

From: [Benzie, Richard \(DEQ\)](#)
 To: [Jim Taft](#); [Roger Crouse](#); [Forbes, Cindy@Waterboards](#)
 Cc: [Darrell Osterhoudt](#); [Shekter Smith, Liane \(DEQ\)](#)
 Subject: RE: Reduction of Lead in Drinking Water Act State Workgroup Members -- Request of You
 Date: Tuesday, October 14, 2014 6:00:28 PM

Jim,

I believe Michigan would be willing to participate in this effort. Several of our PWSS Program staff worked closely with Region 5 EPA staff and other states in the region on providing meaningful input in the earlier attempts at the combined LCR/RLDWA rule development. However, I cannot name the staff person that should participate until I discuss it with Liane and the staff potentially involved.

If I understand correctly, the Reduction of Lead in Drinking Water Act is primarily enacted in Michigan through our state plumbing code, which is implemented by another state department. However, the PWSS program currently has 2 employees that are appointed members of the state plumbing board, so they would have knowledge of both programs to bring to this discussion. If my assumption about the RLDWA is correct, it would be my recommendation that one of them represent Michigan on this state-EPA rule development workgroup. One is currently a District Supervisor managing staff implementing the Community Public Water Supply Program and the other is a manager supervising staff that oversee local health departments that are implementing the Noncommunity Public Water Supply Program and Michigan's well construction code.

I will discuss this matter with Liane and these two candidates and get back to you as soon as possible.

Richard

From: Jim Taft [mailto:jtaft@asdwa.org]
 Sent: Tuesday, October 14, 2014 10:48 AM
 To: Roger Crouse; Forbes, Cindy@Waterboards; Benzie, Richard (DEQ)
 Cc: Darrell Osterhoudt
 Subject: Reduction of Lead in Drinking Water Act State Workgroup Members -- Request of You

Good morning Roger, Cindy, and Richard –

We wanted to ask if you would consider participating (or naming a staff expert to participate) in a state-EPA rule development workgroup for the Reduction of Lead in Drinking Water Act (RLDWA) requirements. You may recall that EPA's original game plan was to roll these new requirements into the long term Lead and Copper Rule revisions and to get by with RLDWA FAQs, in the meantime. They've since decided that it would be best and more efficient to handle the two efforts (LCR and RLDWA) as separate rule development activities.

So, what kind of commitment are we talking about? EPA envisions roughly a conference call per month over the course of about one year. The exercise would essentially involve taking their Frequently Asked Questions document, as a starting point, and translating those scenarios and elements into rule requirements. State experience and perspectives are obviously critical (especially those of you – Roger and Cindy – whose states have had

similar state requirements in place pre-dating the RLDWA) to be sure that what EPA comes up with is workable and reasonable.

We've very much appreciated being asked to participate on these rule development workgroups in the past since it gives states a seat at the table instead of reacting to a proposed rule, after the fact. (FYI, ASDWA staff cannot participate in the workgroup calls, it has to be a "real" state, but we can support you before and after calls.) So...with all of this in mind, *can you kindly let me know, at your earliest opportunity, whether this workgroup would be one that you or a staff member could participate in?* EPA is actually hopeful of having a kick-off meeting of the workgroup this week, but, realistically, I don't think it will be possible to comprise the state members of the workgroup in time for that.

Thanks much for considering this.

Jim Taft
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