



**American Water Works  
Association**

The Authoritative Resource on Safe Water <sup>SM</sup>

**Memo**

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**TO:** AWWA Section Leadership

**DATE:** April 20, 2011

**FROM:** Thomas W. Curtis  
Deputy Executive Director

**RE:** Lead Service Line Replacement Survey

**ACTION NEEDED:** **Assistance obtaining strong community water system response to attached survey instrument on lead service line replacement.**

On April 25, 2011 AWWA will release a 12-question survey on the topic of lead service line replacement. We will request that responses be submitted by June 3, 2011. The survey is intended to:

1. Estimate the current number of lead service lines in use nationally, and
2. Inform our understanding of local barriers to full lead service line replacement.

This survey is short, but it collects information central to AWWA's efforts to facilitate effective management of lead in drinking water. **The broadest possible utility participation is important to informing U.S. EPA regulatory options.** AWWA would appreciate any steps each Section can take to increase awareness regarding this survey effort. Steps may include:

1. Increasing awareness through Section newsletters, email distributions, or website content (draft article text attached),
2. When queried by members, directing member utilities to AWWA's point-of-contact, and
3. Actively encouraging utility participation through any other available mechanisms.

A fact sheet on the survey is attached. If it would be helpful, AWWA staff and volunteers are available to participate in conference calls with Section committees or groups of utilities interested in understanding the national debate and the survey request.

**Issue in Brief**

EPA is currently developing its long-term revisions to the Lead and Copper Rule (LCR). These revisions are addressing a number of difficult issues within the LCR structure, including requirements associated with lead service line replacement. EPA anticipates publishing a proposed rule in Spring 2012.

Data collected by water systems and researchers have illustrated that disturbing lead service lines will release lead particulate and fines. This issue was highlighted in the National Review of the LCR conducted prior to the 2007 LCR revisions. Local advocacy groups have subsequently

raised this issue with a particular focus on partial lead service line replacement in individual communities, including Washington, D.C. and Providence, Rhode Island. Most recently, an epidemiology study conducted by the Centers for Disease Control and Prevention (CDC) (Brown et al, *Env Research* 111(1): p 67-74), based on data from Washington D.C., suggests partial lead service line replacement may be associated with children's blood lead levels. CDC's interest and study was followed by a recommendation by the American Academy of Pediatrics (April, 2011) to EPA that the agency require full-lead service line replacements or require water systems to provide water filters for the kitchen in homes following lead service line replacement even during non-mandatory lead service line replacements. Partial lead service line replacement is also being framed as an environmental justice issue, because older housing stock, where one would find lead service lines, can be the housing available to disadvantaged households. Such households cannot always afford the cost of replacing the portion they own.

Currently the LCR delineates responsibility for lead service line replacement based on ownership; this framework stems largely from the Final Rule EPA published after EPA considered the DC Circuit Court's ruling in *AWWA v EPA* (40 F.3d 1266 (DC Cir 1994) and other available data. When proposing revisions to the LCR, it is likely that EPA will raise the appropriateness of partial lead service line replacement as a practice and the risk reduction measures water systems should take when conducting a lead service line replacement. EPA has already asked its Science Advisory Board to provide advice on the available technical information related to these questions.

The current federal policy discussion around LCR lead service line replacement will not just impact water systems unable to comply with the lead action level. It also has implications for water systems engaged in routine maintenance and capital improvements that encounter lead service lines.

### **Summary**

This survey will not provide all the answers the drinking water community will need to develop to inform EPA's deliberations. Other activities are ongoing through AWWA's Water Industry Technical Action Fund (WITAF) information collection and through the Water Research Foundation (WaterRF). AWWA will engage water systems throughout this ongoing national conversation.

Since the late 1980s, AWWA has actively promoted "getting the lead out" in a way that recognizes the responsibilities and limitations of both the utility and the customer. The attached survey is one step AWWA is taking to develop technical information to inform EPA's deliberations and AWWA's comments on EPA's proposed rule in Spring 2012. Under the Safe Drinking Water Act (SDWA), EPA must make its decisions based on the best available scientific information. AWWA's goal is to make sure EPA has the information necessary to make a sound decision. Any assistance individual Sections can provide that will promote water system participation would be appreciated.

### **Additional Information Contact**

Questions regarding AWWA's LCR-related activities and this survey effort should be directed to Steve Via at [svia@awwa.org](mailto:svia@awwa.org) or (202) 326-6130.

**Fact Sheet**  
**Lead Service Line Replacement Survey**

**Survey Sponsor:** American Water Works Association, Water Utility Council  
**Survey Organized by:** American Water Works Association, Government Affairs Office

**Survey Point-of-Contact:** Steve Via  
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**Survey Timeline:** Distribution Date: April 25, 2011  
**Response by:** June 3, 2011  
(Survey period may be extended; responses after June 3 will be accepted.)

**Type of Survey:** Brief web-based survey (12 questions), conducted using SurveyMonkey

**Target Response:** Community water systems of all sizes

**Encouragement To Respond:**

- Survey is important to revision of federal Lead and Copper Rule to be proposed in Spring 2012
- Survey is brief. Most respondents will complete survey in 15 minutes or less.
- A drawing to be held for complimentary registration to AWWA conferences in Fall of 2011. Drawing winners may choose between:
  - 2011 Distribution Systems Symposium and Exposition & Water Security Conference and
  - 2011 Water Quality Technology Conference and Exposition

On June 7 AWWA will announce winners from drawing.

**Survey Instructions:**

- See Utility Alert or contact Steve Via for SurveyMonkey weblink
- Use weblink to print a copy of the survey questions
- Carefully read the survey instructions
- Answer the questions
- Return to SurveyMonkey weblink and enter responses to survey questions