



March 2, 2020

Docket: EPA-HQ-OW-2017-0300

The Association of Public Health Laboratories (APHL) supports the US Environmental Protection Agency's (EPA) decision to incorporate requirements to test drinking water in schools and day cares within the proposed *National Primary Drinking Water Regulations: Lead and Copper Rule Revisions*. Our membership looks forward to supporting this important effort through provision of the required expert testing services.

We are concerned however, that current laboratory testing capacity will not adequately support the volume of testing provided for in the proposed rule. In many small to mid-sized cities, the requirements will generate hundreds to thousands of water samples in addition to laboratories' current testing workload. APHL recommends EPA explicitly disconnect residential sample compliance schedules from school and daycare sample timing by spreading school and daycare sampling across the entire calendar year. APHL further recommends EPA develop funding programs designed to expand lead testing capacity in public health and environmental laboratories to allow full implementation of this needed public health service.

APHL is concerned by the proposed rule's lack of remediation and retesting requirements when school and daycare samples exceed action levels. For our members to have the greatest public health impact, their quality data should be used to initiate health-protective actions.

Please contact Sarah Wright, environmental laboratories manager, (sarah.wright@aphl.org) with any questions.

Sincerely,

Handwritten signature of Scott J. Becker in black ink.

Scott Becker

Chief Executive Officer

Handwritten signature of Kathryn Wangsness in black ink.

Kathryn Wangsness

Chair, Environmental Laboratory Science Committee

APHL works to strengthen laboratory systems serving the public's health in the US and globally. APHL's member laboratories protect the public's health by monitoring and detecting infectious and foodborne diseases, environmental contaminants, terrorist agents, genetic disorders in newborns and other diverse health threats.