

Charter Township of West Bloomfield

Water & Sewer Utilities Department

2400 Haggerty Road
West Bloomfield, MI 48323
(248) 451-4780
Ed Haapala, Director

NOTIFICATION – MDEQ Lead & Copper Rule (LCR)

March of 2016

As of March, 2016 the Michigan Department of Environmental Quality (MDEQ), Office of Drinking Water and Municipal Assistance (ODWMA) has issued a statement "*suggesting a recommendation*" that all local Community Public Water Supplies in the state of Michigan implement several items of action with respect to the Lead and Copper Rule, which is part of Public Act 399 of the Safe Drinking Water Act of 1976, as amended. The MDEQ believes that these actions will aid in the protection of public health by encouraging local water 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 that are subject to lead and copper monitoring requirements *should* be doing the following:

1. Confirm that lead and copper monitoring practices conform to the Lead and Copper Rule and associated guidance and protocols.
 - a. **Review and update our 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 our 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 the 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. The GLWA does perform this item quite adequately.
 - f. **Prior to any change to source and treatment, examine potential effects on water chemistry.** Ensure that regulatory requirements, including notification to the MDEQ 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 MDEQ 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 the community, as well as all sampling results and educational materials, including posting this material on the Supply's Web Site.** General information with regards to lead exposure can be found at:
<http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=500025W.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 levels, and/or other recommendations for action.
 - c. **Provide expertise and assistance to those in the community with questions about lead and copper and those interested in supplemental sampling to determine levels of lead and copper in their water at locations not included in the sampling pool for Lead and Copper Rule compliance, such as: schools, medical facilities, day care centers, nursing homes, and private residents or businesses.**

The MDEQ recommends 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 while causing many logistical issues. However, a plan should be started and potential funding and tools should be explored for incorporating into the annual operating budget.

It is likely that there will be new guidance and regulations coming in the near future to all water supply system owners. The MDEQ states that it is committed to working with municipalities to assist in addressing risks from lead and copper found in drinking water and desires for our supply to start working on implementing a programmed plan. The local MDEQ District Office assigned to the West Bloomfield area is the Southeast Michigan District Office located in Warren, Michigan. 48092-2793 at the service address of 27700 Donald Court. Telephone number is: (586) 753-3700.

Recent Consumer Confidence Reports (CCRs) are included on the web site. Note that the 2014 CCR is shown on the web site while the 2015 CCR will trail by a year. Therefore, in July of 2016 the 2015 CCR will be posted to the web site which shall provide all testing results of water quality from the water supply system from West Bloomfield Township sampling site locations taken from residential, institutional and places of business.

End.