

US EPA ARCHIVE DOCUMENT



City of Columbus
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June 9, 1999

**Regulatory Reinvention Pilot Projects: XL Community Pilot
Program, FRL-5322-9
Water Docket, Mail Code 4101
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460**

To Whom It May Concern:

The City of Columbus is pleased to submit this proposal for the XL Community Pilot Program. The Columbus Division of Water is submitting this proposal to request regulatory flexibility for compliance with the Lead and Copper Rule promulgated under the Safe Drinking Water Act. Specifically, we propose to implement a comprehensive Lead-Safe Columbus Program designed to identify and reduce lead hazards as an alternative to the Lead and Copper requirements for testing and replacement of lead service lines. We believe that the Lead-Safe Columbus Program will achieve better public health protection from lead exposure, at an equivalent or lower cost, than would be obtained by strict adherence to these Lead and Copper Rule requirements.

The Lead-Safe Columbus Program was developed by the partnership of the Division of Water with the Columbus Health Department's existing Childhood Lead Poisoning Prevention Program (CLPPP). The CLPPP has an established track record of successfully dealing with, and reducing the incidence of childhood lead poisoning in Columbus. They have further support from the Ohio Department of Health, the Columbus Department of Trade and Development. This program is designed based on local lead risk assessment data and recognizes that children are exposed to lead from a variety of sources through a variety of pathways. The Program's interventions are targeted to children who are at most risk for lead poisoning and are targeted at those exposure pathways that would have the greatest impact on a child's body-lead burden.

XL Community Pilot Project

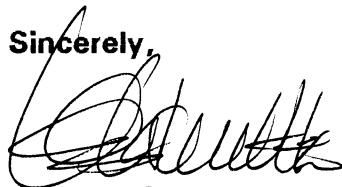
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Enclosed are one original and three copies of the proposal and a set of attachments containing supporting information. The first attachment contains tables and maps. The second is composed of flow charts illustrating risk assessment and medical case management procedures. The third is the "Report of the Environmental Science Advisory Committee (ESAC)" which considered the issue of the LCR as it has been applied to Columbus. The final attachment contains letters written in support of this proposal by public agencies and community groups which are active in the fight against childhood lead poisoning.

We look forward to the opportunity to work with you in developing a successful XL project. If you have any questions or would like to discuss this proposal further, please feel free to contact Gary Garver (614/645-6129) or Kenneth Button (614/645-7691).

Sincerely,



**Gregory S. Lashutka
Mayor**

GSL:GG:nst

Enclosures

**cc: EPA Region V
Bob Knipmeyer, OEPA**