



**WATER SUPPLY CITIZENS
ADVISORY COMMITTEE**
to the Mass. Water Resources Authority

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March 7, 2018

Mr. Peter Grevatt
Director, OGWDW
USEPA Headquarters
Mail Code: 4601M
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

RE: Long-Term Lead and Copper Rule Federalism Consultation (Docket ID No. EPA-HQ-OW-2018-0007)

Dear Mr. Grevatt,

The Water Supply Citizens Advisory Committee (WSCAC) appreciates the opportunity to comment on three key areas for revisions of the Lead and Copper Rule.

WSCAC was formed in 1978 as a volunteer committee under the Massachusetts Secretary of Environmental Affairs. In 1990, the Massachusetts Water Resources Authority (MWRA) retained WSCAC as advisors to its Board of Directors on all water matters. The committee provides substantive input to the MWRA Board of Directors, the MWRA Advisory Board, and other state agencies including the MA Department of Conservation and Recreation's Division of Water Supply Protection and MassDEP.

There is no doubt that lead in drinking water can lead to serious health issues, particularly for children. It is also well known that in many communities, especially those in rural and underserved areas, corrosion control treatment may be limited or not required. Homeowners are largely unaware of lead service lines unless the local water department has a robust public education component. Thus, there is a critical need for transparency in local water departments and an accessible public information campaign to identify and address lead service lines. As a citizen's water advisory group that focuses on water quality, we will be commenting on the following:

Replacement of lead service lines

While corrosion control plays an important role for public water suppliers in keeping lead from leaching into drinking water as noted in Flint, the replacement of lead service lines is the best defense for removing lead and protecting public health. Therefore, WSCAC supports:

- Requiring communities to create an inventory of lead service lines.
- Requiring communities to create a specified schedule for full lead service line replacement over a specified number of years each town can commit to. Without this requirement, there is a high likelihood that replacement of lead water pipes will not occur for a very long time.

Transparency and public education

A clear example in Massachusetts of transparency, public education and funding to address the problem is the lead program initiated, organized and funded by the MWRA for their ratepaying communities. <http://www.mwra.com/01news/2016/032116-serviceline-funding.html>

Many towns in the state, especially those outside the MWRA service area have done little to educate their water customers beyond requesting free school testing by MassDEP. Smaller communities in central and western Massachusetts with private wells have little, if any knowledge about lead. Sufficient funding is needed now for public education and low or no-interest loans and grants to help homeowners replace lead service lines. With adequate funding and public education efforts including bill inserts, school meetings, videos on town websites and social media, it is highly likely that most homeowners will support full lead replacement. Many decline due to cost barriers. WSCAC recommends:

- EPA funding for media campaigns at the state and local levels to educate homeowners about health effects and how to check for lead service lines.
- Interest-free loans and grants for replacement of residential lead service lines.
- Requiring replacement of lead service lines when homes or building are sold.

Comprehensive interagency approach

WSCAC believes EPA should continue consulting with state and local governing bodies to clearly understand the full array of circumstances inhibiting the replacement of lead service lines.

Transparency at the local level is paramount. Homeowners depend on the town water department for drinking water information. Private well owners depend on their local Board of Health for guidance in assuring safe and healthful drinking water. A comprehensive and transparent interagency approach means that:

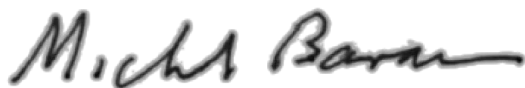
- EPA requirements are informed by an understanding of state and local conditions.
- Transparency and a comprehensive approach begin with state agencies such as MassDEP. Informed EPA revisions should be based on knowledge gathered at the state and local level and shared at the national level.
- Once EPA completes the revision process, the information should move from MassDEP to the local level. Appropriate decision-making is only possible when accurate information is available to all decision-makers. Thus, the state is responsible for making sure that essential information doesn't stop with the public water supplier, but includes the town manager, the local Board of Health and homeowners with private wells.

In summary, WSCAC supports requiring communities to complete an inventory of homes with lead service lines, a schedule to remove them, and a requirement to remove lead service lines when a home or building changes ownership. The following points should be considered:

- Flexibility due to community size, cost to water department and homeowner
- The importance of an outreach program to educate the public
- Transparency and open lines of communication between state and local entities
- The importance of a funding mechanism to move the programs forward
- Regulations to ensure steady progress toward replacement of lead service lines

Thank you for the opportunity to comment on revisions to the Lead and Copper Rule.

Sincerely,

A handwritten signature in black ink that reads "Michael Baram". The signature is written in a cursive, flowing style.

Michael Baram, WSCAC Chair