U.S. Environmental Protection Agency
Office of Water
1200 Pennsylvania Avenue NW
Washington, DC 20460

Subject: Comments on Draft Drinking Water Contaminant Candidate List 6 (CCL 6): Docket Number EPA-HQ-OW-2022-0946

Dear Thomas Lombardi and Office of Water Staff,

The American Cleaning Institute (ACI) appreciates the opportunity to submit comments to the U.S. Environmental Protection Agency (EPA) on the draft Sixth Contaminant Candidate List (CCL 6), including EPA's proposal to include microplastics on the CCL for the first time. ACI supports science-based policy that advances cleaner and safer drinking water and recognizes EPA's effort, under the Safe Drinking Water Act, to identify contaminants that may warrant further research and evaluation. In that context, ACI respectfully encourages EPA to continue progressing on the foundation its built by pursuing a research-driven, harmonized approach to microplastics that prioritizes definitional clarity, sound analytical methods, and a stronger understanding of any public health implications associated with potential exposure through drinking water.

ACI is the home of the U.S. Cleaning Products Industry® and represents the $60 billion U.S. cleaning product supply chain. ACI members include the manufacturers and formulators of soaps, detergents, and general cleaning products used in household, commercial, industrial and institutional settings; companies that supply ingredients and finished packaging for these products; and chemical distributors. ACI promotes industry growth, stewardship, and innovation. To this end, ACI's members conduct extensive research to ensure that the products they market are safe and effective.

ACI is submitting these comments because microplastics sit at the intersection of drinking water protection, environmental stewardship, and evidence-based policymaking.[1, 2] We note EPA's recent coordination with the U.S. Department of Health and Human Services on the Systematic Targeting of Microplastics initiative, which reflects growing federal interest in improving measurement, research, and understanding of microplastics. EPA has also emphasized that the CCL process is intended to identify unregulated contaminants that may require future regulatory attention, not to prejudge whether regulation is appropriate before the supporting science is sufficiently developed.[1, 2] That framework is especially important here.

[1] U.S. Environmental Protection Agency. Draft Contaminant Candidate List 6 (CCL 6), announced April 2, 2026.
[2] U.S. Environmental Protection Agency. Drinking Water Contaminant Candidate List 6—Draft, Federal Register notice, April 6, 2026, Docket ID EPA-HQ-OW-2022-0946, Document ID EPA-HQ-OW-2022-0946-0015.

ACI encourages the Agency to build on its previous work and continue to lay the scientific foundation needed to clearly define the category, characterize relevant exposures, and determine whether and under what conditions public health risks may arise. The Agency should continue grounding its approach in the analytical precedent it has applied when evaluating particulate materials across EPA programs. This includes careful consideration of physical form, behavior in drinking water systems, and relevance of available measurement methods to drink-water-relevant exposures. Maintaining continuity with these analytical approaches established by EPA will support consistency, data comparability, and alignment across EPA programs.

Key Recommendations

1. EPA should prioritize a clear, fit-for-purpose definition of microplastics to further research on microplastics in drinking water research and policy frameworks.
2. EPA should focus on strengthening its understanding of the potential for exposure to microplastics and any resulting health effects before making assumptions that may impact any future regulatory decision making.
3. EPA should continue prioritizing the development of validated analytical methods to support the standardized collection and evaluation of data that address adverse effects from exposure to microplastics through drinking water.
4. EPA Office of Water should coordinate across EPA programs and with other federal efforts to promote consistent terminology, methods, and research priorities.

1. Definitional clarity should come first

ACI agrees that additional research is needed to better understand the potential impacts of microplastics on human health and the environment. A threshold issue is definitional clarity. EPA has included microplastics as a group on draft CCL 6 and has identified the need to understand characteristics that could be associated with adverse health effects such as particle size, polymer type, shape, color, and the presence of other chemical components. EPA's own draft CCL 6 technical support materials recognize that microplastics are being considered as a group and that important data gaps remain regarding health effects, occurrence, and analytical methods.[1, 3] Without a clear and fit-for-purpose definition, it is difficult to establish precise research objectives, compare study results across programs, or determine which forms of microplastics are most relevant to drinking water exposure and potential adverse outcomes. Aligning definitional work with EPA's established approaches for evaluating particulate materials will also help ensure that future research and monitoring efforts remain targeted, interpretable, and relevant to drinking water exposure.

[3] U.S. Environmental Protection Agency. Technical Support Document for the Draft Sixth Contaminant Candidate List (CCL 6) – Chemical Contaminants, EPA 815-R-26-004, February 2026.

2. EPA should keep foundational research needs at the center of the CCL 6 process

EPA's Technical Support Document for draft CCL 6 appropriately recognizes that substantial data gaps remain in the Agency's understanding of the potential occurrence of microplastics in drinking water and possible health effects resulting from such occurrence. As EPA explains, the draft CCL 6 represents the first time the Agency has included a group composed primarily of a diverse set of polymers, rather than a class of closely related chemicals, on draft CCL 6.[3] Therefore, EPA's typical approach to evaluating CCL chemicals may not be appropriate for evaluating microplastics. EPA further notes the need to determine whether exposure to microplastics through drinking water may contribute to adverse health effects, identify which characteristics of microplastics may be linked to any such effects, and develop robust, validated analytical methods that can standardize future data collection and analysis. [3] EPA also points to the need for additional information on occurrence, exposure pathways, and the interaction of microplastics with other substances.[3] ACI agrees that these are foundational research needs and believes they should remain central to EPA's next steps.

3. Method development and occurrence monitoring need harmonization before regulatory conclusions are drawn

Because there is not yet a sufficiently harmonized definition(s) or validated analytical framework, there is also a lack of consistency in how microplastics are measured and monitored. Differences in sample preparation, particle identification techniques, size thresholds, reporting units, and polymer characterization can lead to findings that are difficult to compare across studies. This creates challenges not only for occurrence assessments in source water and finished drinking water, but also for any effort to establish a reliable evidence base for future risk assessments. These challenges also demonstrate the importance of maintaining consistency with EPA's established analytical frameworks for particulate materials, which rely on clearly defined assumptions about measurement, detection, and exposure. EPA should continue to prioritize method development, interlaboratory validation, quality assurance, and standardization.

4. Cross-program harmonization will improve the quality and usability of EPA's work

Harmonization across definitions, frameworks, and methodologies will be critical to making EPA's research program more effective. ACI encourages EPA's drinking water program to coordinate closely with other EPA offices that already evaluate polymers in different regulatory and programmatic contexts. Greater internal alignment can help reduce confusion, improve terminology, and support a more coherent federal approach to microplastics research. This includes drawing from EPA's established analytical approaches where the evaluation of particulate materials has been informed by physical form, exposure pathways, and appropriate measurement techniques. Such coordination would also help EPA better distinguish among polymer types and uses when considering which materials are most relevant to drinking water occurrence and potential public health concern. Specifically, ACI recommends that the Office of Water aligns with the Office of

Chemical Safety and Pollution Prevention (OCSPP), to best understand how polymers have previously been reviewed in other contexts within the agency and how programs like Safer Choice, evaluated the potential risks to human health and the environment.

Conclusion

In conclusion, ACI applauds EPA's continued efforts to better understand microplastics in drinking water before considering any potential regulatory action. ACI recommends that the Agency focus at this stage on definitional clarity, analytical method development, occurrence characterization, and bolstering the scientific basis for evaluating any potential adverse health effects from exposure through drinking water. Given the significant remaining data gaps, this is the appropriate point in the CCL 6 process for EPA to strengthen the research foundation, promote harmonization, and ensure that any future policy decisions are grounded in reliable and reproducible science. ACI welcomes the opportunity to provide additional information, technical input, or industry expertise to assist EPA as it advances this work. [4]

Sincerely,

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[4] U.S. Environmental Protection Agency. Safer Choice Criteria for Colorants, Polymers, Preservatives and Related Chemicals, August, 2025, EPA's Safer Choice Criteria for Colorants, Polymers, Preservatives, and Related Chemicals