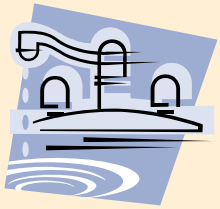


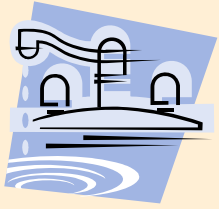
Lead and Copper Rule Short Term Regulatory Revisions (LCRSTR)

Environmental Quality Board
June 16, 2009

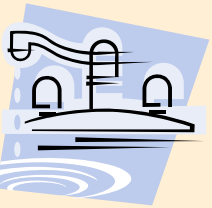
Presented by
Bureau of Water Standards and
Facility Regulation



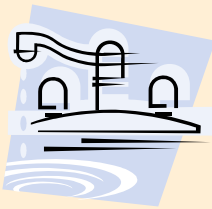
Lead and Copper Rule Short Term Regulatory Revisions (LCRSTR)



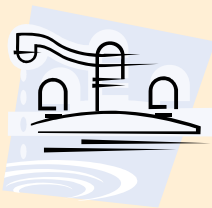
- Federal revisions promulgated October 10, 2007



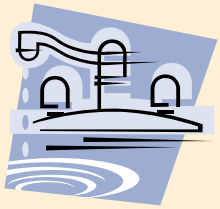
- Goal: Strengthen implementation of existing Lead and Copper Rule



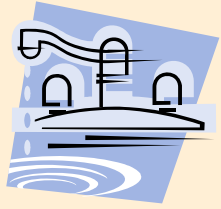
- Must adopt to retain Safe Drinking Water Program primacy



- Section 4(a) of the PA SDWA, 35 P.S. § 721.4(a), requires EQB to adopt maximum contaminant levels and treatment technique requirements no less stringent than the federal drinking water regulations



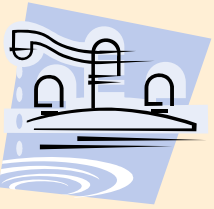
Proposed Amendments to Safe Drinking Water Regulations



› “Tap” = A tap that provides water for drinking

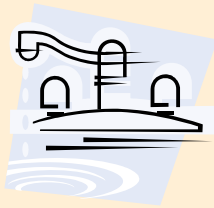
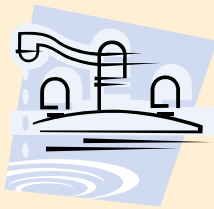
› No reduced monitoring frequency if either the lead or copper action level is exceeded

(Federal regulations allow systems to exceed copper and remain on a reduced frequency)



› “Consumer Tap Notice” for sampled taps

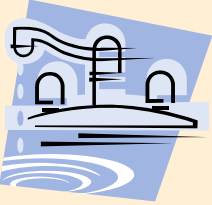
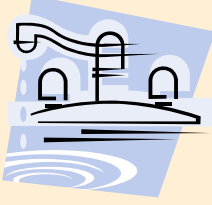
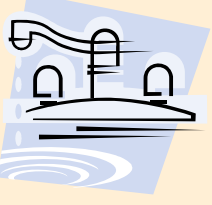
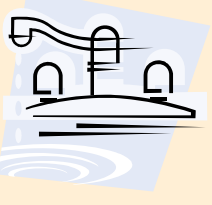
- lead results for the sampled tap
- explanation of the health effects of lead
- steps to reduce exposure to lead in drinking water



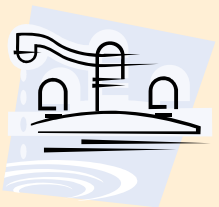
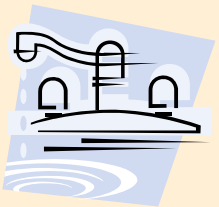
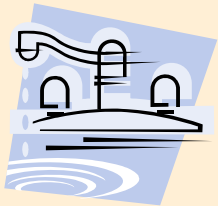
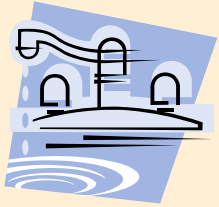
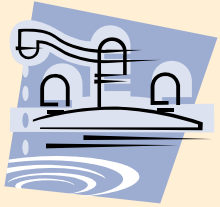
continued ...



Proposed Amendments to Safe Drinking Water Regulations

- 
- › Public Education Program
 - clarify mandatory language
 - expand delivery requirements
- 
- › Consumer Confidence Reports (CCRs): require an informational statement about lead in all CCRs
- 
- › Lead Service Lines (LSLs): reevaluate any LSL previously deemed “replaced” through testing if PWS resumes a LSL replacement program
- 

Population Affected

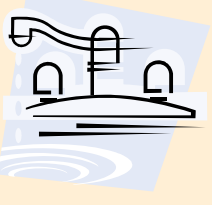
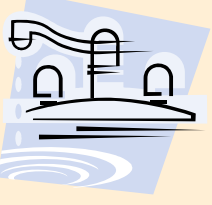
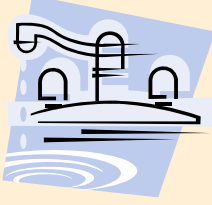
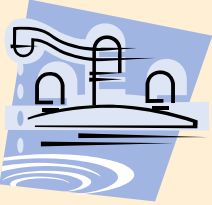
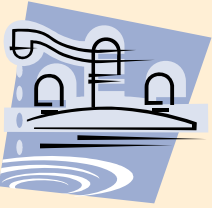


- Approximately 3228 public water systems...
- ...serving over 11.2 million Pennsylvanians
- Benefit: continued reduction in health risks associated with lead contamination



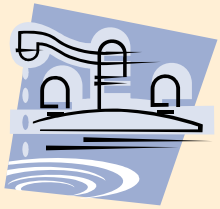
Annual Compliance Costs*

(Estimated)

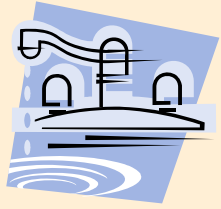


Monitoring & Reporting	\$125 (small systems) up to \$2,930 (large systems) if an action level is exceeded
Public Education	\$60 (small systems) up to \$2,500 (large systems) if the lead action level is exceeded
CCRs	\$7-10 (community systems only)
Consumer Tap Notices	\$4 per notice

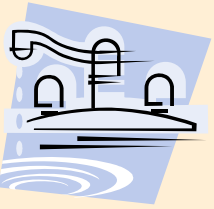
**Not all systems will need to implement each provision each year.*



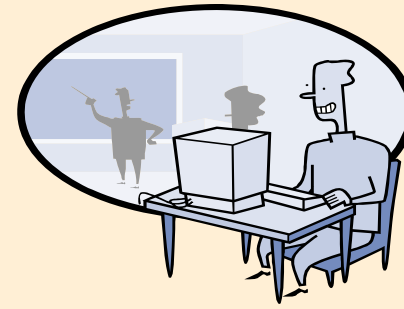
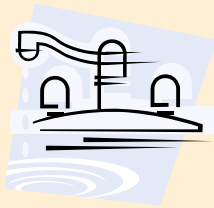
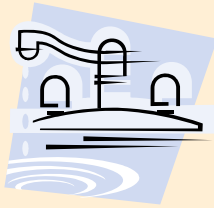
Compliance & Implementation



- Compliance upon publication of final rulemaking in *PA Bulletin*



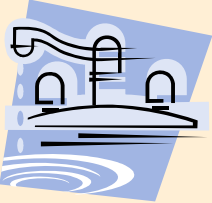
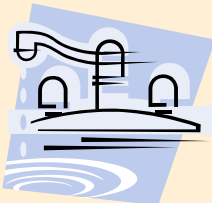
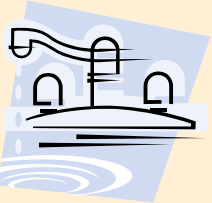
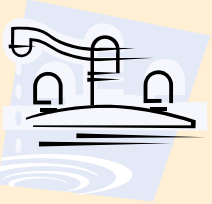
- Staff to provide training and support to water system operators

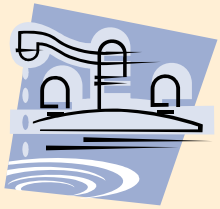


- Additional assistance via newsletters, guidance documents, training sessions and surveillance activities

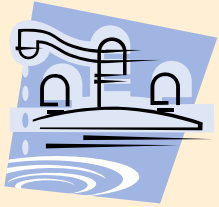


Technical Assistance Center Advisory Board (TAC) Comments

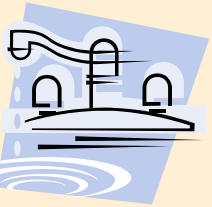
- 
- 
- 
- 
1. The minimum of 5 sample sites “does not make sense”
 - There is a high degree of variability between individual taps, so a sufficient number of samples is required in order to be confident that the measured lead levels are accurately assessed
 - EPA maintains that systems must take a minimum of 5 samples in order to adequately capture the variability of lead & copper levels
 - Proposed rulemaking does not change minimum number of samples required



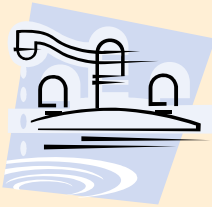
Technical Assistance Center Advisory Board (TAC) Comments



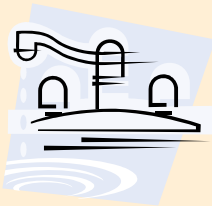
2. A PWS should not be required to deliver public education materials to local/county health agencies or other organizations that are outside the PWS's service area



- Public Education requirements are no more stringent than federal provisions
- Local health agencies are identified in the preamble of this rulemaking & in guidance



3. Request suggested content for the Consumer Tap Notices



- EPA guidance for PE content is also acceptable for Consumer Tap Notices

Summary

- ❖ Revisions required to maintain primacy
- ❖ The Department recommends that the EQB approve the proposed revisions with a 30-day public comment period

