WATERWORKS DEPARTMENT
CITY OF NEWPORT NEWS

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March 7, 2018

Peter C. Grevatt, Ph.D.
Director
Office of Ground Water and Drinking Water
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W. *Mail Code:* 4601M
Washington, DC 20460

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

Dear Dr. Grevatt:

The City of Newport News Waterworks Department appreciates the opportunity to offer comments to the U.S. Environmental Protection Agency (EPA) as part of its federalism consultation on potential long-term revisions 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.

Newport News Waterworks is committed to protecting consumers of 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.

As EPA contemplates improvements to the Long-Term Lead and Copper Rule, Newport News Waterworks encourages a focus on actions that are feasible within current statutes so that we can move forward without confusion and additional delay. It also is 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 assist in developing a protective rule within available resources while avoiding unintended consequences.

Lead Gooseneck Replacement

We are evaluating implementation of a full lead gooseneck replacement strategy in our service area. Our current estimate is that there are *3,000* lead goosenecks in our system, a reduction from *8,000* thirty years ago. We have identified the following challenges in our efforts to remove them:

- Limited information on the pipe material in use on each customer's property.
- Customers who are unwilling to replace service lines or unable to afford the cost of service line replacement.
- Replacement projects require coordination in order to minimize disruption to our community.

With these challenges in mind:

- Newport News Waterworks has funding in its capital improvements program to replace all lead goosenecks over a ten year period.
- We are committed to establishing an inventory of lead goosenecks. Waterworks has scrubbed its GIS data and pipe inventory in concert with empirical/observational data gathered from routine field work to improve our count and system-wide accuracy. Currently, through our capital project planning, we anticipate that all lead goosenecks will be replaced in 10 years or sooner provided no unanticipated issues arise.

Optimized Corrosion Control

The Newport News Waterworks Department has employed pH control and zinc orthophosphate treatment since 1992 and has never exceeded the lead or copper action level. This successful strategy has used a dose of approximately 0.2 mg/l as P or 0.6 mg/l as PO_4. Waterworks sees no advantage to a higher phosphate dose given its extremely low levels of lead detected and the negative impacts on the wastewater treatment process and the environment would exceed any benefits.

Public Communications

Newport News Waterworks recognizes the importance of regular and transparent communication that helps customers address risks from lead in drinking water.

In addition to required language in consumer confidence reports:

- Waterworks promptly notifies all customers of their lead testing results at their homes and/or businesses.
- Waterworks and the Virginia Department of Health provide steps customers can take to protect themselves from lead at the tap.
- Waterworks provides guidance on how to have water tested in the home.
- Results of testing for the lead and copper rule are available on the Waterworks web page.

The Newport News Waterworks Department encourages 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 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.

Enclosed is a brief summary about the Newport News Waterworks system.

If the EPA has any questions regarding these comments, please contact me at Ex. 6 or via e-mail at lmartinez@nnva.gov.

Best regards,

Louis Martinez
Director

LM/MLH/sjth

Enclosure

sc: David Ross, Assistant Administrator for the Office of Water

Summary of
Newport News Waterworks System

General Description

The City of Newport News Waterworks Department serves approximately 420,000 customers and is predominately a surface water system. The median household income in our service area is somewhat below the national average.

Meeting the Current LCR

Currently, our system's average lead level is below the detection level, as is our 90th percentile reading. We achieve these low levels by pH control and zinc orthophosphate treatment.

Current Investments in Infrastructure

Revision of the LCR is coming at a time when our system has recently completed $100 million dollars in capital projects over the last five years and Waterworks expects to invest $100 million more in the next five years. These improvements are being funded through water rates and fees. Over the last five years water rates have increased *15* percent to finance these improvements.