Frequently Asked Questions (FAQ)
Lead and Copper Rule Letter

1. *Why are Community Water Systems being asked by the Department to go beyond the Lead and Copper Rule (LCR) requirements?*

   Recent events and research suggests that the LCR does not adequately protect consumers from exposure to lead in public drinking water. According to The Center for Disease Control (CDC), exposure to lead can cause behavior problems and learning disabilities in young children, and can also affect the health of adults. US EPA issued three communications to states regarding measures that Community Water Systems should take in order to reduce the risk of lead exposure. We expect many of the recommendations in this letter will become part of the US EPA proposed rule revisions to the LCR in 2017. These recommendations will likely become requirements sometime after year 2020. .

2. *Why are community water systems being asked to inventory all lead components of their distribution system?*

   The LCR requires systems to identify residences with lead service lines and copper plumbing with leaded solder in order to aid in establishing appropriate monitoring sites. Historically, once a System identified an adequate number of monitoring sites, Systems would stop looking for lead distribution system components, and a comprehensive inventory of the entire distribution system remained incomplete. As a result, many Systems are not aware of lead service lines and other lead components in their community that may contribute to lead exposure.

3. *Do Community Water Systems have to sample for lead at the same monitoring sites in each monitoring period?*

   Yes. The Department has been working with municipal water systems to verify that sites chosen for LCR monitoring fit within the tiered criteria required for lead sampling . The Department will continue this work with all Community Water Systems during sanitary surveys to verify that sites representative of the tiered site selection criteria are being used. These must be used for LCR sampling during each monitoring period. The Department is working towards developing a program within its data system that will reject samples that are not part of an approved LCR Monitoring Site Plan.

   a. *If a residence has a lead service line replaced, should I have it removed from my Monitoring Site Plan?*

      Yes. If a residence does not have a lead service line or copper plumbing with leaded solder, it should be removed from the Monitoring Site Plan and a new monitoring site meeting the Tier 1 criteria should be selected.

   b. *If a home used as a LCR monitoring site is sold, does the home have to stay on the Monitoring Site Plan?*

Yes. Systems may want to review the LCR sampling instructions and requirements with the new homeowner to make sure they are willing and able to complete sampling procedures.. If sampling cannot be continued at a site within a System's designated Monitoring Site Plan , a new monitoring site meeting the Tier 1 criteria must be selected and changes communicated to your local DNR representative.

4. *What specific instructions should Community Water Systems give their customers that are being asked to monitor for lead and copper at their homes as a part of LCR compliance monitoring?*

US EPA issued a memo clarifying proper sampling procedures on February 29, 2016. Language from this memo should be included with monitoring instructions given to customers who perform sampling on the Sytem's behalf. DNR also includes a copy of monitoring instructions in each System's final Monitoring Schedule mailed every January; these instructions can be copied and distributed to customers performing sampling.

https://www.epa.gov/dwreginfo/memo-clarifying-recommended-tap-sampling-procedures-lead-and-copper-rule

5. *Why should Partial Lead Service Line replacement be avoided? How can Systems work with customers to encourage the replacement of the private portion of lead service lines?*

Studies have shown that lead levels increase in drinking water in homes where Partial Lead Service Line replacement has been done. Some communities have implemented ordinances that require homeowners to replace their portion of the line when the system replaces the utility portion. Other communities have worked to identify other funding sources within their communities to assist with the replacement of the private portion of the line. Currently, there are funds available from the DNR to replace the private portion of the lead service line.

http://dnr.wi.gov/Aid/documents/EIF/leadServiceLineFunding.html

The American Waterworks Association has a guide available to help communicate with homeowners regarding lead service line replacement: http://www.awwa.org/portals/0/files/resources/publicaffairs/pdfs/finaleadservicelinecommguide.pdf.

6. *Our system is adding orthophosphate for corrosion control; therefore, I do not need to worry about lead in our drinking water, correct?*

Orthophosphate is one way to limit the corrosion of lead distribution system materials. The specific chemical used and the feed rate should be reviewed periodically to ensure corrosion control is being optimized. The Department must be notified of any treatment changes that will effect water quality, per s. NR 810.20. New research shows that orthophosphate addition reduces the risk of exposure to lead in drinking water, but in order to compleltly eliminate the risk, lead service lines and other lead components must be removed.

7. *Delivering monitoring results within 24 hours to customers who are a sampling site for LCR monitoring will be difficult if results come in on a Friday. Can we get this done in one business day instead?*

   The Department encourages Systems to deliver the results to the effected customers within 24 hours. In the rare case that results are received from the lab on a Friday, the utility can decide whether it is possible or practical to get the results out by Saturday or wait until Monday.