



May 13, 2025

Chairwoman Susan R. Donovan  
House Committee on Health and Human Services  
State House – Room 135  
Providence, RI 02903

Re: H 6304 – An Act Relating to Health and Safety – Lead Poisoning Prevention Act

**The Hon. Brett P. Smiley**  
Mayor

**Ricky Caruolo**  
General Manager

Dear Chairwoman Donovan:

The Providence Water Supply Board would like to take this opportunity to express our support for the passage of H 6304 which would modify the Lead Poisoning Prevention Act to align mandates and maintain consistency with current Environmental Protection Agency (EPA) Lead and Copper Rule requirements.

Providence Water owns and operates the largest water utility in Rhode Island. We are responsible for supplying high-quality drinking water to more than 600,000 retail and wholesale consumers throughout the state. We understand our critical role in ensuring safe and reliable water for our customers. One of our top priorities is addressing the issue of lead service lines. Lead exposure poses a potential health risk, and we are committed to eliminating lead at the tap. The drinking water that leaves our treatment plant in Scituate and is distributed through Providence Water's system does not contain lead. While the water that we provide to homes and businesses is lead-free, lead can get into the water as it moves through lead-containing household fixtures, plumbing and water service lines.

Working with a nationally recognized expert panel, we have developed and implemented a multi-pronged strategy to mitigate the presence of lead at a customer's tap. That strategy includes lead service line replacement, corrosion control treatment, water main replacement, regular flushing of our water mains, and extensive public outreach. We implemented a 0% interest loan program for customers to replace their private lead service lines and are utilizing federal grant funding to replace private lead service lines at no cost to homeowners in disadvantaged communities.

Providence Water supported the passage of the Lead Poisoning Prevention Act in 2023. In January 2024, Providence Water began the Accelerated Lead Service Line Replacement Program. The goal of the program is to replace all lead service lines in our distribution system within ten years in accordance with Rhode Island law and subject to available funding and access to properties. As a result of the experience gained through the implementation of our accelerated program, we are requesting the following modifications to the Lead Poisoning Prevention Act to improve efficiencies and ensure consistency with current EPA Lead and Copper Rule requirements:

- Modify specific requirements for the RI Department of Health (RIDOH) to publish and maintain online water supply system service line location/materials maps to ensure public access to inventories that are published and maintained by individual water systems under DOH's oversight. RIDOH maps may not be updated frequently enough to accurately reflect service line materials and may conflict with maps that are published and maintained by the individual water supply systems.

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- Modify mitigation requirements related to the distribution of water pitchers and filters. Current EPA Lead and Copper Rule mitigation measures require water suppliers to provide water filter pitchers and six months of filter replacement cartridges in conjunction with lead service line replacement.
- Modify lead service line inspection requirements to include the component of homeowner or tenant request for inspection. The current EPA Lead and Copper Rule requires public water systems to provide written notification to all property owners with known lead or unknown service line materials. The notification letters provide information for property owners to contact the water supplier for assistance with identifying service line materials.
- Modify full lead service line replacement requirements to align with current EPA Lead and Copper Rule allowances. The current legislation requires full service line replacement unless it is an emergency or all persons served by the service line must object in writing.
- Adding language that reinforces the necessity of property access in order for water suppliers to complete the replacement of all public and private lead service lines in its service area.

Providence Water appreciates the opportunity to work with legislators to continue to address this important issue and urges support for the passage of H 6304.

Respectfully,  
PROVIDENCE WATER SUPPLY BOARD



Ricky Caruolo  
General Manager