

Comments to
Science Advisory Board Drinking Water Committee
on
**Review of the
Effectiveness of Partial Lead Service Line Replacements**
presented at
Public Meeting, March 30-31, 2011
prepared by the
American Water Works Association

The American Water Works Association (AWWA) is an international, nonprofit, scientific and educational society dedicated to the improvement of drinking water quality and supply. Founded in 1881, the Association is the largest organization of water supply professionals in the world. Our 54,000-plus members represent the full spectrum of the drinking water community: treatment plant operators and managers, environmental advocates, scientists, academicians, and others who hold a genuine interest in water supply and public health. Our membership includes more than 4,000 utilities that supply roughly 80 percent of the nation's drinking water. Protecting public health is an essential goal of the drinking water profession and the mission of each public water system.

AWWA would like to offer several comments to assist the Drinking Water Committee (DWC) in responding to its charge questions regarding the effectiveness of partial lead service line replacement.

1. Research and field experience after both partial and full lead service line replacement has shown that the physical act of touching, banging, and cutting the service line can release both particulate lead and lead fines.
2. Available data show that following replacement activity any unpassivated surface will take a short period of time (typically weeks

but it can be longer in some situations) to re-equilibrate to a stable form.

3. During the period immediately after replacement activity, elevated lead levels in water will most likely occur. As water systems, we have the responsibility to develop best management practices to minimize both the disturbance of the line and the flushing procedures to remove particulate following the replacement, while providing education and information to our customers. The customers also have a responsibility to follow the instructions provided by the water system in order to ensure that post-replacement actions are taken to minimize exposure to lead to the greatest extent possible.
4. Every day water systems replace and repair their water main infrastructure as part of necessary maintenance activity. Part of this replacement includes reconnection of customer's homes to the water main. In some communities, some, potentially many, of the mains being replaced will have lead service lines.

Working together to implement a feasible solution and minimize exposure to lead without hindering essential capital replacement programs and regular maintenance is essential. Risk reduction suggestions must be practical for water systems with service populations ranging from only a few hundred to several million customers. Suggested measures must be implementable in both planned maintenance and emergency repair situations.

Whatever the DWC recommends to EPA, water systems will have to implement every day. Consequently, any solution needs to be one that is workable and addresses a genuine problem in a meaningful way. Individual households and water systems must balance scarce, available resources to cost-effectively address a variety of competing risk management opportunities. So, we ask that the committee be very certain that its recommendations assist us to identify meaningful

opportunities for risk reduction. There are very real consequences for overall water system reliability and the individual households a water system serves if the committee's recommendations prevent the renewal of community infrastructure.