



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 28 2004

OFFICE OF
WATER

Honorable Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Leavitt:

On behalf of the National Drinking Water Advisory Council (NDWAC), I am pleased to forward to you the *National Drinking Water Advisory Council Report on the Candidate Contaminant Classification Process to the U.S. Environmental Protection Agency*. This report provides the Council's recommendations regarding future approaches for developing the Contaminant Candidate List Classification Process for drinking water. NDWAC convened a CCL Classification Process Work Group of 20 members that met 10 times in plenary between September 2002 and March 2004.

The CCL Classification Process Work Group was specifically asked to evaluate recommendations made by the National Academy of Science's National Research Council (NRC), including methods, activities and analysis, and make recommendations for an expanded approach to the CCL listing process for the purpose of protecting public health. The NDWAC discussed the report at a May 19, 2004, meeting and unanimously approved and adopted the report to forward to the Agency with only minor technical edits.

In conducting its review, NDWAC and the Work Group considered both the large and growing number of potential contaminants that might become candidates for scrutiny in the CCL process as well as the rapid expansion of information on these contaminants. Based on this review, the report highlights the following conclusions:

- The three-step selection process as proposed by the NRC for both chemicals and microbial contaminants is an appropriate approach to follow.
- The Agency should move forward with the NRC recommendation to develop and evaluate a prototype classification approach.
- Expert judgment plays an important role throughout the selection process, particularly in reviewing the prototype model and the new classification approach.
- Establishment of surveillance and nomination processes is essential to assure a full consideration of emerging chemical and microbial contaminants.

The report identifies a number of practical limitations or difficulties in developing and applying the NRC's recommendations. It both recommends that the Agency adopt a phased adaptive management approach with expert and stakeholder input and provides some insights on how these issues might be addressed.

The NDWAC CCL Classification Process report to the Agency, with the full suite of recommendations, is enclosed. This report, along with minutes of the May meeting will be posted on the Office of Ground Water and Drinking Water's website at www.epa.gov/safewater/ndwac/council.html. The Council thanks you for the opportunity to produce this report and sincerely hopes it will assist you in further work on the CCL Classification Process.

Sincerely,



Clare Donaher
Designated Federal Officer
National Drinking Water Advisory Council

Enclosure

cc: Stephen L. Johnson, Acting Deputy Administrator
Benjamin Grumbles, Acting Assistant Administrator for Water
Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water
Brian Ramaley, Chair, NDWAC