December 02, 2016

SUBJECT: Lead and Copper Rule Implementation at Community Public Water Systems

Dear Community Public Water System Official:

This letter is being sent to all Community Public Water System (System) officials clarifying the requirements of the Lead and Copper Rule [LCR] and providing updated U.S. EPA implementation recommendations. Recent events indicate that federal regulations do not adequately reduce the risk of lead exposure from drinking water and may result in health consequences due to elevated blood lead levels. The Centers for Disease Control and Prevention (CDC) is clear that all exposures to lead should be minimized\(^1\).

The Department of Natural Resources (department) is responsible for ensuring compliance with the LCR. The department recommends that System officials go beyond LCR requirements to educate consumers about the danger of lead in drinking water and take additional actions to further reduce lead exposure through drinking water. Specifically:

1. **Assure your system is meeting and implementing all LCR requirements and associated U.S.EPA guidance**\(^2\) and protocols.
   a. Required actions:
      i. Review the System’s lead and copper monitoring site plan to ensure that sampling sites are appropriate and meet the required Tier criteria prior to future compliance sampling events (NR 809.547(1), Wis. Adm. Code).
      ii. If optimizing corrosion control utilizing chemical addition, review and ensure the treatment strategy efficacy\(^3\) (NR 809.543(8), Wis. Adm. Code).
      iii. Contact the department prior to any implementation of source water or water treatment changes; potential effects on water chemistry must be thoroughly examined\(^3\) (NR 809.542(1), Wis. Adm. Code).
   b. Additional recommended actions:
      i. Incorporate updated sampling instructions into future sampling events\(^4\).
      ii. Review and update the System’s distribution system materials inventory. Include all public and privately owned water piping materials, specifically any lead components\(^2\).
      iii. Avoid partial lead service line replacement (PLSLR) and proactively engage in a lead

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\(^1\) Center for Disease Control (CDC) information on lead and drinking water. [https://www.cdc.gov/nceh/lead/leadinwater/](https://www.cdc.gov/nceh/lead/leadinwater/)


service line replacement program. PSLRs have not been shown to reliably reduce drinking water lead levels in the short-term and are frequently associated with elevated lead levels for some period of time after replacement.\(^5\)

2. **Proactively provide monitoring results and public educational information directly to all residents as soon as possible. Increase transparency and assistance to the public.**

   c. Required actions:

   i. Systems must provide notice of test results to consumers at residences in which samples were taken as soon as practical, but no later than 30 days after receiving the test results (NR 809.546(4), Wis. Adm. Code).

   ii. Systems must distribute public education materials to all bill paying customers when lead monitoring results exceed an Action Level (NR 809.546(2), Wis. Adm. Code).

   d. Recommended actions:

   i. Provide notice of test results and public educational materials directly to consumers at residences in which sample results exceeded 15 parts per billion (ppb); results must be provided within 24 hours of receiving test results (DNR recommendation).

   ii. Work with your local health department when an individual’s home monitoring result is above 15 ppb or you have a community action level exceedance (DNR recommendation).

   iii. Demonstrate transparency in lead monitoring by making materials available within your community including sampling results, educational materials, and locations of lead service lines. If possible post this information on a website.\(^5\)

   iv. Distribute additional information regarding ways to protect consumers from exposure to lead in drinking water (including information on testing options) to vulnerable populations.\(^5\)

For more information please visit our webpage on lead and drinking water at [http://dnr.wi.gov/topic/drinkingwater/lead.html](http://dnr.wi.gov/topic/drinkingwater/lead.html).

The department will continue to work in partnership with you to address the risks of lead in drinking water. Thank you for your cooperation in implementing these actions. Progress on protecting consumers from exposure to lead in drinking water will be discussed at your next sanitary survey inspection. For additional details regarding the above items, please see the attached frequently asked questions (FAQ) document. Please contact your local DNR Representative if you have any questions.

Sincerely,

[Signature]

Steven B. Elmore
Director, Bureau of Drinking Water and Groundwater

cc: Water System Operators on File (by email)

enclosure: FAQ – Lead and Copper Rule letter

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