

# Lead & Copper Rule Exceedance Fact Sheet

For Public Water Systems serving less than 50,000 people

*[Note: All citations in this fact sheet refer to the July 1, 2014 edition of 40 CFR 141 (National Primary Drinking Water Regulations). That is the version of the Federal Drinking Water Regulations that CNMI adopted by reference as of January 2016]*

## **If you exceeded the LEAD Action Level at the 90<sup>th</sup> percentile sample**

If your water system exceeds the lead Action Level of 15 ug/l at the 90<sup>th</sup> percentile of your tap water samples, you must take the following actions:

1. Provide Public Education to all users to inform them about the health effects of lead and the measures they can take to reduce their exposure.
  - Public Education must be provided within 60 days of determining your exceedance.
  - Requirements can be found at §141.85.
  - Additional information can be found in guidance #4, listed below.
2. Conduct Water Quality Parameter (WQP) monitoring in order to determine your water's corrosivity.
  - WQP monitoring must take place in the same compliance period in which your water system exceeds the lead Action Level.
  - Samples must be collected from entry points to the distribution system and from a set of representative sites located throughout the distribution system.
  - Requirements can be found in §141.87.
  - Additional information can be found in guidances #2 and #3, listed below.
3. Monitor your source water to determine if it is contributing lead to your water system and provide to BECQ a source water treatment recommendation.
  - Source water monitoring for lead and copper (at all entry points to the distribution system) and a source water treatment recommendation must be submitted to DEQ within 6 months of exceeding the lead Action Level.
  - Requirements can be found in §141.88 (monitoring) and §141.83 (treatment).
  - Additional information on source water monitoring and treatment can be found in guidance #3, listed below.
  - Use Form 141-D of guidance #3 as a guide to report to BECQ your source water monitoring results and treatment recommendation.
4. Provide to BECQ one or more corrosion control treatment recommendations to reduce your user's exposure to lead and copper.
  - Based on the results of lead & copper tap monitoring and WQP monitoring, within 6 months of exceeding the lead Action Level you must recommend to BECQ the installation of one or more corrosion control treatments.
  - Requirements can be found in §141.82.
  - Additional information on corrosion control treatment can be found in guidance #5, listed below.
  - Use Form 141-C of guidance #3 as a guide to report to BECQ your optimal corrosion control treatment recommendation.

## If you exceeded the COPPER Action Level at the 90<sup>th</sup> percentile sample

If your water system exceeds the copper Action Level of 1300 ug/l at the 90<sup>th</sup> percentile of your tap water samples, you must take the following actions:

1. Conduct Water Quality Parameter (WQP) monitoring in order to determine your water's corrosivity.
  - WQP monitoring must take place in the same compliance period in which your water system exceeds the copper Action Level.
  - Samples must be collected from entry points to the distribution system and from a set of representative sites located throughout the distribution system.
  - Requirements can be found in §141.87.
  - Additional information can be found in guidances #2 and #3, listed below.
2. Monitor your source water to determine if it is contributing copper to your water system and provide to BECQ a source water treatment recommendation.
  - Source water monitoring for lead and copper (at all entry points to the distribution system) and a source water treatment recommendation must be submitted to BECQ within 6 months of exceeding the copper Action Level.
  - Requirements can be found in §141.88 (monitoring) and §141.83 (treatment).
  - Additional information on source water monitoring and treatment can be found in guidance #3, listed below.
  - Use Form 141-D of guidance #3 as a guide to report to BECQ your source water monitoring results and treatment recommendation.
3. Provide to BECQ one or more corrosion control treatment recommendations to reduce your user's exposure to lead and copper.
  - Based on the results of lead & copper tap monitoring and WQP monitoring, within 6 months of exceeding the copper Action Level you must recommend to BECQ the installation of one or more corrosion control treatments.
  - Requirements can be found in §141.82.
  - Additional information on corrosion control treatment can be found in guidance #5, listed below.
  - Use Form 141-C of guidance #3 as a guide to report to BECQ your optimal corrosion control treatment recommendation.

## Guidance Documents

In addition to the requirements of the National Primary Drinking Water Regulations found in the CNMI Drinking Water Regulations (Part 2, Subpart I), the U.S. EPA guidance documents listed below provide additional information to help you comply with the regulations. All documents can be found at U.S. EPA's Office of Groundwater and Drinking Water's internet site, at <http://www.epa.gov/safewater/lcrmr/implement.html>.

1. Notification and Reporting Requirements for Partial Lead Service Line Replacement under the Lead and Copper Rule (EPA 815-R-99-022, April 2000)
2. How to Determine Compliance with Optimal Water Quality Parameters as Revised by the Lead and Copper Rule Minor Revisions (EPA 815-R-99-019, February 2001)
3. Lead and Copper Monitoring and Reporting Guidance for Public Water Systems (EPA 816-R-02-009, February 2002)
4. Lead in Drinking Water Regulations: Public Education Guidance (EPA 816-R-02-010, June 2002)
5. Revised Guidance Manual for Selecting Lead and Copper Control Strategies (EPA 816-R-03-001, March 2003)