



November 1, 2021

Roger Seaver
Madison Country Day School
5606 River Road
Waunakee, WI 53597

Project Number: W-2020-1008
Date Received: 12/11/2020
DNR Region: SCR
PWSID: 11305580

SUBJECT: Corrosion Control Treatment Recommendation Packet Receipt and Next Steps

Dear Mr. Seaver,

The Wisconsin Department of Natural Resources (Department) corresponded with you in September 2020 regarding a lead Action Level Exceedance (ALE) that occurred during the 2020 lead and copper compliance monitoring period. In accordance with Chapter NR 809, Wisconsin Administrative Code (Wis. Adm. Code) Subchapter II – Control of Lead and Copper (the Rule) the Department required completion of a Corrosion Control Treatment (CCT) Recommendation as a follow-up to the ALE. The Department is in receipt of the CCT Recommendation as of December 11, 2020. The following is a summary of the information provided in your CCT Recommendation:

Corrosion Control Treatment Recommendation:

- 1) Madison Country Day School (MCDS) has noted that the water fountains responsible for the elevated lead results had been recently installed at the time of the ALE and were likely first used during lead and copper compliance sampling, implying that the disturbance associated with installing these water fountains was likely responsible for mobilizing lead. This, in combination with stagnation in the distribution system while students were not present as a result of Covid-19, likely caused the ALE.
- 2) MCDS is proposing to flush the distribution system during school vacations.
- 3) MCDS will collect an additional round of lead and copper compliance samples in the first half of 2021 and will replace fixtures if lead concentrations are found to be elevated at that time.

In accordance with s. NR 809.542, Wis. Adm. Code, the Department shall either accept the CCT Recommendation or require MCDS to conduct a CCT Study. The Department consulted EPA's guidance document *Optimal Corrosion Control Treatment Evaluation Technical Guidance for Primacy Agencies and Public Water Systems* (Guidance) in making this determination; the evaluation included:

- 1) Examination of water quality parameter (WQP) data;
- 2) Consideration of your monitoring site plan and sampling practices;
- 3) Consideration of the effectiveness of the proposed corrective action(s); and
- 4) Consideration of sources of lead in MCDS's public water system.

After reviewing the CCT Recommendation, water quality parameter data, and other available system data, **the Department does not object to the proposed CCT Recommendation.** If future lead and copper compliance results are elevated, MCDS must follow through with the proposed fixture replacement or consult with the Department to find a more suitable alternative. Please provide your DNR Representative, Tony Knipfer, with evidence (e.g. plumbing invoices, fixture receipts) that the corrective action was completed **within 90 days of when any fixtures are replaced.**

In addition to the proposed conditional fixture replacement, the Department strongly encourages the following:

- 1) **Consider more frequent distribution system flushing to minimize stagnation, both during and outside of the school year.**
- 2) Work with your DNR Representative, Tony Knipfer, to establish proper sampling techniques and maintain a sampling pool to capture worst case lead exposure from locations where water may be obtained for human consumption from your water system.
- 3) **Identify additional sources of lead in the distribution system including but not limited to old brass fixtures, copper plumbing joined with lead solder, lead internal plumbing, or lead service lines.**
- 4) Develop a standard sampling procedure to ensure consistent sampling practices in alignment with the Rule.

In compliance with the timelines found in the EPA Lead and Copper Rule and Chapter NR 809, Wis. Adm. Code, MCDS must complete CCT requirements following an ALE.

- 1) Collect lead and copper compliance samples from **ten (10)** designated lead/copper sample locations between **January 1 – June 30, 2021** and have them analyzed for lead and copper at a laboratory certified for Safe Drinking Water analysis. Section NR 809.547(2)(d), Wis. Adm. Code requires you to collect lead and copper samples from the same locations each time, or to notify the Department if a site in the sampling pool becomes unavailable. Please contact your DNR Representative, Tony Knipfer, at (608) 275-3461 if you need to change any location(s) for your lead/copper compliance samples. **The Department is in receipt of these results as of April 12, 2021 and notes that neither the lead nor copper action levels were exceeded.**
- 2) **Because the most recent round of compliance monitoring did not exceed the lead or copper action level, you may cease posting the Lead in Drinking Water public education material (brochure).**
- 3) Collect another round of **ten (10)** lead and copper compliance samples between **July 1 – December 31, 2021** and have them analyzed for lead and copper at a laboratory certified for Safe Drinking Water analysis. **The Department is in receipt of these results as of August 12, 2021 and notes that neither the lead nor copper action levels were exceeded.**
- 4) In accordance with s. NR 809.547(4)(d)3 and s. NR 809.547(4)(d)5, Wis. Adm. Code, small or medium public water systems that meet lead and copper action levels of 15 µg/L for lead and 1300 µg/L for copper during three consecutive years or that meet lead and copper levels of 5 µg/L for lead and 650 µg/L for copper for two consecutive 6-month monitoring periods may reduce the frequency of lead and copper monitoring to once every three years. Following review of your system's recent lead and copper monitoring results, your system has been determined to be eligible to move to triennial monitoring.
- 5) Eligibility for triennial monitoring means your system will next be required to collect samples during the Non-Transient Non-Community triennial monitoring period from **June 1 – September 30, 2022**. If your system is moving directly from standard monitoring to triennial monitoring, your lead and copper Monitoring Site Plan may need to be updated to reflect any changes to your sampling locations due to the reduced sampling requirement.

If you have any questions regarding these requirements, you may contact me at (608) 266-9257; or your DNR Representative, Tony Knipfer, at (608) 275-3461.

Sincerely,



Ann Hirekatur
Public Water Supply Section
Bureau of Drinking Water and Groundwater
(608) 266-9257

Enclosures:

- 1) *Lead Free Fixture Information*
- 2) *Lead and Copper Sampling and Compliance Guide*

cc: Tony Knipfer – Water Supply Specialist, DNR, Fitchburg
Eileen Pierce – SCR Supervisor, DNR, Fitchburg
Adam DeWeese – Public Water Supply Section Chief, DNR, Madison
Colin Sinclair – Water Supply Specialist, DNR, Madison