

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



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Drinking Water Section

DWS Circular Letter #2017-06

TO: CT DPH Certified Water System Operators of
Community and Non-Transient Non-Community Public Water Systems

FROM: Lori Mathieu, Public Health Section Chief, Drinking Water Section *Lori Mathieu*

DATE: July 17, 2017

RE: Lead and Copper Rule (LCR) - 90% Calculation - Certified Operator Responsibilities

We would like to call to your attention your responsibilities under the Lead and Copper Rule and specifically your responsibilities in calculating the 90th percentile lead and copper level. You are accountable to take immediate action on any high lead result, including the provision on education information, and to assure correct and accurate sampling. Further, your specific attention to existing treatment effectiveness and maintenance is critical to reducing exposure to lead.

The certified operator is responsible for making process control and system integrity decisions concerning the quality and quantity of water that affect public health and; therefore, represent the technical capacity of a PWS. As a method of ensuring compliance with Connecticut's water quality standards, it is necessary for the certified operators to be aware of and to assess all water quality test results as part of their operational / maintenance activities. This includes the certified operator's involvement with the following:

1. LCR sample site selection,
2. Assessing lead and copper test results.
3. Calculating the 90 percentile of the lead and copper results,
4. Ensuring that the consumer notice of lead tap water monitoring results, to the persons at sites that are tested, is delivered no later than 30 days after learning of the results,
5. Ensuring that high lead results, in excess of the lead action level of 15 ppb, at the individual tap are reported promptly (i.e. within 24 hours of learning of the results) to the affected consumers along with the required consumer notice,
6. Ensuring that the lead public education material is distributed to the consumers within 24 hours of learning the system exceeded the action level for lead,
7. Ensure corrosion control treatment is performing per established water quality parameter range (entry point & distribution system),
8. Ensuring that the system meets all the requirements of the lead and copper rule.



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The “90% calculation” is a necessary component in LCR compliance determination. Note, there are specific deadlines that PWSs must comply with when the 90 % calculation exceeds the respective Lead and/or Copper Action Level (i.e. lead public education, public notification for copper exceedance, water quality parameter analysis, source lead/copper analysis, corrosion control treatment proposal, corrosion control treatment installation). Based on the above, the PWS’s certified operator(s) is expected to be directly involved with 90 % compliance calculations.

Please refer to the following presentation (slides 24 through 35) for details in calculating the lead and copper 90 % levels and result submission:

http://www.ct.gov/dph/lib/dph/drinking_water/pdf/LCR_Compliance_Requirements_P2-Madonna_color.pdf

During Calendar Year 2016, this office issued 6 circular letters regarding the LCR, which included clarification on LCR sampling procedures, reminders as to PWSs obligations/responsibilities, requests to re-evaluate lead and copper sampling site selection, notification of the EPA publication on Optimal Corrosion Control Treatment Evaluation Guidance, and alerts to the lead public education / notification requirements, etc. For your information, LCR Circular Letters, presentations, forms, guidance documents and other related publications have been posted on the following web page: <http://www.ct.gov/dph/cwp/view.asp?a=3139&q=541928>. It is expected that certified operators will spend time reading and understanding the information provided on this page.

If you have any additional questions regarding the Lead and Copper Rule, please contact Carissa Madonna at (860) 509-7333.

Cc: Owners of Community and Non-Transient Non-Community Public Water Systems