



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

L. Scott Baird
Executive Director

DIVISION OF DRINKING WATER
Marie E. Owens, P.E.
Director

November 12, 2019

Eric Hawkes
Emigration Improvement District
PO Box 58945
Salt Lake City, UT 84158

**Subject: Notice of Action Level Exceedance for Lead
Emigration Improvement District, UTAH18143**

Dear Mr. Hawkes:

According to water sampling results submitted to the Division of Drinking Water (DDW), Emigration Improvement District has exceeded the action level (AL) for lead. The lead AL is exceeded if the 90th percentile concentration is greater than 0.015 mg/L according to R309-200-5(2). The samples collected in September 2019 which led to the AL exceedance were reported as the following:

Analyte	Lab Sample ID	Collection Date	Location	New Facility Identification Code	Result	Action Level
Lead	19J0277-02	9/23/2019	75 Silver Oak Rd (EID-2)	LC001	0.0196 mg/L	0.015 mg/L
Lead	19J0277-05	9/22/2019	105 Young Oak Rd (EID-5)	LC002	0.0234 mg/L	0.015 mg/L
Lead	19J0277-09	9/24/2019	5430 E Pioneer Fk Rd (EID-9)	LC003	0.0315 mg/L	0.015 mg/L

Based on this AL exceedance your system is now required to do the following:

1. Increased Sampling

- a. Resample the high sites listed on the table above by November 30, 2019. If these repeat samples cannot be taken by November 30, 2019, please notify the Division. *Note: Resamples for LC001 and LC003 have been submitted as of the date of this letter.*
- b. Sample for 20 lead and copper samples every six months. The next set of samples should be collected between January 1, 2020, and June 30, 2020.
- c. Sample for lead as well as the Water Quality Parameters (WQPs), at the active

sources by December 31, 2019. These parameters are: pH, alkalinity, calcium, conductivity, temperature, orthophosphate (if used in the system), and silica (if used in the system). The sources are designated as WS001 – Freeze Creek Well, WS002 – Well #2, and WS004 – Upper Freeze Creek Well.

Note: Samples for lead and pH from WS001, WS002, and WS004 have been submitted as of the date of this letter.

- d. Monitor WQPs at two locations in the Distribution System quarterly for at least four consecutive quarters. The first samples should be collected by December 31, 2019. The sampling locations should be designated and approved by the Division prior to sampling. Locations should be near the mid-point and end-point of the distribution system. Please contact Luke Treutel at (385) 258-6084 or (ltreutel@utah.gov) to have these locations approved.

These new sampling requirements are shown in the enclosed monitoring schedule for your system. Please note that the repeat samples at the high locations must be marked with the New Facility Identification Codes on the laboratory chain of custody form. These are LC001, LC002, etc. Continue to use the DS001 sample identification code for the rest of the 20 samples that satisfy the six month sampling requirement. For help in filling out the chain of custody form, please see the enclosed proper sample labeling.

2. **Public Notice**

Share the Enhanced Public Notice with all connections by November 30, 2019. Certify with the Division when this is complete by contacting Luke Treutel at (385) 258-6084 or (ltreutel@utah.gov).

Note: The Enhanced Public Notice has been delivered to all connections as of the date of this letter.

3. **Submit Sampling Site Plan**

Submit the current lead/copper sampling site plan for your system. A template for the lead/copper sampling site plan is attached. The sampling site plan should have a minimum of 20 sites. Submit the sampling site plan by December 31, 2019.

4. **Submit a Materials Inventory for the Distribution System**

Supply the Division with an inventory of materials for the distribution system by March 31, 2020. This inventory should cover the side of the distribution system for which the water system is responsible. A typical materials inventory would include a map and identify the material makeup (e.g. lead, steel, asbestos cement, etc.) of mains and other components. Please contact Luke Treutel at (385) 258-6084 or (ltreutel@utah.gov) with any questions on conducting this inventory.

5. **Submit a Lead Service Line Inventory**

Supply the Division with a lead service line inventory by June 30, 2020. This inventory should include verified information about the service line material at a minimum of 10% of connections, including the locations that exceeded the action level. The information from the lead service line inventory should be used to update the lead/copper sampling site

Eric Hawkes
November 12, 2019
Page 3

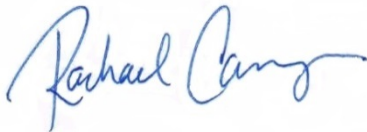
plan. Please contact Luke Treutel at (385) 258-6084 or (ltreutel@utah.gov) with any questions on conducting this inventory.

This action level exceedance is not a violation. There are no IPS points associated with the exceedance, only the requirements in this notice. If your system fails to take action on the steps above, violations will be applied to the system's IPS report.

The Division will work with your system to further resolve this Action Level Exceedance. Please work with Luke Treutel, the DDW Lead/Copper Rule Manager, for help in reviewing the data and future possible requirements. At this time the Division does not require your system to complete a corrosion control study.

You will find a current copy of your monitoring schedule enclosed. If you have any questions, please contact Luke Treutel at (385) 258-6084 or ltreutel@utah.gov.

Sincerely,



Rachael Cassidy
Rules Section Manager

LT

Enclosures – Monitoring Schedule
Proper Sample Labeling
Sample Site Plan Template

cc: Eric Hawkes, Emigration Improvement District, eric@ecid.org
Larry Hall, Aqua Environmental Services, Inc., larryh@aquaenviron.com
Salt Lake County Health Department
Luke Treutel, Utah Division of Drinking Water
Marie Owens, Utah Division of Drinking Water