

Standard Operating Procedures for Lead and Copper Rule Managing

Systems that have samples results that come back high in Lead or Copper

- When a lead or copper sampling result is received that is high or an outlier of any sort to their data from previous years, the following procedures are followed:
 - Call System operator to verify where and how sample was collected
 - Most often outlier samples were incorrectly collected from an outside spigot or from a faucet that is very seldom used. The correct location of sample collection is from the bathroom or kitchen sink.
 - **Corrective Action:** Drinking water staff reviews with the operator where and how the samples are to be collected and ask that they re-sample at the home and explain to the homeowners the importance of collecting the samples from the right location.
 - Verify water usage of resident where sample was collected
 - Often times elderly residents use very little water or barely above the minimum billing amount.
 - **Corrective Action:** Drinking water staff ask the operator to re-sample the residence and have the operator spend time with the homeowner asking them to make sure they are using water the day before they will collect the sample, i.e use the shower, hand wash dishes, let water run in the kitchen for a few minutes, etc. to allow for good flushing of the water lines to get an accurate reading the following day when the sample is collected at first draw.

Outreach to systems who sample for Lead and Copper

As a courtesy, systems are emailed reminders of sampling requirements approximately one month prior to the end of the compliance period. Two weeks prior to the end of the compliance period, any system who has not submitted lead and copper sampling results are called and reminded of the upcoming deadline. Any remaining systems are frequently called for reminders all the way up to the compliance period ending. This effort is conducted in order to limit the number of failure to monitors for lead and copper. During the compliance period of June 1 to September 30, 2015, only one system was issued a failure to monitor.

The EPA requires Lead Consumer Tap Notices to be issued to each home that took part in the Lead and Copper sampling for a respective system. These notices must contain the address of the home sampled, the lead results and lead education information. To assist systems to comply with this requirement, the state generates and supplies these Consumer Tap notices to every system based on the sample results we already enter into our database. Thus every residence that was sampled, upon the receipt of the lead and copper sampling results, has a specific notice detailing the results from their home as required by the rule. In order to ensure that the operators of the systems are sending out their Lead Consumer Tap Notices, the State tracks the return of the Notice of Distribution form stating that the tap notices have been distributed by the system to each resident where the sample was collected.

Corrosion Control Plans – Checkup

In 2016, Drinking water staff called every system on a previously approved corrosion control plan for lead or copper. This effort was intended to ensure that the previously approved corrosion control treatment is being closely monitored and that records are up to date. If any changes had been made to corrosion treatment in the system, the system was asked to submit a written explanation of the changes and the reasons for the change. If changes were acceptable, they were approved.