



Commonwealth of the Northern Mariana Islands
OFFICE OF THE GOVERNOR

Bureau of Environmental and Coastal Quality

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March 22, 2016

Joel Beauvais, Deputy Assistant Administrator
United States Environmental Protection Agency, Office of Water

Dear DAA Beauvais:

This letter is in response to your letter dated February 29, 2016 urging BECQ to take action in several areas of the Lead and Copper Rule management and public education. I am pleased to let you know that BECQ has made progress on the five topic areas you requested we focus on listed below. BECQ's specific progress is in blue font at the end of each topic area:

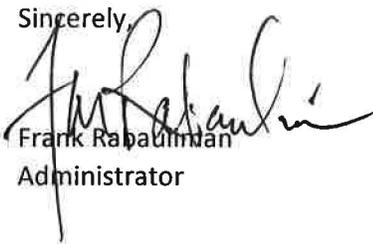
1. Confirm that the state's protocols and procedures for implementing the LCR are fully consistent with the LCR and applicable EPA guidance; [BECQ adopted the Lead and Copper Rule (LCR) in December 2000, and established at that time guidance material for selecting sampling locations collecting samples. BECQ's guidance materials were based on EPA guidance. A materials inventory of all PWS's required to sample for lead and copper was conducted at that time, and sample sites were selected based on the tiering system. New PWSs since that time have also been required to develop their lead and copper sampling plans based on their materials inventory. It is BECQ's belief that all of our protocols for implementing the LCR are fully consistent with EPA guidance.]
2. Use relevant EPA guidance on LCR sampling protocols and procedures for optimizing corrosion control; [BECQ uses EPA guidance when requiring PWSs to provide corrosion control.]
3. Post on your agency's public website all state LCR sampling protocols and guidance for identification of Tier 1 sites (at which LCR sampling is required to be conducted); [BECQ has partnered with a local non-profit organization to publish lead and copper information on their website. The non-profit is the Mariana Islands Water Operator Association (MIWOA) and their website address is: <http://www.MarianasOperators.org>. Lead and copper information is under the following page <http://www.marianasoperators.org/lead-and-copper-info.html>. BECQ has published a link to this website from our own website <http://becq.gov.mp>. On the MIWOA website is a page about sampling protocols <http://www.marianasoperators.org/tap-sampling-procedures.html> and a page about the tiering system for selecting sample sites <http://www.marianasoperators.org/sample-site-guidance.html>.]
4. Work with public water systems – with a priority emphasis on large systems – to increase transparency in implementation of the LCR by posting on their public website and/or on your agency's website: [Specific information about every public water system in the CNMI required to sample for lead and copper (55 water systems total) has been published on the MIWOA website with links available on this page <http://www.marianasoperators.org/system-specific-info.html>.]
 - a. The materials inventory that systems were required to complete under the LCR,

including the locations of lead service lines, together with any more updated inventory or map of lead service lines and lead plumbing in the system; and [There are no lead service lines or lead plumbing in the CNMI. For each water system a link to the Lead and Copper Site Certification Form has been provided. This form shows that a material inventory was conducted for the system and sample sites were selected based on the materials inventory. The form was certified by the water system and BECQ's Drinking Water Program.]

- b. LCR compliance sampling results collected by the system, as well as justifications for invalidation of LCR samples; and [The latest round of sample results for every public water system required to sample for lead and copper is published on the MIWOA website on the specific page for that water system. There has not been an invalidation of a lead or copper sample result in the CNMI to date.]
5. Enhance efforts to ensure that residents promptly receive lead sampling results from their homes, together with clear information on lead risks and how to abate them, and that the general public receives prompt information on high levels in drinking water systems. [BECQ will continue its ongoing efforts towards providing information on lead and copper risks and how to abate them. The local public utility that provides piped water to the majority of homes on our three inhabited islands routinely provides the test results to individual home owners that assisted in collecting lead and copper samples from their houses. BECQ assisted the local hospital develop public education material for the hospital after results from their facility exceeded the action level several years ago (the hospital immediately revised their corrosion control and they have not had an exceedance since then). Other water systems that have exceeded the action level include hotels and condominiums. When there are permanent residents, they are notified immediately upon receipt of lead and copper test results, but in many cases such as at hotels, it is not possible to notify the appropriate occupants.]

In performing our review of our management of the lead and copper rule, we identified several areas that we could improve including prompt notification to water systems when their sampling schedule or number of samples required to collect changes. If there are other areas in our lead and copper management program you feel could use adjustment, we welcome the opportunity to enhance our program.

Sincerely,



Frank Rapaulliman
Administrator

Cc Corine Li, USEPA Region IX Drinking Water