

# parents for nontoxic alternatives

Dear SAB:

Three points for your consideration:

## **ADDITIONAL BENEFITS TO FULL LEAD SERVICE LINE REPLACEMENT**

When a water utility removes lead service lines fully, the amount of corrosion control needed to prevent lead leaching is reduced. Annual treatment costs for corrosion control chemicals like orthophosphate drop dramatically, and will drop even further as more non-leaded brasses permeate the market. Also disinfection byproduct regulations do not come into conflict with lead corrosion control to the same degree.

Lead pipes in the distribution system (as intact lead service lines or partial lead service lines) are a reservoir of pure lead that is vulnerable to treatment changes, which could mobilize massive amounts of lead that dwarf the amounts that can leach from lead-bearing faucets or soldered joints.

## **A POINT ABOUT THE LCR'S LEAD SERVICE LINE REPLACEMENT "TESTING OUT" PROVISION, FOR YOUR INFORMATION**

The LCR's "testing out" provision allows water utilities that are required to replace lead service lines to count a line as "replaced" simply if it tests below 15 ppb. *There are no restrictions on the time of year that the "testing out" can occur. This means that utilities are allowed to test lines during cold months, when lead-in-water levels tend to be far lower than lead-in-water levels during warm months.* There are concerns that the "testing out" provision undermines the intent of the LCR's lead service line replacement requirement (i.e., to permanently eliminate lead from service lines) because it a) can lead to missing lead-in-water problems, b) allows leaving a pure lead source intact, and c) leaves homes vulnerable to future contamination (as a result, for example, of temperature changes due to seasonality).

## **REGARDING VOLUNTARY LEAD SERVICE LINE REPLACEMENTS**

When doing voluntary lead service line replacements, some water utilities (maybe even most) only warn residents that they may be without water during the work, but do not offer information about what work is being done and what the health implications of this work might be.