



Lead and Copper Rule Update

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Rule Development:

Revisions to the Lead and Copper Rule

Background

- EPA under the Safe Drinking Water Act (SDWA) sets public health goals and enforceable standards for drinking water quality
- Lead and Copper: National Primary Drinking Water Regulation (NPDWR) initially promulgated June 7, 1991
- The goal of the LCR is to:
 - Protect public health by minimizing lead and copper levels in drinking water, primarily by reducing water corrosivity
- The rule applies to 68,000 public water systems
 - All community water systems (CWSs) and
 - non-transient non-community water systems (NTNCWSs)
- The LCR addresses corrosion and leaching of lead and copper from service lines and household plumbing in to drinking water



Rule Development:

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Background

- EPA conducted a national review of LCR implementation issues in 2004
 - collected and analyzed lead concentration data
 - carried out a review of implementation and monitoring at the state level
 - held four expert workshops to discuss elements of the regulations
- EPA released the ***Drinking Water Lead Reduction Plan (DWLRP)*** in March 2005
 - The plan outlined both short and long term goals for improving LCR implementation
- In 2007 EPA promulgated the Short-term Revisions to the LCR
 - The rule enhanced monitoring, treatment, lead service line replacement, public education, and customer awareness
- EPA is currently working on the Long-term Revisions to the LCR
 - The areas of the rule requiring revision were identified in the DWLRP and the 2007 Rule



Rule Development:

Revisions to the Lead and Copper Rule

- EPA requested the NDWAC form a working group to provide stakeholder input on several key rule revision issues
 - The 16 member WG was comprised of a diverse group of impacted stakeholders – states, utilities, environmental, public health groups/organizations and public interest/citizen group representatives.
- In December 2015 the NDWAC provided the following recommendations:
 - Proactive Lead Service Line Replacement programs
 - More robust public education requirements for lead and LSLs
 - Strengthening Corrosion Control Treatment requirements
 - Modify monitoring requirements to provide for consumer requested tap samples for lead
 - Tailor water quality parameters for each system and increase frequency of monitoring
 - Establish a health based household action level
 - Separate copper requirements focused on water corrosive to copper
 - Establish appropriate compliance and enforcement mechanisms



Rule Development:

Revisions to the Lead and Copper Rule

- October 2016, EPA released a LCR Revisions White Paper
- The white paper provides examples of regulatory options to improve the existing rule and highlights key challenges, opportunities, and analytical issues presented by these options.
 - Lead service line replacement
 - Improved optimal corrosion control treatment
 - Health based benchmark for lead
 - Potential role for point of use filters
 - Clarify and strengthen sampling requirements
 - Increased transparency and information sharing
 - Public Education
 - Copper
 - Relationship with broader lead issues



Rule Development:

Revisions to the Lead and Copper Rule

- On January 19, 2017, EPA initiated a peer review of draft scientific modeling approaches to inform EPA's evaluation of potential health-based benchmarks for lead in drinking water.
 - The draft document described three alternative approaches to inform selection of a health based benchmark for lead
 - All three approaches utilized EPA's Integrated Exposure Uptake BioKinetic (IEUBK) model to predict drinking water concentrations that resulted in changes in blood lead levels
 - One of these approaches also combined the Stochastic Human Exposure and Dose Simulation Model (SHEDS) with the IEUBK to account for variability in population exposures from multiple media
- Peer reviewers met on June 27-28, 2017 and are currently preparing their final peer review comments.
- EPA will consider the specific role for a health-based benchmark in the proposed revisions to the LCR after considering peer review comments.



Rule Development: Reduction of Lead in Drinking Water

- The RLDWA amended § 1417 of the SDWA regarding the prohibition on use and introduction into commerce of lead pipes, fittings, fixtures, solder and flux.
- The effective date of the Act was January 4, 2014.
- EPA published a summary of the RLDWA requirements and answers to some frequently asked questions related to the RLDWA to assist manufacturers, retailers, plumbers and consumers in understanding the changes to the law (2013)
- The above summary and other information is available at:

<https://www.epa.gov/dwstandardsregulations/use-lead-free-pipes-fittings-fixtures-solder-and-flux-drinking-water>



Rule Development: Reduction of Lead in Drinking Water

- EPA proposed regulations for the lead free requirements on January 17, 2017.
- The proposal included:
 - Codifying the change in definition of “lead free” and the calculation methodology
 - Labeling requirements for potable use products & certain products that are “used exclusively for non potable services”
 - Product certification requirements: third party for large firms and third party or self for small firms
 - Compliance information authority for information from manufacturers, retailers, etc
 - Codifying state enforcement requirement for the use prohibition
- EPA is considering the comments received on this proposal.