



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

February 12, 2020

Mr. Erik Helm, U.S. Environmental Protection Agency
OGWDW, Standards and Risk Management Division
1200 Pennsylvania Ave, NW
Mail Code 4607M
Washington, DC 20460

Via regulations.gov: EPA-HQ-OW-2017-0300

Re.: Docket ID# EPA-HQ-OW-2017-0300
Nevada Division of Environmental Protection Comment on the Proposed
Lead and Copper Rule Revisions

Dear Mr. Helm:

The Nevada Division of Environmental Protection (NDEP) appreciates the opportunity to offer comments on the US EPA's Proposed Lead and Copper Rule Revisions (LCRR) published Wednesday, November 13, 2019 in the *Federal Register*. Protecting drinking water quality is of high importance to the environmental and economic vitality of the State of Nevada.

The NDEP, Bureau of Safe Drinking Water (BSDW), is the public water system (PWS) Supervision Program Primacy Agency for Nevada. The State of Nevada offers the attached remarks in response to the request for comments. (See Attachment A)

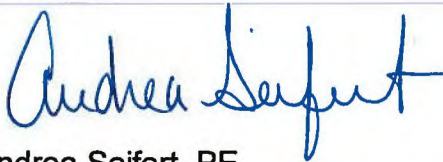
NDEP could not respond to all the inquiries posed by the US EPA in the proposed rule. As the vast responses and answers to the inquiries set out in the proposed rule are compiled, we encourage active ongoing engagement with state co-regulators. This could be conducted with states directly or through the Association of State Drinking Water Administrators. As future implementers of the final rule, the states have a vested interest in ensuring that there is clarity at the end of the day. Because the answers to the inquiries could result in modifications between the proposed and final rule, it is critical that states be included in the process of moving toward the final rule. We take the role of co-regulator seriously and will continue to engage with EPA during this process as opportunities become available.

Association of State Drinking Water Administrators (ASDWA) Comments

Nevada has reviewed the comments prepared by ASDWA and supports the recommendations and insight included in the response. Since Nevada has chosen to respond directly to EPA on the Lead and Copper Rule Revisions (LCRR), and supports the ASDWA/States remarks, Nevada will focus comments on issues not addressed in the ASDWA response. Generally, our comments reflect Nevada-specific experiences and PWS information or proposed LCRR language not targeted specifically for comment by EPA in the Federal Register.

Please do not hesitate to reach out to Nevada representatives for any clarifications on these comments, as well as any efforts made while moving forward. Please contact the undersigned at (775) 687-9526 or ASeifert@ndep.nv.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrea Seifert". The signature is fluid and cursive, with the first name "Andrea" and last name "Seifert" clearly distinguishable.

Andrea Seifert, PE
BSDW Compliance Branch Supervisor

Att (3): Attachment A – NDEP Detailed Comments
Attachment B – 90th Percentile Lead Graphs
Attachment C – Source Change Targeted Monitoring Example

cc w/: Greg Lovato, Administrator, NDEP, glovato@ndep.nv.gov
Jennifer Carr, PE, C.E.M., NDEP Deputy, jcarr@ndep.nv.gov
Ross Cooper, BSDW, Lead and Copper Rule Manager, rcooper@ndep.nv.gov