



February 28, 2022

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, D.C. 20460

Dear Administrator Regan:

The bipartisan infrastructure bill (BIF) provides an historic opportunity to address a significant source of lead exposure. The bill provides \$15 billion to remove lead service lines that convey drinking water into homes, businesses, and schools. EPA and CDC [agree](#) that there is no known safe level of lead in a child's blood, and drinking water accounts for approximately [20 percent](#) of a person's total lead exposure – perhaps double that level for infants who consume mostly mixed formula.

While new federal support to remove lead service lines to reduce these risks is welcome, clear EPA guidelines are critically needed to assure the funds are used to achieve maximum risk reduction. Specifically, EPA should disallow states and water systems from using the federal funds for *partial* lead service line replacements, which can exacerbate lead risks, and should require proper notification, provision of water filters and tap water testing to water users during the replacement process.

EPA's guidelines should explicitly urge states to require full lead service line replacement. The guidelines should also clearly allow funding of the replacement or removal of galvanized lines

that are, or were at one time, connected to leaded pipes and fittings. This is an important issue in some states, including California, where the state's Division of Drinking Water has stated that over 550,000 galvanized lines remain in use. Many of these are, or were, attached to lead fittings.

In addition, we urge EPA to issue guidelines that:

- Allow the funds to be used to remediate lead goosenecks, pigtails or connectors, in addition to any galvanized lines that are, or had at one time been, attached to those pipes or fittings.
- Require that funds only be used to remove ALL - both publicly and privately owned - portions of the service line.
- Prohibit the funds from being used to remove only part of a lead service line, or only some of the leaded or galvanized portions of the service line. ALL of the leaded and galvanized parts should be removed at the same time.
- Require funded replacements or removals to provide public health mitigation measures, including customer notification, pre-and post-construction tap water testing, and the provision of lead-removing filters and six months' worth of cartridges.
- Explicitly allow state or local public health departments to receive grant funds to pay for greater public outreach and education campaigns, as well as to ensure that mitigation measures are adequately provided.

Thank you for your consideration of these issues as you finalize guidelines for the use of the bipartisan infrastructure funds.

Sincerely,

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