

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GUIDANCE FROM HOTLINE COMPENDIUM

WSG H40

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SUBJECT: Faucets Interpreted as "Lead Pipe Fittings"

SOURCE: Jeff Cohen
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On June 7, 1991, EPA finalized the Lead and Copper Rule that establishes revised National Primary Drinking Water Regulations (NPDWRs) for lead and copper (56 FR 26460). Section 141.85 (a)(3)(ii), the public education and supplemental monitoring requirements, states that "Congress banned the use of lead solder containing greater than 0.2% lead, and restricted the lead contents of faucets, pipes, and other plumbing materials to 8.0%." In reviewing the provisions of the Lead Ban, it is not apparent that the term "faucet" is specifically included. Section 1417(d)(2) of the Safe Drinking Water Act states that the term lead-free -- "when used with respect to pipes and pipe fittings refers to pipes and pipe fittings containing not more than 8.0 percent lead."

The Safe Drinking Water Hotline's Compendium of Responses to Policy Inquiries resolves several issues dealing with the Lead Ban and faucets. One of the issues (Issue VIII-5) responds to a lead sample size question by indicating site sources to include "faucets, fittings, pipes, and solder" for lead sampling. Another issue (Issue VIII-4) addresses interpretation of pipe fittings which states that "it is reasonable to suggest that various other elements common to water distribution systems--such as joints, valves, meters, and fire hydrants--must be lead-free as well."

Is it EPA's interpretation that the term "faucets" was intended to be covered by the term "pipe fitting"?

Response:

Yes, in implementing the provisions of the Lead Ban, EPA has included the term "faucets" as a "pipe fitting", under the restrictions of the Lead Ban. EPA believes that the term "pipe fitting" purposely was used to include a wide range of plumbing products to protect the public against the use of lead in drinking water.