

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



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Drinking Water Section

February 12, 2020

The Honorable David P. Ross  
Assistant Administrator, Office of Water  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

**SUBJECT:** Comments on the Proposed Lead and Copper Rule Revisions (LCRR)  
(Docket No. EPA-HQ-OW-2017-0300)

Dear Assistant Administrator Ross:

The Connecticut Department of Public Health (CT DPH), as the State of Connecticut agency responsible for Primacy of the SDWA public drinking water provisions, supports the efforts to revise the federal Lead and Copper Rule (LCR) and make it first and foremost protective of public health, but also logical and practical. The proposed LCRR has identified many actions to reduce lead exposure in drinking water and; included this time, a deliberate focus on the most at risk communities.

Although the CT DPH believes that the proposed changes meet the intent of the Agency to reduce public exposure to lead, the unintended consequence, however, is a significant increase in workload to an already under resourced state primacy workforce. In order to address public health and update the current LCR, a significant increase in the workload will be necessary at the state program level in order to appropriately and comprehensively enforce compliance. Oversight and enforcement of the LCRR will become the work of the primacy state program, appropriately resourcing the State SDWA Primacy Program must be a priority in order to assure appropriate implementation of the new LCRR.

Fundamentally, the CT DPH supports the following:

- Lead Trigger Level to encourage PWS to take proactive steps in planning, evaluating, and preparing before an action level exceedance (ALE)
- Lead Service Line (LSL) Inventories
- LSL Replacement (LSLR) Requirements



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- Increased and effective communication and education with homeowners regarding sources of lead, impacts to health and mitigation options
- Comprehensive educational material should include information on other sources of lead in water such as lead in brass fixtures and lead solder. Educational information should highlight how to address all potential lead exposures in a home in a comprehensive and effective manner.
- Strengthened corrosion control treatment (CCT) and water quality parameters (WQP) monitoring requirements
- Increased and ongoing CCT training for state primacy agencies and water companies
- Sampling at school and childcare centers
- Increased communication and work across federal agencies to offer financial support opportunities for full LSL replacement for homeowners in need

The EPA is requesting comments for all aspects of the proposed LCR revisions. While most of these changes will work to reduce the public exposure to lead, CT DPH is concerned about the practicality of implementing some of these proposed changes and the significant increase in workload to state primacy agencies. Based on current data from the CT DPH lead program, the primary contributor to elevated blood lead levels in children under the age of five in Connecticut is from lead-based paint, dust and soil exposure; therefore, resources should be balanced to achieve adequate public health protection in the areas most needed. Additionally, corrosion control treatment (CCT) is complex and very dependent on site-specific conditions. There is a shortage of trained engineers able to review and approve these proposals as well as utility engineers or consultants to help conduct and prepare these complex CCT evaluations and to properly recommend an effective CCT. In addition to providing guidance documents, EPA needs to conduct trainings and provide assistance to States in developing expertise on topics like CCT, the use of WQPs for CCT, service line inventories, sampling site pool determination, selection of sampling locations for schools and child care facilities, sample collection methods including investigative samples to determine the source of lead, and data management for state personnel, water system personnel, and the consultants the systems hired.

The regulatory changes in the proposed LCRR will lead to significant action and increased workloads on the already skeleton staff for the current LCR. Any change to the LCR is going to require substantial training and technical assistance. Therefore, minimizing unnecessary changes and simplifying the regulatory language should be well balanced with public health protection as the goal for the final LCRR to reduce the burden to the primacy agencies.

CT DPH has put together the following comments and recommendations for consideration to help improve the final rule and to reduce the workload imposed on the primacy agencies:

1. Clarification

- a. Please clarify the intent of section §141.80(a)(4)(ii), which requires the system to comply with the LCR if they have an exemption from Subpart I. It's confusing when

regardless of whether the system has an exemption or not, they are still required to comply with the LCR.

- b. All community water systems are subject to sampling for lead in schools and child care facilities and public education requirements regardless of the results of the compliance tap sampling. Please clarify this requirement so as not to include facilities with certified plastic piping and lead free fixtures.
- c. Please clarify if §141.81 (b)(3)(iv) should read “unless it meets the lead and copper action level.”
- d. It is not clear what orthophosphate residual (i.e. orthophosphate as phosphate or orthophosphate as phosphorus) is specified in the rule. All references having an orthophosphate residual should be specified with the specific type of measurement and maintained consistently throughout the rule. Is total phosphate required? If so, then it also needs to be specific in the measurement (i.e. total phosphate as phosphate or total phosphate as phosphorus).
- e. Please clarify who is the responsible party (wholesale or consecutive system) for the consecutive PWS to achieve compliance of §141.82(g) to operate and maintain optimal corrosion control treatment (OCCT), including maintaining water quality parameters at or above minimum values or within ranges designated by the State, when the consecutive PWS has no control over the operation and maintenance of the CCT.
- f. §141.86 (a)(1) Sites may not include faucets that have point-of-use (POU) or point-of-entry (POE) treatment devices designed to remove inorganic contaminants, except for systems monitoring under § 141.93 (Small System Compliance Flexibility). How to track this when SDWIS is not set up for the LCR? What does POE specifically mean, house filter or water system filter? This needs to be clarified in the Rule.
- g. §141.87 (a)(1)(ii) Can samples be taken from entry points at a different time during normal use? Wells may not come on at the same time, but instead alternate, alternate lead/lag, or lead/lag, where the lag well may not come on frequently depending on the demand. This needs to be clarified.

## 2. Definition

- a. The term “Sample period” should be replaced with “Collection period” to be consistent with the current terminology and in SDWIS.
- b. Lead service line should be defined to include lead gooseneck, pigtail, connector, and all galvanized pipe whether it’s connected to a LSL or not.
- c. Definition of the orthophosphate measurement is needed for all to use the same measurement (i.e. orthophosphate as phosphate or orthophosphate as phosphorous).
- d. Optimization and re-optimization should be defined.
- e. Customer and consumer should be defined and used appropriately within the rule.
- f. Define significant treatment change.

## 3. Action Level and Trigger Level

A new trigger level (TL) of  $P_{90} > 10$  and  $\leq 15$   $\mu\text{g/L}$  is introduced to trigger additional CCT planning, evaluation, and recommendation, and implementing LSLR goal rates for systems

over 10,000 people and notification requirements. These additional requirements have to be overseen, reviewed and approved by the state staff. Based on the most recent monitoring compliance period in 2019 in CT, up to 20 PWS could be subjected to these additional requirements each compliance period.

4. Lead and Copper Tap Monitoring

Changes priorities for collection of samples with a greater focus on lead service lines and lead solder, and the new monitoring frequency/schedule based on P90 level. This also requires systems to update the sampling site plan for lead and copper sampling. In CT, 100% of PWSs will be subjected to these requirements. Additionally, it is anticipated that with an increase of monitoring frequency and standard number of samples for annual monitoring that the number of PWS to take action with a trigger level exceedance (TLE) will increase. The work load to implement these changes increase considerably for the state staff.

- a. EPA should specify a time frame to submit the new sampling site plan using the new LSL inventory and the new Tiering system in the final LCRR.
- b. Sampling site plan only need to be updated if there's an upgrade to the plumbing, including LSL.
- c. Sampling site plan should be updated annually if the system is implementing LSLR.
  - i. CT DPH agrees with EPA that first draw sampling following a 6-hour stagnation period is an effective technique to determine when OCCT is being maintained. However, this sampling collection method will not be able to collect representative samples for LSL as the first liter of sample is collecting water representative of the faucet, supply line, and part of the internal plumbing. The new sampling site tiering procedure prioritizes LSL locations, which means another collection method is necessary to collect representative water sample from the LSL. However, the proper collection method will be difficult to determine because each dwelling may have different length of pipes before reaching the LSL from the tap. Therefore, CT DPH recommends that the EPA's suggested collection method of 1 gallon plus 1-liter samples with only the 1-liter sample use for compliance to represent water from the LSL be re-evaluated to ensure adequate representation of water that was resting in the LSL.
- d. Water systems with LSL should be required to collect tap samples that are representative of water that was in contact with the LSL for at least 6-hours of stagnation time.
- e. The regulation should require a minimum tap sampling frequency of two six month monitoring periods following a source water change or a significant treatment change.

5. 90 Percentile Calculation

These changes the P90 calculation that require more sophisticated data tracking and SDWIS is not currently capable of implementing the existing rule. Training is necessary and extensive technical assistance is anticipated. In addition, SDWIS must be upgraded with the new Tier system and be able to calculate the 90<sup>th</sup> percentile AL based on the new

requirements and be able to implement all aspects of the LCRR to minimize the workload to all primacy agencies.

6. Lead Service Line (LSL) Inventory

All systems must develop an LSL inventory and LSL replacement plan within the first 3 years of final rule publication. This important modification will necessitate all PWSs to update the materials inventory evaluation for the entire distribution system to develop the LSL inventory. CT DPH has requested systems to submit the material evaluation inventory in July 2019. Many PWSs are currently having difficulty in obtaining material and lead service line information. The proposal requires systems to update the LSL inventory annually. Additionally, systems over 10,000 people with LSL and unknown materials must develop and submit a LSLR goal rates within 6 months after the initial LSL inventory for LSLR, when they exceeded the trigger level, but are below the action level. In CT, up to 1,027 PWS's LSL inventories, LSLR plans, new sampling site plans, LSLR goal rate plans, notification methods, and outreach requirements will have to be reviewed and approved by the state staff. Technical assistances and trainings will be required to educate PWSs of these additional requirements. These will be a significant increase the workload to the overtaxed DWS staff, which will need additional funding for additional staff will be needed to implement these new requirements. Below is CT DPH comments and recommendations:

- a. Lead gooseneck, pigtail, connector, and all galvanized pipe should be defined as LSL and be included in the LSL inventory. These materials should be counted toward the mandatory LSLR and goal-based plans.
- b. CT DPH agrees with EPA that all unknown material should be considered as LSL and included in the LSL inventory. This requirement may help to pressure systems to put in good faith efforts to find ways to determine the service line material. It is recommended that EPA provides grant funding and DWSRF to fund PWS to contract companies' using new methods to identify LSLs.
- c. Maintaining an updated inventory list is critical for the proposed changes to the LCR. The frequency of updating the materials inventory should be decreased to at least once every 3 years to reduce the work load for state and PWS, particularly when the PWS did not have an ALE.
- d. LSL inventory should be using the exact address, particularly when submitting to the states for compliance and for determining sampling pools, as there may be multiple locations with LSL on the same street. The exact address will also prevent confusion. This information is also useful for a purchasers or renters to consider, which may provide some pressure for the property owner to consider working with the system for LSLR. As LSLR is completed, the website, for those required systems to have the information on the website, can be updated.
- e. PWS should make note of the type of populations (i.e. schools, daycares, senior centers, hospitals, nursing homes, youth camps, etc.) during the material inventory evaluation process to identify and prioritize replacements at the locations that have the highest lead levels and/or the sensitive populations.
- f. The initial LSL inventory should be developed and submitted to the primacy agency in a staggered time frame from small, medium, to large water systems. Three years

for small systems is too long a timeframe. CT DPH recommends the following timeframes: small 1 yr, medium 2 yrs, and large 3 yrs. These timeframes also allow the primacy agency to stagger their workload to review/approve and update these inventories.

- g. Some systems may have limited records to determine the material of the service lines. Some systems may not have to enter homes for the meter readings. In such instances, systems should schedule with the dwelling owner to enter the dwelling for assessment.
- h. EPA should provide the primacy agencies and water systems with acceptable methods to use and guidance to designate the acceptable methods to determine the service line material of unknown lines.
- i. The system should update the LSL inventory on the website more frequently than annual.
- j. An annual update on LSL inventory for review and update is a heavy workload for the primacy states, particularly, with scarce resources. The updated inventory should be required on a 3-year frequency instead of annually.
- k. EPA should require water systems to effectively distribute education materials to homes with unknown service line to inform them of the potential for their line be made of lead and the actions they can take to reduce their exposure to drinking water lead. EPA should develop the standard language and template for systems to use.
- l. Enforcement workload will increase because of the need to issue violation letters and possible formal enforcement actions to systems that do not submit their annual LSL update and distribute/submit the lead education materials.

#### 7. LSL Replacement Plan

- a. The 3% replacement rate after an ALE is too low. It is recommended to require at least 3% replacement rate if the system exceeded the trigger level but below the action level. The LSLR rate after an ALE should stay at a minimum with the 7% from the current rule. Even with the 7% replacement rate, it will take at least 15 years, which is already a long time, to replace all LSL including the unknown service lines with the 7%.
- b. To reduce disturbances of the lead pipe that can release lead from the portion of the LSL not being replaced, partial LSL replacement should not be allowed. The LSL replacement should be conducted simultaneously unless it's an emergency. PWS must work with the owner and coordinate for full LSL replacement (public and private) at the same time to not disturb any LSL. EPA should have an incentive to provide funding to water systems to replace the full service line (both public and private), but not funding partial LSLR.
- c. The PWS should replace its portion of the LSL regardless of when the customer had their portion of the LSL replaced.
- d. The PWS should replace its portion of the LSL if the customer side does not have a LSL.

- e. All systems should develop a LSLR goal-based plan to implement after exceeding the trigger level. This is a good program to give the systems a head start in reducing their LSL inventory prior to getting an ALE.
- f. The LSLR plan requirement should not be determined by system size. It should be consistent to reduce the complexity of the rule. Therefore, small water system should be required to prepare a LSLR plan and be required to implement the replacement like any other system.
- g. The systems should describe in their LSLR plan how LSLR will be prioritized.
- h. 45 days for the system to replace the LSL after receiving notification from the customer is not feasible, particularly in the winter months in states with cold winters and frozen grounds. A time period of up to 6 months should be allowed to complete the LSLR. The replacement should be mandatory.
- i. A follow up sample should be taken after the initial flushing of the service line after a LSLR to have a reference of the lead level.
- j. It is appropriate for requiring a pitcher filter to provide an extra layer of protection after a LSL replacement in addition to the other steps.
- k. All LSL should be replaced once a system exceeded the AL. The systems should not be allowed to stop LSLR when they meet two years of tap sample monitoring. If EPA selects to allow stopping LSLR, then CT DPH recommends that the lead results should be below 5 ppb for two consecutive years.

8. Corrosion Control Treatment (CCT)

The proposed LCRR specifies CCT requirements for systems with P90 level  $> 10$  to  $\leq 15$   $\mu\text{g/L}$  in addition to the ALE requirements. States will have to designate CCT if the system's recommended CCT is not acceptable. In addition, the find and fix requirements is similar to the CCT steps (comments later). CT DPH supports strengthening CCT and having systems evaluate and prepare a CCT plan when the system has exceeded the trigger level and can move directly to implement the CCT when the system then has an action level exceedance. However, these additional requirements will have to be reviewed and approved by the state staff and; as a result, a significant increase in the amount of technical assistance will be necessary. With the trigger level at 10  $\mu\text{g/L}$ , we anticipate to see many more systems that will need to go through the CCT steps. In CT, based on the 2019 monitoring period data, a minimum of 20 PWSs will be subjected annually to this requirement. This is a significant increase in workload for the CT DPH. Further, corrosion control training is necessary to prepare state staff, consultants, engineers, and system operators to conduct proper CCT evaluation and recommend appropriate treatment.

- a. The requirements for CCT are much greater than the current LCR. With the limited expertise within the primacy agencies, EPA must develop additional implementation guidance, flowcharts, and decision trees for CCT.
- b. The regulatory language should be included in the LCRR to allow primacy states to designate a shorter time frame for CCT installation.

- c. The replacement of lead-bearing materials option should only be applied to small PWS and NTNC that owns and has total control of the building(s) in the service area.
- d. Clarification of the measurement of the orthophosphate residual (orthophosphate as phosphate or orthophosphate as phosphorus) is needed to avoid confusion with EPA's intentions.
- a. Given the lack of resources to develop CCT expertise and knowledge on the State Level, EPA should provide training, guidance, and technical assistance on designation of the appropriate alternative CCT for different water chemistry scenarios, the appropriate residuals needed to achieve OCCT, how to evaluate/re-evaluate OCCT, how to appropriately set OWQP values and ranges, and the type of effects of different treatments on water quality parameters and on other water quality treatment processes in order not create a violation of other SDWA regulations.
- b. §141.82(i) Treatment decisions by the EPA in lieu of the State on OCCT is good to include in the regulation to give EPA oversight. However, EPA's involvement can be minimized or avoided if EPA can provide more CCT training with appropriate levels of corrosion control lessons to improve staff's technical knowledge on this complex subject, as well as, more funding to hire additional staff.
- c. CTDPH recommends the following CCT training topics to help water systems, primacy agencies staff, and consultants to understand CCT and operate and maintain an effective OCCT:
  - Incremental CCT training from basic to advanced – basic is for someone that has no knowledge of corrosion and chemistry
  - How to evaluate corrosion potential when system is replacing or adding new source of supply including interconnections.
  - How to evaluate or re-evaluate CCT/OCCT – including using new sources/interconnections, how to use the WQPs for the evaluation, and how to conduct simultaneous compliance evaluation with other SDWA rules. EPA should also put together a guidance document and checklist for the evaluation.
  - How to conduct CCT studies and interpret the results
    - Analogous treatments
    - Pipe-loop studies
    - Pipe scale analysis
    - Partial system tests
  - How to select and review/approve the CCT to achieve OCCT – additionally, EPA should update the current OCCT guidance with additional water quality scenarios, i.e. elevated chloride level (not the CSMR), high silica level from source of supply, etc..
  - How to select representative distribution system WQP monitoring locations
  - How to set and use OWQPs to maintain treatment operation and effectiveness
  - How to maintain OCCT for a school that closes for the summer – we had a school with CCT that was working, but then had an ALE after their summer vacation with close to no water usage for the summer.
  - How to maintain OCCT with other potential adverse impacts from:



- o Changes in raw water quality (changes in pH, DIC, alkalinity, etc.) – we had a system with CCT that had an unexplained raw water pH and alkalinity change, which impacted the effectiveness of the CCT.
  - o Mixing zones (different water chemistry from different entry points/interconnections)
  - o Water main work
  - o Microbial activity
  - o Low flow/low usage (high water age)
9. Water Quality Parameters (WQPs) - Systems serving  $\leq 50,000$  people must continue WQP monitoring until they are no longer over lead and/or copper AL for two consecutive 6-month monitoring periods. The additional monitoring results will have to be entered, reviewed and responded to by the state staff.
- a. Calcium should not be removed from the water quality parameters. It is a needed parameter to determine the saturation pH and the aggressiveness of the water if there is water softening treatment during CCT evaluation and to properly determine the pH range for treatment. Therefore, calcium should be included in the final LCRR.
  - b. The following statement should be added to allow the state to require additional water quality parameters that may impact corrosion control:  
The water system shall measure the following water quality parameters “and any additional water quality parameters deemed necessary by the State” in any tests conducted.....
  - c. The LCRR requires the states to determine if a system meets compliance for continued operation and monitoring of the OCCT. The primacy states cannot determine compliance with this requirement if a system is not required to monitor for WQPs. All systems with CCT should be required to monitor for WQP on a permanent basis. This requirement will reduce the work load for rule implementation staff to set schedules for all small and med-sized systems when they exceeded the trigger level and/or the action level and/or when they are below the TL or AL after meeting the required number of monitoring periods. In addition, requiring the WQP monitoring will help the system to maintain OCCT; therefore, minimizing exceedances and subsequent requirements, which will minimize/reduce the work load for rule implementation, technical, and enforcement staff.
  - d. WQP should not be reduced to every three years as this is necessary to maintain the operation and effectiveness of the CCT.

10. Sanitary Survey Review

CCT and WQP data must be reviewed as part of the sanitary survey against most recent CCT guidance issued by EPA. This review is necessary but will add hours to each survey totaling many days a year given that in CT, between 250 and 325 CWSs and NTNCs are surveyed annually. In addition, training of staff is necessary to complete this additional task as many engineers conducting the sanitary survey may have limited knowledge of the LCR and do not have knowledge of CCT and the use of the WQP.

#### 11. Find and Fix

Oversight and compliance with the additional testing coupled with the review and concurrence of the needed corrective action will require additional resources. In CT, it is estimated that approximately 100 sampling sites will be subjected to this annual requirement.

- a. EPA should provide different options of sampling procedures to assess the source of the lead levels.
- b. The follow up samples are required in SDWIS with a different type than routine (RT). EPA must include this type in the upgrade of the SDWIS for the LCR.
- c. The follow up samples are a great idea to assess the source of the elevated lead and will aid the system in determining the type of corrective actions needed. However, the steps required with this revision are similar to the CCT steps when a system has an ALE that already creates a large workload to the state.
- d. If a PWS does not have a 90% TLE or ALE, and the corrective actions such as replacing the plumbing inside a dwelling from a follow up sampling should not require the primacy agency's review and approval, which will increase the work load significantly.

#### 12. Small System Flexibility

While having more than one compliance option for small systems provides flexibility to achieve compliance, these additional compliance options increase the burden of tracking for the primacy agencies.

- a. CT DPH does not agree with the allowance to install and maintain POU devices to reduce/remediate lead levels. The POU devices may give users a false sense of security that the problem is resolved. The filters must be used and maintained properly in order to work as intended which is hard to ensure as they are primarily maintained by the customer. In addition, the certified POU filters are challenge tested to a maximum lead level, which may in fact be lower than the actual lead level at the sample sites; therefore, they may not remove the lead level to below the action level. A POU device should be used only as a short term interim solution, while the system is working on a long term solution. The use of the POU devices should be limited to small community and NTNC systems with total control in the operation and maintenance of buildings that are served by a water system. A POU can be used as an OCCT option if the lead levels are at or below 150 ppb, which is the maximum challenge level for the POU for certification.
- b. Replacement of lead-bearing materials should be one of the options to allow flexibility for small community and NTNC systems that owns and has total control of the building(s) in their service area.

#### 13. Testing in Schools and Child Care Facilities

These requirements, which include sampling requirements, public notification, different type of certifications, tracking of compliance, will significantly increase CT's workload to implement these additional changes to the LCR. Significant technical assistance will be

required for the community water systems (CWSs) and the unknown number of schools and childcare facilities that are customers of the CWSs.

- a. Schools may not wish to participate in the sampling, this might become a very difficult area of the Rule to enforce.
- b. EPA should expand the EPA's 3Ts guidance document on how to determine/select sampling sites from schools and childcare facilities.
- c. The stagnation time for schools and child care facilities is listed as a minimum of 8 hours of stagnation. It should be consistent with the compliance sample collection method. Therefore, it should be listed as at least 6-hours of stagnation and no more than 18 hours.

#### 14. Public Education and Outreach, Reporting and Notification

Expands current LCR requirements to include: All P90 action level and trigger level values for all system sizes, the number of LSLs and service lines of unknown material for every water system, OCCT status of all systems including Primacy Agency-specified OWQPs, and the public education and notification requirements for LSLs, LSLR, and schools and child care facilities. This expanded public education and outreach and reporting, and notification requirements are expected to significantly increase the state workload in these areas as the state primacy program would be required to implement, track, and enforce all these new requirements. It is recommended that EPA should include the following in the final LCRR.

- a. EPA should require water systems to distribute education materials to homes with an unknown service line to inform them of the potential for their line being made of lead and the actions they can take to reduce their exposure to drinking water with high lead. EPA should develop the standard language and template for systems to use, and should promote an effective method of communication to homeowners. This educational material should also include information on other sources of lead in water such as lead in brass fixtures and lead solder. Educational information should highlight how to address all potential lead exposures in a home in a comprehensive and effective manner.
- b. It is appropriate to require water system to conduct outreach activities if they do not meet the goal LSLR rate in response to a trigger level exceedance.
- c. An exception should be included in the requirement to provide a copy of the Tier 1 public notification to the primacy agency within 24 hours in the event that learning of the violation or exceedance occurs on a Friday, weekends, or holidays. Suggest to use next business day instead of 24 hours.
- d. CT currently recommends 24 hour notification to customers. However, EPA should create additional public notification templates with standard health effects language and information about other possible sources of lead (including paint, soil, and dust) to be issued within 24 hours of being notified of a lead exceedance.
- e. Other sources of lead, such as paint, soil, and dust, should be included in the informational statement for the Consumer Confidence Report.

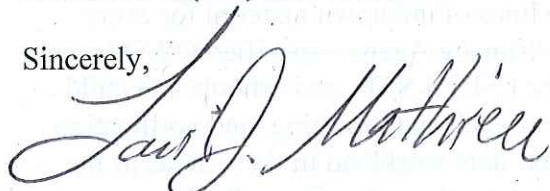
15. Enforcement

All of the proposed LCRR requirements will greatly increase the enforcement workload required to ensure compliance.

Finally, CT DPH is deeply concerned about data management for the Proposed LCRR. As it stands now, SDWIS/State does not have full capability to track everything for the current LCR, never the less the proposed LCRR with all of the new requirements. CT hopes EPA will update SDWIS/State to accommodate management of the proposed changes to these new LCR requirements. If SDWIS/State is not updated, implementation of the proposed LCRR requirements will significantly increase CT's data management workload.

Thank you for the opportunity to comment on the LCRR. If you have any questions, please contact us at (860) 509-7333.

Sincerely,



Lori Mathieu

Public Health Branch Chief

Environmental Health & Drinking Water Branch

C: Heather Aaron, MPH, LNHA, Deputy Commissioner, Department of Public Health