



**American Water Works
Association**

Utility Member Benefit

Government Affairs Office
1300 Eye Street NW
Suite 701W
Washington, DC 20005
T 202.628.8303
F 202.628.2846

Headquarters
6666 West Quincy Avenue
Denver, CO 80235-3098
T 303.794.7711
F 303.795.1989
www.awwa.org

The Authoritative Resource on Safe Water®

Public Affairs Advisory

**TO: AWWA Leadership
All Utilities**

FROM: AWWA Public Affairs

DATE: March 28, 2011

Who:	American Academy of Pediatrics
What:	Request for immediate halt of partial service line replacements
When:	Imminent

The American Academy of Pediatrics (AAP) recently sent a letter to the USEPA's Science Advisory Board (SAB) Drinking Water Committee that may spur news coverage about lead in drinking water, particularly as it relates to partial lead service line replacement.

The letter, sent in anticipation of the SAB's discussion of partial lead service line replacement on Wednesday, March 30, recommends that EPA revise the Lead and Copper Rule (LCR) and impose an immediate moratorium on all partial lead service line replacements that may occur for any reason.

Additionally, AAP recommends anywhere that lead service lines must be replaced, water systems should offer to pay for the complete replacement of lead pipe. If full replacement is not possible then the water system should clearly explain the risk of lead and offer to pay for installation of NSF-rated lead filters on the kitchen faucet or pitcher filters, as well as instruct the homeowner in their proper use and replacement.

To read the AAP's comments in their entirety, visit the SAB website at [http://yosemite.epa.gov/sab/sabproduct.nsf/177871EFC7607CD08525785C0050AAB1/\\$File/aapcomments.PDF](http://yosemite.epa.gov/sab/sabproduct.nsf/177871EFC7607CD08525785C0050AAB1/$File/aapcomments.PDF).

AWWA has created talking points and a list of resources available below. Additionally, AWWA will offer testimony that aligns with these talking points at the committee hearing on March 30.

Lead Service Line Replacement Talking Points:

[Utility Name] replaces water infrastructure as a regular part of our ongoing mission to provide a reliable drinking water supply to our customers. The age of the mains being replaced often means that we are removing and replacing lead service lines.

Research has shown that after partial or full lead service line replacement the physical act of touching, banging, or cutting the line will cause both particulate lead and lead fines to break loose and make their way into home plumbing systems.

[Utility Name] works diligently to minimize both the disturbance of the line and the flushing procedures following construction. However, research suggests that disrupting lead service lines, as occurs during lead service line replacement, can increase lead levels for a period of time.

To address the increase in lead levels [Utility Name] works to educate and partner with our customers about the risk and the shared responsibility we both have to minimize exposure to lead during the post-construction period as much as possible.

[Utility Name] is paying close attention to regulatory developments and stands ready to respond. It's our desire to find a solution that offers meaningful risk reduction while continuing the important work of renewing our water systems and maintaining reliability.

Customers who are concerned about lead in their drinking water can contact [Utility Name] to have their water tested.

Additional resources:

Contribution of Service Line and Plumbing Fixtures to Lead and Copper Rule Compliance Issues [Project #3018]

A 2008 report funded by the Water Research Foundation that describes the contribution of service lines to household lead levels, the effects of disturbing service lines on lead levels in the home, and practices to reduce lead levels associated with lead service line replacement.

<http://www.waterresearchfoundation.org/research/TopicsAndProjects/projectSnapshot.aspx?pn=3018>

Strategies to Obtain Acceptance of Complete Lead Service Line Replacement (free download)

A 2006 guide prepared by AWWA on practical steps utilities can take to encourage customers to replace the portion of the lead service line under their control.

[http://www.awwa.org/files/Advocacy/Govtaff/Documents/Lead And Copper Strategies For Lines.pdf](http://www.awwa.org/files/Advocacy/Govtaff/Documents/Lead_And_Copper_Strategies_For_Lines.pdf)

Low-Lead Plumbing Products Guide

NSF has developed evaluation procedures to establish an American National Standard to determine product compliance with the $\leq 0.25\%$ percent maximum weighted average lead content requirement of the California Health and Safety Code as well as for other states developing similar regulations.

http://www.nsf.org/business/mechanical_plumbing/annexg.asp

AWWA has consumer-oriented information on lead in drinking water available on its DrinkTap.org consumer site.

<http://www.drinktap.org/consumerdnn/Home/WaterInformation/WaterQuality/LeadinWater/tabid/70/Default.aspx>

Further information on public policy related to lead in drinking water is available on AWWA's Government Affairs web page.

<http://www.awwa.org/Government/Content.cfm?ItemNumber=1321&navItemNumber=3843>

###