Lead and Copper Tools

Gregg Baird, REHS
OHA Drinking Water Services
Overview

1. Lead and copper related procedures
2. Auto-generated letters after a lead or copper exceedance
3. Compliance schedules in Data Online after a lead or copper exceedance
4. Lead and copper related resources on our website
1. Lead and Copper procedures

- Lead and Copper Exceedance procedure
- Plumbing Replacement Program (PRP) procedure
- Water Quality Parameter (WQP) procedure
Lead and copper exceedance procedure

- Recently updated. Replaces the old “County Responsibilities following a lead or copper exceedance” procedure
- Verify samples valid (refer to Invalidation procedure)
- Three scenarios:
  - Do not already have corrosion control treatment installed
  - Do have corrosion control treatment installed
  - NTNCs that opt for plumbing replacement (refer to PRP procedure)
- Bottom line:
  - Systems without corrosion control treatment that exceed the action level need to complete steps to install treatment (or pursue PRP if NTNC)
  - Systems with corrosion control treatment that exceed the action level need to find and fix problem with treatment or have minimums WQPs adjusted
Without corrosion control treatment installed

- Two rounds of WQPs (pH, alkalinity, calcium, conductivity, temp) two weeks apart from each entry point and in the distribution
- Lead and copper sample from each entry point
- Sent lead results and lead info to households tested (NTNC post in public place). Send copy of notice and certification DWS. *NOTE: required regardless of whether the lead or copper action levels were exceeded*
- Public Education if exceeded lead to all customers. Send copy of notice and certification to DWS
Without corrosion control treatment installed (continued)

- Bill statement if lead exceeded
- Letter of recommendation for corrosion control treatment
- CCR: Include 90th percentiles, # of samples exceeding action level, and lead-specific info
- If it is the first time they have exceeded, systems ≤ 50,000 can voluntarily do two 6-month rounds of lead and copper tap sampling and postpone installation of treatment if both rounds under the action level.
  - Must install treatment if they have exceeded before
  - Cannot postpone any of previously mentioned steps; must be done concurrently
Treatment “Letter of Recommendation” and plan review

- Regulator, consultant, or circuit rider (if eligible) can use the WQP data to determine the best corrosion control treatment using the *EPA Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems* guidance manual
  - Note: this manual replaces the *EPA Revised Guidance Manual for Selecting Lead and Copper Control Strategies*
- Plan review and fee required by DWS prior to installation of treatment
- Plan review engineer will review and approve the system’s Letter of Recommendation for treatment
After treatment installed

- A follow-up monitoring summary will be in the plan review approval letter to the system
- Two consecutive 6-month rounds of lead and copper tap sampling at the standard # of sites
- WQPs at least every 2 weeks at entry point. WQPs in the distribution system with each round of lead and copper tap sampling
- After two rounds, regulator will review WQP data and set minimums
- System continues to conduct entry point and distribution WQP monitoring to demonstrate minimums are met
- If system drops below minimums it is called an excursion. If 9 or more in a 6-month period, public notice required and go back to 6-month rounds of lead and copper tap sampling
Corrosion control treatment already installed

• Immediately investigate if problem with existing treatment.
  – Notify regulator if problem found and corrected
• If minimum entry point pH not met, conduct daily monitoring until met consistently; if minimum entry point pH met when exceedance occurred then minimum pH may need to be increased
• Conduct two 6-month rounds of lead and copper tap sampling at the standard # of sites. Continue until qualifying for a reduction
• Two rounds of WQPs from the distribution with each round of lead and copper tap sampling
• Same as systems w/out treatment: lead results to households tested, public education and bill statement about lead, CCR
Plumbing Replacement Program (PRP) Procedure

• Used to part of old “County Responsibilities” document, now a separate stand-alone procedure
• PRP is an alternative for compliance with the rule at NTNC water systems that exceed the lead or copper action levels
• Involves sampling at all sites where drinking water is reasonably expected to be obtained, replacing fixtures or plumbing at sites that exceed the action level, and resampling to verify replacement was effective (in lieu of installing corrosion control treatment)
PRP: what regulator does

- Reviews system configuration to confirm PRP is a viable alternative to installing treatment
- Discuss with system PRP option, requirements, and that it must be completed in 1 year (Note: this is a change)
- Notify system they need to do initial water quality parameter monitoring at EP and in DIST and source water monitoring for lead and copper (Note: this is a change)
  - Water quality parameters needed to determine treatment if PRP fails
  - Source water monitoring needed to rule out source as cause of lead at the tap
- Notify DWS if system decides to pursue PRP (send email to Compliance email so compliance schedules in Data Online can be modified)
PRP: what regulator does (continued)

- Verify that source water sample results show source is not cause of lead in tap samples
- Review results of PRP to determine if it was successful or if treatment is necessary
- Submit Entry Structure Diagram form to Compliance email with treatment code C550 (“LCAA for L/C”). Also request in email that two 6-month follow-up rounds be added to the system’s lead and copper compliance schedules
PRP: what water system does

- Notify regulator in writing that they intend to do PRP
- Develop a plumbing profile
- Develop a sampling plan
- Collect samples according to the plan using the first draw method
- Replace fixtures that exceed with zero lead fixtures
- Repeat sampling after fixtures replaced to determine if effective
- If not effective, collect follow-up flush samples to compare with first draw samples in order to determine source of lead or copper
- When PRP completed, submit written “final report” to regulator
PRP: what water system does (continued)

- Do two 6-month demonstration rounds of lead and copper tap sampling at the standard # of sites. Note: the re-samples of replacement sites from the PRP count as the first 6-month round
  - If lead and copper below the action levels, can return to annual monitoring or every 3-year monitoring
  - If action levels are exceeded, the system must recommence installation of corrosion control treatment
Water Quality Parameter clarification

• New rule clarification
• Clarifies that:
  – Minimum WQPs must be established for each EP
  – Corrosion control treatment is required for each EP if natural WQPs are below the established minimum
  – Large systems (≥ 50,000) must have minimum WQPs set at each EP and in the distribution system even if never exceeded lead/copper action levels
  – Wholesalers only need EP minimums set (note: only ~4 of these systems in the state)
• Document not on our website
2. Auto-generated letters after an lead or copper exceedance

- DWS is now auto-generating letters following a lead or copper 90th percentile action level exceedance
- Letters include all the steps the system must follow along with due dates for each step
- These compliance schedules will then be added to Data Online
- Regulator is to track progress with deadlines and update DMCE as necessary as steps are completed via the Compliance email
3. Compliance schedules in Data Online after a lead or copper exceedance

- The compliance schedules outlined in the auto-generated letter will be viewable in Data Online under the “Compliance & Enforcement” link for the system
- Violations issued for:
  - Failure to issue LCR public education
  - Failure to submit recommendation for LCR treatment
### OR41 00937  WELCHES WATER COMPANY

**Classification:** COMMUNITY

- **Contact:** JEREMY TOWER
  - PO BOX 1681
  - SANDY, OR 97055

- **Phone:** 503-926-4734
- **County:** CLACKAMAS
- **Activity Status:** ACTIVE (History)
- **Number of Connections:** 130
- **Regulating Agency:** CLACKAMAS COUNTY
- **Owner Type:** LOCAL GOVERNMENT
- **Licensed By:** N/A
- **Approved Drinking Water Protection Plan:** No
- **Source Water Assessment:** Yes
- **Last Survey Date:** Jun 18, 2013

### Sources

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**Show Disconnected and Abandoned Sources**

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#### Consumer Confidence Reports (Last 5 Years)

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#### Cross Connection/Backflow Prevention Information (Last 3 Records)

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For further information on this public water system, click on the area of interest below:

- **System Info** :: **Report for Lenders** :: **Alerts** :: **Violations** :: **Compliance & Enforcement** :: **Contacts** :: **Site Visits** :: **Public Notice** :: **Plan Review**
- **Califom Summary** :: **Califom Results** :: **Sampling Schedule for California** :: **Compliance/GUI/ID/Source Details**
- **Chemical Group Summary** :: **Latest Chemical Results** :: **Entry Point Detections** :: **Single Analyte Results**
PWS ID: 00937 ---- WELCHES WATER COMPANY

Compliance and Enforcement Schedules

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For all compliance errors please phone Brad Daniels, DWS Compliance Specialist, at 971-673-0405.

For further information on this public water system, click on the area of interest below:
Compliance schedules for last 5 years of unresolved exceeders in Data Online

Welcome to Data Online, Oregon's Drinking Water Services data access site.

Here you can access a fair amount of data on public water systems in Oregon. You can find data such as coliform testing, chemical testing, contacts, violations, enforcements, public notices, and basic system information.

If you don't know the water system ID number or are unsure, use the WS Name Look Up feature to find the system. If you know the water system's ID number, use the WS ID Look Up feature to find the system.

Data shown here is "live" data. That means it's as current as the reports we have in our system. This is the same data that Drinking Water Services (DWS) staff see and use. If something is missing, that usually means it has not been reported to us or we have not entered it yet. If you (water system personnel, county staff, lab staff, etc.) find a report is missing, please forward a copy to us at: DWS, PO BOX 14350, Portland, OR 97293.

For all water system sampling, inventory, and compliance errors please phone Chuck Michael, DWS Compliance Officer, at 971-873-0420.

Search Options is where you'll find the various queries to view data we currently have. The choices are explained there.

Information by county:
Inventory :: Surface Water Systems :: Water System Surveys :: Outstanding Performers :: Plan Reviews :: System Scores :: Exceedances Alerts :: Violations :: Compliance & Enforcement :: Significant Deficiencies :: Cross Connection ASRs :: Treatment Plant Inspections :: Fluoride

Inventory List for all Oregon Drinking Water Systems in Excel or printable screen format
Tools for Laboratories
## Compliance and Enforcement Schedules

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[Show Schedules]
Compliance and Enforcement Schedules

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4. Lead and copper related resources on our website

- Partner’s page
- Monitoring & Reporting page
- Water System Operations page
- Pipeline newsletter
Partner’s page

- Lead or copper exceedance procedure
- Plumbing replacement program procedure
- Lead and copper tap sample invalidation procedure
Drinking Water

Access to safe drinking water is essential to human health. Each person on Earth requires at least 20 to 50 liters of clean, safe water a day for drinking, cooking and simply keeping themselves clean. Oregon Drinking Water Services works to help keep drinking water safe for Oregonians.

Oregon Drinking Water Services (DWS) administers and enforces drinking water quality standards for public water systems in the state of Oregon. DWS focuses resources in the areas of highest public health benefit and promotes voluntary compliance with state and federal drinking water standards. DWS also emphasizes prevention of contamination through source water protection, provides technical assistance to water systems and provides water system operator training.

News

- Information on Healthy School Facilities
- Protect Your Groundwater Day, September 6
- Pipeline Newsletter, August 2016

Hot Topics

- Flint Michigan Lead Crisis
- Revised Coliform Monitoring Requirements
- For water systems: Pay your 2015 survey fee online
- Algae resources for water system operators
- Flint Water for personal systems
County & Department of Agriculture Resources

In the very near future you will no longer need the username and password to access the DWS partner’s website!
- You will still be able to access the partner’s site from the main DWS website, or by going to [www.healthoregon.org/dwpartners](http://www.healthoregon.org/dwpartners).
- The content will remain the same with minor exceptions.
- Some of the documents will require a password to access. It will be the same password you are currently using to access the partners site.
- Fall Training & Silver Falls: There will only be two years of presentations & documents on the website.

Forms, training materials and other resources for county and Department of Agriculture partners have been moved to the following location:

[https://partners.health.oregon.gov/Partners/DrinkingWater/](https://partners.health.oregon.gov/Partners/DrinkingWater/)

You must log in to access the new site. If you need to obtain a username and password or have any other questions, contact Drinking Water Services at info.drinkingwater@state.or.us or 971-673-0405.
Drinking Water Resources for Partners

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Quick Reference
- Contact Reports: fillable MS Word -or- printable PDF
- 2014 Department of Agriculture Contract (pdf)
- Contract/Program Elements: County/Ag Responsibilities (pdf)
- Submit Laboratory Sampling Results to DMCE Inbox
- All other requests or correspondence submit to Compliance
Monitoring Resources

- Chemical Monitoring Schedules for Community and Non-Transient Non-Community groundwater systems
- Standard Monitoring Framework
- Alerts: What to Do With Chemical Detections
- Arsenic Testing and Follow-up at TNC and State-Regulated Water Systems

**Lead and Copper Rule:**
- Lead or Copper Exceedance Procedure
- Plumbing Replacement Program Procedure
- Lead and Copper Tap Sample Invalidation Procedure
Monitoring & Reporting page

- Corrosion Control treatment monthly reporting forms
- Consumer notification letter templates & certification form
- Lead and copper sample site change form (141-A)
- Directions for homeowner tap sample collection & EPA memo
- EPA 3T’s guidance manual for school testing
Drinking Water

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- For water systems: Pay your 2015 survey fee online
- Algae resources for water system operators
- Flint water for personal systems
Monitoring & Reporting

Drinking Water Laboratory Information
Information on accredited and certified laboratories, laboratory reporting forms, and direct reporting.

Monitoring & Reporting Forms
Forms and information on monitoring requirements.

Consumer Confidence Reports
All community water systems are required to provide an annual Consumer Confidence Report (CCR) to their customers and submit a copy to Drinking Water Services. For resources to assist your water system in developing a CCR, please click here.

Health Effects of Contaminants
Bulletins covering the possible health effects of drinking water containing various contaminants can be found on our Health Effects of Contaminants page.

See Also
- Domestic Well Testing for Real Estate Transactions
Monitoring & Reporting Forms

On this page:
- Water System Sampling Points
- Coliform Monitoring
- Turbidity and Surface Water Treatment
- Disinfection Byproducts (DBPs)
- Groundwater Rule
- Maximum Residual Disinfectant Levels
- Chemical Monitoring
- Arsenic
- Radionuclides
- Lead and Copper

More Resources
- Drinking Water Data Online
- Site Map
- For Consumers

Contact Us
- Drinking Water Services
- Center for Health Protection

Read about Oregon Drinking Water Services public notice resources and view templates.

Water System Sampling Points
- Where to Take Samples-Groundwater Systems (pdf)
Lead and Copper

- **Corrosion Control Treatment (i.e., Lead and Copper Rule) Reporting Forms**
  - EPA Lead and Copper Rule Quick Reference (pdf)
  - EPA Optimal Corrosion Control Treatment Evaluation Technical Recommendations (pdf)
  - Reporting Form for Water System Entry Point (pdf)
  - Reporting Form for Water System Distribution (pdf)
  - Monitoring and Reporting Form Instructions (pdf)
  - EPA Summary Page for Reduction of Lead in Drinking Water Act

- **Consumer Notification Forms for Community Water Systems**
  - When the individual tap and the entire water system are below the action level (AL) at a community water system (fillable MS Word)
  - When the individual tap and entire water system exceed the AL at a community water system (fillable MS Word)
  - When the individual tap is below the AL but the entire water system exceeds the AL at a community water system (fillable MS Word)
  - When the individual tap exceeds the AL but the entire water system is below the AL at a community water system (fillable MS Word)

- **Consumer Notification Forms for Non-Transient Non-Community Systems**
  - When samples exceed the AL at a non-transient non-community water system (fillable MS Word)
  - When samples are below the AL at a non-transient non-community water system (fillable MS Word)

- **Certification to Drinking Water Services that consumer notification has been completed** (fillable MS Word)

- **Lead and Copper Sample Site Selection Form**: Systems that would like to change lead and copper tap sampling site locations, need to receive approval from the regulatory agency (DWS or local health agency) prior to conducting the sampling at the new locations. Systems will need to request the change on the EPA 141-A form.

- 📝 Directions for homeowner tap sample collection

- 📝 EPA sampling clarifications memo

- **Lead in Schools Testing**: EPA’s Lead in Drinking Water in Schools manual describes how drinking water can be tested for lead and how contamination problems can be corrected. This manual is intended for use by school officials responsible for the water system maintenance and/or safety. Revised technical guidance is available in EPA’s 3Ts for Reducing Lead in Drinking Water in Schools (pdf). Visit EPA’s website for more information on Testing Schools and Child Care Centers for Lead in the Drinking Water (including where to sample, before you sample, how to sample and sample results). For more information about lead poisoning, please contact the Oregon Lead Poisoning Prevention Program (phone 971-673-0440).
• Lead public education brochure
• Public notices for failure to meet minimum corrosion control treatment WQPs
Drinking Water

Access to safe drinking water is essential to human health. Each person on Earth requires at least 20 to 50 liters of clean, safe water a day for drinking, cooking and simply keeping themselves clean. Oregon Drinking Water Services works to help keep drinking water safe for Oregonians.

Oregon Drinking Water Services (DWS) administers and enforces drinking water quality standards for public water systems in the state of Oregon. DWS focuses resources in the areas of highest public health benefit and promotes voluntary compliance with state and federal drinking water standards. DWS also emphasizes prevention of contamination through source water protection, provides technical assistance to water systems and provides water system operator training.

News
- Information on Healthy School Facilities
- Protect Your Groundwater Day, September 6
- Pipeline Newsletter, August 2016

Hot Topics
- Flint Michigan Lead Crisis
- Revised Coliform Monitoring Requirements
- For water systems: Pay your 2015 survey fee online
- Algae resources for water system operators
- Flint water use for personal systems
Water System Operations

Surface Water Treatment
Water systems that treat surface water sources have to deal with complex regulatory requirements, constantly changing raw water quality, and costly management of various assets. The Surface Water Treatment site provides information and tools needed to optimize water treatment processes and maximize public health protection without costly capital improvements.

Capacity Development
Water system capacity is the technical, managerial and financial capability of a water system to achieve and maintain compliance with drinking water standards and consistently provide safe drinking water. The Capacity Development site provides information and resources for drinking water systems to help build their capacity.

Public Notice Resources & Templates
Water systems are required to issue public notices to alert consumers under specific circumstances (for example, when exceeding a Maximum Contaminant Level, failing to complete required tests, failing to report the results, or failing to meet treatment technique requirements). This page includes information on public notification requirements and templates for issuing public notices, as well as translations and FAQs for effective communication with partners and the public.
Public Notice Resources & Templates

On this page:
- General Water Advisory Guidance
- EPA Revised Public Notification Rule
- Lead and Copper Public Education Requirements
- Public Notice Templates

You must contact Drinking Water Services immediately when issuing a boil water advisory at any public water system.

General Water Advisory Guidance
- Translations for Public Notices: Four basic drinking water messages that have been translated into 27 different languages
- Commonly Asked Questions Following a Boil Water Notice
- Drinking Water Advisory Communications Toolbox: A practical guide for water systems, containing tools for
Lead and Copper Public Education Requirements

If lead is present above the action level, public education must be delivered to water users. The following materials are appropriate:

- “Lead in Drinking Water” Public Education Brochure Template
- For community water systems: MS Word -or- PDF
- For non-transient non-community water systems: MS Word -or- PDF

For water systems where corrosion control is practiced, the following public notice templates are appropriate if water quality parameters fail to meet minimums.

- Failure to maintain minimum water quality control parameters - Lead
- Failure to maintain minimum water quality control parameters - Copper

Additionally, whenever monitoring for lead in tap water is completed, regardless of the results, consumers must be notified of the sample results from their own residence. Notification must be provided to customers within 30 days of when the water supplier is notified of the tap water monitoring results. Appropriate templates can be found on the Monitoring & Reporting Forms page.

Public Notice Templates

These are commonly used templates, procedures, and forms designed for operators of public water systems to utilize when issuing public notices (for example, when exceeding a maximum contaminant level (MCL), failing to complete required tests, failing to report the results, or failing to meet treatment techniques). Templates are available for download below. Please consult Oregon’s public notification rules for appropriate use criteria.

- Translations for Public Notices: Four basic drinking water messages that have been translated into 27
Pipeline newsletter

• Most recent issue (August 2016) is all about lead and copper - Check it out!

The Flint, Michigan lead crisis, aftermath and ramifications
by Dave Leland

The drinking water lead crisis in Flint, Michigan continues to receive national and local media coverage and attention from Congress, USEPA and the state of Michigan. This tragic incident gives us the opportunity to take a fresh look at our collective lead and copper regulation implementation efforts to assure that we are collectively doing all we can do to minimize lead in drinking water. This issue of the Pipeline is devoted entirely to this topic.

Before we look in detail at the Flint crisis, what does it mean to water suppliers here in Oregon? Here are our recommendations for action in the aftermath of the Flint crisis:

1. Revisit your water system materials evaluation. Revisit status of lead paint paint removal from service lines, ensure completion.

State agencies announce plan to help school districts and childcare centers reduce lead in drinking water
by Dave Leland

On Jun. 8, 2016, Oregon’s education and health agencies recommended all school districts and childcare programs test drinking water this summer, as part of a statewide plan to reduce student exposure to lead. The plan, developed by the Oregon Department of Education (ODE) and the Oregon Health Authority (OHA), is in response to Governor Kate Brown’s April directive to the agencies to review water quality in schools and develop recommendations. See http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Pages/index.aspx under “News.” Also see the OHA Fact Sheet on page 11.

Schools and childcare centers are likely to contact their water supplier as this plan moves forward. The plan is summarized here to help water suppliers respond to and assist their customers.
Drinking Water

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Contact us!

For technical assistance, contact

Oregon Health Authority
Drinking Water Services
971-673-0405