

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

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Drinking Water Section

DWS Circular Letter #2016-11

TO: Community Water Systems & Non-Transient Non-Community Water Systems

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

DATE: May 5, 2016

RE: Lead and Copper Rule (LCR)

The Department of Public Health-Drinking Water Section (DWS) is assessing and re-evaluating all protocols and procedures related to the implementation of the Lead and Copper Rule (LCR) and as necessary sending out reminders and alerts to make sure that the public water systems (PWSs) are fully informed of their responsibilities and obligations under the LCR. As a result, this letter will:

1. Bring to your attention the [EPA Technical Recommendations for the Optimal Corrosion Control Treatment Evaluation](#) that was published in March 2016. We expect that this technical publication be used as a guide when PWSs evaluate corrosion control treatment and make submittals to DWS for review & approval. The purpose of this document is to provide technical recommendations to help primacy agencies and systems comply with corrosion control treatment (CCT) requirements of the Lead and Copper Rule (LCR), including designation of Optimal Corrosion Control Treatment (OCCT). This document summarizes the regulatory requirements, and provides technical recommendations that can assist systems in complying with CCT steps and assist primacy agencies with evaluation of technical information from systems. It also includes background information on corrosion and CCT techniques. This document provides Excel-based OCCT Evaluation Templates that can be used to organize data and document decisions.

2. Remind you that the addition of a new source or a change in treatment requires DWS review and approval, and will automatically revert the system back to the standard monitoring requirements for Lead, Copper & Water Quality Parameters. Pursuant to Section [19-13-B102\(e\)\(8\)\(D\)\(iv\)\(VII\)](#) of the Regulations of Connecticut State Agencies (RCSA), Any Community Water System (CWS) or Non-Transient Non-Community (NTNC) subject to a reduced monitoring frequency shall obtain approval from the department in writing of any upcoming change in treatment or the addition of a new source. The department shall review and approve such change in treatment or addition of a new source before the CWS or NTNC may implement it. The department may require the CWS or NTNC to increase monitoring frequency to a routine monitoring schedule and increase the number of required sample sites specified for standard monitoring or take other appropriate steps, such



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as increased water quality parameter monitoring or re-evaluation of the CWS's or NTNC's corrosion control treatment given the potentially different water quality considerations.

3. Ask you to re-evaluate the lead and copper sampling pool and the sampling site selection criteria & location pursuant to the requirements set in Section 19-13-B102(e)(8)(A) of the RCSA.

In compliance with this LCR requirement, each CWS or NTNC shall complete a materials evaluation of the distribution system in order to identify a pool of targeted sampling sites. When conducting the materials evaluation, the CWS or NTNC must use the information collected pursuant to [40 CFR 141.42\(d\)](#), as amended from time to time. When the information collected is insufficient to locate the requisite number of lead and copper sampling sites to meet the targeting criteria then the CWS or NTNC shall review the sources of information listed hereafter:

- (I) All plumbing codes, permits, and records in the files of the building department(s) that indicate the plumbing materials that are installed within publicly and privately owned structures connected to the distribution system;
- (II) All inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system (e.g., checking service line materials when reading water meters or performing maintenance activities); and
- (III) All existing water quality information, which includes the results of all prior analyses of the CWS or NTNC or individual structures connected to the CWS or NTNC, indicating locations that may be particularly susceptible to high lead or copper concentrations.

The sampling sites selected for a CWS's sampling pool (tier 1 sampling sites) shall consist of single family structures that contain copper pipes with lead solder (CPLS) installed after 1982 and before 1987 or contain lead pipes (LP); or are served by a lead service line (LSL). When multiple-family residences comprise at least 20 percent of the structures served by a CWS, the CWS may include this type of structure in the CWS's sampling pool. Any CWS with insufficient tier 1 sampling sites shall complete the CWS's sampling pool with tier 2 sampling sites, consisting of buildings, including multiple-family residences that contain copper pipes with lead solder installed after 1982 and before 1987 or contain lead pipes; or are served by a lead service line. Any CWS with insufficient tier 1 and tier 2 sampling sites shall complete the CWS's sampling pool with tier 3 sampling sites, consisting of single family structures that contain copper pipes with lead solder installed before 1983. A CWS with insufficient tier 1, tier 2, and tier 3 sampling sites shall complete the CWS's sampling pool with representative sites throughout the distribution system. For the purpose of this requirement, a representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the CWS. Sampling sites shall not include faucets that have point-of-use or point-of-entry treatment devices designed to remove inorganic contaminants.

The sampling sites selected for a NTNC (tier 1 sampling sites) shall consist of buildings that contain copper pipes with lead solder installed after 1982 and before 1987 or contain lead pipes; or are served by a lead service line. A NTNC with insufficient tier 1 sites to meet the targeting criteria shall complete the NTNC's sampling pool with sampling sites that contain copper pipes with lead solder installed before 1983. If additional sites are needed to complete the sampling pool, the NTNC shall use representative sites throughout the distribution system.

Any CWS or NTNC having a distribution system containing lead service lines shall draw 50 percent of the samples the CWS or NTNC collects during each monitoring period from sites that contain lead pipes, or copper pipes with lead solder, and 50 percent of those samples from sites served by a lead service line. A CWS or NTNC that cannot identify a sufficient number of sampling sites served by a lead service line shall collect first-draw samples from all of the sites identified as being served by such lines.

Your sampling pool should be re-evaluated and updated. The sampling site plan inventory form should be revised to include at least the minimum number of required sampling sites for lead and copper

standard monitoring based on your water system's population, which shall be reported to the DWS on [this form](#) (i.e. sampling point form under the sampling site plan) by 6/15/16.

4. Re-emphasize the new sampling protocol and remind you of the appropriate sampling collection methods. In our Circular Letter #[2016-07](#) dated 3/14/2016, we alerted you of the EPA memorandum titled "[Clarification of Recommended Tap Sampling Procedures for Purposes of the Lead and Copper Rule](#)". We encourage you to follow these sampling procedures, and further remind you of the sampling collection methods described in Section 19-13-B102(e)(8)(B) of the RCSA, specifically the method established for the collection of lead service line samples. Pursuant to Section 19-13-B102(e)(8)(B)(iii) of the RCSA, lead service line samples shall be collected in 1 of the following 3 ways:

(I) At the tap after flushing the volume of water between the tap and the lead service line (the volume of water shall be calculated based on the interior diameter and length of the pipe between the tap and the lead service line);

(II) Tapping directly into the lead service line; or

(III) If the sampling site is a building constructed as a single-family residence, allowing the water to run until there is a significant change in temperature which would be indicative of water that has been standing in the lead service line.

5. Alert you of the lead public education and notification requirements. Section 19-13-B102(i)(6) of the RCSA describes clearly the requirements for content of the public education and consumer notification, the delivery method, timing and frequency of the notifications. To assist you in assuring compliance with these requirements, a [guidance](#) document is available on our [webpage](#). Although there is a maximum wait period in the regulations to issue the lead education and consumer notices, the Department expects the lead public education materials and/or consumer notices to be issued to customers within 48 hours of learning of the lead test results.

Please direct any questions regarding this matter to Carissa Madonna of the DWS at 860-509-7333.

Cc: Ellen Blaschinski, Branch Chief – Regulatory Services Branch
Local Health Directors
Certified Operators