



GUAM ENVIRONMENTAL PROTECTION AGENCY

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GUAM ENVIRONMENTAL PROTECTION AGENCY

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TO	INITIAL	DATE	EPA.GUAM.GOV
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May 23, 2016

Mr. Joel Beauvais
Deputy Assistant Administrator
United State Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Beauvais,

The Guam Environmental Protection Agency (Guam EPA) adopted the Lead and Copper Rule (LCR) by reference, in the Guam Safe Drinking Water Regulations (GSDWR), under 22 Guam Code Annotated (GCA), Division II, Chapter 6, Part 6141. The GSDWR applies to Public Water Supply Systems (PWSS) in the territory of Guam including the military facilities. Eighty (80%) percent of water sources are from ground water under limestone (potentially non-corrosive) and only 20% are surface water from lakes and rivers (potentially corrosive).

Guam EPA is implementing the Lead and Copper Rule and all revisions in adherence to the provisions of the rules as described in the Federal Register and the Implementation Guidance Manual as shown below:

1. Guam EPA complies with the protocols and procedures for implementation of the LCR which are consistent with USEPA guidance manuals with respect to water sampling and analysis.
2. Guam PWSS opted to remove and replace plumbing materials that were identified as sources of lead contamination in the drinking water in lieu of optimizing corrosion control.
3. Guam EPA does not maintain an updated public website to post the LCR sampling protocols and other related and pertinent data. However, the PWSS will be posting the required information to increase transparency within the regulated community. PWSS that have direct control with their customers' point of use (i.e. military bases, hotels, resorts, etc.) notify their customers through direct mail and door-to-door delivery. PWSS that are required to submit an annual Consumer Confidence Report (CCR), also called "Annual Water Quality Report," use the CCR to inform customers about Lead and Copper monitoring information.
 - o The material inventory that the systems were required to complete was done during the initial sampling in 2001. Guam does not have lead service lines in any of the plumbing systems or buildings.
 - o LCR compliance sampling results collected by the system are available at both the Guam EPA office and in the PWSS databases and can be posted to websites if so directed; CCRs also contain this information. The number of samples collected,

sampling techniques, and sample analytical test results and justifications for invalidation of LCR samples can be included if such posting is considered necessary.

4. Guam EPA requires the PWSS to send analytical test results to all customers that were selected as sampling sites. Health effects, lead risks, and methods for abatement can also be included.

The primary sources of lead contamination in the drinking water on Guam were attributed to lead content of endpoint devices which includes, but is not limited to, plumbing fittings and fixtures intended to dispense water from the domestic water piping system for human ingestion.

To insure elimination of these sources of lead in Guam's drinking water, Public Law 25-51:2 "Guam Lead Ban Act" (the Act), was enacted on June 30, 1999. Guam EPA was commissioned to enforce the provisions of the law. The Act prohibits the use of lead pipes, solder and flux and importation, use or sale of pipes, plumbing fittings and fixtures that are not "Lead-Free". The Act regulates/requires the use and sale of lead-free plumbing materials by any person that installs and/or repairs PWSS plumbing system and appurtenances for residential use and/or non-residential use in structures providing water for human consumption. The implementation of the "Guam Lead Ban Act" entails mandatory testing of a representative water sample(s) for every facility prior to the issuance of an occupancy permit clearance by Guam EPA.

Guam EPA enforces the provisions of the Guam Lead Ban Act through a permitting process in which every structure being built on the island that contains a potable plumbing system requires that the owner must secure permit clearances from Guam EPA prior to building and/or occupying the structure. The Act entails an administrative penalty of not more than Five Thousand Five Hundred Dollars (\$5,500.00) per day per violation and a civil penalty of not more than Twenty-Seven Thousand Five Hundred Dollars (\$27,500.00) for each day of violation.

Through the aggressive implementation and enforcement of the provisions of the Guam Lead Ban Act to the regulated community, Guam has successfully managed to control the sources of lead contamination in the drinking water for the entire island. Based on recent testing by the PWSS, all the systems are well below the Action Level for both Lead and Copper.

Should you have questions and need additional information, please contact Mr. Angel B. Marquez, Acting Chief Engineer at (671) 300-4796 or email him at angel.marquez@epa.guam.gov.

Respectfully yours,



YVETTE L.G. CRUZ
Acting Administrator

cc: Ms. Corine Li, USEPA Region IX
Mr. Michael Mann, USEPA Region IX