

Lead Education Program and Notification Requirement Update for Lead & Copper Rule:

The purpose of the Lead and Copper Rule (LCR), and the rule's Short-Term Revisions, adopted April 2016 by Arizona Department of Environmental Quality, is to protect the consumers of public water systems from exposure to lead and copper in drinking water. This article emphasizes the lead public education requirements of the rule since there are no comparable requirements for copper.

The LCR requires community and non-transient non-community water systems to monitor lead and copper levels at the taps of consumers who have volunteered to participate in the testing program.

Determining the Action Level (AL)

Utilities must ensure that water from the customer's tap does not exceed the "action level" (AL) for lead of 15 parts per billion (ppb) in drinking water in at least 90 percent of the taps sampled. This means that if 90% (i.e., 9 out of 10) of the samples taken are below the AL, then the system is in compliance. In other words, no more than 10 percent of the samples may exceed the 15 ppb lead AL.

During the first year of sampling, each water system must complete at least two consecutive 6-month Standard Monitoring periods during which, it must collect at least one tap sample from each of the selected sites to determine the action levels.

If the lead AL is exceeded (i.e., more than 10% of the samples exceed 15 ppb), it triggers "actions," which a public water system must follow such as *public education requirements outlined below*. No public education is required, if the copper AL of 1.3 parts per million (ppm) is exceeded.

LCR's lead "consumer notification" & "public education" requirements:

☐ **Provide sample results to each homeowner.** You must notify the participating consumers of the tap results of the lead monitoring tests, **within 30 days** of receiving the lab results, *even if the sample does not exceed the lead "action level."*

☐ **A Lead AL exceedance requires public education requirements.** If during a monitoring period, more than 10 percent of the tap water samples collected exceed the AL of 15 parts per billion (ppb), you must conduct a "public education program."

"Public education" means that system owners must notify customers that the AL was exceeded, as well as deliver public education information (about the dangers of lead and how to reduce its health risks) **within 60 days** after the end of the monitoring period in which the exceedance occurred.

Please note, *Water systems must submit all written public education materials, for approval, to their regulatory agency prior to delivery.*



LCR "Public Notification" (PN) requirements

Public notifications for the LCR generally fall into a Tier 2 or Tier 3 category and must be issued by the system owner **within 30 days** of the violation.

In general, lead public notification is required for the following violations:

- Failure to monitor for lead and copper.
- Failure to provide customers with the required "public education" cited above.
- Failure to install a required optimal corrosion control treatment, or failure to submit a control treatment recommendation or plan to DEQ.

Drinking Water Monitoring & Protection Contact Information:

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Drinking Water Hotline (602) 771-9200