
From: Benzie, Richard (DNRE)
Sent: Friday, March 25, 2011 4:10 PM
To: Cook, Pat (DEQ);Kris Philip;Shekter, Jean (DEQ);Howard, Brock (DEQ);Dettweiler, Dan (DEQ)
Subject: FW: Information Needed to Support States on LCR Work Group
Attachments: 9-22-09 copper tiering paper - FINAL DRAFT.doc; LCR SHM Presentation Master (11-2-10).pptx

Please try to accommodate this request. I can't do much by next Thursday, and Pat is out as well. At least get some data on the number of violations we have experienced and make an effort to answer the questions at the end of this message. Thanks.

From: Darrell Osterhoudt [<mailto:dosterhoudt@asdwa.org>]
Sent: Friday, March 25, 2011 1:44 PM
To: Darrell Osterhoudt
Subject: Information Needed to Support States on LCR Work Group

Good afternoon state drinking water administrators -

As you know an EPA work group, including states (MA, IN, MO, NC, WA), is currently working on "long term" revisions to the Lead and Copper Rule (LCR). One of the major issues the group is trying to address is how to handle copper. The work group is considering many alternatives and the states on the group would like some feedback from you so they can present a reasonable alternative that reflects state interests.

Lead and copper behave differently in water systems yet are treated the same by the LCR. A summary of the issues and relevant research is included in the attached white paper on Copper. I have also attached some slides from last year's stakeholder meeting that briefly describes what the work group is considering. See slides 15 and 16 for the copper information.

For the benefit of the states on the work group, please share you thoughts on how copper might be handled in new rule revisions. First, how significant is copper for you under the current rule - action level exceedances compared to lead, etc. If the monitoring were to change to capture more sensitive sites for copper, would you expect a significant increase in work load.? Second, how would you suggest managing copper to improve public health protection? Some questions to consider here include: Does it need to be addressed separately from lead, especially related to monitoring? This might include completely separating the two or "decoupling". If specific copper sites are added, does that need to be offset by some reduction in lead samples? If so, how would reductions in lead samples being accomplished? Are there other considerations related to copper that should be considered?

Any feedback you can provide for this or other LCR issues will be appreciated. The work group is preparing for a face to face meeting in April. Please provide your input by March 31.

Thank you.

Have a good weekend.

Darrell Osterhoudt
Regulatory Affairs Manager
Association of State Drinking Water Administrators

1401 Wilson Blvd. Suite 1225
Arlington, VA 22209
(703) 812-9908
Fax (703) 812-9906
dosterh@asdva.org