



February 10, 2020

Mr. David Ross, Assistant Administrator
Office of Water, USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Mail Code 4101M
Washington, DC 20460

Proposed Lead and Copper Rule Revisions, 84 FR 61684, Docket: EPA-HQ-OW-2019-0300 – Request for Extension of Comment Period

Dear Mr. Ross:

Enclosed are the comments from the Environmental Protection Network (EPN) on the U.S. Environmental Protection Agency's (EPA's) proposed Lead and Copper Rule (LCR) revisions. EPN is an organization comprised of almost 500 EPA alumni volunteering their time to protect the integrity of EPA, human health, and the environment. We harness the expertise of former EPA career staff and confirmation-level appointees to provide insight into regulations and policies proposed by the current administration that have a major impact on public health and the environment.

EPN strongly supports selected elements of the EPA proposal. EPN appreciates both the challenge and importance of updating the 1991 LCR. The current LCR has been one of the most complex and challenging to implement for the water systems and State primacy agencies. The LCR revisions have been in development for more than a decade and add complexity and substantive new provisions to the current rule.

EPN recognizes that EPA's objective in proposing these LCR revisions is to accelerate the pace of progress in reducing the exposure to lead in drinking water. EPN supports EPA's objective. However, EPN is deeply concerned that this objective will not be met unless very significant improvements are made to the proposal. EPN believes that EPA should have considered an option to lower the action level to 10 ug/L, retained the lead service line annual replacement rate at 7%, made requirements much less complex, simplified noncompliance determination and enforcement, and improved reporting. The proposed LCR does none of these things and may unintentionally delay protection of public health compared to the existing LCR.

Attached are detailed comments on the preamble, rule, and economic analysis, as well as recommendations on policy and guidance to support the revised regulation. We have identified specific steps we believe EPA should take before finalizing this regulation. We hope that these comments will help EPA finalize a rule that ensures accelerated progress in reducing lead in drinking water.

If you have any questions regarding these comments, please contact me at michelle.roos@environmentalprotectionnetwork.org or Carl Reeverts at carlbreeverts@gmail.com.

Sincerely,

Michelle Roos
Executive Director
Environmental Protection Network

cc: Jennifer McLain
Eric Burneson
Lisa Christ