

From: Larry Hall [mailto:larryh@aquaeviron.com]

Sent: Monday, November 07, 2016 1:45 PM

To: 'Eric Hawkes'; 'Eric Hawkes'

Subject: FW: Lead and Copper results for system #18143

Hi Eric,

Here is Emily's email that we discussed on Friday with the list of questions we need to follow up on. I have also attached the required form for 142 Young Oak Rd and 160 Young Oak Rd. I have put you down on the contact information on the forms, I also need to mail these forms to all homes that participated in the sampling, should I put you down as the point of contact on all of these? Let me know if you want my help on this or when you have answers to these questions so I can forward this information to the State for further direction.

Thank You,

Larry Hall



801.209.6382 (Mobile)

From: Emily Frary [<mailto:emilyfrary@utah.gov>]

Sent: Monday, October 17, 2016 3:59 PM

To: Larry

Subject: Re: Lead and Copper results for system #18143

Hi Larry,

The significant figure argument is legitimate. Technically, you do not exceed the Action Level of 0.015 mg/L for lead when sig fig's are taken into account. Systems with lead and copper exceedances are highly scrutinized by both DDW and EPA. We can't just record these sample results without having any follow-up. Investigating these high samples will help make your case more defensible to your consumers and will help prepare you for any questions probed by EPA. Additionally, investigation and follow-up may uncover any issues with the water system or with your sample sites.

Can you please answer the following questions about the samples with the high lead levels (142 Young Oak Rd. (EID-5) and 160 Young Oak Rd. (EID-6)?

What is the general water use activity for each site and sample tap (ex: used often, seldom, etc.)?

Was the sample taken for a kitchen or bathroom cold water tap?

What was the general sampling procedure used in taking all of the samples?

What type of connection/type of tap and material was the sample taken from?

How long was the water sitting stagnant for?

Is the electricity grounded to the water line?

Does the tap have a Point-of-Use Device?

Does the home have a water softener and is it set to an appropriate level?

I highly recommend that you take follow-up samples from these two residences. I would conduct another first draw sample and a flush sample (let the water run until it changes temp or for approximately 2 min).

Thanks Larry, let me know what you find out.

Emily [801-536-0070](tel:801-536-0070)

Emily,

Thank you for the call back yesterday, regarding the recent Lead and Copper sampling results for system #18143 EID Oaks. Since I have received the results from Chemtech Ford Laboratory I have been reviewing the rule and I think we are okay but I wanted to clarify with you.

Our 90th percentile sample had a value of .0152 mg/L as reported by Chemtech Ford Labs. As you may know, Chemtech will highlight a sample results in red when it exceeds the MCL, which was the case with this particular sample result.

The MCL (or I guess technically the AL) for lead is clearly stated in the rule with three significant digits of .015 mg/L. If the results as reported by the lab uses three significant digits, as the rule is clearly written, then my results for the 90th percentile sample would be .015mg/L which does not exceed the MCL/AL and would not trigger any additional requirements. Obviously we will still comply with the rule and notify all residents of the sample results and send the appropriate forms to you acknowledging that we have done so.

After speaking yesterday with the Chemtech Ford Lab director, David Gayer specifically about these results. He said that he felt the sample results as reported on the lab sheet, while correct, should not be red because they did not exceed the MCL for Lead, also pointing out that there are many MCL's that have more significant digits than three and therefore there was a reason why the EPA set the MCL at three significant digits for Lead. At a minimum, he indicated he wanted to change the color of the results from red to black to indicate it did not exceed the MCL but felt he wanted to keep the value on the report the same at .0152 mg/L but was going to talk to a couple of colleges at the lab and get there assessment. He also indicated he would like to get the Division of Drinking Waters take on it because, while uncommon, it would probably surface again on other constituents.

So, I guess ultimately I'm asking the question, am I correct in reporting the same number of significant digits as stated in the rule?

Please let me know if you have any questions. I am anxious to get the results mailed to the homeowners for their information but would like to know how I need to report those results with regards to significant digits.

Thank You,

Larry Hall