

February 12, 2020

Mr. Andrew R. Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Mail Code: 1101A
Washington, DC 20460

RE: National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions, Docket No. EPA–HQ–OW–2017–0300

Dear Administrator Wheeler:

On behalf of the National Association of County and City Health Departments (NACCHO), I appreciate the opportunity to submit comments regarding the proposed regulatory revisions to the National Primary Drinking Water Regulation (NPDWR) for lead and copper under the authority of the Safe Drinking Water ACT (SDWA); (Docket No. EPA-HQ-OW-2017-0300). NACCHO represents the nearly 3,000 local health departments across the country, many of which develop, promote, and engage in lead poisoning prevention efforts. NACCHO promotes primary prevention and advocates for the removal of lead sources from the environment prior to exposure, particularly in water and housing, in order to prevent the potential for adverse effects, especially in children.

NACCHO's comments are summarized by the following key points:

1. NACCHO recommends EPA prioritize full removal of lead services lines.

NACCHO recommends that EPA's efforts moving forward focus on the need to identify and remove sources of lead in community infrastructure prior to an exposure occurring. According to a national survey, an estimated 6.1 million lead service lines are present in public community water systems, serving a population of 15 to 22 million. Health-based lead level triggers should be identified instead of the arbitrary 15 and 10 ppb currently proposed. The parts per billion values are not health-based as there is no safe level of lead. **NACCHO also recommends that EPA consider the cost burden full lead service line replacement will have on local governments and homeowners and develop a new funding source to ensure timely action without diverting resources from other public health priorities.**

2. NACCHO recommends EPA establish sampling requirements for schools and childcare facilities.

NACCHO recommends all taps in schools and childcare facilities be tested for lead. In the U.S., children are particularly vulnerable to the effects of lead, which can cause permanent adverse health outcomes, including damage to the brain and nervous systems, slowed growth and development, learning behavior problems, and hearing and speech problems. In addition, the burden of lead



poisoning falls disproportionately on low-income families and communities of color, with African American children more than two times more likely to experience lead poisoning than white children. The rule also stops short of preventing exposures by omitting a requirement to act on sampling results from schools and childcare facilities. NACCHO recommends that the 10 ppb trigger level (e.g., to develop a goal for replacing lead service lines) and 15 ppb action level (e.g., xxx) proposed for lead in public drinking water also be applied to lead in drinking water at schools and childcare facilities. **NACCHO also recommends that EPA consider the cost burden full lead service line replacement will have on local governments, schools, and childcare centers and develop a new funding source to ensure timely action and prioritize the prevention of lead exposure to children.**

3. NACCHO recommends that the proposed rule revisions address the impacts of climate change on the water supply and water quality.

NACCHO recommends that EPA consider the effects of climate change, including the increased corrosion of lead service lines, the chemical changes in local water supplies, and the inequities that will result from varying water qualities. The warming climate is already causing saltwater to increasingly infiltrate freshwater drinking supplies which not only corrodes lead service lines and lead-soldered copper lines, but also changes the concentration of chemicals and minerals in local water supplies. Water treatment facilities and operators will be challenged by the changing and varying water quality, thus decreasing water sampling reliability. This will also result in inequities based on location and financial resources.

4. NACCHO strongly encourages EPA to explore collaborations between EPA and local health departments to identify optimal community engagement practices.

NACCHO recommends that EPA review established connections between the agency and local health departments to determine successes and areas that need to be improved. As more communities are notified about lead service lines, local health departments can play a key role in education and reinforcing related messages from national and federal partners, including EPA. In addition, there should be more opportunities for collaborations among EPA and local health departments to not only effectively spread messaging around lead exposure, but to also advocate for the priorities and concerns of local communities. As consumers and homeowners become more educated about lead service lines in their community, there will be an increased need for public education and response to inquiries about the health impacts of lead and how to prevent lead exposure.

NACCHO appreciates this opportunity to comment on EPA's efforts to improve processes and tools needed for a safer future. We look forward to continuing to work with you to protect the public from lead exposure. Please contact Jennifer Li, Senior Advisor, Public Health Programs, for further information at 202-507-4242 or jli@naccho.org.

Sincerely,



Lori Tremmel Freeman, MBA
CEO