Water Quality Association Comments on the EPA's Proposed Revisions to the Lead and Copper Rule
For follow-up questions, please call 630-505-0609

1. Comment on option to maintain point-of-use devices certified to remove lead in small community water systems and non-transient non-community water systems.

The Water Quality Association supports the option to allow community water systems serving ≤10,000 people and non-transient non-community water systems (NTNCWS) to elect to maintain point-of-use devices certified to remove lead in place of corrosion control treatment.

A number of studies have been published on the effectiveness of using point-of-use devices to mitigate lead in drinking water. A few are listed below:

EPA Flint, MI Filter Challenge Assessment: https://www.epa.gov/sites/production/files/2016-06/documents/filter_challenge_assesment_field_report_-_epa_v5.pdf

Cost-Benefit of Point-of-Use Devices for Lead Reduction; published in Environmental Research Journal: https://www.sciencedirect.com/science/article/abs/pii/S0013935119300180?via%3Dihub

American National Standards Institute (ANSI) accredited standards to test point-of-use device performance for lead removal include NSF/ANSI 53: *Drinking Water Treatment Units – Health Effects* and NSF/ANSI 58: *Reverse Osmosis Drinking Water Treatment Systems*.

ANSI has accredited the Water Quality Association (WQA), as well as NSF International (NSF), Underwriters Laboratories (UL), and others, as certification bodies to test and certify products according to NSF/ANSI standards.

NSF also serves a role as the secretariat for development of consensus standards, and sometimes confusion arises because the standards have the standard developing body's name in them. All certification bodies listed above are viewed as equal for product testing and certification to specific standards based on the accreditation issued by ANSI and are subject to ANSI's applicable procedural oversight and rigorous requirements, including an annual audit.

WQA's Certificate of Accreditation for Product Certification by ANSI can be found https://www.ansica.org/wwwversion2/outside/PRODirectoryDetailsAccredited.asp?menuID=1&prgID=1&orgID=144

The EPA has published a factsheet to help consumers find certified water filters: https://www.epa.gov/water-research/consumer-tool-identifying-pou-drinking-water-filters-certified-reduce-lead

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2. Comment on systems providing a pitcher certified to remove lead to address potential line disturbance (lead service line replacement, partial lead service line replacement, disturbance from replacement of the water meter or gooseneck, pigtail, or connector).

The Water Quality Association supports the use of certified water treatment devices at the point-of-use to protect residences from lead service line disturbance caused by a variety of activities listed in the proposed revisions (lead service line replacement, partial lead service line replacement, disturbance from replacement of the water meter or gooseneck, pigtail, or connector).

In these situations, proposed revisions will require systems to provide pitcher filters certified to remove lead. Pitchers can be third-party certified by an American National Standards Institute (ANSI) accredited certifier to standards NSF/ANSI 53 for lead reduction.

There are other technologies that can work in this situation and are also certified to ANSI standards to remove lead. For example, faucet-mount filters or at the sink reverse osmosis. It is the Association's position that systems be given the flexibility to decide which certified technology will best address their community and system needs.

3. Comment on providing an annual letter to residences with a lead service line or unknown material, from the system explaining its line replacement program and other options.

The Water Quality Association supports the continued efforts to provide communication and useful information to water system customers. As proposed, providing an annual letter to customers with lead service lines or unknown materials will further promote line replacement. It will also notify customers of their service line and potential options along with replacement, such as certified point-of-use devices to remove lead.

The EPA has published a factsheet to help consumers find certified water filters: https://www.epa.gov/water-research/consumer-tool-identifying-pou-drinking-water-filters-certified-reduce-lead

4. Comments on new "trigger level" of 10 ppb, which requires water systems to prepare remediation efforts and take some early actions.

A 10 ppb lead reading would require water systems that currently treat for corrosion to re-optimize their equipment; those that do no treat for corrosion to conduct a corrosion control study; and all systems to begin working with their state officials to set an annual goal for replacement of lead service lines. The Water Quality Association supports all of these proactive efforts to mitigate lead exposure in drinking water. In some cases, these efforts could prevent a system from reaching 15 ppb lead, which is the point at which remediation efforts are mandated. Even if a community's levels should increase to that level, the water systems will be well on its way to instituting the mandated remediation efforts.

WQA applauds efforts to reduce lead in public drinking water wherever possible while standing ready with immediate solutions, such as the use of certified point-of-use devices.