



# Ohio Environmental Council

## US EPA Lead and Copper Rule Testimony

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Good afternoon, thank you for the opportunity to testify before you today on the US EPA's proposed improvements to the Lead and Copper Rule. My name is Annalisa Rocca and today I speak to you in my capacity as Drinking Water Manager at the Ohio Environmental Council.

I want to start by commending the EPA and Biden-Harris administration for making lead service line removal a priority.

Ohio is my home and is estimated to have the second largest collection of lead service lines in the country, around 650,000 lines. The most critical element of this rule is that it puts an end date on when lead service lines need to be removed and replaced, for the first time. This has local advocates and impacted communities celebrating. We also believe that the 10 year timeline is achievable for the vast majority of our cities in Ohio.

The rule's improvements also call for a comprehensive inventory of water service lines, which must be updated regularly. This is critical because it will set utilities up for the work ahead and give communities the information they have been asking for.

There are two areas of the updated rule that we would like to see strengthened to better protect Americans. First, the rule as written, will allow utilities to forego removing and replacing lead services in certain circumstances, such as when the utility is not able to gain access to the property or when the property owner is unable or unwilling to pay for the private-portion of the replacement. We urge the EPA to work with states to address this potential loophole in the rule.

Secondly, we urge the EPA to strengthen the testing requirements for schools and childcare centers. The proposed rule currently requires only one lead test to be performed at five locations in each school and two locations in childcare centers. This is problematic because lead can still be found in different faucets and fixtures, especially in old buildings. The rule should require retesting, testing at more locations, and that results be shared with parents and staff.

The \$15 billion earmarked for lead service line replacement is an essential first step at funding the requirements of the rule yet it is still not enough. The expected costs associated with replacing just Cleveland, Ohio's 185,000 lines is close to \$1 billion. We need more federal funding and a commitment from the EPA to continue to fight for more dollars and to send them to the communities who need them most.

Every American, every Ohioan deserves clean, safe and affordable drinking water. We thank the EPA and the Biden-Harris administration for developing an ambitious rule that will chart the path forward to finally getting the lead out of our drinking water delivery systems. This single rule will have measurable benefits for citizens in Ohio and across the country.

Thank you.