



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8WD

Mr. Jim Lochhead  
CEO/Manager  
Denver Water  
1600 West 12<sup>th</sup> Ave.  
Denver, Colorado 80204

Re: Denver Water's Request for a Variance from the Optimal Corrosion Control Treatment Requirements under the Safe Drinking Water Act's Lead and Copper Rule

Dear Mr. Lochhead:

The U.S. Environmental Protection Agency has reviewed your March 18, 2022 request for a variance from the Safe Drinking Water Act (SDWA) related to the definition of optimal corrosion control treatment in the Lead and Copper Rule Revisions (LCRR). Under Section 1415(a)(3) of the SDWA, the EPA has authority to grant a variance from any treatment technique requirement upon a showing that an alternative is "at least as efficient in lowering the level of the contaminant." Pursuant to that authority and following review of comments received during the public comment period that ran from September 1, 2022 through October 7, 2022, EPA finds that Denver Water's Lead Reduction Program Plan (LRPP) is sufficient to qualify for a variance because it is expected to provide at least as efficient lead reductions as compared to compliance with the LCRR provisions regarding optimal corrosion control treatment.

EPA is committed to embedding environmental justice into all our decisions. This new variance from the LCRR includes a metric to ensure that lead service line replacements and filter outreach do not result in disproportionate impacts to areas with health equity and environmental justice concerns. The approved variance includes minor edits to the footnote that describes this metric to align with the latest release of EPA's EJScreen Tool.

Addressing lead contamination is one of the highest priorities for EPA. I was thrilled to hear Denver Water was also approved for additional funding under the Bipartisan Infrastructure Law to further accelerate lead service line replacements conducted under this variance. Thank you for taking this innovative and aggressive approach to permanently removing the main source of lead in drinking water for all of Denver Water's customers. Your work will benefit generations of children across our community.

Sincerely,

KC Becker  
Region 8 Regional Administrator

cc: Ms. Alexis Woodrow, Denver Water  
Ms. Nicole Rowan, Director, Water Quality Control Division, CDPHE  
Mr. Ron Falco, Manager, Drinking Water Program, CDPHE