MICHIGAN DEPARTMENT OF PUBLIC HEALTH

MEMORANDUM

Date: April 13, 1989

To: Water Supply Division Staff

From: Elgar WEB

Subject: Lead Contamination Act

As you probably have heard, EPA held a news conference on April 10 to "explain" the requirements of the Lead Contamination Control of 1988. The act basically deals with lead exposure in schools, especially from water coolers. There are no direct sampling requirments for schools in the act. The act requires EPA to develop a list of water coolers that may be lead lined or are "non lead free". It also requires the states to develop a program to assist school systems in assessing the exposure of lead in their water systems. This news conference caught us by surprise.

Rich Overmyer and I have developed a letter to be sent to the schools, day care centers and local health departments explaining their requirements and that the state will be developing a plan to assist the schools. Rich had been working on this prior to the news conference and had planned on this type of mailing. Along with this letter we are sending EPA's list of lead lined and non lead free water coolers. We hope to get this letter out as soon as possible but it has to be signed by the directors of three departments. We also plan to send a copy of this letter directly to the environmental health directors with a cover letter in case the letter to the administrators does not get to them.

If you get questions from school administrators or local health departments you can forward them to Rich or I.

WEB:lw

MICHIGAN DEPARTMENT OF PUBLIC HEALTH

MEMORANDUM

TO: Local Health Department
Environmental Health Directors

DATE: 4/15/88

FROM: William A. Kelley, P.E., Chief
Division of Water Supply
Bureau of Environmental and Occupational Health
Michigan Department of Public Health

SUBJECT: Notification At Schools

The attached packet of information on the EPA required lead notice will be sent out by this Department to all school superintendents in order to help them meet their obligation for public notification as required under part 141.34 of The Safe Drinking Water Act Amendments, PL 99-399 of 1986.

The notice is required of all community and nontransient water supplies. Community supplies have already begun this notification process, the schools should begin shortly, and we will provide a similar notice for the business/industry nontransient supplies on the noncommunity water supply inventory. The notification is required to begin before June 19, 1988.

We anticipate that this mandated lead notification will generate numerous phone calls and questions regarding lead in drinking water. Basically the lead issue involves contamination from lead components of potable water piping (lead pipe, solder, and flux) as opposed to source contamination of ground or surface water. Studies in Michigan and elsewhere have shown that where there are lead plumbing components, levels of lead exceeding the .050 parts per million MCL may be found when the water has been in contact with the lead for an extended period of time. The levels vary with the aggressiveness of the water, time, and other factors. Fortunately, tests also indicate that flushing the piping satisfactorily reduces the lead levels. Based on these findings, we are recommending that nontransient supplies implement a routine flushing of potable water lines each morning or especially after weekends or holidays. Home owners, and other consumers should follow similar procedures prior to using the water for drinking or cooking.

We expect that there will be numerous requests for sampling of lead. We are in the process of sampling nontransient supplies for metals including lead and most community supplies have been sampled for metals in the past. However, these samples normally represent the water quality at the source. They would not necessarily be a good indicator of the lead content of drinking water from a worst case scenario, ie, where a distribution system contains lead components and a sample is collected without flushing from a line that has not been used over a weekend. It is not practical or reasonable to attempt to sample distribution systems, service lines, homes, and nontransient potable water piping to determine what we know can occur, especially when flushing will effectively and reasonably address the concern.