

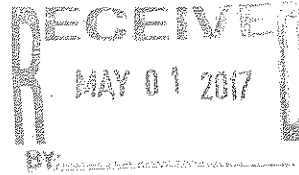


Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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LEAD AND COPPER RULE (LCR) REVIEW SUMMARY SHEET

Requirements for Systems **without** Corrosion Control Treatment that *exceed* an Action Level
(90th percentile result was greater than the Action Level)

The following is a review summary sheet for the results you submitted to the Department of Environmental Protection (MassDEP) for the compliance and monitoring period specified. This sheet is intended to help you remain in compliance with the LCR. Exceeding an LCR Action Level is not a violation of 310 CMR 22.00, however to maintain compliance your Public Water System is required to comply with all checked () items identified below with their respective compliance dates. Please refer to the Drinking Water Regulations (310 CMR 22.00) for specific requirements relative to LCR and Consumer Confidence Report Rule.

PWS Name:	WESTPORT ELEM. SCHOOL	PWS ID#:	4334017	TOWN:	WESTPORT
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Sampling Date(s): 4/14/2017 Round #: 1 Revised Form
 Compliance Period: 1/1/2017 to 6/30/2017 Frequency: Semiannual Annual Every 3 Years
 Monitoring Period: 4/1/2017 to 6/30/2017 Number of Samples Required? 20
 School/Childcare samples required per 310 CMR 22.06B(7)(a)9? Yes , No

SAMPLING RESULTS FOR LCR COMPLIANCE for the period specified above:

Parameter	Action Level (AL) (mg/l)	90 th % (mg/l)	90 th % >AL?	# samples	# samples above AL
Lead	0.015	0.068	yes	20	4
Copper	1.3	1.700	yes	20	4

SCHOOL/CHILDCARE RESULTS for the period specified above:

School/Childcare Sampling Results required by 310 CMR 22.06B(7)(a)9: This is an additional requirement for community water supplies with every sampling round unless the school/daycare facility has its own well. These four diagnostic samples are in addition to the minimum number required and the results are not used in determining the 90th percentiles for lead and copper. These samples are used to educate the school/school district or childcare facility on the importance of lead and copper sampling, the MassDEP Lead Contamination Control Program (LCCA) for schools and childcare facilities. The results for two (2) sampling sites (kitchen and drinking water source, such as a water fountain) for each of two schools/childcare facilities are summarized in the table below:

School/Childcare Sampling Location	Lead (mg/l)	> AL?	Copper (mg/l)	> AL?
		yes / no		yes / no
		yes / no		yes / no
		yes / no		yes / no
		yes / no		yes / no

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.
TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

EXCEEDANCE REQUIREMENTS (for PWSs without corrosion control treatment in operation)

To maintain compliance with the LCR you must take the specific action(s) checked (☒) below with their respective compliance dates.

- Public Education submittal of plan for approval as required by 310 CMR 22.06B (6):** As a result of the lead action level exceedance, submit a letter to MassDEP describing actions that will be taken to administer the Public Education Program on the Health Effects of Lead in drinking water (prior to delivery) for approval **within 30 days (per MassDEP Policy) of the end of the Monitoring Period noted above**. Please be aware that if you wish to exclude the language on lead service lines from the public education materials you must submit a written request and certification that your system does not have lead service lines to MassDEP for approval. A public education brochure template is available on the MassDEP website at: <http://www.mass.gov/eea/agencies/massdep/water/approvals/drinking-water-forms.html#9>
- Public Education Delivery to all Consumers and certification to MassDEP required by 310 CMR 22.06B (6):** As a result of the lead action level exceedance, deliver a Public Education Program on the Health Effects of Lead in drinking water to all consumers **within 60 days of the end of the Monitoring Period (MP) noted above and within an additional 10 days** submit to MassDEP certification that the content and delivery requirements have been met.
- MassDEP and DPH strongly encourage outreach to sensitive populations that may be difficult to contact, such as tenants that may not directly receive bills and non-English speaking consumers. Please consider these populations when fulfilling public education requirements in **310 CMR 22.06B (6)(b)2f**. Activities such as direct material distribution to all multi-family homes and institutions and targeted individual customer contact should be used to reach out directly to tenants and target non-English speaking consumers.
- Notification to sampling program participants (Consumer Notice) required by 310 CMR 22.06B(6)(c):** All water systems must deliver a consumer notice of lead and copper tap water monitoring results to persons served by the water system at sites that are tested as soon as practical, but no later than 30 days after the system learns of the tap monitoring results.
A notification template for participating homeowners/individuals is available at:
<http://www.mass.gov/eea/docs/dep/water/approvals/year-thru-alpha/e-thru-1/lcrhn.doc>
A notification template for participating schools or childcare facilities is available at:
<http://www.mass.gov/eea/docs/dep/water/approvals/year-thru-alpha/e-thru-1/lcrsn.doc>
The Consumer Notice shall also include an explanation of the health effects of lead, steps consumers can take to reduce exposure to lead in drinking water, contact information for the public water system, the MCLG and action level for lead. MassDEP recommends that you also include a copy of the Massachusetts Department of Public Health's (MDPH) fact sheet on lead with your consumer notice. MDPH factsheets are available at www.mass.gov/dph/lead-sources
- Certification of notice to sampling program participants (Consumer Notice) required by 310 CMR 22.06B(6):** As soon as practical, but no later than within 90 days of the end of the monitoring period noted above, submit to MassDEP certification that persons served by the taps tested have been notified of the results. For a copy of the Certification form see <http://www.mass.gov/eea/docs/dep/water/approvals/year-thru-alpha/e-thru-1/lcercert.doc>
- Consumer Confidence Reporting (CCR) required by 310 CMR 22.16A:** Community systems are required to include lead and copper results as provided above in your Consumer Confidence Report (CCR) except lead must be reported in parts per billion (ppb). For example, 0.015 mg/l is 15 ppb.
- Certification of CCR required by 310 CMR 22.16A:** Please note that every CCR must include a short informational statement about *lead* in drinking water and its effects on children. Please refer to the CCR requirements of 310 CMR 22.16A(12). For a copy of the CCR Certification form see <http://www.mass.gov/eea/docs/dep/water/approvals/year-thru-alpha/06-thru-d/ccrcert.doc>
- Schools/Childcare Facilities that are a PWS or were sampled by a community system:** Please remove from service any sites where the sample result was elevated for lead and/or copper until corrective action(s) have been taken. Within 60 days of the end of the Monitoring Period, please investigate and notify MassDEP of corrective actions taken to address the elevated lead and/or copper result(s) for samples collected from this school/childcare. Follow the MassDEP LCCA Follow-up Steps for Schools or Childcare Facilities listed at <http://www.mass.gov/eea/docs/dep/water/drinking/alpha/i-thru-z/pbfacts2.doc>
- Water Quality Parameters monitoring required by 310 CMR 22.06B (8):** All large, medium, and small size systems that exceed the lead or copper action level shall monitor water quality parameters in addition to lead and copper. Water Quality

Parameters must be collected for all medium and small size systems as long as the lead action level is exceeded. Submit two (2) rounds of water quality data on Form WQA-A (available at <http://www.mass.gov/eea/agencies/massdep/water/approvals/drinking-water-forms.html#9>) **within 10 days of the end of the Monitoring Period¹ noted above** but no later than **within six months of the end of the Monitoring Period**. Due to the Short-Term Revisions small or medium-size systems that were on reduced monitoring that have exceeded the action level are given an additional two months to take WQP samples after the end of the monitoring period. Sites to be sampled include each entry point after any treatment and distribution taps representative of water quality throughout the distribution system (e.g., bacteria sampling sites). **In accordance with 310 CMR 22.06B(3)(f)** please be aware that these results will be used to set water quality parameters.

The number of distribution sites to be sampled is based upon the population served:

System Size (No. of People Served)	No. of Sites for Water Quality Parameters
>100,000	25
10,001-100,000	10
3,301 to 10,000	3
501 to 3,300	2
101 to 500	1
<100	1

In accordance with 310 CMR 22.06B(8)(b) samples are to be analyzed for the following water quality parameters: pH (field measurement), temperature (field measurement), alkalinity(when alkalinity is adjusted), conductivity, calcium, orthophosphate (if inhibitor containing a phosphate compound is used), and silica (if inhibitor containing a silicate compound is used). It is recommended that analyses for dissolved carbon dioxide, iron, and manganese also be included. If the source is a rock well and it has never been sampled for radon, it is recommended that radon be analyzed as well.

- Source Water Sample(s) (Point of Entry Samples) required by 310 CMR 22.06B(9)(b):** Any system that exceeds the lead or copper action level at the tap must collect first draw samples from each Point of Entry after any treatment **within six months of the end of the Monitoring Period noted above** and submit the results to MassDEP on Form LCR-C within 10 days. MassDEP recommends that this sampling round occurs as soon as possible. **If the results indicate elevated lead and/or copper levels entering the distribution system, an evaluation of Point of Entry Treatment must be included with the submittal of the BRP WS 29 or 34 permit application noted below.**
- Submit a letter to MassDEP regional office noting the possible cause(s) of the elevated lead and/or copper levels and corrective actions. The letter must be submitted within 60 days of the end of the monitoring period noted above.
- Corrosion Control Treatment required by 310 CMR 22.06B:** Submit a letter of intent to MassDEP **within 60 days of the end of the Monitoring Period noted above** and propose a corrosion control treatment strategy with the submittal of permit application "BRP WS 29 or 34-Chemical Addition Retrofit" with transmittal form to MassDEP **within six months of the end of the Monitoring Period noted above**. Include dissolved carbon dioxide, iron, manganese, chloride, sulfate, aluminum, and radon Point of Entry data if available. Instructions, the permit application and transmittal form are available at: <http://www.mass.gov/eea/agencies/massdep/water/approvals/drinking-water-forms.html#20> . Technical guidance manuals for Selecting Lead and Copper Control Strategies and maintaining compliance with other Drinking Water Rules are available at: <http://www.epa.gov/dwreginfo/lead-and-copper-rule-compliance-help-public-water-systems>.
- EPA and MassDEP recommend that systems with corrosion control treatment follow the New EPA "Optimal Corrosion Control Treatment Evaluation Technical Recommendations", when evaluating corrosion control treatment issues. These recommendations provide the most appropriate treatment for controlling lead and copper and complying with the corrosion control treatment (CCT) requirements of the LCR. It is particularly useful for those systems that repeatedly fail to meet the Lead Action Level or are in close proximity to the Action Level. It is an opportunity for PWSs to re-evaluate treatment techniques in the context of possible changing water quality or the need of a more effective method of treatment. The document is available at: <https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations>

¹ In response to the EPA's request for prompt action on LCR MassDEP recommends that results be submitted within 10 days of end of the monitoring period. <https://www.epa.gov/sites/production/files/2016-03/documents/samplelettercommissionersfeb2016.pdf>

Lead and Copper Sampling required by 310 CMR 22.06B: Please be aware that any approval issued by MassDEP for lead and copper sampling at a reduced frequency or reduced number of sampling locations is hereby revoked. Lead and copper tap sampling must be conducted on a semiannual basis for the standard number of sampling sites

Submit a revised lead and copper sampling plan for the standard # of sites for DEP review and approval.

Submit to DEP lead and copper results from approved sites collected during:

Approved Tap Samples 20 Year 2017 Beginning in: Quarter 2 (April-June) Quarter 4 (Oct-Dec)

A revised Water Quality Sampling Schedule will be issued under separate cover.

It is recommended that school samples be collected during those months when the water system is in use.

Other: _____

Failure to take the required corrective actions within the deadlines identified above may subject you to enforcement. Violations of M.G.L. c 111, § 160 and 310 CMR 22.00 may result in fines up to \$25,000 per day and/or imprisonment up to one year for each day the violation continues.

REMINDERS

Please see MassDEP recommendations on sharing information with consumers on lead and copper results, lead service line locations, having your certified laboratories use eDEP for reporting drinking water analysis, and other EPA and MassDEP LCR recommendations. These recommendations are located at <http://www.mass.gov/eea/agencies/massdep/water/drinking/lead-in-drinking-water.html>

AVAILABLE RESOURCES

Reporting forms are available on the MassDEP website at: <http://www.mass.gov/eea/agencies/massdep/water/approvals/drinking-water-forms.html#9>

For more information on the Lead and Copper Rule, see <http://www.mass.gov/eea/agencies/massdep/water/approvals/drinking-water-forms.html#10> or contact the Drinking Water Program at program.director-dwp@state.ma.us or 617-292-5770.


For additional health information to share with your consumers see Massachusetts Department of Public Health's fact sheet on lead located at <http://www.mass.gov/eohhs/docs/dph/environmental/lead/lead-drinking-water-faq-2016.pdf>.

For EPA Lead and Copper Rule Monitoring and Reporting Guidance see <https://nepis.epa.gov/Exe/ZyPURL.cgi?Dockey=P100DP2P.txt>

FOR QUESTIONS AND MORE INFORMATION

Please contact:

Name:	Phone #:	Email:
Giliane Tardieu	508-946-2789	Giliane.tardieu@state.ma.us


Drinking Water Program

4/27/17
Date

Attachment(s): Form WQA-A

Form LCR-C

LSLR Program Plan/Materials Survey forms

Public Education Program information

cc:

With attachments: Certified Operator: Randall Clarkson ecc

W/o attachments:

Board of Health ecc

MDPH ecc

DEP Use Only: Data Entry-WQTS

File Copy

Y/SERO/WESTPORT/Westport Elementary School /4334017/LCRALE exceedance summary/ Date