

Drinking Water Lead Reduction Plan - March 2005

EPA is announcing its plan for actions the Agency will undertake in response to its review of the Lead and Copper Rule. Our year-long evaluation did not reveal a national problem comparable to the situation observed in the District of Columbia in 2004. However, based on the information derived from our review we have identified opportunities to improve and clarify specific areas of the rule and our guidance materials. In an effort to improve implementation, we will initiate several actions in 2005 with a goal towards completing them later this year or next year.

Workshop - we will hold one additional expert workshop in mid-2005.

#	Workshop	Purpose of Workshop
1	Workshop on lead content of plumbing fittings and fixtures	To help identify actions that can be taken to reduce the amount of lead that comes into contact with drinking water.

Guidance - we will update and expand 2 guidance documents that were developed during the 1990's. We will to complete revisions to the guidance documents by the end of 2005 or early 2006.

#	Guidance Document	Purpose of Guidance
1	Update 1994 guidance on Lead in Drinking Water in Schools and Non-Residential Buildings	The revised document will focus on schools and child care facilities and will incorporate needs identified by stakeholders during a December 2004 national meeting.
2	Update 1999 guidance on Simultaneous Compliance	The document, which is currently being revised to support the Stage 2 Disinfection Byproducts Rule, will be enhanced to discuss in greater depth potential effects of treatment changes on maintaining corrosion control in a distribution system.

Regulatory Changes - we will seek 9 targeted revisions to the regulation. We will initiate the process to develop a proposal via a regulatory workgroup immediately with a goal of releasing a proposal in late 2005 or early 2006.

#	Proposed Revision	Purpose of Revision
Monitoring		
1	Clarify language in the regulation that speaks to the number of samples required.	To address confusion about sample collection.
2	Clarify language regarding the number of locations from which samples should be collected.	To address confusion about sample collection.

#	Proposed Revision	Purpose of Revision
3	Modify definitions for a monitoring period and compliance period	To address inconsistencies between guidance and regulations.
4	Modify language to make it clear that all samples must be taken within the same calendar year	To ensure that samples collected reflect effectiveness of corrosion control.
5	Modify language to reconsider allowing large systems above the action level to reduce tap monitoring based solely on the results of their water quality parameter monitoring	To ensure that systems over the action level maintain a sense of the degree of exposure in the community.
Treatment Processes		
6	Modify language to require that a PWS notify the state of treatment changes 60 days prior to a treatment change rather than 60 days after a change.	To allow states an opportunity to provide input on the utility's decision or require additional monitoring prior to a change in treatment that could affect corrosion control.
Customer Awareness		
7	Add language to require that utilities provide occupant notification of the results of monitoring to detect lead in drinking water	To increase customer awareness for homeowners who participate in tap monitoring programs and parents, students, and staff at schools that are required to monitor for lead in drinking water because they are also a non-transient non-community water system.
8	Revise language to permit states to allow utilities to modify the flushing directions in public education language to address local circumstances (e.g., 10 minute flushing recommendation for DC)	To address concerns about the appropriateness of flushing guidance included in current public education language. We will provide guidance to states and utilities to help them determine an appropriate flushing time to recommend to customers.
Lead Service Line Replacement		
9	Revise language to require that any line previously deemed to be replaced through testing be reevaluated in the event that a subsequent treatment change causes the system to exceed the action level.	To ensure that service lines that test below the action level are not considered permanently "replaced" and removed from the utility's inventory, but are instead retested after any major changes to treatment which could affect corrosion control