

AMWA encourages EPA to consider unintended consequences in comments on developing lead and copper rule

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On November 15, AMWA submitted comments (<https://www.amwa.net/testimonycomments/comments-epa-ej-considerations-lcri>) outlining environmental justice (EJ) concerns for EPA to consider as it develops the proposed Lead and Copper Rule Improvements (LCRI). The letter outlines that EPA must consider all complications related to full lead service line replacement as it develops the proposed rule.

The comment responds to a White House announcement (<https://www.whitehouse.gov/briefing-room/statements-releases/2021/12/16/fact-sheet-the-biden-harris-lead-pipe-%20and-paint-action-plan/>) of its intention to “use every tool at its disposal to eliminate all lead service lines” in the next 10 years, including by “encouraging full lead service line replacement and strongly discouraging partial lead service line replacement.” EPA subsequently concluded an ongoing review (<https://www.federalregister.gov/documents/2021/12/17/2021-27457/review-of-the-national-primary-drinking-water-%20regulation-lead-and-copper-rule-revisions-lcrr>) of the LCRR and announced its intention to “immediately begin development” of further revisions that would be known as the LCRI. Among the revisions that EPA intends to propose as part of the LCRI are requirements that “would result in the replacement of all LSLs as quickly as is feasible.”

In the comments, AMWA asked the EPA to recognize, consider, and address the potential hurdles associated with full lead service line replacements should they be mandated as part of a proposed LCRI rule and to provide support for community water systems to address these challenges.

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