INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 14, 2018

#5285013 Lead Exceedance
Roann Water Works
Attn: Mr. Scott D. Siders
P.O. Box 276
Roann, IN 46974

Dear Mr. Siders:

Re: Lead Exceedance
Drinking Water Branch – Compliance
PWSID #5285013
Roann, Wabash County

Indiana Department of Environmental Management (IDEM) staff of the Drinking Water Branch (DWB) has conducted a review of your drinking water monitoring requirements. This review was conducted in order to determine compliance with 327 IAC 8-2-37.

This review noted the following violations:

Contaminant	Monitoring Period	Violation of	Corrective Action
Lead Action Level Exceedance	June 1 through September 30, 2018	327 IAC 8-2-37	Submit WQP and SW samples, an OCCTR, provide PE, and complete the appropriate follow-up sampling for Lead and Copper

The lead action level is fifteen parts per billion (0.015 mg/l). Your ninetieth percentile level was twenty-four and eight-tenths parts per billion (0.0248 mg/l) for lead for the June 1 through September 30, 2018, monitoring period. Pursuant to 327 IAC 8-2-38 and 327 IAC 8-2-39, any system which exceeds the lead or copper action level is required to collect water quality parameter and source water samples and is also required to submit a corrosion control treatment recommendation.

Water quality parameter sampling consists of the following:

- Collecting two **(2) sets of samples at <u>each entry point</u>** and **two (2) sets of samples at one (1) location in your <u>distribution system</u>** (2 sets of 2 samples, taken at a minimum of 2 weeks apart) and having them analyzed for the following water quality parameters:
  - <u>Alkalinity</u>, <u>Calcium</u>, <u>Conductivity</u>, <u>Water Temperature</u> and <u>pH</u>
  - If you add a phosphate or silicate compound to your water in your treatment process these compounds must be analyzed as well.
- Temperature and pH may be measured on-site. A certified laboratory must analyze the other parameters. **This sampling must be completed by December 14, 2018.**

Source water sampling consists of the following:

- Collecting one sample from each entry point for lead and copper no later than **December 14, 2018.**

Your **corrosion control treatment recommendation** consists of the following:

- Submitting information in writing to the Drinking Water Branch detailing the steps you will take to resolve the lead action level exceedance. These steps can include:
  - Adjustment of the pH and/or Alkalinity levels of your water to make your water less corrosive.
  - Addition of a phosphate or silicate based corrosion inhibitor to coat the inside of your water lines so that lead and/or copper cannot be removed from the lines by the water.
  - Removal of sources of lead and/or copper (brass faucets and fittings, copper lines with or without lead solder, etc.)
  - Other treatment or removal options if approved by the Drinking Water Branch.
- **This recommendation is due to our office by December 31, 2018.**

<u>You will need to begin monitoring for ten (10) lead and copper samples during each six-month monitoring period beginning no later than the January 1 to June 30, 2018, monitoring period</u>. Your system must, at a minimum, demonstrate two consecutive six-month round monitoring periods below both the lead and copper action level before this monitoring frequency and number of samples required will be reviewed for possible reduction.

Public education consists of the following:

- Providing a copy of the enclosed public education materials to all users of your water system by November 30, 2018. A copy of the distributed public education along with documentation as to how it was distributed must be submitted to the Drinking Water Branch by **November 30, 2018.**
- Posting educational information about lead in drinking water in visible locations throughout your facility.
- This information must be distributed at least once during each calendar year until you have one (1) six-month round of samples collected that has a ninetieth (90^{th}) percentile below the lead action level. This information must be distributed at least one (1) time. Please follow the attached instructions for distribution and public education.

Within ten (10) of days of receipt of this letter, a written detailed explanation, documenting compliance with each of the above requirements listed above, must be submitted to this office. Submit this information to:

OWQ, Drinking Water Branch
Attn: Mr. David Koehler
100 North Senate Avenue
Indianapolis, IN 46204-2251
Fax 317/234-7436

Failure to submit the required information may result in a referral to IDEM's Office of Water Quality, Enforcement Section. Thank you for your attention to this matter. If you have any questions, please contact David Koehler at 317/232-8433.

Sincerely,

FOR

Sara Pierson, Section Chief
Compliance Section
Drinking Water Branch
Office of Water Quality

Enclosure
cc: Rob McLaughlin, Field Inspection Section
Wabash County Health Department

IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER

Roann Water Works found elevated levels of lead in drinking water in some homes or buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

Health effects of lead

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys and can interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones, and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect the child's brain development.

Sources of lead

Lead in drinking water, although rarely the sole cause of lead poisoning can significantly increase a person's total lead exposure, particularly the exposure of infants who drink baby formula and concentrated juices that are mixed with water. The EPA estimates that drinking water can make up 20 percent or more a person's total exposure to lead.

Lead is unusual among drinking water contaminants in that it seldom occurs naturally in water supplies like rivers and lakes. Lead enters drinking water primarily as a result of the corrosion, or wearing away, of materials containing lead in the water distribution system and household plumbing. These materials include lead-based solder used to join copper pipe, brass and chrome plated brass faucets, and in some cases, pipes made of lead that connect houses and buildings to water mains (service lines). In 1986, Congress banned the use of lead solder containing greater than 0.2 percent lead and restricted the lead content of faucets, pipes, and other plumbing material to 8.0 percent.

When water stands in lead pipes or plumbing systems containing lead for several hours or more, the lead may dissolve into your drinking water. This means the first water drawn from the tap in the morning, or later in the afternoon if the water has not been used all day, can contain fairly high levels of lead.

Steps You Can Take in the Home (or anywhere else) to Reduce Exposure to Lead in Drinking Water

Let the water run from the tap before using it for drinking or cooking any time the water in the faucet has gone unused for more than six hours. The longer the water resides in the plumbing, the more lead it may contain. Flushing the tap means running the cold water faucet until the water gets noticeably colder, usually about 3 to 5 minutes.

(UTILITY MAY REVISE THE AMOUNT OF TIME ON THIS PORTION). Although toilet flushing or showering flushes water through a portion of your homes plumbing system, you still need to flush the water in each faucet before using it for drinking or cooking. Flushing tap water is a simple and inexpensive measure you can take to protect your health. It usually uses less than one or two gallons of water. To conserve water, fill a couple of bottles for drinking water after flushing the tap, and whenever possible, use the first flush water to wash dishes or water the plants.

Try not to cook with or drink water from the hot water tap. Hot water can dissolve lead more quickly than cold water. If you need hot water, draw it from the cold tap and then heat it. Boiling water does not remove lead content and can concentrate it. In addition, do not mix baby formula with water from the hot water tap.

The steps described above will reduce the lead concentration in your drinking water. However, if you are still concerned, you may wish to purchase bottled water for drinking and cooking.

For more information, call us at [INSERT YOUR TELEPHONE NUMBER] [(IF APPLICABLE), or visit our Web site at [INSERT YOUR WEB SITE HERE]]. For more information on reducing lead exposure around your home or building and the health effects of lead, visit EPA's Web site at http://www.epa.gov/lead or contact your health care provider who can perform a blood test for lead and provide you with information about the health effects of lead. State and local government agencies that can be contacted include:

- _____ (contact person) at _____ (phone number) can provide you with information about your facility's water supply.
- Indiana State Department of Health at (317) 233-1250 or the Elkhart County Health Department at (574) 971-4600 can provide you with information about the health effects of lead.

Customers can get their water tested for lead by contacting a laboratory certified to test for lead in drinking water. A list of those laboratories is available online at www.in.gov/isdh/22452.htm.

Explain why there are elevated levels of lead in the systems drinking water (if known); and what the water system is doing to reduce the lead levels in homes and buildings in this area.

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Delivery Instructions:

- Deliver printed materials to all bill paying customers.
- Contact customers who are most at risk by delivering public education materials to the following:
  - Local public health agencies – this must be accompanied by an informational notice that encourages distribution to all of the agencies potentially affected customers and must be provided by the water system directly to the local public health agency through phone contact or in person – *if the local public health agency provides the water system a specific list of additional community-based organizations serving targeted populations, including organizations outside the service area of the water system, then the water system shall deliver public education materials to all organizations on the provided list.*
  - Public and private schools and school boards
  - Women, Infants, and Children (WIC) and Head Start programs, where available.
  - Public and private hospitals and medical clinics
  - Pediatricians
  - Family planning clinics
  - Local welfare agencies
- Make a good faith effort to locate the following organizations, including requesting a list from the location public health agencies, and deliver public education to them
  - Licensed childcare facilities
  - Public and private preschools
  - Obstetricians/Gynecologists and midwives
- At least once per quarter, provide the following message on or with each water bill:
  - The statement written exactly as follows, except for the text in parentheses, for which the water system must included system-specific information.
  - "(INSERT NAME OF WATER SYSTEM) found high levels of lead in drinking water in some homes. Lead can cause serious health problems. For more information, please call (INSERT NAME OF WATER SYSTEM) or visit (INSERT YOUR WEBSITE HERE)."
  - The delivery mechanism of the message may be modified after consultation with IDEM. Specifically, a separate mailing of public education materials may be allowed if the water system cannot place the information on water bills.
- For systems serving greater than 100,000 people, post the public education material on the water system's website.
- Submit a press release to newspapers and television and radio stations.
- In addition to the items listed above, systems shall implement activities

that have educational content and are selected in consultation with IDEM. A system shall implement at least 3 activities from 1 or more of the following categories:

- Public service announcements
- Paid advertisements
- Public area informational displays
- E-mails to customers
- Public meetings
- Household deliveries
- Targeted individual customer contact
- Direct material distribution to all multifamily homes and institutions
- Other methods approved by IDEM.

Discontinuation of Delivery

- A community water system and a nontransient noncommunity water system may discontinue delivery of public education materials if the following conditions are met:
    - The system has met the lead action level during the most recent six (6) month monitoring period conducted under section 37 of this rule.
    - The system shall recommence public education in accordance with this section if it subsequently exceeds the lead action level during any monitoring period.