



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GRETHER
DIRECTOR

December 21, 2018

VIA E-MAIL AND U.S. MAIL

Ms. Nancy Stoddard
City of Parchment
650 South Riverview Drive
Parchment, Michigan 49004

WSSN: 5200
County: Kalamazoo
Supply: Parchment

Dear Ms. Stoddard:

SUBJECT: Lead and Copper Monitoring - Action Level (AL) Exceedance

The city of Parchment has conducted extensive educational and sampling efforts to inform their customers about lead in drinking water since August 2018. As part of this effort, you have distributed an informational notice, regarding lead, in August to all your customers. Also, you have completed targeted sampling and sent informational notices to those customers that are suspected of having a lead service line. Thank you for your efforts to investigate and inform your community.

During the most recent round of lead and copper monitoring of drinking water taps, from July 1 through December 31, 2018, the city of Parchment community water supply's 90th percentile value exceeded the AL for lead as summarized below.

Contaminant	AL	MCLG*	90 th Percentile Value	Number of Samples Above AL	Range of Sample Results	Typical Source of Contaminant
Lead	15 parts per billion (ppb)	0	16 ppb	7	0 ppb – 140 ppb	Corrosion of household plumbing systems; Service lines that may contain lead; Erosion of natural deposits
Copper	1.3 parts per million (ppm)	1.3	1.0 ppm	1	0 ppm – 1.6 ppm	Corrosion of household plumbing systems; Erosion of natural deposits

*MCLG: Maximum contaminant level goal means the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

An AL exceedance is not a violation, but it triggers other requirements under the administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399). Requirements include water quality parameter (WQP) monitoring, source water monitoring, corrosion control treatment, and public education (PE). As part of the increased investigative sampling and the changes in treatment Kalamazoo has completed, you may already be complying with some of the requirements in this letter. Please refer to the "Timetable of Upcoming Requirements" for your specific deadlines for each of the following requirements.

Issue a Public Advisory

An amendment to Act 399 on March 29, 2017, requires a public water supply to issue a Public Advisory (PA) within three business days to inform all persons served about the lead AL exceedance. It is the intent of the Department of Environmental Quality (DEQ) to work with you to develop the PA materials to ensure it complies with the requirements set forth in Act 399. Enclosed with this letter is a checklist to document the PA distribution activities. Please inform the DEQ when you are going to publish your PA or do a press release.

Deliver Consumer Notice of Lead and Copper Results

You have distributed Consumer Notices and provided an example copy to the DEQ. Thank you for your efforts to complete this requirement timely.

Distribute PE

The city of Parchment has conducted an extensive educational effort since August 2018. As part of this effort, you distributed an informational notice regarding lead in August to all your customers. Thank you for your efforts to inform your community.

In response to the AL exceedance, you are required to distribute PE materials to all consumers 60 days after the end of the monitoring period that exceeded the AL. Repeat each year until the lead AL is no longer exceeded. This material is intended to educate consumers about lead health effects, sources, and steps to minimize exposure. Enclosed is a template you may use to meet the requirement. Note that the PE material must include information about the exceedance in your water supply, information about what you are doing to reduce lead levels, information about lead service lines in your distribution system, and information about the history of lead levels in your water supply.

Also attached is a checklist of PE activity requirements with a certification form to return to us no later than ten days after the PE is due along with a sample copy of the PE material.

Conduct WQP Monitoring

You have already increased your WQP monitoring. Please continue to conduct the WQP monitoring per the e-mail sent by Ms. Heather Bishop, District Supervisor, Kalamazoo District Office, on December 4, 2018. WQP ranges were established in the letter to the city of Kalamazoo, dated September 28, 2018, and must be maintained. Please work with the city of Kalamazoo to ensure levels remain within the ranges in the Parchment distribution system. The letter is enclosed for reference.

Conduct Source Water Monitoring

Six months after the end of the monitoring period that exceeded the AL, collect one sample for lead and copper at each entry point to the distribution system. Repeat every third year until both lead and copper ALs are met during the entire three-year period. Because the city of Parchment purchases water from the city of Kalamazoo, you will need to coordinate with the city of Kalamazoo to comply with entry point sampling requirements.

Lead and Copper Monitoring

You have already increased your lead and copper monitoring. Please continue to collect samples from 20 sites between January 1 and June 30, 2019, and again between July 1 and December 31, 2019.

If you need to select new sampling sites, choose the highest Tier criteria available within the distribution system, giving Tier 1 sites first priority. Please see the enclosed tiering criteria to help inform your site selection process.

If you have Tier 1 or Tier 2 sites, i.e. sites with a lead service line, compliance sampling will require that you collect a 1st liter and 5th liter sample from each sampling location. Specific instructions regarding the 1st and 5th liter sample collection procedures are currently being developed and will be provided after January 1, 2019. Within 30 days of learning of results from the 1st and 5th liter samples, provide individual lead tap results to people who receive water from sites that were sampled. Even if lead was not detected, all monitoring, reporting, consumer notification, and DEQ certification requirements remain in effect.

Consumer Confidence Report (CCR)

Include this AL exceedance in your CCR, which is due to our office, your customers, and the local health department by July 1, 2019. You may use the table format from the first page of this letter.

Also, because the lead AL was exceeded, include the following health effects language:

Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.

Lead Service Line Replacement

Water supplies that exceed the lead AL in a compliance monitoring period after installing corrosion control treatment must begin to replace lead service lines. You must identify the number of lead service lines in your community and replace a minimum of 7 percent of the original number of lead service lines each year.

To comply with Act 399, you will need to provide the initial number of lead service lines that are in place when the replacement program begins and an identification of the portion or portions owned by the system. Please submit this information no later than June 30, 2019. You are required to replace 7 percent of the lead service lines one year from the end of the monitoring period that exceeded the AL. You may discontinue your lead service line replacement activities if the lead action level is met in two consecutive six-month monitoring periods. However, mandatory lead service line replacement for all community water systems will begin January 1, 2021.

What Happens Next?

If you can show that both lead and copper ALs are met in two consecutive six-month periods, then some of the requirements outlined in this letter will no longer apply.

Timetable of Upcoming Requirements

Complete By	Requirement	Comments
Within three business days	Distribute a PA.	Distribute a PA to inform all persons served by the water supply of the lead AL exceedance. Distribution of the notice must be in a form and manner designed to fit the specific situation and must be reasonably calculated to reach all persons served by the public water supply.
February 19, 2019	Perform PE activities including delivering PE materials to all consumers.	PE required activities are listed in enclosed template and checklist. Repeat every year until the lead AL is met in the most recent round of sampling.
March 1, 2019	Send the DEQ certification of PE compliance along with a sample copy of the materials delivered.	Sample certification enclosed. Required whenever PE required.
Between January 1 and June 30, 2019	Collect 20 samples from the distribution system and have them analyzed for lead and copper.	Report the results to the DEQ and deliver the consumer notice of individual lead and copper results using the downloadable <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> . Report due July 10, 2019.
June 30, 2019	Submit your lead service line inventory.	Provide the initial number of lead service lines in your distribution system. Develop a plan to remove 7 percent of the lead service lines by December 31, 2019.
June 30, 2019	Collect one lead and copper sample from each entry point to the distribution system.	Repeat every third year until both ALs are met for the whole three-year period.
July 1, 2019	Report the 2018 AL exceedance in the CCR.	Specific lead health effects language must be included.
Between July 1 and December 31, 2019	Collect 20 samples from the distribution system and have them analyzed for lead and copper.	Report the results to the DEQ and deliver the consumer notice of individual lead and copper results using the downloadable <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> . Report due January 10, 2020.
September 28, 2019	For the January through June 2019 monitoring, send the DEQ certification of Consumer Notice of Lead and Copper results compliance along with a sample copy of the notice delivered.	Download <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> in Word or PDF format from http://michigan.gov/deqleadcopper .
December 31, 2019	Replace 7 percent of lead service lines.	Replace a minimum of 7 percent of lead service lines.
March 31, 2020	For the July through December 2019 monitoring, send the DEQ certification of Consumer Notice of Lead and Copper results compliance along with a sample copy of the notice delivered.	Download <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> in Word or PDF format from http://michigan.gov/deqleadcopper .
June 30, 2022	Collect one lead and copper sample from each entry point to the distribution system.	Repeat every third year until both ALs are met for the whole three-year period.

Ms. Nancy Stoddard
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We recognize that the Lead and Copper Rule is complex and may be confusing. We will continue to offer assistance in implementing these regulations. If you have any questions, please contact us at boltj@michigan.gov; onanb@michigan.gov; or at the phone numbers provided below.

Sincerely,



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Enclosures (PA Checklist, PE Material Template and Sample Certificate, WQP report form, Tier Criteria, Kalamazoo WQP Letter)

cc/enc: Mr. Jim Duby, City of Parchment
Mr. James Baker, City of Kalamazoo
Mr. James Ritsema, City of Kalamazoo
Mr. Tom Spitzner, City of Kalamazoo
Ms. Heather Bishop, DEQ
Ms. Katelyn Reyes, DEQ
Ms. Stacy Wilson, DEQ