

**Oral Comments of Ronnie Levin on
EPA's Proposed Lead and Copper Rule Improvements (LCRI)**
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I am Ronnie Levin, representing the Environmental Protection Network (EPN), a network of over 600 former EPA employees.

There are many improvements in the LCRI. We commend EPA for:

- Expanding the regulated universe to 9 million pipes.
- Reducing the time frame to 10 years.
- Lowering the action level to 10 ppb. However, we suggest that the science could support a lower action level of 5 ppb.
- Requiring both first and fifth liter samples with the higher serving for compliance determination.
- Requiring water systems to report home testing results to the residents within 3 days, regardless of the levels.
- Calculating the average annual replacement rate across a rolling three-year period.
- Requiring disclosure and offering pipe replacement whenever there is a change in building ownership.

We disagree with EPA's proposal that utilities must only replace the portion of the lead service line (LSL) that is on public property. Public water systems should exert the same effort to replace lead pipes as they do to install or replace water meters.

- We suggest that partial pipe replacement should be prohibited except in the direst emergencies.
- EPA should encourage states to adopt explicit policies giving public water systems the authority to use ratepayer funds to replace LSLs and galvanized requiring replacement service lines on private property.

Last year, the Office of Management and Budget changed the discount rate for federal agencies to use in cost-benefit analysis. The discount rate is now 2% and the analysis in the proposal should be updated to incorporate this.

EPA and states need a working, formal agreement on implementation, including an underlying assumption that reporting is accurate and complete. EPA should assert that each requirement is mandatory and that it also constitutes compliance with this regulation. States should assert a statement of public awareness if in compliance or not.

We believe EPA has unnecessarily omitted strengthening requirements to reduce children's lead exposures in schools and other child-occupied facilities. Both exposures and harms are potentially elevated there. In schools and similar facilities, it has been demonstrated that mandatory installation of point-of-use filters on all faucets potentially used for drinking is more efficient than implementing a testing and monitoring program.

Finally, EPN believes that water systems will continue to underreport lead results and exceedances to the public and primacy agency unless the regulatory language is strengthened to compel compliance. In addition, state reporting to EPA will continue to be incomplete and late without a new Safe Drinking Water Information System shared by EPA and the states and working agreements with states to comply with these reporting requirements.

Thank you.