

May 21, 2019

The Honorable Andrew Wheeler
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Wheeler:

On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to recommend that the U.S. Environmental Protection Agency (EPA) develop and implement regulations pertaining to water quality testing, reporting, and remediation for lead, copper/other metals, and biological contaminants in schools and child care facilities.

The Safe Water Drinking Act (SDWA), originally passed in 1974, regulates the nation's public drinking water supply, broadly adding to federal public health protections. Since its inception, the EPA has issued national health-based standards for drinking water to prevent and monitor for the harmful presence of both naturally-occurring and man-made contaminants. More specifically, the EPA has released National Primary Drinking Water Regulations which set legal limits on over 90 contaminants and require water systems testing standards. The SDWA applies to a comprehensive list of water and drinking sources, including those in non-transient non-community water systems, such as schools with their own water supply.¹

Since the removal of lead from gasoline and paint, and reduced factory emissions in the United States, the incidence of fatal lead encephalopathy in children has disappeared and symptomatic lead poisoning in children is now considered rare.² In spite of these developments, lead exposure risk remains close to 25 percent for most U.S. children, with evidence-based research indicating that even a small amount of lead in a child's body can cause serious health problems, such as immune system, renal, and devastating neurocognitive dysfunction.³ Additionally, longstanding exposure to copper has been associated with stomach and intestinal distress, liver and kidney damage, and other complications for individuals who are genetically predisposed to absorb the metal.

However, according to the EPA, approximately 98,000 public schools and 500,000 child care facilities are not regulated under the SDWA.⁴ This finding is of great concern given the potential exposure to harmful contaminants such as lead and copper in these environments. Pediatric and adolescent populations in the

¹ <https://www.epa.gov/sites/production/files/2015-04/documents/epa816f04030.pdf>

² <https://www.aap.org/en-us/advocacy-and-policy/aap-health-initiatives/lead-exposure/Pages/Lead-Exposure-in-Children.aspx>

³ <https://pediatrics.aappublications.org/content/116/4/1036>

⁴ <https://www.epa.gov/dwreginfo/lead-drinking-water-schools-and-childcare-facilities>

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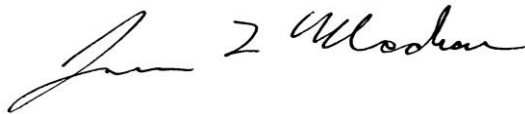
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US spend a significant amount of time in school and child care facilities during critical development periods, and have been shown to absorb these metals at higher rates than the average adult.⁵

Therefore, it is imperative that the EPA extend current regulations, such as the Lead and Copper Rule, or create new regulations for the detection, removal, and reporting of damaging contaminants, including but not limited to lead and copper, to protect children and adolescents in the numerous facilities not currently subject to the standards implemented under the SDWA.

Thank you for considering the AMA's views. If you have any questions, please contact Margaret Garikes, Vice President of Federal Affairs, at margaret.garikes@ama-assn.org or 202-789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is fluid and cursive, with a large initial "J" and "M".

James L. Madara, MD

⁵ <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P10058C5.txt>