



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

March 29, 2016

Mr. Joel Beauvais
Deputy Assistant Administrator
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code: 4101M
Washington, DC 20460

Re: Lead and Copper Rule Implementation
Oklahoma Department of Environmental Quality

Dear Mr. Beauvais:

This letter is in response to your letter of February 29, 2016, asking for Oklahoma's leadership and partnership to ensure safe drinking water for the people that we serve.

In 1977, Oklahoma was the first state in the nation to be approved as the primacy agency for the Safe Drinking Water Act (SDWA). The Oklahoma Department of Environmental Quality (ODEQ), the state's primacy, agrees with your letter that our priority is to protect public health. The ODEQ continues to address water quality issues, including lead in drinking water and maintain public confidence in the safety of our state's drinking water.

The near-term actions that Oklahoma is taking are as follows:

1. ODEQ's protocols and procedures for implementing LCR are consistent with the federal rule. ODEQ references and incorporates the various guidance materials prepared by EPA for the rule.
2. ODEQ's sampling protocols closely match EPA's guidance on LCR sampling protocols. Our sample collection procedure includes similar information as the suggested directions for homeowner tap sample collection procedures provided in "Lead and Copper Rule Monitoring and Reporting Guidance for Public Water Systems," USEPA, 2010. ODEQ will provide water systems with the "Clarification of Recommended Tap Sampling Procedures for Purposes of the Lead and Copper Rule" provided in the Memorandum dated February 29, 2016 from Peter C. Grevatt, Director, EPA's Office of Ground Water & Drinking Water. Additionally, with respect to procedures for optimizing corrosion control, ODEQ utilizes EPA's "Revised Guidance Manual for Selecting Lead and Copper Control Strategies."



3. ODEQ maintains a webpage titled "The Lead and Copper Rule" that includes LCR sampling protocols and identification of appropriate sample sites, among other rule specific information. The website is <http://www.deq.state.ok.us/WODnew/pws/leadandcopper/index.html>. Additionally, the sample site request form describes that the same sites, unless a site is no longer accessible or no longer fits the requirements of a priority site, must be used.
4. ODEQ does not currently display water system's materials inventory, including location or map of lead service lines, nor does it display lead plumbing in the system. ODEQ will encourage water systems to provide documentation concerning materials inventories and associated maps to the public. However, ODEQ fully utilizes the most current version of SDWIS/State. The Drinking Water Watch website is a publicly available site displaying real time data. LCR compliance sampling results are displayed for all water systems. Sample invalidations are maintained in the record and SDWIS/State, but not viewable on the Drinking Water Watch website. Justification for invalidation of LCR samples would be available to the public upon request.
5. ODEQ provides public education documents to water systems when sending monitoring reminders and after lead exceedances. Our webpage, referenced above, includes directions and templates for both types of public education. ODEQ will encourage water systems to more promptly deliver public education to customers. ODEQ will step up violation determination and enforcement for failure to provide lead public education. We have discussed using social media to enhance public education. Additionally, the ODEQ will enhance efforts to ensure that residents promptly receive lead sampling results from their homes, and provide information on lead risks and how to abate them.

The ODEQ works closely with EPA Region VI and we will continue to work together to meet these challenges and maintain the public trust.

Sincerely,



Shellie Chard-McClary
Water Quality Division Director
Oklahoma Department of Environmental Quality

cc Bill Honker, Division Director, EPA Region 6
Peter Grevatt, Director OGWDW, EPA Headquarters