



June 12, 2025

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

The Hon. Brett P. Smiley
Mayor
Ricky Caruolo
General Manager

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

Dear Chairwoman Donovan:

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The Providence Water Supply Board would like to take this opportunity to provide additional information regarding the passage of H 6304 (and companion S 0982) which would modify the Lead Poisoning Prevention Act (LPPA) to align mandates and maintain consistency with current Environmental Protection Agency (EPA) Lead and Copper Rule requirements.

Providence Water strongly supported the passage of the LPPA in 2023. In January 2024, Providence Water began our 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, Providence Water has requested the following five “housekeeping” modifications to the LPPA to improve efficiencies and ensure consistency with current EPA Lead and Copper Rule requirements:

1. Modify the requirements for the RI Department of Health (RIDOH) to publish and maintain online service line location maps to instead ensure public access to inventories that are published and maintained by individual water systems under DOH's oversight:
 - Currently, Providence Water maintains a service line (lead, nonlead/copper, or unknown) location map on our website. This information is updated weekly at a minimum, often several times a week.
 - We also provide our service line location information to RIDOH who is currently required per the LPPA to maintain their own online dashboard/service line location map.
 - Providence Water's website location map is updated much more frequently than RIDOH location map which is being updated monthly. As such, the two websites often contain inconsistent information.
 - This can create confusion for the public and a lack of trust in information supplied by agencies.
 - **Under Providence Water's proposal, service line location mapping requirements would continue to be under the oversight of RIDOH, but suppliers would maintain the online information in order to avoid duplication of efforts and the inconsistencies of dual systems.**

2. 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:
 - Per the recommendation of our Expert Panel, which consists of industry and academic experts, Providence Water uses orthophosphate which is an effective corrosion control measure. The use of orthophosphate is recommended by the EPA and RIDOH.
 - Flushing (running cold water for 3-5 minutes) will also reduce lead in the water.
 - The current average cost of a six-month pitcher and filter set is \$50. Providence Water has an estimated 25,000 private and 7,600 public lead service lines remaining in our system.
 - **Under Providence Water's proposal, water suppliers would provide water filters and pitchers during a disruption of infrastructure, such as a lead service line replacement, per current current Lead and Copper Rule requirements.**
 - Given our effective corrosion control measure/use of orthophosphate, Providence Water feels that funding is better spent replacing lead service lines rather than supplying pitchers and filters unnecessarily.
3. Modify lead service line inspection requirements to include the component of a homeowner or tenant request for inspection:
 - Providence Water currently sends multi-lingual letters to all of our customers with either a lead service or an unknown service. The letter provides information regarding service line inspections and Providence Water contact information to facilitate/request an inspection.
 - This letter is sent to both the service address and the mailing address. The letters are addressed to the "current resident." As such, tenants and property owners, including out-of-state property owners, receive the information and can contact Providence Water to request an inspection.
 - To date, all customers with either a lead service or unknown service have received at least two (2) letters.
 - A lack of homeowner or tenant request/participation in the inspection process creates practical issues for water suppliers to facilitate an inspection.
4. Modify full lead service line replacement requirements to align with the current EPA Lead and Copper Rule:
 - The current EPA Lead and Copper Rule allows for partial lead service line replacement as part of an emergency or larger infrastructure project.
5. Reinforce the necessity of property access for water suppliers to complete the replacement of all lead service lines in its service area.

There have been concerns that the Trump administration may weaken EPA regulations such as the Lead and Copper Rule. **It is standard EPA practice for all rules/regulations promulgated under the Safe Drinking Water Act, such as the Lead and Copper Rule, to be reviewed every seven (7) years for updates. The standard process includes reviews by agency staff and industry experts, a public comment period, etc. While no one can predict the future actions of the Trump administration, the Trump administration could be legally challenged if they were to try to circumvent the standard regulatory process.**

The passage of H 6304 will NOT affect federal funding. Providence Water appreciates the opportunity to work with legislators to address this important issue and urges support for the passage of H 6304.

Respectfully,
PROVIDENCE WATER SUPPLY BOARD



Ricky Caruolo
General Manager