



Division of Environmental Health

Terry L. Pierce, Director

Environmental Health Services Section
Bart Campbell, Section Chief

State of North Carolina
Michael F. Easley, Governor

*Department of Environment and
Natural Resources*
William G. Ross, Secretary

March 9, 2006

MEMORANDUM

FROM: Bart Campbell, Chief
Environmental Health Services Section

Jessica G. Miles, P.E., CPM, Chief
Public Water Supply Section

TO: Terry Pierce, Director
Division of Environmental Health

SUBJECT: Procedure to address exceedences and administrative penalties
reported for public water supply systems

The Environmental Health Services Section (EHSS) and Public Water Supply Section (PWSS) have agreed to the following procedure to address exceedences and administrative penalties reported for public water supply systems.

- 1) The PWSS Lead & Copper Rule Manager will provide a copy of the analysis for any exceedences of the lead and copper drinking water standards as well as any administrative penalties issued by PWSS against schools, day cares, nursing homes and food establishments to the Children's Environmental Health Branch (CEHB) Surveillance Coordinator, Emily Smathers.
- 2) For residential water lead exceedences, the Surveillance Coordinator will mail an educational package to the current resident. The educational mailing will include information regarding the test results, what can be done to correct the problem, and recommendations to test children less than 6 years old, pregnant women, and nursing mothers who reside in or regularly visit the home. The Surveillance Coordinator will also forward electronically a copy of the water sampling test results to the environmental health supervisor at the appropriate local health department.
- 3) For lead or copper exceedences reported for facilities regulated by EHSS (e.g., child care centers and schools), the Surveillance Coordinator will forward electronically a copy of the water sampling test results to the environmental health supervisor at the appropriate local health department. The Surveillance Coordinator will provide guidance to the local health department to ensure that their DENR

authorized agent collects an inorganic water sample at the earliest opportunity to determine if the facility has an approved water supply.

- 4) The Surveillance Coordinator will fax copies of the analytical results for all lead and copper exceedences, with the exception of private residences and regulated establishments, to the State Toxicologist in the DHHS Occupational and Environmental Epidemiology Branch for health risk assessment.
- 5) The Surveillance Coordinator will fax a copy of each administrative penalty received under Item 1 to the environmental health supervisor at the appropriate local health department. The Surveillance Coordinator will provide guidance to the local health department that indicates that these facilities are not operating in accordance with PWSS requirements, and are subject to immediate enforcement action. For facilities licensed by other agencies (e.g., child care centers and schools) and subject to sanitation inspections by EHSS, the Surveillance Coordinator will electronically notify the appropriate licensing official that the facility is not operating in accordance with PWSS requirements.
- 6) Whenever EHSS identifies elevated water lead levels from a public water system during mandated childhood lead poisoning investigations, the CEHB Surveillance Coordinator will forward a copy of the water sampling test results (to include the street address) to the PWSS Lead & Copper Rule Manager. The Lead & Copper Rule Manager will notify the public water system of the elevated water lead sampling results and request that this address be added to the list of homes sampled for future compliance monitoring. In addition, the PWSS Regional Office will conduct a site visit at the public water system to review the lead and copper corrosion control plan and recommend any needed improvements.

cc: Anna Carter, DHHS, Division of Child Development