

Rennaker, Joanne (DEQ)

From: Krisztian, George (DEQ)
Sent: Thursday, October 01, 2015 9:50 AM
To: Wyant, Dan (DEQ); Thelen, Mary Beth (DEQ); Pallone, Maggie (DEQ); Wurfel, Brad (DEQ); Tommasulo, Karen (DEQ); Busch, Stephen (DEQ)
Subject: Clarification on Lead Rules vs Guidance
Importance: High

Yesterday there was discussion as to why EPA had seemingly contradictory lead levels specified in the Lead and Copper Rule vs the Best Management Practices document. I did a little research and figured out what is going on.

The pertinent section of the Lead and Copper Rule reads as follows:

The treatment technique for the rule requires systems to monitor drinking water at customer taps. If lead concentrations exceed an action level of 15 ppb or copper concentrations exceed an action level of 1.3 ppm in more than 10% of customer taps sampled, the system must undertake a number of additional actions to control corrosion. If the action level for lead is exceeded, the system must also inform the public about steps they should take to protect their health and may have to replace lead service lines under their control.

The Best Management Practices states:

EPA recommends that schools and child care facilities take action if samples from any drinking water outlets show lead levels greater than 20 parts per billion.

So in short the Lead and Copper Rule is stating that corrective action is to be taken if more than 10% of the taps exceed 15 PPB while the guidance document is saying take action if **ANY** sampling point exceeds 20 PPB. The Lead and Copper Rule criteria would still apply and the Guidance Document offers additional and potentially more conservative practices even though on the surface the number is higher.

I hope this helps clarify the issue
George

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Rennaker, Joanne (DEQ)

From: Crooks, Jennifer <crooks.jennifer@epa.gov>
Sent: Wednesday, February 11, 2015 11:49 AM
To: Busch, Stephen (DEQ); Prysby, Mike (DEQ)
Cc: Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ)
Subject: Controlled Correspondence from citizen in Flint
Attachments: Flint Michigan Control 2 Feb 2015.docx

Importance: High

Hi, Steve. As we discussed, I've drafted our response and included information you gave us on Monday. Tom Poy has reviewed, so this is our final draft. If you could get back to me this afternoon with any changes, I'd appreciate it. These things are like ticking time bombs around here.

Thank you!

Jennifer