



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

March 2, 2016

RE: WESTERVILLE CITY PWS
COMPLIANCE NOTIFICATION
CORRESPONDENCE
DRINKING WATER
FRANKLIN COUNTY
PWS ID: OH2503411

WESTERVILLE, CITY OF
21 SOUTH STATE STREET
WESTERVILLE OH 43081

Subject: Lead Notification and Action Level Exceedance Required Actions

Dear Contact Name:

This letter is to notify you of changes Ohio EPA is implementing to the lead compliance program. These changes apply to all public water systems required to test for lead and are in accordance with Ohio Revised Code Sections 6109.10 and 6109.12.

Ohio believes, as written, the federal regulations do not match the health consequences of elevated blood lead levels. There is particular concern the timeframes for public notification and education does not meet public expectations when a public water system detects elevated levels of lead in water. The Centers for Disease Control and Prevention (CDC) has been clear that all exposures to lead should be minimized and that young children and pregnant women should use alternative or filtered water when lead in water is greater than 15 micrograms per liter ($\mu\text{g}/\text{L}$). With all of that in mind, we are implementing immediate changes in our lead program procedures and are requesting public water systems take actions in accordance with those changes as detailed below.

Public water systems that have any individual sample locations with results greater than 15 micrograms per liter ($\mu\text{g}/\text{L}$) should implement the following actions.

1. Not later than two business days after the receipt of the laboratory results, issue by hand delivery or by phone followed by certified mail a consumer notice for any lead results over 15 $\mu\text{g}/\text{L}$.
2. Notify the local health department of these individual results.
3. Provide information regarding availability of health screenings and testing of lead blood levels.
4. Within five days of receiving results, inform Ohio EPA using the Consumer Notice Verification Form.

Public water systems that have an action level exceedance (ALE) will be instructed to do the following:

1. Issue a news release within 24 hours of the ALE determination date.
2. Distribute written public education materials no later than 30 days from the ALE determination date.

3. Inform the county health department by the next business day of the exceedance and obtain information on the availability of health screenings or blood lead level testing that can be shared with users/customers.
4. Offer consumer requested water testing to those customers known or likely to have lead service lines, and/or lead pipe, solder and fixtures.
5. Provide information on health screenings and blood lead level testing as part of the public education materials distributed.
6. Provide verification of completion of the above task to the appropriate Ohio EPA district office within 5 business days of the deadlines specified above.
7. All data should be submitted to Ohio EPA using Form 5105 by the end of each month results are received.

Please also be aware that public education materials for lead have been updated to incorporate the CDC recommendations for pregnant women and children. The use of these revised materials is required in the event of a public water system lead ALE. These materials can be found online at:
<http://epa.ohio.gov/ddagw/reporting.aspx#130597507-lead-and-copper>.

Implementing these actions is essential for the protection of public health and those who utilize your water system. Failure to complete these requirements could result in escalation and evaluation of the agency's enforcement options. If you have any questions, please contact your district office inspector.

Thank you in advance for your cooperation. Your prompt attention to this matter is appreciated.

Sincerely,



Michael G. Baker, Chief
Division of Drinking and Ground Waters

- cc: FRANKLIN COUNTY HEALTH DEPARTMENT
- ec: Beth Messer, Assistant Chief, DDAGW-CO
District Manager, DDAGW
District Office Compliance Coordinator, DDAGW