

## **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](http://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 90<sup>th</sup> % 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](http://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.