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MEMORANDUM

Date: March 2, 2016

Attention: Drinking Water Manager

From: Dennis D. Harrison, Chief 
ADEM Drinking Water Branch

Ref: Lead and Copper Materials Inventory

In the early 1990's, as required by the Lead and Copper Rule (LCR), all public water systems (PWSs) should have completed a materials inventory as part of the PWS's lead and copper sampling plan.

With respect to lead, the inventory should have identified whether the PWS's distribution system had construction materials containing lead piping, lead solder, lead caulking, lead alloys, distribution mains with interior lead lining, and home plumbing with lead components. Also, the inventory should have included the location of lead service lines and other lead plumbing in the water system. With respect to copper, the inventory should have identified whether the PWS's distribution system had construction materials containing copper piping, copper alloys, copper service lines, and home plumbing with copper components. In lieu of requiring submittal of this information, ADEM has required all affected PWSs to provide written certification that their lead and copper sampling was performed in compliance with the LCR.

In response to recent events in Flint, Michigan and other U.S. cities, on February 29, 2016 the USEPA sent a letter to the directors of all state environmental agencies urging the agencies to take certain near-term actions. One of those near-term actions was for the agencies to work with PWSs to increase transparency in implementation of the LCR by requiring PWSs to post on their public website and/or on the state agency's website the materials inventory mentioned above.

ADEM will now require all affected PWSs to submit their lead and copper sampling plan (including the material inventory) to the Department by May 31, 2016. When you submit the information, please indicate whether you have a website and the date the information was posted on it. Regardless, ADEM will post the information on its eFile network to assure the public has access to it. If the information needs to be updated,

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you should do this prior to submitting it to ADEM or posting it on your website. If you do not have, or cannot locate this information, you will need to generate it. For further information regarding the required contents of your LCR sampling plan, please contact Tom DeLoach at phone number (334) 271-7791, email address tsd@adem.state.al.us, or Laura Taylor at phone number (334) 271-7820, email address lat@adem.state.al.us.

ADEM fully expects the USEPA to take further actions related to the LCR. ADEM will endeavor to keep all affected PWSs in the state apprised of these developments as they occur and commits to work with all the state's PWSs to assure the public health of all Alabamians is protected.