

Individual Comments from a Member of the SAB Drinking Water Committee. These comments do not represent consensus SAB advice or EPA policy. DO NOT CITE OR QUOTE

Comment from SAB Drinking Water Committee Member Lloyd Wilson on the 5/1/20 SAB Draft Report on the Proposed Lead and Copper Rule

This is a relatively minor comment on the surface particularly given all the complex issues in the lead and copper rule. I wasn't sure where to point this out hence the note. In section 3.6.2 lines 23-30 of the SAB report there is reference to data reporting and a statement from former EPA official Cynthia Giles about the need for better reporting. No problem there. However there is reference to SDWIS Prime. SDWIS prime was a many year (5 year plus?) effort that as I understand was finally abandoned this year. EPA, ASDWA and ECOS have formed a board to update SDWIS which I believe meant SDWIS prime is officially dead.

EPA AND STATES LAUNCH NEW SDWIS MODERNIZATION BOARD

April 1st, 2020

On January 31, 2020, U.S. EPA, the Environmental Council of the States, and the Association of State Drinking Water Administrators initiated the SDWIS Modernization Board. Formed following a series of discussions over the past few months, the Board will be guiding the SDWIS Modernization process, following the principles of the [E-Enterprise Digital Strategy](#). The Board is co-chaired by Benita Best-Wong, EPA Office of Water Deputy Assistant Administrator and by Victoria Phillips, Massachusetts Department of Environmental Protection, Enterprise Information Office Director, and will ensure integrated participation from both State and EPA drinking water program leaders and enterprise information management leaders. See the full Board Membership [here](#).

<https://e-enterprisefortheenvironment.net/epa-and-states-launch-new-sdwis-modernization-board/>

I think it is good for the report to acknowledge issues with reporting and that the agencies have recognized this too, and that this new effort includes the lead and copper rule. **In short, I don't think it is good for the SAB report to reference SDWIS prime.** I would ask current EPA staff to confirm all of this. It also strikes me that this section could leave the reader with the impression that with a good data portal/SDWIS prime all is well. The collapse of SDWIS prime and the initiation of this new effort shows the difficulties and complexities in the automation of data reporting from compliance monitoring, as well as the automation of the determination if there is a violation. The effort in implementation of the SDWA that is given to data reporting, management and compliance determination should not be minimized.

Lloyd Wilson