Key messages on addressing changes to the Lead and Copper Rule

Prepared by the Lead and Copper Rule Coalition:

1. Lead exposure is a public health priority for state and local governments, including environmental and public health departments in addition to water service providers.
2. The primary role of all water service providers is to protect public health.
3. Eliminating lead exposure needs a comprehensive and collaborative approach.
4. Removing lead service lines must be a shared responsibility between water systems and homeowners.
5. Lead paint and dust are the primary sources of lead exposure. Data from Southeast Michigan health department investigations has not shown drinking water as the source. The estimated costs to eliminate the 500,000 estimated lead service lines at a conservative cost of $3,500 each is at least $1.75 billion. This does not address household plumbing.

6. As written, the draft rules will:
   - Minimally address potential implications with changes in source water.
   - Arbitrarily drop lead action levels without a science-based framework.
   - Set regulations that could conflict with changes to the rule at the federal level.
   - Illegally require water service providers to replace service lines on private property at the expense of all other rate payers.
   - Significantly impact and reduce investments in other public health infrastructure investments (stormwater, sanitary sewers and combined sewer systems).
   - Make it very difficult to implement the 21st Century Infrastructure Commission Recommendations.
   - Cost millions of dollars to local communities with unknown benefit.

In order to effectively address lead exposure from all potential sources, a comprehensive, integrated program is necessary that maximizes public health protection and is based on sound scientific and technological principles.

7. A comprehensive approach to addressing lead exposure includes:
   - Conducting detailed evaluations of any source water changes by water service providers.
   - State regulators and utilities working together to assure that corrosion control methods are working and updated based on newly developed techniques.
   - Incorporating inventory and service line replacement into asset management programs.
   - Quickly responding to elevated blood lead level results or water sampling that exceeds the household action level through a coordinated approach between local and state agencies that leads to source determination and ultimate elimination.
   - Integrating state environmental and public health programs to address lead exposure and evaluation across all potential sources.
   - Evaluating other avenues for eliminating lead exposure (real estate disclosure, rental disclosure and abatement, school and day care licensing).
   - Working with other agencies to create a collaborative public awareness campaign to educate the public about the risks for lead exposure.