February 12, 2020

Andrew R. Wheeler
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code: 1101A
Washington, DC 20460

RE: National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions, Docket No. EPA-HQ-OW-2017-0300-0001

Dear Administrator Wheeler,

The City of Pompano Beach appreciates the opportunity to provide input to the Environmental Protection Agency's November 13, 2019, *Federal Register* notice, proposing revisions to the Lead and Copper Rule.

Lead is a well-recognized public health concern. Success to-date to control environmental lead exposures are a tremendous success story, including the reduction of lead in drinking water accomplished under the Safe Drinking Water Act. As a nation we need to continue to make progress eliminating lead exposure.

Shared responsibility is the central concept that underpins lead risk reduction across every media, but is particularly important with developing policies to manage lead in drinking water. Reduction of lead in drinking water requires a collaborative effort by the water system, customers, consumers, state regulators, federal agencies, financing authorities, plumbers, code officials, local government, and many others. The City of Pompano Beach agrees with EPA that in keeping with the Safe Drinking Water Act, water systems should take steps within their authority to reduce lead in water.

City of Pompano Beach hopes that these comments will help EPA finalize the rule expeditiously. In finalizing the rule, it is important that the Agency:

1. **Inventory.** Development of an inventory of lead service lines is a critical first requirement of the proposal. The Agency should continue to emphasize that the lead service line inventory is to be based on available information and improved over time in the course of routine system repair/replacement and maintenance activities. The rule must also recognize that there is going to be uncertainty in which pipe materials are present.

2. **Timely notification of individual home results**. The City of Pompano Beach recognizes the importance of regular and transparent communication that helps customers address risks from lead in drinking water. However, notifying a customer within 24 hours of an action level exceedance is unattainable. Upon receipt of official lab results from contracted laboratories, the City executes our standard operating procedures of reviewing lab reports for errors which often times happen. The City would like to prevent reporting incorrect results to the public as this will

lead to distrust. Therefore, the City recommends increasing the reporting timeframe to allow adequate time to review results.

3. **Monitoring in schools and childcare facilities.** The City of Pompano Beach agrees that schools and registered childcare facilities should be tested for lead. However, the responsibility of such testing effort varies by State. According to a Government Accountability Report (GAO) on the testing of lead in schools, the Department of Education arranges for such testing. This should be the case with all testing efforts in schools. Utilities maintain numerous assets to operate in a cost-effective manner while protecting public health and the environment and this additional requirement would add undue responsibility to the Utility unless we can mirror the current sampling protocol.
4. **Sample Site Selection.** The proposed rule should include provisions for Utilities with no known lead service lines (LSLs).
5. **Collection Procedure.** The proposed rule should remove recommendations to have aerators on during sample collection. Poorly maintained aerators could negatively impact sample results.

We hope that our comments help EPA develop sound rule options that further reduce risk posed by lead and copper while recognizing the realities of local budgets and infrastructure renewal needs. If EPA has any questions regarding these comments, please contact me at 954-545-7043 or Randolph.Brown@copbfl.com

Best regards,

A. Randolph Brown

Utilities Director