

Here are our comments to the proposed Pb/Cu rules from the City of Durango Water Treatment and Water Distribution Divisions

#### Lead service line replacement (LSLR)

- Monumental task to create inventory of lead service lines, and full replacement of identified lead lines. Will financial assistance be provided to small/medium sized systems who do not have the resources and other challenges (labor, money, weather constraints)? What kind of timeline is proposed for this task if it is enacted?
- Is this full service line replacement? Or is a partial line replacement being proposed?
- Partial LSLR for unwilling or unable customers defeats the purpose of lead replacement. If sampling at a consumer tap exceeds the AL, and the PWS is required to remove the LSL, and the consumer is unwilling to replace the LSL will the PWS face fines/corrective actions? What happens when the ownership of that residence/business changes? Will the PWS be required to replace LSL then?
- Pitcher filters after LSLR, will financial assistance be provided to medium sized systems? How does the PWS comply/document the pitcher is regularly maintained when it's in a private residence? What about systems who have non-aggressive water, would they be exempt?

#### Corrosion Control Treatment (CCT)

- Will financial assistance be provided to medium/small PWS's to engineer and install CCT? Will O&M training and guidance be provided to small/medium PWS's who lack the expertise in CCT optimization?
- Point of use treatment – Will financial assistance be provided to procure and install these devices? How does the PWS comply/document the device is regularly maintained when it's in a private residence? What about systems who have non-aggressive water, would they be exempt? This approach, while is cheaper at first is just a Band-Aid to the problem. Continues distrust in the safety of the PWS drinking water.
- Will waivers to be issued to PWS's who have non-aggressive water? How does a PWS demonstrate an equivalent CCT? Will the periodic re-evaluation be reduced if evaluations are consistent time and time again?
- Find and fix problems in CCT if a tap exceeds AL – What happens if there is a sampling error causing a false high positive? Some residents have taken the approach that if 6 hour stagnant time is required, why not a longer time, some have used a never/seldom used faucet to sample from resulting in skewed results not representative of the actual water consumed.

#### Transparency and Public Education

- Will EPA/CDPHE provide required language to be distributed to consumers? Will consumers believe the educational information PWS's give them? There is deep distrust in government at all levels.
- On-going outreach – What is that frequency, every year, 6 months, 3 months? Required language?
- How long will the results of all tap sampling, water quality parameter monitoring, and number and locations of LSL's be available to the public? Can that database be online? What happens when a LSL is removed, can that be removed from the public accessible database?

#### Tap sampling

- Sampling at schools would allow PWS's assurance that proper sampling techniques are being followed. Changing tap sampling site at consumers request can create problems for PWS trying to obtain representative samples.
- Increasing the number of samples, the challenge will be to find appropriate sites to sample for Pb/Cu. Instructing consumers where to sample sounds easy, but might not be able to comply due to minimum 6 hours water must remain still in plumbing, and consumers waking up having to go the bathroom and flush, or need a drink, but sampling must take place at kitchen faucet, and they forget.
- Household action level, would those limits be specific to each household, or one set of limits for all households? Who contacts the applicable health agency for follow-up?

#### Copper Revisions

- Who establishes and conducts the screen determining if water is aggressive to copper? Will a pilot distribution system be utilized, who is responsible for expenses to run and test pilot system?
- Why have separate sampling sites from lead sample sites? Creates additional in home sampling requirements when existing sampling for Pb/Cu is challenging as it is to conduct.

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