Subject: RE: Follow-up on WUC conversation regarding LSLs

Date: Thursday, October 9, 2014 at 6:46:56 AM Central Daylight Time

From: Matthew.Corson@amwater.com

To: dcornwell@eetinc.com

CC: Alan Roberson, Gary Burlingame, Estes-Smargiassi, Stephen, Steve Via

Attachments: Lead and Copper Positions.xlsx

Works for me.

Here is something I've started developing to help get my thoughts together. Still a little rough, but I think its important that we keep the alternative viewpoints around the table in mind as we develop our positions.

Matthew J. Corson, P.E. Manager, Environmental Compliance and Stewardship American Water

matthew.corson@amwater.com

Mailing Address: 1025 Laurel Oak Road, P.O. Box 1770, Voorhees, NJ 08043 Physical Location: 3906 Church Road, Mount Laurel, NJ 08054

From: "David A. Cornwell" <dcornwell@eetinc.com>

To: "Gary Burlingame" < Gary.Burlingame@phila.gov>, "Estes-Smargiassi, Stephen" < Stephen.Estes-Smargiassi@mwra.com>, "Steve Via" < SVia@awwa.org>,

Date: 10/08/2014 05:56 PM

Subject: RE: Follow-up on WUC conversation regarding LSLs

works

From: Gary Burlingame [mailto:Gary.Burlingame@phila.gov]
Sent: Wednesday, October 08, 2014 5:46 PM
To: Estes-Smargiassi, Stephen; 'Steve Via'
Cc: David A. Cornwell; Matthew.Corson@amwater.com; Alan Roberson
Subject: RE: Follow-up on WUC conversation regarding LSLs

I can make that happen. Who will bring the donuts?

Gary A. Burlingame Laboratory Director Bureau of Laboratory Services Philadelphia Water Department 1500 E. Hunting Park Avenue

Philadelphia, PA 19124

From: Estes-Smargiassi, Stephen [Stephen.Estes-Smargiassi@mwra.com]
Sent: Wednesday, October 08, 2014 5:39 PM
To: 'Steve Via'
Cc: David A. Cornwell; Gary Burlingame; <u>Matthew.Corson@amwater.com</u>; Alan Roberson
Subject: RE: Follow-up on WUC conversation regarding LSLs
Works for me.

Stephen Estes-Smargiassi

From: Steve Via [mailto:SVia@awwa.org]
Sent: Wednesday, October 08, 2014 5:38 PM
To: Estes-Smargiassi, Stephen
Cc: David A. Cornwell; Gary Burlingame; Matthew.Corson@amwater.com; Alan Roberson
Subject: Re: Follow-up on WUC conversation regarding LSLs

11:00 am Eastern on Monday?

Steve Via American Water Works Association 1300 Eye Street NW, Suite 701W Washington DC, 20005

e. svia@awwa.org

On Oct 8, 2014, at 5:35 PM, "Estes-Smargiassi, Stephen" <<u>Stephen.Estes-Smargiassi@mwra.com</u>> wrote: Friday or Monday are workable

Stephen Estes-Smargiassi

From: David A. Cornwell [mailto:dcornwell@eetinc.com]
Sent: Wednesday, October 08, 2014 5:34 PM
To: Gary Burlingame; Steve Via
Cc: Matthew.Corson@amwater.com; Estes-Smargiassi, Stephen; Alan Roberson
Subject: RE: Follow-up on WUC conversation regarding LSLs

I can make mon work

From: Gary Burlingame [mailto:Gary.Burlingame@phila.gov]
Sent: Wednesday, October 08, 2014 5:32 PM
To: David A. Cornwell; Steve Via
Cc: Matthew.Corson@amwater.com; Stephen.Estes-Smargiassi@mwra.com; Alan Roberson
Subject: RE: Follow-up on WUC conversation regarding LSLs

Friday will be bad for me. Monday is possible.

Gary A. Burlingame Laboratory Director Bureau of Laboratory Services Philadelphia Water Department 1500 E. Hunting Park Avenue

Philadelphia, PA 19124

From: David A. Cornwell [dcornwell@eetinc.com] Sent: Wednesday, October 08, 2014 5:30 PM To: Steve Via; Gary Burlingame Cc: Matthew.Corson@amwater.com; Stephen.Estes-Smargiassi@mwra.com; Alan Roberson Subject: RE: Follow-up on WUC conversation regarding LSLs

I will be out next two days but except for fri morning I can make time for a phone call

Dave

From: Steve Via [mailto:SVia@awwa.org]
Sent: Wednesday, October 08, 2014 5:12 PM
To: Gary Burlingame
Cc: David A. Cornwell; Matthew.Corson@amwater.com; Stephen.Estes-Smargiassi@mwra.com; Alan Roberson
Subject: Re: Follow-up on WUC conversation regarding LSLs

I tested out the notion of an on-line survey as a way to gauge response to specific elements on several WUC members and they were amenable to the idea. If there are specific items you think are important for a <10 min on-line survey let me know.

Steve Via

American Water Works Association 1300 Eye Street NW, Suite 701W

Washington DC, 20005

e. svia@awwa.org

On Oct 8, 2014, at 10:04 AM, "Gary Burlingame" <<u>Gary.Burlingame@phila.gov</u>> wrote: Maybe then we need a call to go through the key items one by one and make sure we know where we stand. Let's list the key items, such as inventory of LSL, provision of filters, replace LSL when CIP and leaks, educate customers when find LSL, sample homes on request, sample homes to confirm OCCT, etc. Once we have the key items listed, we can talk through them. That's one approach?

 From: David A. Cornwell [mailto:dcornwell@eetinc.com]

 Sent: Wednesday, October 08, 2014 09:57 AM Eastern Standard Time

 To: Gary Burlingame; svia@awwa.org <svia@awwa.org>; Matthew.Corson@amwater.com

 Stephen.Estes-Smargiassi@mwra.com

 Stephen.Estes-Smargiassi@mwra.com

 Cc: ARoberson@awwa.org <ARoberson@awwa.org>

 Subject: RE: Follow-up on WUC conversation regarding LSLs

It doesn't seem that what we have described is compatible at all with steves take on WUC? Am I mis interpreting?

From: Gary Burlingame [mailto:Gary.Burlingame@phila.gov]
Sent: Wednesday, October 08, 2014 9:53 AM
To: 'svia@awwa.org'; 'Matthew.Corson@amwater.com'; 'Stephen.Estes-Smargiassi@mwra.com'; David A. Cornwell
Cc: 'ARoberson@awwa.org'
Subject: Re: Follow-up on WUC conversation regarding LSLs

I feel that we are close to having a revised rule described. If Dave or Steve could begin formatting what Steve and Dave have recently described then we may be able to tweak it with a few conference calls. Or we get together in DC for an afternoon and morning to do it in person. But I think we are close or did I miss something?

From: Steve Via [mailto:SVia@awwa.org]
Sent: Wednesday, October 08, 2014 08:20 AM Eastern Standard Time
To: Corson, Matt <<u>Matthew.Corson@amwater.com</u>>; 'Estes-Smargiassi, Stephen <<u>Stephen.Estes-Smargiassi@mwra.com</u>>; David
Cornwell <<u>dcornwell@eetinc.com</u>>; Gary Burlingame
Cc: Alan Roberson <<u>ARoberson@awwa.org</u>>
Subject: Follow-up on WUC conversation regarding LSLs

While it is still fresh in my mind, I wanted to share with you the character of the WUC's conversation yesterday regarding LSLs and notion of a quid pro quo exchange of more aggressive LSL removal for transition to WQP-based compliance monitoring.

1. The notion of getting completely away from taking samples for lead in the home was not credible to the WUC broadly though they were comfortable with shifting treatment technique more toward WQP-based monitoring.

2. There were a number of WUC members that believed that appropriate due-diligence by the water system requires understanding Pb levels in the home and WQPs alone are not an adequate substitute for some kind of in-home observations.

3. There is a mix of belief systems regarding importance of the contribution of Pb from drinking water to public health based on the available data

4. There continues to be a bright line in the sand regarding taking responsibility for the portion of the lead service line the customer owns.

5. There was interest in use of other mechanisms beyond utilities' purview to engage home owners in LSLR (e.g., real estate transfers). WUC members ran aground on the same issues that have been voiced in prior discussions – political feasibility at the local level, liability for provision of information about state of lead service line.

6. The notion of providing information about lead service lines in a new customer letter (like we are discussing for copper) seemed more likely to engage homeowners than trying to motivate existing property owners – the notion being that new owners are taking care problems with their new acquisition and if it is a young couple or growing family there is greater interest in removing all sources of lead

Clear direction to staff included the following:

1. Limit of what seems reasonable is

a. Customer is responsible for replacing the portion of the LSL they own

b. Infrastructure replacement of lead service line (e.g., LSLR in the course of planned CIP projects) makes sense and should include engaging customers.

c. Provision of information on LSLs and pursuing full lead service line replacement with the customers through provision of information makes sense.

2. Assuming that in-home sampling continues:

- a. Sampling lead service line sampling protocols are infeasible and should be avoided
- b. Pursue longer than 3-year reduced monitoring interval for systems that have been reliably below the action level

I'll be back in the office tomorrow if you would like to discuss by phone.

Best regards, Steve

Steve Via Regulatory Affairs Manager American Water Works Association 1300 Eye Street NW, Suite 701W Washington, DC 20005

e. svia@awwa.org

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