toxins, 80 Fed. Reg. 34637, June 17, 2015 and perfluorinated compounds (Perfluorooctanoic Acid and Perfluorooctane Sulfonate), 81 Fed. Reg. 33250, May 25, 2016
- Phase I, II, IIB, and V Chemical Contaminant Rules, 52 Fed. Reg. 25690, January, 1987; 56 Fed. Reg. 3526, January 1991; 56 Fed. Reg. 30266, July 1, 1991; and 57 Fed. Reg. 31776, July, 1992

- Unregulated Contaminant Monitoring Rule, 81 Fed. Reg. 92666, 40 CFR 141.40

AWWA states that it selected the previously referenced rules and guidance documents because opportunities exist for cost savings.

[A copy of the comments can be downloaded here.](#)