

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

September 7, 2016

Mr. Joel Beauvais
Deputy Assistant Administrator, Office of Water
USEPA
1200 Pennsylvania Ave, Mail code 4101M
Washington, DC 20460

SUBJECT: EPA's Letter of July 6, 2016 concerning the Lead & Copper Rule (LCR)

Dear Mr. Beauvais:

The Connecticut Department of Public Health (CTDPH) is responding to the EPA Administrator letter of July 7, 2016 to Connecticut Governor Dannel P. Malloy and your letter of July 6, 2016 to the Association of State and Territorial Health Officials (ASHTO). Connecticut, as noted in my previous response, is completely committed to assuring public health protection for the people and ensuring that public drinking water consumed in the state of Connecticut is safe. To that end, the CTDPH instituted practices and policies to strengthen the implementation of the Lead and Copper Rule (LCR) beyond the minimum requirements such as:

- 1) Issuing formal enforcement actions as soon as the CTDPH learns of an exceedance
- 2) Requiring the consumer notices to be issued to customers promptly and within 48 hours of learning of the high lead results
- 3) Requiring that the lead education is issued to customers promptly and within 48 hours of learning of the lead exceedance
- 4) Encouraging and reminding public water systems to post individual sampling results and provide information on lead service line locations
- 5) Working with public water systems, local health departments and school boards to identify and address lead risks at schools
- 6) Sharing of high lead results with the CTDPH Childhood Lead Poisoning Prevention Program to ensure that children exposure to lead is evaluated and abated.
- 7) Reaching out to EPA to assist with questions raised by public water systems in Connecticut regarding the applicability of the EPA technical recommendations for the optimal corrosion control treatment evaluation that was published in 2016 to the small water systems, the conflicting action level and sampling procedures provided in the existing EPA 3Ts guidance, and the pre-stagnation recommendation in the revised sampling protocol of February 2016.
- 8) Working to comprehensively address each and every complaint received.



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Therefore, we concur that committing resources to practices and policies that enhance the LCR beyond the minimum requirements are helpful in the efforts to lessen the potential implications of lead in drinking water. However this shifting of limited staff resources has continued to weaken the State oversight capacity to ensure that the many other regulated contaminants of significant health risk are equally and adequately addressed. The extensive requirements under the Safe Drinking Water Act deserve complete and comprehensive attention by state agency staff. To address this critical responsibility and need to be comprehensive, the State of Connecticut and CTDPH once again requests that the EPA join us in support of doubling the financial resources under the Federal STAG Public Water Supervision Grant. This grant is used in Connecticut specifically to fund DPH Drinking Water Section staff that assure compliance and oversee SDWA Rules. Presently CTDPH receives \$1.3 million; we are requesting \$2.6 million to assure adequate public drinking water program staffing levels.

We encourage EPA to support Connecticut in maintaining this level of essential public health protection and look forward to working with EPA with a focus on public health to identify strategies that will improve the safety and sustainability of our public drinking water systems in Connecticut. The CTDPH would appreciate a written response from EPA addressing the important items noted within this letter.

Sincerely,



Raul Pino, M.D., M.P.H.
Commissioner

Attachments

Cc: Peter Grevatt, Director, Office of Ground Water and Drinking Water, USEPA, 1200 Pennsylvania Ave, Mail code 4601M, Washington, DC 20460
Yvonne Addo, Deputy Commissioner, CTDPH
Governors' Office