



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING



LIESL EICHLER CLARK  
DIRECTOR

October 2, 2019

VIA EMAIL AND U.S. MAIL

Mr. Aaron Potter  
White Lake Township  
7525 Highland Road  
White Lake, Michigan, 48383

WSSN: 07065  
County: Oakland  
System: White Lake Township

Dear Mr. Potter:

**SUBJECT: Lead and Copper Monitoring - Action Level (AL) Exceedance**

The White Lake Township community water system's 90<sup>th</sup> percentile value for Distribution System 2 (a.k.a. Village Acres) exceeded the AL for lead during the most recent round of lead and copper monitoring of drinking water taps from June 1 through September 30, 2019, as summarized below.

**Distribution System 2 (Village Acres)**

Contaminant	AL	MCLG*	90 <sup>th</sup> Percentile Value	Number of Sites Above AL	Range of Sample Results	Typical Source of Contaminant
Lead	15 parts per billion (ppb)	0	21 ppb	3	0 - 138 ppb	Corrosion of household plumbing systems; Service lines that may contain lead; Erosion of natural deposits
Copper	1.3 parts per million (ppm)	1.3	0.7 ppm	0	0 - 0.9 ppm	Corrosion of household plumbing systems; Erosion of natural deposits

\*MCLG: Maximum contaminant level goal means the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

An AL exceedance is not a violation, but it triggers other requirements under the administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399). Requirements include water quality parameter (WQP) monitoring, source water monitoring, corrosion control treatment, and public education (PE). Please refer to the "Timetable of Upcoming Requirements" for your specific deadline for each of the following requirements.

**Issue a Public Advisory (PA)**

An amendment to Act 399 on March 29, 2017, requires a public water supply to issue a PA within three business days to inform all persons served about the lead AL exceedance. It is the intent of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to work with you to develop the PA materials to ensure it complies with the requirements set forth in Act 399. A template has already been provided to you. Please contact EGLE if you plan to use broadcast media as your delivery method.

### **Deliver Consumer Notice of Lead and Copper Results**

Thank you for your efforts to complete this requirement timely.

### **Distribute PE**

Sixty days from the date of this letter or sixty days after the end of the monitoring period that exceeded the AL, whichever is sooner, deliver PE materials to all consumers.

This material is intended to educate consumers about lead health effects, sources of lead, and steps to minimize exposure. Note that the PE material must include information about the following: the exceedance in your water supply, what you are doing to reduce lead levels, lead service lines in your distribution system, and the history of lead levels in your water supply. A template has already been provided to you.

A sample copy of the final PE material, along with a PE distribution certification form must be submitted to EGLE no later than ten days after the PE is due. Repeat each year until the lead AL is no longer exceeded.

### **Conduct WQP Monitoring**

You must continue collecting one set of WQP samples every two weeks from each entry point to the distribution system that serves Distribution System 2 (TP206 - Village Acres and TP202 - Hillview Village).

Six months after the start of the monitoring period that exceeded the AL, collect two sets of WQP samples at least 24 hours apart from three locations in the distribution system. Essentially, WQP sampling must be done twice from each location in the distribution system but cannot be at the same site on the same day.

All WQP samples (entry point and distribution) shall be analyzed for pH, alkalinity, calcium, conductivity, orthophosphate, chloride, sulfate, and temperature. Temperature and pH are field tests and should be completed at the time of sample collection.

If you use EGLE's laboratory, order bottles by calling 517-335-8184 or by downloading the form EQP 2301 *Bottle Order Form* from [Michigan.gov/EGLELab](http://Michigan.gov/EGLELab). Click on Drinking Water. The tests are analyzed from one sample bottle per location. Request the analyses using the following test codes:

Test Code	Cost	Bottle Number	Test Description
CORR	\$51.00	33	Conductivity, Alkalinity, Phosphate, and Calcium
R	\$18.00	32,33	Chloride, Sulfate

### **Conduct Source Water Monitoring**

Six months after the end of the monitoring period that exceeded the AL, collect one sample for lead and copper at each entry point to the distribution system that serves Distribution System 2 (TP206 - Village Acres and TP202 - Hillview Village). Repeat

every third year until both lead and copper ALs are met during the entire three-year period.

### **Correct the Problem**

Minimize lead and copper in drinking water by reducing corrosion of water pipes and household plumbing that contain lead and copper. This is your second AL exceedance; the first was a copper AL exceedance in 2009. To accomplish this, you must propose a plan for adjustment to your corrosion control treatment or propose to perform a corrosion control study no later than six months after the end of the monitoring period that exceeded the AL. If additional treatment is found to be necessary, it must be implemented, and samples collected to ensure the lead and copper ALs can be consistently met.

### **Lead and Copper Monitoring**

To show the ALs can be met, collect a lead and copper sample from 40 sites between January 1 and June 30, 2020, and again between July 1 and December 31, 2020.

When selecting new sites, choose the highest Tier criteria available within the distribution system, giving Tier 1 sites first priority. Please see the enclosed tiering criteria to help inform your site selection process.

Within 30 days of learning of results, provide individual lead and copper tap results to people who receive water from sites that were sampled. Even if lead or copper was not detected, all monitoring, reporting, consumer notification, and EGLE certification requirements remain in effect.

### **Consumer Confidence Report (CCR)**

Include this AL exceedance in your CCR, which is due to our office, your customers, and the local health department by July 1, 2020. You may use the table format from the first page of this letter.

Also, because the lead AL was exceeded, include the following health effects language:

*Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure.*

### **What Happens Next?**

If you can show that both lead and copper ALs are met in two consecutive six-month periods, then many of the requirements outlined in this letter will no longer apply.

### Timetable of Upcoming Requirements

Complete By	Requirement	Comments
Within three business days	Distribute a PA.	Distribute a PA to inform all persons served by the water supply of the lead AL exceedance. Distribution of the notice must be in a form and manner designed to fit the specific situation and must be reasonably calculated to reach all persons served by the public water supply.
Right away	Continue to collect WQP samples. (entry point to the distribution system)	Collect one set of WQP samples every two weeks from each entry point to the distribution system that serves Distribution System 2 (TP206 - Village Acres and TP202 - Hillview Village).
November 29, 2019	Perform PE activities including delivering PE materials to all consumers.	Required PE distribution activities are listed in the enclosed template and checklist. Repeat every year until the lead AL is met in the most recent round of sampling.
November 30, 2019	Collect WQP samples. (Distribution System 2)	Collect two sets of WQP samples at least 24 hours apart from three locations in the distribution system.
December 9, 2019	Send us certification of PE compliance along with a sample copy of the materials delivered.	Sample certification enclosed. Required whenever PE required.
Between January 1 and June 30, 2020	Collect 40 samples from the distribution system and have them analyzed for lead and copper.	Report the results to EGLE and deliver the consumer notice of individual lead and copper results using the downloadable <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> . <b>Report due July 10, 2020.</b>
Between January 1 and June 30, 2020	Collect WQP samples. (Distribution System 2)	Collect WQP samples from three locations in the distribution system quarterly.
March 31, 2020	Collect one lead and copper sample from each entry point to the distribution system that serves Distribution System 2.	Repeat every third year until both ALs are met for the whole three-year period at each entry point to the distribution system that serves Distribution System 2 (TP206 - Village Acres and TP202 - Hillview Village).
March 31, 2020	Submit a plan for adjustment to your corrosion control treatment or a proposal to perform a corrosion control study.	Contact us for guidance on corrosion control adjustment or corrosion control study options.
July 1, 2020	Report the 2019 AL exceedance in the CRR.	Specific lead health effects language must be included.
Between July 1 and December 31, 2020	Collect 40 samples from the distribution system and have them analyzed for lead and copper.	Report the results to EGLE and deliver the consumer notice of individual lead and copper results using the downloadable <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> . <b>Report due January 10, 2021.</b>
Between July 1 and December 31, 2020	Collect WQP samples. (Distribution System 2)	Collect WQP samples from three locations in the distribution system quarterly.
September 28, 2020	For the January through June 2020 monitoring, send us certification of Consumer Notice of Lead and Copper results compliance along with a sample copy of the notice delivered.	Download <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> in Word or PDF format from <a href="http://Michigan.gov/LCR">Michigan.gov/LCR</a> .

Mr. Aaron Potter  
Page 5  
October 2, 2019

Complete By	Requirement	Comments
March 31, 2021	For the July through December 2020 monitoring, send us certification of Consumer Notice of Lead and Copper results compliance along with a sample copy of the notice delivered.	Download <i>Lead and Copper Report and Consumer Notice of Lead and Copper Results Certificate</i> in Word or PDF format from <a href="http://Michigan.gov/LCR">Michigan.gov/LCR</a> .
March 31, 2023	Collect one lead and copper sample from each entry point to the distribution system.	Repeat every third year until both ALs are met for the whole three-year period.

We recognize that the Lead and Copper Rule is complex and may be confusing. We will continue to offer assistance in implementing these regulations. If you have any questions, please contact us at [BoltJ@Michigan.gov](mailto:BoltJ@Michigan.gov); [OnanB@Michigan.gov](mailto:OnanB@Michigan.gov); or at the phone numbers provided below.

Sincerely,



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Lead and Copper Unit  
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Health Division  
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Enclosures (PA Checklist, PE Certificate of Distribution, WQP report form, Tier Criteria)  
cc/enc: Ms. Leigh-Ann Stafford, Oakland County Health Department  
Mr. Steve Crider, Michigan Department of Health and Human Services  
Ms. Kristina Donaldson, EGLE  
Mr. Josh Aden, EGLE  
Ms. Tiffany Yusko-Kotimko, EGLE