



March 8, 2018

Peter Grevatt  
Director, Office of Ground Water and Drinking Water  
1200 Pennsylvania Avenue, N.W.  
Mail Code: 4601M  
Washington, DC 20460

RE: Long-Term and Copper Rule Federalism Consultation (Docket ID No. EPA-HQ-OW-2018-0007)

Dear Mr. Grevatt:

The City of Grand Rapids, Michigan (City) provides water and sewer services to surrounding communities under the Urban Cooperation Act. The arrangement is overseen by the Utility Advisory Board which is comprised of the City and all of the municipalities served (Ada Township, Cascade Charter Township, City of East Grand Rapids, Grand Rapids Charter Township, City of Kentwood, Tallmadge Charter Township and the City of Walker). The City appreciates the opportunity to offer comments to the U.S. Environmental Agency as part of its federalism consultation on potential long-term revision to the Lead and Copper Rule (LCR). Our system is a member of the American Water Works Association, a participating association in this federalism consultation, hence our submittal.

The City is committed to protecting our drinking water from exposure to lead. Improving the LCR to further reduce exposure to lead requires community-specific solutions that recognize the shared responsibility between consumers and water systems for managing exposure to lead in drinking water. We also recognize the importance of federal, state, and community-wide investment in managing lead exposure from multiple sources: lead paint in housing, lead deposited in soils, sources of lead in schools, lead in other household items and lead in drinking water. Furthermore, all of the communities the City serves have consistently remained well below the Lead Action Level.

As the EPA contemplates improvements to the Long-Term Lead and Copper Rule, The City of Grand Rapids encourages a focus on actions that are feasible within current statutes so that we can move forward without confusion and additional delay. It is also critical that any requirement to change water chemistry provides flexibility to address local water quality and operational considerations. A federal rule that requires all water systems to use the same corrosion control treatment would be problematic. We hope that our observations assists in developing a protective rule using available resources while avoiding unintended consequences.

### Lead Service Line Replacement

Over the past several years, the City has been actively identifying all service line materials in our system and updating our database as those services are replaced. In March of 2017, the City implemented Administrative Policy 17-01, titled "Replacement of Residential Privately-owned Lead Water Service Lines". Under 17-01, the City is replacing all lead service lines (LSL) in the public right-of-way and on private property when there is the potential for lead to be released into the homes drinking water as a result of a disturbance to the existing lead water service. There are two scenarios where this can occur. One is when there is an emergency leak on a lead service line that requires a replacement and the other is when there is a capital water main replacement project that requires service replacement. Costs associated with these lead service line replacements are absorbed in the local communities rates. To date, we have successfully:

- Identified and reviewed 98 percent of potential lead service lines and our current totals indicate there that there are approximately 23,000 lead service lines in our system.
- Since implementation of policy 17-01, the city has replaced 101 lead service lines due to ongoing capital water main projects and 173 lead service lines caused by leaks resulting in an estimated cost of \$1,700,000.
- For our Fiscal Year 2019, we have allocated \$2,700,000 strictly for lead service line replacement. Over the last year water rates have increased approximately 2.4 percent to help finance these improvements.
- If a homeowner decides to voluntarily replace their lead service line without leak or city project the property owner has the option of applying for a 10 year pay program through the city at a low interest rate to finance the cost of the lead service line replacement.
- City staff has taken the initiative to provide residents with educational material on the flushing of water service line after the lead service line replacement.

If the EPA advances in its recommendation to change the current Lead and Copper Rule, we have identified the following challenges:

- Requiring municipalities to replace all lead service lines within a specific timeframe would be extremely costly to our system and ultimately increasing our water rates, affecting those within our communities with limited resources or fixed incomes. The City supports the replacement of full lead service lines in accordance with a responsible asset management plan.
- Gaining access to the homes to inspect for lead service lines has been a huge challenge and this also ties in with trying to get the property owner to sign a form allowing us access to replace the service line on private property.
- Any requirement that forces the municipality to perform follow up lead sampling of the drinking water in a home that has had a full or partial lead service line replacement is an issue. There are significant cost implications to the City for this requirement as well as risk to the City if lead is still found. At some point, there needs to be a clear delineation of where the responsibility stops for a community water system and where the property owner assumes it.

We are committed to establishing an inventory of lead service lines and improving its accuracy by gathering data during routine field work. Currently, we anticipate all lead service lines be replaced by 2050.

### Optimized Corrosion Control

Even though the EPA appears to be seriously considering phosphate addition as the gold standard for corrosion control treatment, this will have limited impact on the City. At this time, the City already treats our water with an orthophosphate blend to limit the impacts of corrosion. The City initially studied this treatment method in the 1990's and we are now starting a new optimized corrosion control study. As our water source continues to change, we want to use this study to ensure we are treating our water with the correct chemical at the correct dosage rate.

### Public Communications

The City of Grand Rapids recognizes the importance of regular and transparent communication that helps customers address risks from lead in drinking water. In addition to required language in the 2017 consumer confidence reports, our system:

- Will be addressing unregulated contaminants such as Chromium-6, Turbidity, Cyanotoxin, Cryptosporidium, and Giardia lamblia. Though our samples show low levels or no detection of these contaminants we continue to advocate for full transparency.
- Staff is currently developing a Spanish version of the 2017 consumer confidence report allowing us to reach districts where over half of the population is Hispanic/Latino.

We encourage the development of a national clearinghouse of information on lead to help water systems and other entities communicate effectively about lead risks across all media.

We hope that our comments help the EPA develop sound rule options that further reduce risk posed by lead, recognizing the realities of local budgets and infrastructure renewal needs. If the EPA has any questions regarding these comments, please contact me at [dharran@grcity.us](mailto:dharran@grcity.us) or Ex. 6.

Best Regards,



Water System Manager

cc: David Ross, Assistant Administrator for Water

