

State of Louisiana

Department of Health and Hospitals
Office of the Secretary

March 7, 2016

Mr. Joel Beauvais Deputy Assistant Administrator United States Environmental Protection Agency Washington, D.C. 20460

RE:

Lead and Copper Rule Implementation

State of Louisiana

Dear Mr. Beauvais,

I am in receipt of your recent correspondence regarding the Lead and Copper Rule implementation in the State of Louisiana.

The Louisiana Department of Health and Hospitals (LDHH) is the primacy agency for enforcing the federal Safe Drinking Water Act in the State of Louisiana, and was granted primacy responsibility for the Lead and Copper Rule in 1996. Since that time, LDHH has strived to implement and enforce all aspects of the Lead and Copper Rule, as well as all other federal Safe Drinking Water Act Rules, to ensure that the residents and visitors of the State receive safe drinking water.

Your letter requested that LDHH take near-term actions in five areas:

- LDHH strives to and will continue to make every effort to implement and enforce all
 aspects of the Lead and Copper Rule as well as corresponding EPA guidance. In order to
 ensure that all aspects of the Rule have been implemented historically, LDHH is
 reviewing all implementation protocols and procedures for the Lead and Copper Rule as
 well as historical compliance sample results. Furthermore, the recently issued EPA
 guidance regarding removal and cleaning of aerators, flushing, and bottles will be
 included into LDHH's protocols.
- 2. LDHH uses relevant guidance in the Lead and Copper Rule sampling protocols and procedures given to water systems. The systems are provided sampling kit(s) complete with the sampling protocols for further distribution to the customer. Optimization of corrosion control methods is conducted by all large water systems and small or medium systems that may have an Action Level exceedance.
- 3. LDHH has a public Safe Drinking Water Program website that has all Lead and Copper Rule sampling protocols and guidance for Tier 1 site selection. In addition, all Lead and Copper Rule compliance sample results can be found on the website on the Drinking Water Watch page.

- 4. LDHH is working with systems to submit materials inventories and associated maps to LDHH for publication on the LDHH website. LDHH is also encouraging water systems to publish the same information on their websites. As previously noted, all Lead and Copper Rule compliance sample results are currently on the LDHH website.
- 5. LDHH will enhance efforts to ensure the lead public education and lead consumer notice requirements of the Lead and Copper Rule are followed by public water systems. In addition, LDHH notifies the Maternal and Child Health Program when any lead exceedance occurs at a school or daycare for further investigation and possible blood lead level testing. LDHH also notifies the Maternal and Child Health Program in the event of a high Action Level exceedance at a home to determine if any children live at the home and to investigate further as necessary. LDHH also investigates high exceedances to determine if proper sampling protocol was followed including sample tap type and also provides sample recollection for concerned homeowners.

LDHH is in the process of implementing electronic reporting of laboratory analysis results. This system will decrease the amount of time required for reporting sample results; therefore, water systems will receive earlier notifications of any exceedances and in turn can notify affected customers quicker.

LDHH has maintained and will continue to maintain an excellent working relationship with the Region 6 EPA office in Dallas, Texas. By working together, we can ensure a reliable, consistent, and safe drinking water supply to the residents and visitors of the State of Louisiana.

Warmly,

Rebekah E. Gee, MD, MPH

CC: Jimmy Guidry, M.D., State Health Officer

Amanda Laughlin, P.E., Chief Engineer and Safe Drinking Water Program Administrator Caryn Benjamin, P.E., Deputy Chief Engineer of Compliance and Enforcement Jim Taft, ASDWA

James Brown, Region 6 EPA