



● **Board of Directors**
Communications and Legislation Committee

5/12/2015 Board Meeting

8-6

Subject

Express support for H.R. 212 (Latta, R-Ohio) and S. 460 (Portman, R-Ohio) — Drinking Water Protection Act; and express support, if amended, for H.R. 243 (Kaptur, D-Ohio) and S. 462 (Brown, D-Ohio) — Safe and Secure Drinking Water Protection Act of 2015

Executive Summary

This board letter covers four federal bills related to managing the risks of cyanotoxins in drinking water. H.R. 212 and S. 460 were introduced by Congressman Bob Latta and Senator Rob Portman, respectively ([Attachment 1](#) and [Attachment 2](#)). These companion bills direct the United States Environmental Protection Agency (USEPA) to develop a strategic plan for the assessment and management of the risks of cyanotoxins in drinking water within 90 days of the bill's enactment. The strategic plan shall: (a) evaluate the risk to human health from drinking water contaminated with cyanotoxins; (b) establish a comprehensive list of cyanotoxins harmful to human health; (c) summarize the known adverse human health effects of cyanotoxins and factors that cause cyanobacteria to proliferate and express toxins; (d) determine whether to publish health advisories for such cyanotoxins; (e) establish guidance regarding analytical detection methods; (f) establish guidance regarding the frequency of monitoring necessary to determine if such cyanotoxins are present in drinking water provided by public water systems; and (g) recommend feasible treatment options to mitigate any adverse public health effects of cyanotoxins.

H.R. 243 and S. 462 were introduced by Congresswoman Marcy Kaptur and Senator Sherrod Brown, respectively ([Attachment 3](#) and [Attachment 4](#)). Unlike the two bills mentioned above, H.R. 243 and S. 462 more specifically direct the USEPA to publish a health advisory for microcystins in drinking water. Under H.R. 243, the health advisory shall be prepared within 90 days of the bill's enactment, whereas S. 462 provides USEPA 180 days to complete this task. The health advisory shall include: (1) the level of microcystins in drinking water below which the water is expected to be safe for human consumption; (2) feasible treatment techniques and other means for achieving such a level; and (3) standardized procedures for testing for microcystins in drinking water. Furthermore, both H.R. 243 and S. 462 direct the USEPA to: (a) submit a report to Congress on the status of efforts to regulate drinking water with respect to levels of microcystins; (b) describe actions to promote testing of drinking water for microcystins in areas that have been affected by harmful algal blooms; and (c) identify available treatment techniques and other means for addressing microcystins in drinking water. USEPA must report back to Congress no later than 120 days after enactment of H.R. 243, or 180 days after enactment of S. 462, and every year thereafter. Staff recommends removing the date-specific timelines for the USEPA to develop health advisories for microcystins prior to supporting H.R. 243 and S. 462.

Background

These four federal bills were drafted in response to “do not drink” and “do not boil” notices issued by Toledo, Ohio on August 2, 2014. The cause of these warnings was a particularly severe algal bloom in Lake Erie that produced microcystin — the commonly found algal toxin. (The terms “algal toxin,” “cyanotoxin,” and “microcystin” are increasingly specific terms for a class of more than 50 toxins produced by blue-green algae.) Microcystins in drinking water are a human health concern primarily due to their potential chronic toxicity to the

human liver. Although higher concentrations can also lead to diarrhea, respiratory symptoms, and skin rashes, these levels were not observed in Toledo's treated water supply.

Though there is no national or international drinking water standard for microcystin, the Ohio EPA adopted the World Health Organization's provisional guidance level of 0.001 mg/L for microcystin-LR (one of the main varieties of microcystins). This provisional guidance level was developed to be adequately protective of public health given the limited information that was available at the time. The city of Toledo followed Ohio EPA's guidance and issued the water warnings once the treated water exceeded this level.

Currently, there is no federal or state regulatory standard for algal toxins in drinking water. Independent of the proposed legislation, USEPA is already developing a public health advisory for microcystin-LR and cylindrospermopsin (two of the most prevalent algal toxins). The anticipated release date for this draft public health advisory is late Spring 2015. Public health advisories are nonenforceable drinking water standards that provide information on contaminants that can cause human health effects and are known or anticipated to occur in drinking water. These advisories guide federal and state governments, and other public health officials, on health effects, analytical methodologies, and treatment technologies associated with drinking water contamination.

As part of the early regulatory determination process, USEPA included a generic category for "cyanotoxins" in the draft Drinking Water Contaminant Candidate List (CCL4) released on February 4, 2015. The CCL4 is a list of contaminants that are currently not subject to any proposed or promulgated national primary drinking water regulations, but are known or anticipated to occur in public water systems. Contaminants listed on the CCL may lead to future regulations under the Safe Drinking Water Act (SDWA).

On February 5, 2015, at a House Committee on Energy and Commerce, the American Water Works Association (AWWA) testified in support of H.R. 212. AWWA acknowledged that H.R. 212 did not bypass the existing regulatory framework for regulatory determinations under the 1996 SDWA Amendments. This well-established framework requires evaluating health risk using peer-reviewed science, monitoring source water supplies to estimate exposure, establishing analytical methods, defining best-available treatment technologies, and performing an economic analysis to determine whether the benefits of a new standard justify the costs.

Details

H.R. 212, H.R. 243, S. 460, and S. 462 may indirectly impact Metropolitan. Metropolitan's source water reservoirs (e.g., Diamond Valley Lake, Lake Skinner, and Lake Mathews) are susceptible to algal blooms. Any process leading to the creation of a health advisory for algal toxins may impact the perceived quality of Metropolitan's source waters. However, Metropolitan has an active reservoir management program that monitors and treats, when necessary, algal blooms in its source water reservoirs, aqueducts, and canals. Additionally, Metropolitan can make operational changes (e.g., change reservoir outlet tier level or bypass the affected reservoir) in response to algal blooms. Lastly, ozone has been shown to be an effective oxidant for many algal toxins. Collectively, these actions have been highly successful in controlling the consequences of algal blooms in Metropolitan's system.

Staff supports the development of strategic plans (i.e., H.R. 212 and S. 460) and health advisories (i.e., H.R. 243 and S. 462) for algal toxins in drinking water. While the USEPA is directed to develop a strategic plan within 90 days, this legislative timeline does not result in a regulatory determination. Hence, staff is not opposed to the timelines found in H.R. 212 and S. 460. However, H.R. 243 and S. 462 mandate that USEPA develop a health advisory within 90 days and 180 days, respectively. These dates contradict the existing regulatory framework of the 1996 SDWA Amendments and supersede USEPA's discretion in making science-based public health guideline determinations. Therefore, staff recommends removing the date-specific timelines for USEPA to develop a health advisory for microcystins specified in H.R. 243 and S. 462 prior to supporting these bills. Staff recommends the following amendments:

H.R. 243

“SEC. 2. MICROCYSTINS IN DRINKING WATER.

(a) *HEALTH ADVISORY.*—~~Not later than 90 days after the date of enactment of this Act, the~~ The Administrator of the Environmental Protection Agency (in this Act referred to as the “Administrator”) shall develop and publish a health advisory including recommendations on ...”

S. 462

“SEC. 2. MICROCYSTINS IN DRINKING WATER.

(a) *HEALTH ADVISORY.*—~~Not later than 180 days after the date of enactment of this Act, the~~ The Administrator of the Environmental Protection Agency (referred to in this Act as the “Administrator”) shall develop and publish a health advisory including recommendations on ...”

This position is consistent with Metropolitan’s prior positions opposing regulatory timelines built into legislation (e.g., MTBE (methyl tert-butyl ether) and perchlorate).

Policy

Policy Principle on Drinking Water Quality – “Support legislative and administrative efforts to adopt cost-effective drinking water regulations to help ensure the protection of human health;” M.I. 46191 – April 12, 2005

California Environmental Quality Act (CEQA)

CEQA determination for Option #1:

The proposed action is not defined as a project under CEQA because it involves continuing administrative activities, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines). In addition, where it can be seen with certainty that there is no possibility that the proposed action in question may have a significant effect on the environment, the proposed action is not subject to CEQA (Section 15061(b)(3) of the State CEQA Guidelines).

The CEQA determination is: Determine that the proposed action is not subject to CEQA pursuant to Sections 15378(b)(2) and 15061(b)(3) of the State CEQA Guidelines.

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt the CEQA determination that the proposed action is not subject to CEQA, and authorize the General Manager to express support for H.R. 212 and S. 460; and express support, if amended, for H.R. 243 and S. 462.

Fiscal Impact: No fiscal impact to Metropolitan

Business Analysis: If passed, these bills would aid in the creation of health advisories for algal toxins designed to protect human health.

Option #2

Take no position on H.R. 212, S. 460, H.R. 243, and S. 462.

Fiscal Impact: No fiscal impact to Metropolitan

Business Analysis: The development of health advisories for algal toxins may be delayed.

Staff Recommendation

Option #1



Dee Zinke
Deputy General Manager, External Affairs

4/29/2015

Date



Jeffrey Kightlinger
General Manager

4/29/2015

Date

Attachment 1 – H.R. 212

Attachment 2 – S. 460

Attachment 3 – H.R. 243

Attachment 4 – S. 462

Ref# ea12637134

IB

Union Calendar No. 18

114TH CONGRESS
1ST SESSION

H. R. 212

[Report No. 114-26]

To amend the Safe Drinking Water Act to provide for the assessment and management of the risk of cyanotoxins in drinking water, and for other purposes.

IN THE HOUSE OF REPRESENTATIVES

JANUARY 8, 2015

Mr. LATTA (for himself, Mrs. MILLER of Michigan, Mr. QUIGLEY, and Ms. KAPTUR) introduced the following bill; which was referred to the Committee on Energy and Commerce

FEBRUARY 24, 2015

Additional sponsors: Mr. MURPHY of Pennsylvania, Mr. JOYCE, and Mr. MCKINLEY

FEBRUARY 24, 2015

Reported with amendments, committed to the Committee of the Whole House on the State of the Union, and ordered to be printed

[Strike out all after the enacting clause and insert the part printed in *italic*]

[For text of introduced bill, see copy of bill as introduced on January 8, 2015]

A BILL

To amend the Safe Drinking Water Act to provide for the assessment and management of the risk of cyanotoxins in drinking water, and for other purposes.

1 *on human health when present in drinking*
2 *water provided by public water systems, taking*
3 *into account likely exposure levels;*

4 “(C) summarize—

5 “(i) *the known adverse human health*
6 *effects of algal toxins included on the list*
7 *published under subparagraph (B) when*
8 *present in drinking water provided by pub-*
9 *lic water systems; and*

10 “(ii) *factors that cause toxin-producing*
11 *cyanobacteria and algae to proliferate and*
12 *express toxins;*

13 “(D) *with respect to algal toxins included*
14 *on the list published under subparagraph (B),*
15 *determine whether to—*

16 “(i) *publish health advisories pursuant*
17 *to section 1412(b)(1)(F) for such algal tox-*
18 *ins in drinking water provided by public*
19 *water systems;*

20 “(ii) *establish guidance regarding fea-*
21 *sible analytical methods to quantify the*
22 *presence of algal toxins; and*

23 “(iii) *establish guidance regarding the*
24 *frequency of monitoring necessary to deter-*
25 *mine if such algal toxins are present in*

1 *drinking water provided by public water*
2 *systems;*

3 “(E) *recommend feasible treatment options,*
4 *including procedures, equipment, and source*
5 *water protection practices, to mitigate any ad-*
6 *verse public health effects of algal toxins included*
7 *on the list published under subparagraph (B);*
8 *and*

9 “(F) *enter into cooperative agreements with,*
10 *and provide technical assistance to, affected*
11 *States and public water systems, as identified by*
12 *the Administrator, for the purpose of managing*
13 *risks associated with algal toxins included on the*
14 *list published under subparagraph (B).*

15 “(2) *UPDATES.—The Administrator shall, as ap-*
16 *propriate, update and submit to Congress the stra-*
17 *tegic plan developed under paragraph (1).*

18 “(b) *INFORMATION COORDINATION.—In carrying out*
19 *this section the Administrator shall—*

20 “(1) *identify gaps in the Agency’s understanding*
21 *of algal toxins, including—*

22 “(A) *the human health effects of algal toxins*
23 *included on the list published under subsection*
24 *(a)(1)(B); and*

1 “(B) methods and means of testing and
2 monitoring for the presence of harmful algal tox-
3 ins in source water of, or drinking water pro-
4 vided by, public water systems;
5 “(2) as appropriate, consult with—
6 “(A) other Federal agencies that—
7 “(i) examine or analyze cyanobacteria
8 or algal toxins; or
9 “(ii) address public health concerns re-
10 lated to harmful algal blooms;
11 “(B) States;
12 “(C) operators of public water systems;
13 “(D) multinational agencies;
14 “(E) foreign governments;
15 “(F) research and academic institutions;
16 and
17 “(G) companies that provide relevant drink-
18 ing water treatment options; and
19 “(3) assemble and publish information from each
20 Federal agency that has—
21 “(A) examined or analyzed cyanobacteria or
22 algal toxins; or
23 “(B) addressed public health concerns re-
24 lated to harmful algal blooms.

1 “(c) *USE OF SCIENCE.*—*The Administrator shall carry*
2 *out this section in accordance with the requirements de-*
3 *scribed in section 1412(b)(3)(A), as applicable.*

4 “(d) *FEASIBLE.*—*For purposes of this section, the term*
5 *‘feasible’ has the meaning given such term in section*
6 *1412(b)(4)(D).’.*”

7 (b) *REPORT TO CONGRESS.*—*Not later than 90 days*
8 *after the date of enactment of this Act, the Comptroller Gen-*
9 *eral of the United States shall prepare and submit to Con-*
10 *gress a report that includes—*

11 (1) *an inventory of funds—*

12 (A) *expended by the United States, for each*
13 *of fiscal years 2010 through 2014, to examine or*
14 *analyze toxin-producing cyanobacteria and algae*
15 *or address public health concerns related to*
16 *harmful algal blooms; and*

17 (B) *that includes the specific purpose for*
18 *which the funds were made available, the law*
19 *under which the funds were authorized, and the*
20 *Federal agency that received or spent the funds;*
21 *and*

22 (2) *recommended steps to reduce any duplica-*
23 *tion, and improve interagency coordination, of such*
24 *expenditures.*

Amend the title so as to read: “A bill to amend the Safe Drinking Water Act to provide for the assessment and management of the risk of algal toxins in drinking water, and for other purposes.”.

Union Calendar No. 18

114TH CONGRESS
1ST SESSION

H. R. 212

[Report No. 114-26]

A BILL

To amend the Safe Drinking Water Act to provide for the assessment and management of the risk of cyanotoxins in drinking water, and for other purposes.

FEBRUARY 24, 2015

Reported with amendments, committed to the Committee of the Whole House on the State of the Union, and ordered to be printed

II

114TH CONGRESS
1ST SESSION

S. 460

To amend the Safe Drinking Water Act to provide for the assessment and management of the risk of algal toxins in drinking water, and for other purposes.

IN THE SENATE OF THE UNITED STATES

FEBRUARY 11, 2015

Mr. PORTMAN (for himself and Mr. BROWN) introduced the following bill; which was read twice and referred to the Committee on Environment and Public Works

A BILL

To amend the Safe Drinking Water Act to provide for the assessment and management of the risk of algal toxins in drinking water, and for other purposes.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Drinking Water Pro-
5 tection Act”.

1 **SEC. 2. ALGAL TOXIN RISK ASSESSMENT AND MANAGE-**
2 **MENT.**

3 (a) IN GENERAL.—Part E of the Safe Drinking
4 Water Act (42 U.S.C. 300j et seq.) is amended by adding
5 at the end the following:

6 **“SEC. 1459. ALGAL TOXIN RISK ASSESSMENT AND MANAGE-**
7 **MENT.**

8 “(a) DEFINITION OF FEASIBLE.—In this section, the
9 term ‘feasible’ has the meaning given the term in section
10 1412(b)(4)(D).

11 “(b) STRATEGIC PLAN.—

12 “(1) DEVELOPMENT.—Not later than 90 days
13 after the date of enactment of this section, the Ad-
14 ministrator shall develop and submit to Congress a
15 strategic plan for assessing and managing risks as-
16 sociated with algal toxins in drinking water provided
17 by public water systems.

18 “(2) INCLUSIONS.—The strategic plan shall in-
19 clude steps and timelines—

20 “(A) to evaluate the risk to human health
21 from drinking water provided by public water
22 systems contaminated with algal toxins;

23 “(B) to establish, publish, and update a
24 comprehensive list of algal toxins that the Ad-
25 ministrator determines may have an adverse ef-
26 fect on human health when present in drinking

1 water provided by public water systems, taking
2 into account likely exposure levels;

3 “(C) to summarize—

4 “(i) the known adverse human health
5 effects of algal toxins included on the list
6 published under subparagraph (B) when
7 present in drinking water provided by pub-
8 lic water systems; and

9 “(ii) factors that cause toxin-pro-
10 ducing cyanobacteria and algae to pro-
11 liferate and express toxins;

12 “(D) with respect to algal toxins included
13 on the list published under subparagraph (B),
14 to determine whether—

15 “(i) to publish health advisories pur-
16 suant to section 1412(b)(1)(F) for such
17 algal toxins in drinking water provided by
18 public water systems;

19 “(ii) to establish guidance regarding
20 feasible analytical methods to quantify the
21 presence of algal toxins; and

22 “(iii) to establish guidance regarding
23 the frequency of monitoring necessary to
24 determine if such algal toxins are present

1 in drinking water provided by public water
2 systems;

3 “(E) to recommend feasible treatment op-
4 tions, including procedures, equipment, and
5 source water protection practices, to mitigate
6 any adverse public health effects of algal toxins
7 included on the list published under subpara-
8 graph (B); and

9 “(F) to enter into cooperative agreements
10 with, and provide technical assistance to, af-
11 fected States and public water systems, as iden-
12 tified by the Administrator, for the purpose of
13 managing risks associated with algal toxins in-
14 cluded on the list published under subpara-
15 graph (B).

16 “(3) UPDATES.—The Administrator shall, as
17 appropriate, update and submit to Congress the
18 strategic plan developed under paragraph (1).

19 “(c) INFORMATION COORDINATION.—In carrying out
20 this section, the Administrator shall—

21 “(1) identify gaps in the Agency’s under-
22 standing of algal toxins, including—

23 “(A) the human health effects of algal tox-
24 ins included on the list published under sub-
25 section (b)(2)(B); and

1 “(B) methods and means of testing and
2 monitoring for the presence of harmful algal
3 toxins in source water of, or drinking water
4 provided by, public water systems;
5 “(2) as appropriate, consult with—
6 “(A) other Federal agencies that—
7 “(i) examine or analyze cyanobacteria
8 or algal toxins; or
9 “(ii) address public health concerns
10 related to harmful algal blooms;
11 “(B) States;
12 “(C) operators of public water systems;
13 “(D) multinational agencies;
14 “(E) foreign governments;
15 “(F) research and academic institutions;
16 and
17 “(G) companies that provide relevant
18 drinking water treatment options; and
19 “(3) assemble and publish information from
20 each Federal agency that has—
21 “(A) examined or analyzed cyanobacteria
22 or algal toxins; or
23 “(B) addressed public health concerns re-
24 lated to harmful algal blooms.

1 “(d) USE OF SCIENCE.—The Administrator shall
2 carry out this section in accordance with the requirements
3 described in section 1412(b)(3)(A), as applicable.”.

4 (b) REPORT TO CONGRESS.—Not later than 90 days
5 after the date of enactment of this Act, the Comptroller
6 General of the United States shall prepare and submit to
7 Congress a report that includes—

8 (1) an inventory of funds—

9 (A) expended by the United States, for
10 each of fiscal years 2010 through 2014, to ex-
11 amine or analyze toxin-producing cyanobacteria
12 and algae or address public health concerns re-
13 lated to harmful algal blooms; and

14 (B) that includes the specific purpose for
15 which the funds were made available, the law
16 under which the funds were authorized, and the
17 Federal agency that received or spent the
18 funds; and

19 (2) recommended steps to reduce any duplica-
20 tion, and improve interagency coordination, of such
21 expenditures.

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114TH CONGRESS
1ST SESSION

H. R. 243

To direct the Administrator of the Environmental Protection Agency to publish a health advisory and submit reports with respect to Microcystins in drinking water.

IN THE HOUSE OF REPRESENTATIVES

JANUARY 9, 2015

Ms. KAPTUR (for herself, Mr. LEVIN, Mr. CONYERS, Mr. HIGGINS, Mr. RYAN of Ohio, Ms. NORTON, Ms. FUDGE, Mrs. MILLER of Michigan, Ms. SLAUGHTER, Mr. QUIGLEY, Mrs. BEATTY, and Mr. JOYCE) introduced the following bill; which was referred to the Committee on Energy and Commerce

A BILL

To direct the Administrator of the Environmental Protection Agency to publish a health advisory and submit reports with respect to Microcystins in drinking water.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Safe and Secure
5 Drinking Water Act of 2015”.

6 **SEC. 2. MICROCYSTINS IN DRINKING WATER.**

7 (a) HEALTH ADVISORY.—Not later than 90 days
8 after the date of enactment of this Act, the Administrator

1 of the Environmental Protection Agency (in this Act re-
2 ferred to as the “Administrator”) shall develop and pub-
3 lish a health advisory including recommendations on—

4 (1)(A) the level of Microcystins in drinking
5 water below which the water is expected to be safe
6 for human consumption; and

7 (B) feasible treatment techniques and other
8 means for achieving such level; and

9 (2) standardized procedures for testing for
10 Microcystins in drinking water.

11 (b) PERIODIC REPORTS.—

12 (1) IN GENERAL.—Until the Administrator
13 makes a determination of whether or not to regulate
14 Microcystins in drinking water under section
15 1412(b) of the Safe Drinking Water Act (42 U.S.C.
16 300g-1(b)), the Administrator shall submit reports
17 as required by paragraph (2).

18 (2) REPORTING REQUIREMENTS.—Not later
19 than 120 days after the date of enactment of this
20 Act, and every year thereafter, the Administrator
21 shall submit to the Congress a report on the fol-
22 lowing:

23 (A) The status of the Administrator’s ef-
24 forts to determine whether to regulate drinking
25 water with respect to the level of Microcystins.

1 (B) The steps taken by the Administrator
2 to promote testing of drinking water for
3 Microcystins in areas that have been affected by
4 harmful algal blooms.

5 (C) An analysis of available treatment
6 techniques and other means for addressing
7 Microcystins in drinking water.

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II

114TH CONGRESS
1ST SESSION

S. 462

To direct the Administrator of the Environmental Protection Agency to publish a health advisory and submit reports with respect to microcystins in drinking water.

IN THE SENATE OF THE UNITED STATES

FEBRUARY 11, 2015

Mr. BROWN (for himself and Mr. PORTMAN) introduced the following bill; which was read twice and referred to the Committee on Environment and Public Works

A BILL

To direct the Administrator of the Environmental Protection Agency to publish a health advisory and submit reports with respect to microcystins in drinking water.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Safe and Secure
5 Drinking Water Protection Act of 2015”.

6 **SEC. 2. MICROCYSTINS IN DRINKING WATER.**

7 (a) HEALTH ADVISORY.—Not later than 180 days
8 after the date of enactment of this Act, the Administrator
9 of the Environmental Protection Agency (referred to in

2

1 this Act as the “Administrator”) shall develop and publish
2 a health advisory including recommendations on—

3 (1)(A) the level of microcystins in drinking
4 water below which the water is expected to be safe
5 for human consumption; and

6 (B) feasible treatment techniques and other
7 means for achieving that level; and

8 (2) standardized procedures for testing for
9 microcystins in drinking water.

10 (b) REPORTS.—Not later than 180 days after the
11 date of enactment of this Act, and each year thereafter,
12 the Administrator shall submit to Congress a report that
13 includes—

14 (1) a description of the status of the efforts of
15 the Administrator to determine whether to regulate
16 drinking water with respect to the level of
17 microcystins;

18 (2) a description of the steps taken by the Ad-
19 ministrator to promote testing of drinking water for
20 microcystins in areas that have been affected by
21 harmful algal blooms; and

22 (3) an analysis of available treatment tech-
23 niques and other means for addressing microcystins
24 in drinking water.

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