



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 25 2017

Mr. Larry Gillanders  
EPIPE  
3122 West Alpine Street  
Santa Ana, CA 92704

OFFICE OF WATER

Dear Mr. Gillanders,

Thank you for your letter to Administrator Pruitt regarding lead service line rehabilitation as an option for revisions to the Lead and Copper Rule. Protecting children from exposure to lead is a top priority for the U.S. Environmental Protection Agency.

The EPA has conducted extensive engagement with stakeholder groups and the public to inform potential revisions to the Lead and Copper Rule. The agency is carefully evaluating the recommendations from these groups and is giving extensive consideration to the national experience in implementing the Lead and Copper Rule as we develop proposed revisions to the rule. Likewise, the agency will evaluate the material that you have provided on the practice of lead service line rehabilitation and take that information under consideration. The agency must also consider the potential impact of these regulatory revisions on the thousands of communities across the country that will have to implement the Lead and Copper Rule requirements.

Again, thank you for providing us with information regarding lead service lines.

Sincerely,

A handwritten signature in blue ink that reads "Steph. Flaherty".

Stephanie Flaherty  
Sr. Regulations Manager  
Office of Ground Water and Drinking Water

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JUL 31 2017

June 28, 2017

Scott Pruitt, Administrator  
Environmental Protection Agency  
Office of the Administrator, 1101A  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Re: Revisions to the LCR

Dear Mr. Pruitt,

We encourage your Committee to look beyond the LSL “replacement only” option and look to include LSL “rehabilitation”.

Water Research Foundation Report 4351 released March 2017, recommends coating lead service lines (LSL’s) be considered an option to replacement. This study was jointly funded by the Water Research Foundation (WRF) and the U.S. Environmental Protection Agency (EPA).

To focus on a replacement only approach could cut out the path of innovation in rehabilitation technologies which are currently being used in other jurisdictions, such as the UK.

We encourage you to leave the door open and include “rehabilitation” as an option to solving this nationwide problem. Let’s encourage innovation and advanced technologies in the area of LSL’s and not close the door.

We invite you to review the attached subject matter and leave the future open for establishing an effective lead/corrosion control program that goes beyond cut and replace methods.

Sincerely,

Larry Gillanders  
CEO, ACE DuraFlo Systems, LLC