



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



KEITH CREAGH
DIRECTOR

TO: Community Public Water Supply Owner or Operator
FROM: Jim Sygo, Chief Deputy Director
DATE: March 14, 2016
SUBJECT: Lead and Copper Rule Implementation at Community Public Water Supplies

This mailing is to notify you of changes that the Department of Environmental Quality (DEQ), Office of Drinking Water and Municipal Assistance (ODWMA), is recommending be implemented by each Community Public Water Supply (Supply) in the state of Michigan. The DEQ believes these actions will aid in the protection of public health by encouraging Supplies to confirm compliance with the Lead and Copper Rule and to be proactive and transparent in their approach to further reduce lead and copper concentrations in drinking water.

Supplies subject to lead and copper monitoring requirements should:

1. *Confirm that lead and copper monitoring practices conform to the Lead and Copper Rule and associated guidance and protocols.*
 - a. **Review and update the Supply's distribution system material inventory to ensure accuracy.** This should include as much information as possible about not only what is owned by the Supply, but also the privately-owned portion of the service lines.
 - b. **Review the Supply's lead and copper sampling pool to ensure that sampling sites are appropriate and meet the required Tier criteria prior to future sampling events.** Keep appropriate documentation to justify sample site, including any additions to or deletions from the sampling pool. Review past documentation of sample sites that have been discontinued to determine if adequate justification exists.
 - c. **Incorporate updated sampling collection procedures into future sampling events.** Current procedures no longer include a "pre-stagnation flush" the day prior to collection and require the use of wide-mouth sample bottles. A separate DEQ mailing will be sent to supplies that are due for lead and copper sampling during the summer of 2016, with updated instructions, educational materials, forms, and other details. Also, please be aware that related documents are available online.
 - d. **Be advised that partial lead service line replacements should be avoided** since these activities may result in a lead level increase in the water of associated homes. Additionally, if lines are disturbed during construction, this information should be provided to affected occupants along with information about decreasing risk of lead exposure.
 - e. **If the Supply is optimizing corrosion control utilizing chemical addition, review the treatment strategy to ensure efficacy.** Review all water quality parameters and monitoring results for adequacy and regulatory compliance, including proper tracking and reporting.

March 14, 2016

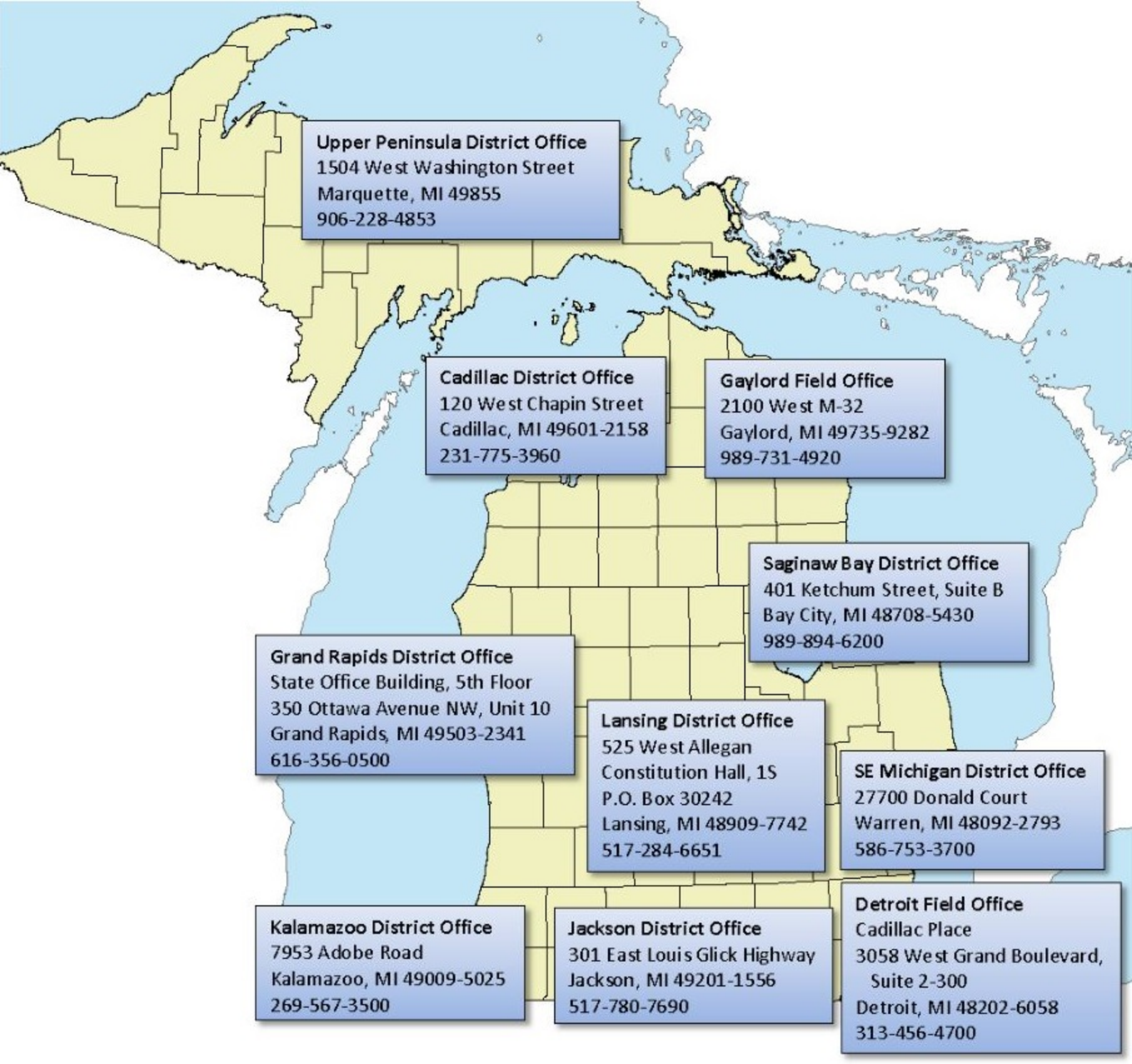
- f. **Prior to any change to source and treatment, examine potential effects on water chemistry.** Ensure that regulatory requirements, including notification to the DEQ as well as possible increased monitoring, are met and methods to reduce parameters of concern are explored.
2. *Enhance proactive measures to provide lead and copper monitoring results and public educational information directly to all residents as soon as possible after it is received.*
 - a. **Set goals for the Supply to provide results and educational information directly to impacted residents more quickly than required by the regulations,** particularly to homes where lead results exceed 15 parts per billion (ppb).
 - b. **In the event that future lead and copper sampling results in an action level exceedance (ALE) for the Supply, ensure that results and educational materials are widely distributed within the community** through a press release and/or other means, and consult with the DEQ on regulatory requirements.
3. *Increase the Supply's transparency and assistance to the public.*
 - a. **Widely distribute information about the location of lead service lines within your community, as well as all sampling results and educational materials,** including posting this material on the Supply's Web site, if applicable. General information about lead exposure reduction can be found at:
<http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=500025PW.txt>.
 - b. **Be aware that all lead monitoring results above 15 ppb will be provided to the Department of Health and Human Services (DHHS) and will inform them of ALEs in communities.** This may result in additional public education, health screenings, testing of blood lead levels, and/or other recommendations for action.
 - c. **Provide expertise and assistance to those in your community with questions about lead and copper and those interested in supplemental sampling to determine water lead and copper levels at locations not included in the sampling pool for Lead and Copper Rule compliance, such as schools, medical facilities, day cares, nursing homes, as well as private residents.**

Finally, it is recommended that each Supply begin developing a plan to identify and replace **all** lead components in the Supply's distribution system, including the privately-owned portion of the service lines. It is recognized that this will require significant time and capital outlay and cause many logistical issues, but a plan should be started and potential funding and tools should be explored.

It is likely that there will be new guidance and regulations coming in the near future. The DEQ is committed to working with you to address risks from lead and copper in drinking water. Thank you for your cooperation in implementing these actions. Please contact your DEQ district office (see attachment) if you have questions about the contents of this memorandum.

Attachment

cc: Nick Lyon, Director, DHHS
Keith Creagh, Director, DEQ



Upper Peninsula District Office
1504 West Washington Street
Marquette, MI 49855
906-228-4853

Cadillac District Office
120 West Chapin Street
Cadillac, MI 49601-2158
231-775-3960

Gaylord Field Office
2100 West M-32
Gaylord, MI 49735-9282
989-731-4920

Saginaw Bay District Office
401 Ketchum Street, Suite B
Bay City, MI 48708-5430
989-894-6200

Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341
616-356-0500

Lansing District Office
525 West Allegan
Constitution Hall, 1S
P.O. Box 30242
Lansing, MI 48909-7742
517-284-6651

SE Michigan District Office
27700 Donald Court
Warren, MI 48092-2793
586-753-3700

Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5025
269-567-3500

Jackson District Office
301 East Louis Glick Highway
Jackson, MI 49201-1556
517-780-7690

Detroit Field Office
Cadillac Place
3058 West Grand Boulevard,
Suite 2-300
Detroit, MI 48202-6058
313-456-4700