



**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: September 30, 2011

Who:	AWWA Member Utilities
What:	Science Advisory Board report to EPA on effectiveness of partial lead service line replacements
When:	Released September 28, 2011

The Science Advisory Board (SAB) to the U.S. Environmental Protection Agency (EPA) on Sept. 28 released a report that calls into question the effectiveness of partial lead service line replacements. AWWA first advised member utilities of the SAB report on Aug. 4.

To this point, the report has received a small amount of coverage only in water trade press. Still, utilities should prepare to answer potential media questions about lead levels in their communities and lead service line practices. Suggested talking points are provided below.

As anticipated, the report suggests that utilities doing partial lead service line replacements (PLSLR) – even as a part of routine operational maintenance – may be doing more harm than good, particularly in the short-term following the replacement. The report notes that “The SAB finds that the quantity and quality of the available data are inadequate to fully determine the effectiveness of PLSLR in reducing drinking water lead concentrations. ... Nevertheless, despite these limitations, the SAB concludes that PLSLRs have not been shown to reliably reduce drinking water lead levels in the short term, ranging from days to months, and potentially even longer.”

Copies of the report are available at

<http://yosemite.epa.gov/sab/sabproduct.nsf/02ad90b136fc21ef85256eba00436459/38b92187b29155dd852577f80050b4d9!OpenDocument&TableRow=2.3#2>.

Background

EPA requested the SAB review in order to inform its development of revisions to the lead service replacement requirements of the current Lead and Copper Rule (LCR). The agency anticipates proposing revisions to the LCR in Spring-Summer 2012. If the rule development follows a typical timeline, a final rule will be promulgated in 2014.

In 2005, AWWA prepared [Strategies to Obtain Acceptance of Complete Lead Service Line Replacement](#) to assist community water systems as they work with their customers to achieve full lead service line replacement. The document notes that “unpublished data indicates that partial lead service line replacements may substantially increase lead levels” and that “it is prudent to consider the replacement of the entire lead service line as a means to reduce exposure to lead in drinking water.”

Suggested Lead Service Line Replacement Talking Points:

- [Utility Name’s] first concern is the protection of public health. We are committed to working collaboratively with our customers to limit exposure to lead in drinking water.
- [Utility Name] does not have lead service lines in its distribution system.

or

- [Utility Name] knows/estimates that there are [insert number] lead service lines in our service area.
- Lead at the tap is a uniquely challenging issue because lead typically comes from home plumbing or lead service lines on the homeowner’s property, and not from water mains. To fully replace lead service lines, the [Utility Name] works to earn buy-in from the customer. *[List any programs in place at your utility, e.g. public education, line replacement finance options.]*
- [Utility Name] routinely repairs and replaces water mains and other water infrastructure. In some cases, we replace lead service lines as part of this regular maintenance *(if applicable)*.
- Research suggests that working on lead service lines can cause lead to break loose and make its way into to the tap. [Utility Name] works diligently to minimize the disturbance of lead service lines. To address potential increases in lead levels following repair work, [Utility Name] notifies customers and provides information on how to minimize lead exposure.
- If you are concerned about lead exposure, there are simple steps you can take to minimize lead in drinking water. They include:
 - Flushing the tap is particularly important when the faucet has gone unused for more than a few hours. It takes time for lead to dissolve into water, so the first

water drawn from the tap in the morning or after a long period of non-use can contain higher levels of lead. Let the water run from the tap for a minute or two after it is noticeably colder (this may take several minutes or more) before using it for cooking or drinking.

- Periodically remove faucet strainers and rinse them to remove any debris.
- If you purchase a home treatment device to remove lead, make sure it is certified for that purpose and follow maintenance guidance. For information on product selection, try [NSF International](#).
- Use only cold water for cooking or drinking. Lead leaches more easily into hot water than cold water.
- Find out from [Utility Name] or a certified plumber if your home has lead service lines. Talk to us about programs that ease the financial burden of lead service line replacements. *[if applicable.]*
- If you are concerned that you or a family member may have been exposed to lead, consult with your family doctor or pediatrician to receive a blood test for lead and learn more about the health effects associated with exposure.

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

Low-Lead Plumbing Products Guide

NSF has developed evaluation procedures to establish an American National Standard to determine product compliance with the ≤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>

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