

Georgia Department of Natural Resources
Environmental Protection Division

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Judson H. Turner, Director
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March 30, 2016

Mr. Joel Beauvais
Deputy Assistant Administrator
Office of Water
United States Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Beauvais:

I am writing to respond to your request for information regarding Georgia's activities in five near-term action areas identified in your letter of February 29, 2016 to help assure the public we are working together with EPA to address risks from lead in drinking water.

As a primacy state, the Georgia Environmental Protection Division permits about 2,400 public water systems (PWS) to provide water in accordance with the requirements of the Safe Drinking Water Act. In addition, our EPD Laboratory analyzes more than 50,000 drinking water samples each year, including more than 7,000 drinking water samples for lead. We share EPA's interest in assuring the public that Georgia's program is properly implemented, and, in support of that effort, provide activity summaries below for each of the near-term action areas.

Action Area 1. Since January 2016, when the issues in Flint were publicized throughout the nation, we re-examined our procedures and responses to Action Level Exceedances (ALEs), the Systems' responses to ALEs, and the overall effectiveness of our program within the parameters of the current Lead and Copper Rule. We confirmed appropriate actions were taken, and that the systems have either returned to compliance or, in the more recent cases, are on track to do so. We provided extensive information to EPA Region 4 through several communications/calls during this period regarding our implementation of the Lead and Copper Rule (LCR), as well as individual sample results for lead for systems with ALEs, summaries of causes/actions taken, and other information. These efforts **confirmed that Georgia's protocols and procedures are fully consistent with the LCR and applicable guidance**, as substantiated in the information we provided to Region 4.

Action Area 2. EPD's LCR sampling protocols and procedures for optimizing corrosion control incorporate available, relevant EPA guidance. Specifically:

- Georgia EPD uses the available EPA guidance on LCR sampling protocols and procedures to ensure adequate optimal corrosion control treatment for those systems serving greater than 50,000 persons or exceeding the lead action level of 0.015 mg/L or copper action level of 1.3 mg/L in more than 10% of customer taps sampled during the compliance period. Most of the corrosion control treatment systems were installed at the onset of the LCR many years ago. PWSs providing optimal corrosion control treatment continue to monitor Water Quality Parameters (WQPs) in accordance with the LCR and submit the results to EPD.

- PWSs exceeding the action levels are provided assistance from EPD through a contract with the Georgia Rural Water Association (GRWA). GRWA visits the systems to collect the required lead and copper source samples and conduct WQP monitoring. The results of the sampling are forwarded to EPD.

EPD's LCR sampling protocols and procedures are updated as EPA issues revised/updated guidance. Accordingly, EPD revised the sampling protocols and procedures to reflect the clarifications in EPA's February 29 memo pertaining to removal and cleaning of aerators and pre-stagnation flushing.

Action Area 3. LCR sampling protocols and guidance for identification of Tier 1 sites (at which LCR sampling is required to be conducted) are posted on EPD's Drinking Water Technical Guidance webpage at <http://epd.georgia.gov/drinking-water>. EPD updated this page to include the Attachment to your February 29, 2016 letter (Memorandum from Peter Grevatt; "Clarification of Recommended Tap Sampling Procedures for Purposes of the Lead and Copper Rule"). We also added a link from our website to EPA's "Drinking Water Requirements for States and Public Water System" webpage to facilitate prompt distribution of future updates to PWSs.

The page now includes:

- Fact Sheet on Lead in Drinking Water
- Lead and Copper Rule Sample Site Selection & Sampling Protocols
- Lead and Copper Consumer Notice Certification Form.
- A link to Drinking Water Watch (<http://gadrikingwater.net>), including navigation instructions
- EPA's Lead and Copper Sampling Memorandum Dated February 29 2016
- Link to US EPA Optimal Corrosion Control Treatment Evaluation Technical Recommendations
- Link to US EPA Drinking Water Requirements for States and Public Water Systems
- Link to US EPA Lead and Copper Rule
- Link to US EPA Lead and Copper Rule Compliance Help for Public Water Systems

Over the next 90 days, EPD plans to re-design our website home page to increase the visibility of technical guidance for water systems and drinking water compliance related information for the public. In conjunction with this re-design EPD will post a list of PWSs with ALEs on its website on a quarterly basis.

In addition to online availability of protocols and guidance, the LCR sampling protocol is included in each LCR Sample Kit provided to the PWS by the EPD Laboratory for reference during sample collection.

Action Area 4. EPD will continue to work with public water systems to increase transparency in implementation of the LCR. Our long standing practice has been to use information technology to make technical information and water compliance data easily accessible to water systems and the public. Georgia's Drinking Water Watch website (<http://gadrikingwater.net>) is a publicly accessible website that contains detailed information about all of the public drinking water systems in Georgia, including all compliance-based sample analytical results. EPD recently enhanced of our lab data flow process so that analytical results are updated weekly. For the Lead and Copper Rule, **LCR compliance sample results for all PWS's, 90th percentile summaries, and sample schedules are available on this website.** Note that Georgia EPD rarely invalidates lead/copper samples, and the four criteria for sample invalidation are derived directly from the LCR. Records for past invalidations are maintained in the individual water system file, and are available for public review.

When the LCR was initially implemented, PWSs performed materials evaluations in order to identify a sufficiently large pool of sites that would satisfy the sampling requirements. The Division maintains hard copy records related to sample site identification in accordance with requirements of the LCR; these records are available for public review and copying.

EPD's interactions and partnerships with professional and trade associations provide a very effective mechanism to raise awareness and disseminate information to the regulated community. For example, EPD provided an update on LCR activities during a recent forum with the Georgia Association of Water Professionals (GAWP). Additional outreach with GAWP and GWRA scheduled over the next few months will provide more opportunities to encourage systems to follow protocols and use their websites to promote transparency.

Action Area 5. The EPD Laboratory analyzes lead and copper samples for more than 99% of Public Water Systems that are required to sample under the LCR and provides reports to the water system for each individual site for distribution to participating homes. In addition to the analytical results, the reports contain the required consumer notice, which includes information on lead risks and how to minimize exposure. EPD has updated our report transmittal letters to the water systems to clarify requirements to promptly provide the analytical reports to the individual homes where the samples were collected. For the 17 PWSs that use other laboratories to analyze their compliance samples, EPD will distribute a written communication in the next 30 days to remind them of requirements to provide results promptly to residents. In concert with the availability of information on EPD's websites, these measures help **ensure that residents promptly receive lead sampling results from their homes, and that the general public receives prompt information on high lead levels in drinking water systems.**

Georgia EPD takes our responsibility to protect public health and the environment very seriously, and we appreciate the gravity of the situation in Flint, Michigan. We will continue to work with the state's public water systems and with EPA to improve the effectiveness of the LCR as new guidance is issued, and as the Rule is revised. If you have any questions or would like to further discuss this response, please contact James Capp, Chief of the Watershed Protection Branch at James.Capp@dnr.ga.gov or 404-463-4911.

Sincerely,



Judson H. Turner
Director

cc: Peter Grevatt, US EPA Office of Ground Water and Drinking Water
Shawneille Campbell-Dunbar, US EPA Region 4