



EPA's Revised Lead and Copper Rule Public Listening Session Comments

Mike McGill, President

Thank you for the opportunity to speak with you today. My name is Mike McGill, and I'm president of WaterPIO, a public communications firm dedicated to helping water utilities and departments affordably improve their customer, media, and crisis communications.

I started my firm after working for more than a decade as a communications leader for the Washington Suburban Sanitary Commission, Loudoun Water, and the Cape Fear Public Utility Authority.

I wish to speak to you today about my hope that you will review the revised LCR and consider reducing its many public communication challenges.

Before I lay out those challenges, I want to join with others and say we must get the lead out of our drinking water systems. We must protect future generations from exposure.

Because of the importance to get the lead out, it is incumbent on all of us to make sure this effort is carried out correctly and puts water utilities and departments in a position to succeed.

Unfortunately, the revised LCR puts water professionals in a position to fail.

Because I have handled lead exceedances since 2007, I'm asked to speak at water conferences across the country about LCR communications.

I lead off with the need to proactively inform the press and the public about LCR testing and corrosion control programs before a problem is found.

For credibility's sake, however, I must also address the elephant in the room; the fact that the vast majority of professionals I am speaking to don't have anybody specifically employed to communicate with the public about their services.

It's why a recent AWWA poll found that only 28% of customers remembered a communication from their utility in the last year. Even during Covid.

Yes, for some, they want to be out of sight and out of mind when it comes to public attention. But for thousands of utilities and departments, they just can't meet some of the revised LCR's new COMMS requirements.

These water pros won't have a chance to succeed, and their unavoidable failures will create unwarranted public panics that could result in a nationwide lack of confidence in our drinking water.

The drop in the systemwide public notification from 30 days to 24 hours is problematic at best. Because of the staffing issues I mentioned, utilities and departments will make mistakes during their worst possible moments. Reputations will be permanently damaged, including that of public water as a whole.

There are a variety of other COMMS-related challenges under the revised LCR, including:

- communicating the lead service line inventory process,
- clarifying the new "Trigger" Level versus the Action Level,
- handling difficult school and childcare facility testing program conversations, and
- explaining lead service line replacement projects.

All carry the potential for chaos.

Because of these challenges, just as we are finally getting the lead out, we could very well be making the case that the public shouldn't trust their drinking water.

That's why I believe the EPA needs to reopen the LCR and make COMMS-related adjustments.

I thank you for your time and consideration. We have already seen tremendous work by the EPA in just the last few months. I wish you all the best.