



Together
We Can Protect
Drinking Water

EPA NATIONAL DRINKING WATER ADVISORY COUNCIL

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December 23, 2011

Ms. Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington D. C. 20460

Dear Administrator Jackson:

The National Drinking Water Advisory Council (the Council) held our semi-annual meeting on July 20-22, in San Francisco, CA. At that meeting, the Council was consulted with on potential changes to the Revised Lead and Copper Rule (RLCR). Specifically, among other questions, the Council was asked to consider whether partial lead service line replacements (PLSLRs) should continue to be required.

The Council reviewed an initial study completed by the Center for Disease Control and Prevention (CDC); however, because the Science Advisory Board had been preparing an evaluation of this and other studies on the effectiveness of the partial lead service line replacements, the Council felt that the Final SAB report was needed to appropriately provide guidance. On September 28, 2011 the Science Advisory Board issued their report "Evaluation of Lead of the Effectiveness of Partial Lead Service Line Replacements" the report evaluated five issues: (1) associations between PLSLR and blood lead levels in children; (2) lead tap water sampling data before and after PLSLR; (3) comparisons between partial and full lead service line replacement (FLSLR); (4) PLSLR techniques; and (5) the impact of galvanic corrosion. The Council reviewed this report at a specially called meeting on the RLCR on November 18, 2011.

In summary, the SAB report confirmed that "PLSLRs have not been shown to reliably reduce drinking water lead levels in the short term, ranging from days to months, and potentially even longer. Additionally, PLSLR is frequently associated with short-term elevated drinking water lead levels for some period of time after replacement, suggesting the potential for harm, rather than benefit during that time period."

After considerable deliberation and discussion, the Council approved by a strong majority the following recommendations for EPA's consideration

- 1) The Council recommends EPA not require either partial or full lead service line replacement under the RLCR. *In addition and importantly, the Council took the unusual step of recommending EPA should issue immediate guidance on the possible negative health impacts related to compliance with the current lead service line replacement provisions of the LCR. NDWAC further recommends that EPA consider suspending enforcement of the lead service line replacement requirement.* The Council also recommended EPA continue to investigate mitigation strategies for lead exposure via household piping.
- 2) The Council recommends the RLCR have provisions to notify the homeowner if a lead service line is repaired or replaced *for any reason*, not just reasons triggered under the current LCR.
- 3) The Council recommends that EPA not require homeowner sampling after lead service line replacement. However, the Council recommends that EPA provide guidance for enhanced distribution system monitoring related to corrosion control at some point in the future.

We respectfully request these important recommendations be considered, with special attention to the immediate health impact of continued enforcement of the PLSLR portion of the current LCR.

Sincerely,



Olga Morales
Chair

National Drinking Water Advisory Council

cc:

Nancy Stoner, Acting Assistant Administrator for Water

Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water