



March 16, 2022

The Honorable Barry Breen  
Principal Deputy Assistant Administrator,  
Office of Land and Emergency Management  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW Washington, DC 20460

**Submitted through the Federal Rulemaking Portal Re: EPA-HQ-OLEM-2021-0762**

Dear Deputy Assistant Administrator Breen:

The Water Quality Association (WQA) appreciates the opportunity to submit comments to the U.S. Environmental Protection Agency on its *EPA Strategy to Reduce Lead Exposures and Disparities in U.S. Communities*.

Founded in 1974, WQA is a not-for-profit international trade association representing the residential, commercial, and industrial water treatment industry with over 2,500 member companies. WQA is dedicated to improving awareness and knowledge of water quality across the United States. Through research, education, professional training, and product certification, WQA aims to enhance the quality of life through sustainable technologies and services. Our members are manufacturers, suppliers, dealers, and distributors that specialize in point-of-use (POU) and point-of-entry (POE) water filtration systems, which treat water at the tap or entry point of a home or building to prevent waterborne contaminants from entering a home or business.

WQA is an American National Standards Institute Accreditation Board (ANAB) accredited Certifying Body (CB) and operates a laboratory that provides third-party certification for water filtration systems to nationally accepted industry standards for contaminant removal. This includes the WQA Gold Seal Program, which is the oldest third-party testing and certification program in the water treatment industry. The Gold Seal Program is accredited as a reputable certification in the United States and Canada by ANSI and the SCC (Standards Council of Canada) through the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC) to ISO/IEC standard 17065 for *Conformity assessment — Requirements for bodies certifying products, processes, and services*.

**Reduce Exposure to Lead from Drinking Water**

WQA is dedicated to reducing lead in drinking water and supports the EPA’s goals to implement solutions to reduce lead exposures in communities across the United States. Lead can leach into drinking water and enter a household or building through contact with various materials used in plumbing and through corrosion of plumbing and fixtures over time. As a result, point-of-use (POU) systems are a viable and cost-effective option to remediate lead.

Currently, federal guidance by EPA and under the Lead & Copper Rule (LCR) establishes an Action Level (AL) for lead to be 15 parts per billion (ppb). Although there is no “safe” level of lead to consume, water



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filtration systems have been developed to remediate lead down to <5 ppb which is well below the EPA AL. There are many third-party certified products through ANSI accredited CBs. These certifications are performed according to the requirements in American National Standards including standard NSF/ANSI 53 for filters and NSF/ANSI 58 for Reverse Osmosis (RO) systems. These systems have not only been a viable option for households and buildings to mitigate exposure to lead but are often used in many schools and childcare facilities as mentioned in the draft strategy. WQA is pleased that the EPA recognizes the use of water filters as a tool to assist in the reduction of lead concentrations that are detrimental to human-health.

- Outlined under the first approach of the EPA strategy, addressing underserved communities is vital in this discussion. With an estimated 6 – 10 million lead service lines in use and the disproportionate exposure to environmental health hazards among low-income and communities of color, there is still a substantial amount of work needed to achieve President Biden’s goal of removing 100% of lead-service lines.<sup>1</sup> Although the Bipartisan Infrastructure Law has provided \$15 billion to address lead in drinking water by replacing service lines, there is a significant need to address the inequities associated with lead service line replacement. As a result, the EPA should consider the incorporation and deployment of other strategies such as POU systems to limit lead exposure. POU systems are generally recognized as techniques that can effectively remediate drinking water contaminants.
- Designated under the second approach – WQA finds it extremely important that EPA plans to reduce lead through nationally protective standards, analytic tools, and outreach. Our association embodies the EPA’s 3Ts method: Training, Testing, and Taking Action and would like to serve as a partner to EPA to communicate water quality information and options to improve it. Our members across the nation have the skills necessary to advise on the mitigation and reduction of drinking water contaminants. WQA would like to offer its expertise to provide training and technical assistance and develop additional guidance as necessary as part of EPA’s strategy. Through the WQA professional certification program and online resources, WQA is considered the recognized source for water quality information, testing, and most importantly taking action.

### **Support and Conduct Critical Research to Inform Efforts to Reduce Lead Exposures and Related Health Risks**

WQA has a wide breadth of tools to communicate water quality information across the United States. The industry’s research arm, the Water Quality Research Foundation (WQRF), is a universally recognized, independent organization. WQRF conducts and funds scientific research on subjects relating to the water quality improvement industry. WQRF has published numerous studies and the new WQRF Contaminant Occurrence Map displays data in the United States for regulated drinking water contaminants and also aesthetic contaminants that can cause taste, odor and color or staining issues.

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<sup>1</sup> Cornwell, D.A., Brown, R.A. and Via, S.H. (2016), National Survey of Lead Service Line Occurrence. Journal - American Water Works Association, 108: E182-E191.  
<https://doi.org/10.5942/jawwa.2016.108.0086>





- This new interactive [Contaminant Occurrence Map](#) displays data points of regulated drinking water contaminants in the United States is a free tool for the public so they can identify what contaminants are in their water including lead. The Contaminant Occurrence data collection effort gathered water quality data over the last 10 years for 57 different drinking water contaminants in the United States. The data comes from 46 state regulatory agencies, the US EPA's 4th Unregulated Contaminant Monitoring Rule (UCMR4), and the EPA's Safe Drinking Water Information System (SDWIS). The mapping tool provides a visual illustration of this occurrence data provided by the states and through US EPA UCMR4. WQA would welcome working with the EPA to gather more data, make improvements and bring awareness to this tool.

WQA is pleased to see the EPA take a holistic governance approach to address lead exposures in drinking water. We hope the agency will look to WQA as a valuable resource for drinking water information and the effectiveness of POU systems to help support the agency's goals. We welcome the opportunity for future collaboration and applaud the great work by EPA. If you have any questions, feel free to contact me directly.

Sincerely,

A handwritten signature in black ink that reads "Jeremy Pollack".

Jeremy Pollack  
Director of Government Affairs  
Water Quality Association



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