

Frequently asked questions about providing information about lead analysis results to consumers.

Is this a new rule?

Yes, the Lead and Copper Rules were recently revised and this requirement is one of the new rules in the revised Lead and Copper Rule.

Who does this rule apply to?

Community ("C") and non-transient, non-community ("NTNC") public water suppliers are now required to provide lead analysis results and information about lead in drinking water to consumers after Tap Water Lead/Copper samples are collected. **This requirement applies to all public water systems that are required to submit Tap Water Lead/Copper samples regardless of the concentration of lead in the samples.**

I don't agree with/don't like/cannot afford this new rule – does my system have to do everything this new rule requires?

Yes. If your system is required to submit Tap Water Lead/Copper samples you must do everything this new notification rule requires.

What does this rule require?

The rule (located at 40 C.F.R. § 141.85 (d) and 40 C.F.R. § 141.90 (f)(3)) requires a system to perform two tasks:

- 1) Provide the lead analysis results and information about lead to the consumers at the sites used to collect Tap Water Lead/Copper samples within **thirty (30) days** of the end of the monitoring period.
- 2) Provide both an example of the information provided to consumers and a certification that the information was provided to consumers to DEQ within **ninety (90) days** of the end of the monitoring period.

What type of information about lead should be provided to consumers?

The rule specifies the content of the information a system must provide to consumers. DEQ has prepared a letter template ("Information about the amount of lead in your drinking water") that has all the required information in the template:

- The letter template is available at www.deq.state.ok.us.
- Your system should use the letter template to notify consumers of lead analysis results and provide information about lead in drinking water.
- Your system will have to fill in all blanks in the template before it is provided to consumers.

Can my system write our own language to notify the consumer of lead analysis results and provide information about lead in drinking water?

If your system wants to create your own letter to notify consumers, your system must submit a copy of your proposed letter to DEQ for approval at least **fifteen (15) days** before the end of the monitoring period. **Any proposed letter that is not approved by DEQ (in writing) may not satisfy the consumer notification requirement.**

Do all systems provide the lead analysis results and information to consumers by the same method?

No. The method of delivery is different for community and non-transient, non-community systems, as follows:

- **Community systems:**
All community systems must provide a completed copy of “Information about the amount of lead in your drinking water” to the consumer at each site used to collect a Tap Water Lead/Copper sample – this must be done by **mail or hand-delivery** within **thirty (30) days** of the end of the Tap Water Lead/Copper monitoring period.
- **Non-transient, non-community:**
Non-transient, non-community system can physically post a completed copy of “Information about the amount of lead in your drinking water” **with information about all lead analysis results** in a conspicuous public place within **thirty (30) days** of the end of the Tap Water Lead/Copper monitoring period. The posted notification must remain posted for at least ten (10) days. In the alternative, a non-transient, non-community system can provide a completed copy of “Information about the amount of lead in your drinking water” **with information about all lead analysis results** by mail or hand delivery to all consumers.

My system has a lead 90th % action level exceedance and is required to perform multiple types of Public Education. Does my system still have to provide a copy of lead analysis results and information about lead in drinking water to consumers after Tap Water Lead/Copper samples are collected?

Yes. Rules require a system with a lead action level exceedance to perform both the required Public Education (required after a lead exceedance) and also provide lead analysis results and information about lead in drinking water to consumers after Tap Water Lead/Copper samples are collected.

Is there a form my system should use to notify DEQ that consumer notification has been completed?

Yes. The “Certification of Lead Results Notification” (available at www.deq.state.ok.us) should be used to notify DEQ within **ninety (90) days** of the end of the Tap Water Lead/Copper monitoring period.

When does my system have to start providing lead analysis results and information about lead in drinking water to consumers?

DEQ is implementing this rule incrementally depending upon the Tap Water Lead/Copper monitoring schedule in effect on June 1, 2011, as follows:

- **If** your system is required to submit Tap Water Lead/Copper samples **between June 1, 2011 and September 30, 2011** your system must begin providing lead analysis results and information about lead in drinking water to consumers for all samples collected on **June 1, 2011 or later**.
- **If** your system is required to submit Tap Water Lead/Copper samples **between July 1, 2011 and December 31, 2011** your system must begin providing lead analysis results and information about lead in drinking water to consumers for all samples collected on **July 1, 2011 or later**.
- **If** your system is required to submit Tap Water Lead/Copper samples **on or after January 1, 2012** your system must begin providing lead analysis results and information about lead in drinking water to consumers for all samples collected on **January 1, 2012 or later**.

Does my system have to provide lead analysis results and information about lead in drinking water for Tap Water Lead/Copper samples collected before the dates described in the paragraph above?

No. The new rule does not require your system to provide lead analysis results and information about lead in drinking water when the Tap Water Lead/Copper samples was submitted for the January 1, 2011 to June 30, 2011 Tap Water Lead/Copper monitoring period or any Tap Water Lead/Copper monitoring period before January 1, 2011.

After my system collects Tap Water Lead/Copper samples, does my system have to provide analysis results and information about lead in drinking water to all the consumers in the distribution system?

- No. Community systems must provide the lead analysis results and information about lead in drinking water **ONLY** to the consumers from which a Tap Water Lead/Copper sample was collected.
- No. Non-transient, non-community systems can post all the lead analysis results (from the most recent monitoring period) and information about lead in drinking water in a conspicuous public place where all consumers are able to read the information. **If** a non-transient, non-community does **not** post the analysis results and information about lead in drinking water then they must provide all the lead analysis results and information about lead in drinking water to all consumers.