

GAWP/GAWWA SELECT INFORMATION FOR WATER MANAGERS REGARDING INQUIRIES ABOUT LEAD IN DRINKING WATER

WHAT: A recommended Call to Action for proactively managing local concerns about lead in drinking water

WHEN: Now! Local media across Georgia are reporting on a recent series of *USA Today* articles about lead in drinking water in communities well outside of Flint, Michigan. One headline: “Beyond Flint: Excessive lead levels found in almost 2,000 water systems across all 50 states.” Articles in the series also focus on impacts to daycare centers and schools. Here is a link to the initial article:

<http://www.usatoday.com/story/news/2016/03/11/nearly-2000-water-systems-fail-lead-tests/81220466/>

WHY: Georgia is highlighted on an interactive map at the end of each article that allows readers to see every violation of the Action Level of Lead in drinking water across the state with a simple click. Georgia is listed as having 81 violations of the Actionable Level of Lead, meaning at least 10% of the sites tested within the system exceeded the 15 ppm level. The interactive map will show the reported levels for each violation.

WHY YOU SHOULD CARE: Your customers and elected officials may be confused or unnecessarily concerned about the information without additional clarification from you.

WHAT YOU CAN DO: Every utility in Georgia needs to be prepared to respond to inquiries following this story, and some may want to proactively approach the media or post information in advance of inquiries. GAWP and GAWWA are providing guidance to assist with general messaging and a comprehensive communications framework.

Key Points to be Tailored to Your System as Appropriate

- ◆ Focus on your local utility first. If you are in compliance, state that upfront. If there have been violations in your community, explain those even if they are in private systems that you don't manage. *You are the water expert for your community, and the voice that local citizens want to hear from.*
- ◆ Georgia is very different from Flint, Michigan, both in the amount of oversight of local utilities and the type of water systems in our communities.
 - **Oversight.** The Georgia Environmental Protection Division (EPD) actively enforces the Lead and Copper Rule and all parts of the Safe Drinking Water Act (SDWA) in utilities all across the state. Georgia's water withdrawal permitting would not allow a source to be switched without a comprehensive process that would include evaluating the effects of the water chemistry on pipes and an appropriate control plan to minimize any potential corrosion.
 - **System type.** The greatest potential for lead is in the private plumbing system in homes and businesses, not in the public drinking water system. In Georgia, the private plumbing system is the line from the water meter into the house or business. Michigan and other, colder parts of the country have shared service lines not found in Georgia.

- ◆ The exceedances in Georgia of the Actionable Level of Lead have largely been small, private systems, not public systems. EPD has worked with these systems to help them become compliant very rapidly.
- ◆ The exceedances in Georgia have been much lower than those seen in Flint and have been remedied quickly.
- ◆ Where exceedances do occur in Georgia, local utilities and EPD have a consistent track record of making sure that affected citizens are properly notified in a timely manner.
- ◆ As further assurance, Georgia utilities extend their public health efforts beyond the public system by using optimized corrosion control techniques to minimize the leaching of lead from private systems into water at the tap.

Who needs to be informed?

- ◆ Customers—see attached sample from Cobb Water System
- ◆ Staff
- ◆ Political leadership
- ◆ Press and media, if asked or proactively

Tips for Messaging to Customers

- ◆ **General considerations.** Most of the listed sites in Georgia are small, private systems (homeowner associations and mobile home parks). GA EPD works with these systems when violations are found to resolve these issues. If relevant, mention your system has not had Actionable Level exceedances. If your system has had any, address what is being done—focus in particular on notification of affected customers as this is where the tension point is (i.e., not only the violations in Flint, but the failure to disclose them to the affected public).
- ◆ **Testing protocol.** How do you test for lead in compliance with the SDWA? How many sites are tested? How often? Have you had exceedances? If so, how were those customers contacted? What was done to resolve the issue?
- ◆ **Lead in your system.** Is there a large, older housing stock? Do you have any lead service lines? Do you have lead solder and lead components in meters? When did you remove lead from your distribution systems? What rehab and replacement programs are currently underway that will further reduce this? What is your corrosion control protocol to minimize the chance of lead leaching from home plumbing systems?
- ◆ **Timeline information so customers can gauge their potential concern.** Homes built prior to 1940 are at greatest risk for lead plumbing services. Houses built in 1970s and earlier are most at risk for galvanized plumbing that might have lead in the accumulated pipe corrosion. Homes built in the 1980s up until 2012 might have small amounts of lead in pipe solder or brass plumbing fixtures. Homes constructed after 2012 should have been built after the current zero lead rules.

- ◆ **Best Management Practices to lessen chances of exposure.** Share basic tips concerned customers can use to lessen the potential of exposure to lead from their private plumbing systems (examples in the attached sample document).
- ◆ **A Resource for testing.** This will be an internal decision if your utility takes samples and tests at your cost for customers who are concerned. At a minimum, a utility should provide the concerned customer with a lab to contact to have water tested at the customer's expense.

Tips for Messaging to Staff

- ◆ **Provide the same information you're providing to customers.** Make sure your frontline staff has access to the materials prepared for customers. If it is available on the website, give them that link to share. Give them an electronic copy that they can send out to customers, if requested.
- ◆ **Water Quality Report (CCR).** Make sure staff has access to your most recent water quality report (Consumer Confidence Report or CCR), and knows how to direct customers to this resource.
- ◆ **Trends.** If you have trend data that indicates that lead testing has trended down over the years as a result of improved treatment upgrades, infrastructure repair, and private plumbing system upgrades, consider providing it to staff. *This does not need to go to customers but may help frontline staff put the conversation in perspective.*
- ◆ **Technical Contact.** Provide frontline staff with assigned technical staff that can discuss customers' drinking water quality concerns in more detail, including a phone number and email contact. Make sure the technical staff is prepared to take these escalated calls.

Tips for Messaging to Political Leadership

- ◆ **Customer information.** Provide the same information being provided to the public, as well as links to or copies of your most recent water quality report.
- ◆ **Technical contact.** Provide them the same technical contacts given to frontline staff and let them know they can refer constituents to these staff members.
- ◆ **Heads-up.** If you have lead level exceedances, alert them in advance and discuss what has been done.
- ◆ **Clarify private and public.** In the national media messaging, much has been said about "shared" service lines. In the South, it is very unusual to have shared service lines, and in Georgia the ownership is much clearer. Our public systems end at the meter, and the service lines past the meter and into the house or business are owned by the property owner. In colder climates this is more complicated because the "shared" service line is due to the fact that many water meters are inside the home or basement as opposed to outside.
- ◆ **Media requests.** Inform them who from your utility they can refer media requests on this issue to, and inform them proactively if you are contacted by the media about this issue.

Tips for Messaging to Press and Media

- ◆ **Any exceedances.** These are questions you may be asked by media regarding exceedances. What level was detected? How many exceedances? When did they occur? How were the affected citizens informed? What was done to remedy the situation? What has been put in place to prevent or reduce the likelihood of this to occur again?
- ◆ **Your corrosion control process.** Since many utilities are on reduced lead and copper sampling, focus on how often you test water entering the distribution system to make sure your corrosion control is consistently optimized.
- ◆ **Presence of lead in your system.** What sources are in your system? (Galvanized pipe, lead solder, brass fittings on meters).
- ◆ **Difference in Georgia private vs. shared service lines.** Discussed above. Make sure not to pass the blame to customers, but stress the challenge of accounting for these service lines because they are part of a private plumbing system. Focus on the limited number of homes in your service area that were built before 1940 or that may have galvanized pipe, how your treatment is designed to protect them, and that you have consumer best practices to minimize potential exposure.
- ◆ **Detected level from last tests.** Have the water quality report handy so you can let them know the detected level in your system compared with the Action Level.

Resources on Lead

GA EPD:

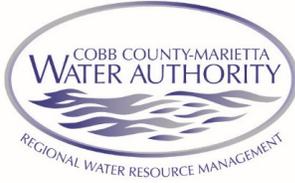
<http://epd.georgia.gov/state-georgia-department-natural-resources-environmental-protection-division-public-water-system>

CDC:

<http://www.cdc.gov/nceh/lead/>

EPA:

<https://www.epa.gov/your-drinking-water/basic-information-about-lead-drinking-water>



Cobb County...Expect the Best!

Cobb County-Marietta Water Authority and Cobb County Water System Overview of Lead and Copper Corrosion Prevention and Monitoring

Cobb County Water System purchases all of their water wholesale from Cobb County-Marietta Water Authority. The Authority treats the water and sends it to the Water System's distribution system to be delivered to homes and businesses in Cobb. Cobb Water works in partnership with the Authority to ensure high quality drinking water.

Sources of Lead and Copper:

The primary source of lead and copper in a drinking water system is from private plumbing systems including the service line from the meter and the piping inside homes (copper piping with solder containing lead or a lead-based service line). CCMWA's water transmission system contains no lead piping or connections. Cobb County Water System's distribution system contains trace amounts of lead in solder on older pipes and brass fittings used at system meters. Since 2015 CCWS has used only lead-free brass fittings and continues to proactively replace aging pipe in our system.

Lead soldering of copper water pipes was banned in Georgia in 1985, but some homes still contain these plumbing systems. Per federal regulation, both CCMWA and CCWS test locations with these "at-risk" plumbing systems to ensure our corrosion control technique is effective.

Corrosion Control Techniques:

To protect water consumers from lead and copper contamination that could occur from their home plumbing systems, public water systems are required to use "optimized corrosion control" techniques under the Lead and Copper Rule. These techniques include treating the drinking water to reduce its ability to carry lead and copper from the plumbing system to the faucet.

Sample Collection, Optimization and Monitoring:

CCMWA and CCWS comply with the lead and copper monitoring requirements of the U.S. Environmental Protection Agency (EPA) under the Lead and Copper Rule of the Safe Drinking Water Act. We report to the Georgia Environmental Protection Division (EPD).

We conduct regular testing to tell us whether we are maintaining optimized corrosion control to prevent lead and copper from leaching out of pipes:

- Every two weeks, we test for water quality parameters at each treatment plant that indicate whether the water is corrosive of customer plumbing systems.
- Water quality testing is also conducted at 25 sample sites throughout The Authority's service area each spring and another 25 sites each fall.
- At the treatment plants, hourly samples are taken to monitor pH levels, which ensure optimization of the corrosion control strategy at all times.

Because of low levels of lead and copper historically found in the service area (and an associated low level of risk for lead and copper contamination), CCMWA and CCWS are required to submit samples collected at customer taps to the state only once every three years. The next round of sampling is scheduled for 2017.

What should I know about Lead in Drinking Water

Age of the home

In Cobb County the most likely source of trace amounts of lead would be from private home plumbing systems, including the service line from the meter to the home and internal plumbing. Cobb County-Marietta Water Authority's corrosion control protocol minimizes the potential for these metals to leach into drinking water.

- Homes built prior to 1970 have a greater chance of having partial lead plumbing or galvanized service lines where lead may have accumulated in the corrosion of the pipe.
- Many homes built prior to the late 1980s may have lead solder connecting copper pipes.
- Homes built after 1985 have significantly less potential for the presence of lead.
- Newer homes with brass fixtures installed before 2015 could contain minute amounts of lead.

For more information on the history of lead plumbing and regulations, visit:

<http://www.epa.gov/dwreginfo/lead-and-copper-rule#rule-history>

Identifying lead service lines

In an older home, if a portion of your plumbing is visible, you may be able to determine whether you have lead water service lines.

- Lead lines are metallic and appear light grey in color.
- They are not magnetic.
- They may be gently scratched with a key. (Be careful not to pierce the pipe.)

You can also review records for your home to see whether the plumbing has been updated and replaced since the home was built. A plumber may be able to determine if you have lead plumbing serving your home.

For more information on lead in the home, visit: <http://www.epa.gov/lead/protect-your-family-exposures-lead#testdw>

Best practices to minimize potential exposure to lead in drinking water

There are a few best practices that can help to lessen chances of ingesting trace amounts of lead from drinking water.

- Consume only cold water directly from the faucet. Hot tap water can increase the potential for lead and other metals to leach into drinking water from the home plumbing system. (Heating cold water does not release any lead.)
- If the water has been sitting in the pipes in your home for longer than 6 hours allow the water to run a few minutes before consuming. Turn on the cold water tap and wait for the temperature to change.
- Periodically clean out the aerators (screens on the faucet). These screens can trap sediment and debris over an extended period time. They easily twist off and can be cleaned or replaced.

Getting your water tested

If you are concerned about the presence of lead in your drinking water, there are two certified labs that can test it. The test for lead ranges from \$15-\$40, depending on the number of samples submitted. Please contact them for more information and proper sample collection protocol.

- Analytical Environmental Services
Chamblee
770-457-8177
- Analytical Services, Inc.
Norcross
770-734-4200