

**Congress of the United States**  
**Washington, DC 20515**

February 18, 2020

Hon. Andrew Wheeler, Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20004

RE: Proposed revisions to the Lead and Copper National Primary Drinking Water Regulations, Docket No. EPA-HQ-OW-2017-0300

Dear Administrator Wheeler,

We write to express our deep concerns about the critically-important proposed revisions to the EPA Lead and Copper Rule (LCR), 84 Fed. Reg. 61,684 (Nov. 13, 2019). We urge you to strengthen the proposal to ensure that the public, and particularly young children and pregnant mothers who are especially vulnerable to lead's hazards, are fully protected from the scourge of lead-contaminated drinking water. Most importantly, we strongly recommend that you require all lead service lines to be fully and promptly removed by public water systems.

As you know, EPA, the Centers for Disease Control and Prevention, and many other health authorities have found that there is no safe level of lead in drinking water. Children, infants and fetuses are particularly at risk of a range of adverse effects including decreased IQ, learning disabilities, behavioral issues including increased impulsiveness, and other impacts on the brain and nervous system, some of which are irreversible. Adults also are at risk from lead, with harms including cardiovascular disease as well as kidney and reproductive problems.

We must do everything we can to reduce lead levels in drinking water. The problem is not limited to Flint, Michigan. EPA estimates 9.3 million lead service lines delivering lead-contaminated water to homes when the rule goes into effect in 2023. EPA data show that millions of consumers are served by public water systems across the country that exceed its lead action level.

With the goal of strengthening protections for public health, the rule should explicitly require that public water systems fully replace all lead service lines and prohibit partial lead service line replacements. Scientists, including EPA's Science Advisory Board, have found that partial lead service line replacement does not reduce the risk of lead exposure and can actually make it worse. Relying only on disincentives to avoid partial lead service line replacements, or requiring individual homeowners or landlords to foot the bill, will disadvantage communities that need it

the most. Experience has shown that lower-income owners and renters simply do not have their lines fully replaced. There should also be a clear and rational deadline for all water systems to complete this important task. We recognize the proposal's incentives for some utilities to complete replacements within 15 years.

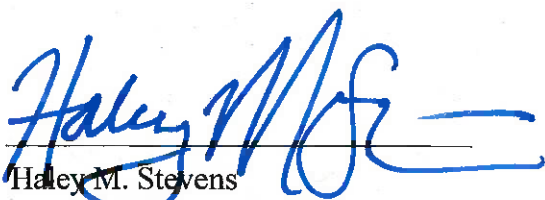
To help achieve the goal of protecting all Americans from this threat, we would like to work with you to secure significant additional federal funding to help replace lead service lines. Current funding levels are inadequate to help affected communities promptly replace their lead service lines. A combination of strong requirements and funding will result in the most effective lead service line replacement programs and ensure that low-income communities and those at greatest risk are able to remove all the lead service lines.

We strongly recommend that the final rule include the proposed annual notification to customers if they have service lines of lead or unknown material and that consumers, especially renters, be notified to help ensure that they are made aware of the risk from lead contamination. The public education and notification materials must be made understandable, accessible, and accurate, to ensure consumers understand the health risks.

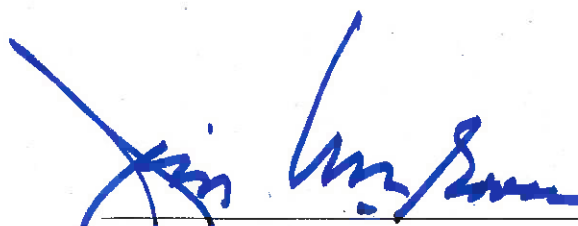
Finally, we recommend simplifying the proposed two-tier system with a "trigger level" of 10 parts per billion (ppb) lead and an "action level" of 15 ppb by reviewing whether to simply reduce the action level. The new trigger system could cause confusion and implementation problems as local governments and water systems try to achieve compliance with federal and state requirements. To ensure appropriate implementation of the action level and corrosion control treatment, the agency must strengthen the monitoring requirements so compliance sampling represents water coming from lead service lines.

Thank you for your attention to this important matter. A stronger lead and copper rule and our mutual effort to fund action to remove lead contamination from our nation's water supplies will help to ensure protection of the health of consumers across the country, especially our children.


Sincerely,




Haley M. Stevens  
Member of Congress



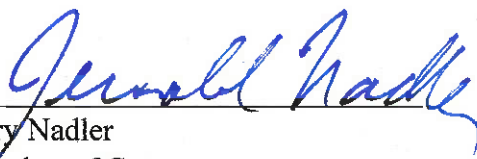
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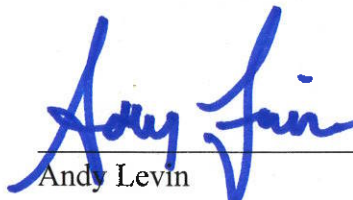
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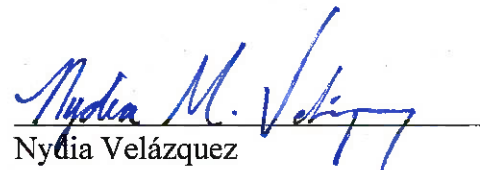
  
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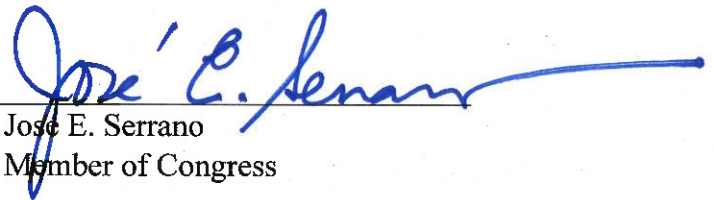
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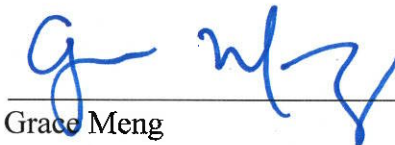
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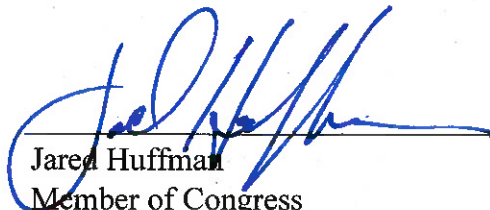
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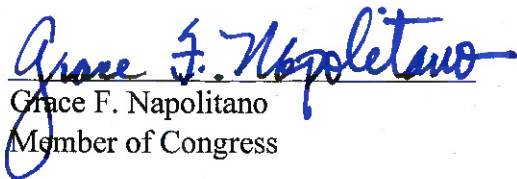
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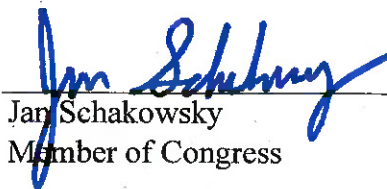
Peter Welch  
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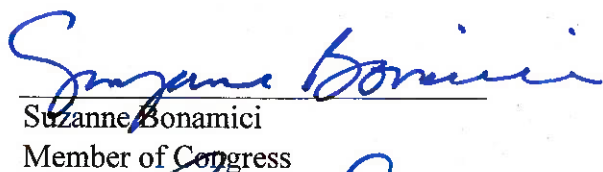
Daniel W. Lipinski  
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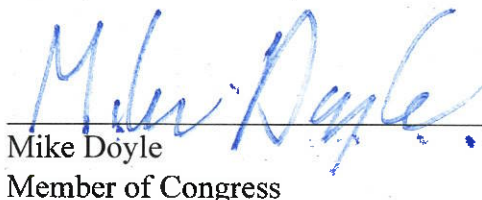
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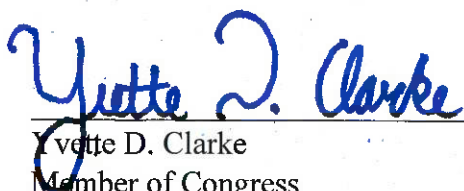
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Brenda L. Lawrence  
Member of Congress



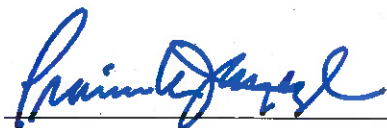
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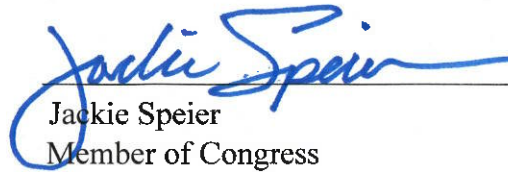
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