



Connecticut Department of Public Health

Testimony Presented Before the Public Health Committee

March 20, 2018

Commissioner Raul Pino, M.D., M.P.H.
860-509-7101

House Bill 5489 - An Act Concerning Replacement Of Lead Service Lines By A Water Company And Water Testing

The Department of Public Health (DPH) provides the following information on House Bill 5489, which would allow water companies whose rates are regulated by the Public Utilities Regulatory Authority (PURA) to submit lead service line replacement plans to PURA, and would allow PURA to authorize cost recovery mechanisms for the replacement of customer-owned lead service lines. The Department would like to thank the Public Health Committee for the opportunity to testify on this important issue.

DPH is the Connecticut agency that is charged with implementing and enforcing the National Primary Drinking Water Regulations, including the federal Lead and Copper Rule (the LCR). In Connecticut, over 1,000 public water systems, of which approximately 140 are owned by the ten water companies whose rates are regulated by PURA, are subject to the requirements in the LCR. The Department has already begun to collect lead service line information from water companies. Specifically, following the incident in Flint, Michigan, DPH issued a number of circular letters to public water systems regarding the requirements under the LCR, and requested a lead service line inventory from Connecticut's largest public water systems. To date, ten public water systems have reported the number of lead service lines in their systems, which totaled 213 lines.

The Department supports the removal of all lead in the components of a water company's distribution system, including lead service lines. When removing lead service lines, it is important that the full line, including both the portion owned by the water company and the portion owned by the customer, is removed. Elimination of the customer-owned service lines is an important factor in the reduction of lead exposure. In addition, when only the portion of the lead service line owned by the water company is removed, water quality problems occur. Partial removal of lead service lines has contributed to an increase in lead exceedances in major cities in the Northeast, including Providence, Rhode Island. It is such a problem that the U.S. Environmental Protection Agency (EPA) is considering requiring removal of lead service lines in its modifications to the LCR. Both the Department and the [Association of State Drinking Water](#)

*Phone: (860) 509-7269,
410 Capitol Avenue - MS # 13GRE, P.O. Box 340308 Hartford, CT 06134
An Equal Opportunity Employer*

[Administrators \(ASDWA\)](#), as well as many others, recently provided comments to EPA regarding the proposed modifications to the LCR.

The removal of lead service lines is also supported by organizations and large water companies in the United States. For example, the [Lead Service Line Replacement \(LSLR\) Collaborative](#), which is a joint effort of 23 organizations representing the public health, water utility and environmental sectors that work with state and local governments, has as its goal the acceleration of voluntary lead service line replacement in communities across the United States. To assist with this, it recently released an online toolkit designed to help communities across the United States accelerate removal of lead service lines. In addition, [American Water Company](#), the nation's largest investor-owned water and wastewater company, has recently taken steps to assist with the removal of customer-owned service lines. American Water Company is working with the public utility commissions in Indiana, Missouri, New Jersey, and Pennsylvania to replace the customer-owned lead service lines. In addition, the Virginia Department of Health awarded the American Water Company Drinking Water State Revolving Fund (DWSRF) money for lead service line replacements.

Finally, DPH recommends that the public be educated on the lead found in premise plumbing. The Reduction of Lead in Drinking Water Act prospectively reduced the amount of lead that may be in solder, joints, pipes and fixtures. Unfortunately, much of the premise plumbing in use today still contains high levels of lead. Without the removal of premise plumbing from the pre-Reduction of Lead in Drinking Water Act era, lead will still exist in customers' plumbing. One way in which to encourage the removal of solder, joints, pipes and fixtures with high lead content in homes is to educate homeowners about that steps that they can take to reduce their own lead risk. The water company is in the best position to provide such public education to their customers in a meaningful way. The Department would be happy to work with water companies in the preparation of these public education materials pursuant to [section 25-32k](#) of the general statutes.

Thank you for your consideration of this information. We encourage Committee members to reach out to the Department with any questions.

*Phone: (860) 509-7269,
410 Capitol Avenue - MS # 13GRE, P.O. Box 340308 Hartford, CT 06134
An Equal Opportunity Employer*