MISSISSIPPI STATE DEPARTMENT OF HEALTH

Wednesday, January 29, 2020

Charles Williams
City Engineer, City of Jackson
P.O. Box 17
Jackson, Mississippi 39205

RE: Treatment Technique Violations - CITY OF JACKSON PWSID # MS0250008

Dear Water System Official:

The above referenced public water supply violated the following drinking water standards and requirements:

1. Treatment Technique Violation: Maximum Residual Disinfectant Level (MRDL) Exceedance for Chloramines;
2. Treatment Technique Violation: Lead and Copper Rule Water Quality Parameter Monitoring Minimum Values Not Met; and
3. Treatment Technique Violation: Lead and Copper Rule Failure to Install Corrosion Control Equipment

State regulations require that your customers be notified of these violations as indicated in the enclosed "Instructions for Monitoring Violation Notices." If you propose to use a different notice, it must be factual, and it must be approved in writing by this Bureau before use. Also, these three notices may be combined, but prior written approval from us is required before issuance to customers. After notification has been given, the attached "Confirmation of Notices" must be completed and returned to the Bureau of Public Water Supply along with a copy of the actual notice(s) used within ten (10) days of completion.

If you have information that shows this public water supply is not in violation of these laws, contact this Bureau as soon as possible. The law specifies a limited time frame in which notice must be given.

Failure to give this public notice to your customers is a violation of the Safe Drinking Water Act. Your water system must provide Tier 2 Public Notification as soon as possible, but no later than 30 days by mail or direct delivery to each customer and service connection. Also, the Treatment Technique Violations for Lead and Copper Rule (#2 and #3), must repeat public notification along with confirmation of notice every 60 days until notified otherwise by the Bureau.

570 East Woodrow Wilson • Post Office Box 1700 • Jackson, MS 39215-1700
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MISSISSIPPI STATE DEPARTMENT OF HEALTH

If you have questions, you may contact us at (601)576-7518.

Sincerely,

William F. Moody, P.E., BCEE
Director, Bureau of Public Water Supply
570 East Woodrow Wilson Blvd
P.O. Box 1700
Jackson, Mississippi 39215-1700

pc: Terence Byrd, CWO

INSTRUCTIONS

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
City of Jackson (MS0250008) Had Levels of Chloramines Above Drinking Water Standards
Treatment Technique Violation

Chemical or radiological maximum contaminant level (MCL) violations require Tier 2 notification. You must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [40 CFR 141.203(b)]. You must issue a repeat notice every three months for as long as the violation persists.

Community systems must use one of the following methods [40 CFR 141.203(c)]:

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

Community systems must use another method reasonably calculated to reach others if they would not be reached by the first method [40 CFR 141.203(c)]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on your system's letterhead, if available.

The notice on the reverse is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required PN elements from 40 CFR 141.205(a) and leave the mandatory language unchanged (see below).

Mandatory Language

Mandatory language on health effects (from Appendix B to Subpart Q) must be included as written (with blanks filled in). This notice includes a placeholder for a specific contaminant's health effects language.

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [40 CFR 141.205(d)]. This language is also presented in this notice in italics and with an asterisk on either end.

Corrective Action

In your notice, describe corrective actions you are taking. Do not use overly technical terminology when describing treatment methods. Listed below are some steps commonly taken by water systems with chemical violations. Depending on the corrective action you are taking, you can use one or more of the following statements, if appropriate, or develop your own text:

- We are working with [local/state agency] to evaluate the water supply and are researching options to correct the problem. These options may include treating the water to remove [contaminant] or connecting to [system]'s water supply.
- We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well.
- We have increased the frequency that we will test the water for [contaminant].
- We have since taken samples at this location and had them tested. These samples show that we meet the standards.

Repeat Notices

If this is an ongoing violation and/or you fluctuate above and below the MCL, you should give the history behind the violation, including the source of contamination, if known. List the date of the initial detection, as well as how levels have changed over time. If levels are changing as a result of treatment, you can indicate this.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met all public notification requirements within ten days after issuing the notice [40 CFR 141.31(d)].

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

City of Jackson (MS0250008) Had Levels of Chloramines Above Drinking Water Standards
Treatment Technique Violation

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. In January 2020, we received notice that the samples collected from December 3rd to December 5th, 2019 showed that our system exceeded the standard, or maximum residual disinfectant level (MRDL), for chloramines. The standard for chloramines is 4.0 mg/L. The average level of chloramines over the three (3) day period was 4.3 mg/ L with a maximum level of chloramines of 5.0 mg/L during that time.

What should I do?

- *There is nothing you need to do. You do not need to boil your water or take other corrective actions. However, if you have specific health concerns, consult your doctor.*
- *If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your health care providers about drinking this water.*

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours. However, some people who use water containing chloramines well in excess of the MRDL could experience irritating effects to their eyes and nose. Some people who drink water containing chloramines well in excess of the MRDL could experience stomach discomfort or anemia.

What is being done?

[Describe corrective action.] We anticipate resolving the problem within [estimated time frame].

_____

_____

For more information, please contact Charles Williams at 601-960-1651 or P. O. BOX 17, JACKSON, MS 39205.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice was sent by City of Jackson MS0250008. Date distributed: _____

MISSISSIPPI STATE DEPARTMENT OF HEALTH

CONFIRMATION OF NOTICE

This confirmation must be returned to this office within 10 days of the issuance of the public notice.

Mail: MSDH, Bureau of Public Water Supply
Attn: Compliance
PO Box 1700
Jackson, MS 39215

Email: water.reports@msdh.ms.gov
Fax: 601-576-7800

PWS Name:	City of Jackson
PWS ID #:	MS0250008
Violation of Rule:	Treatment Technique Violation: Maximum Residual Disinfectant Level (MRDL) Exceedance for Chloramines.
Occuring On (date):	December 3-5, 2019

The public water system indicated above hereby affirms that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines given by method(s) indicated below:

Distribution Method (Please check one.):

- ☐ Hand/direct delivery on (date) _____
- ☐ Mail, as a separate notice or included with the bill on (date) _____
- ☐ Alternate method if applicable on (date)_____
  - Indicate method used (email, posting, etc.) _____

Failure to give this public notice to your customers is a violation of the Safe Drinking Water Act and carries penalties under the Mississippi Code Annotated 41-26-31 of not more than $25,000 for each violation with each day of a continuing violation considered a separate violation.

_____ _____ _____

(Print Name) ***(Signature)*** ***(Date)***

_____

(Title)

INSTRUCTIONS

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Lead and Copper Water Quality Parameter Monitoring Results Not Meeting Minimum Values
Treatment Technique Violation

Since lead and copper treatment technique violations require Tier 2 notification, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [40 CFR 141.203(b)]. You must issue a repeat notice every three months for as long as the violation persists. Your primacy agency may have more stringent requirements for treatment technique violations (e.g., it may require you to provide water from an alternate source). Check with your agency to make sure you meet all requirements.

Community systems must use one of the following methods [40 CFR 141.203(c)]:

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

In addition, both community and noncommunity systems must use another method reasonably calculated to reach others if they would not be reached by the first method [40 CFR 141.203(c)]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on your system's letterhead, if available.

The notice on the reverse is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required PN elements from 40 CFR 141.205(a) and leave the mandatory language unchanged (see below).

Mandatory Language

Mandatory language on health effects (from Appendix B to Subpart Q) must be included as written (with blanks filled in) and is presented in this notice in italics and with an asterisk on either end.

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [40 CFR 141.205(d)]. This language is also presented in this notice in italics and with an asterisk on either end.

Description of the Violation

This template is written for systems which are required to install corrosion control after exceeding lead action levels. The Lead and Copper Rule requires some large systems to install corrosion control even if they have never exceeded the lead action level. You may need to modify the template if this applies to you. The following may help you explain the violation:

- This is a treatment violation, but it does not mean there is lead in your drinking water. However, it is important that we take measures to control lead levels in the water, because ingesting lead can cause serious health consequences.

If the delay in installation is related to outside circumstances, such as funding, you should explain the delay. Consumers may be more supportive of rate increases or may pressure local authorities to provide funds if they understand the circumstances.

Corrective Action

In your notice, describe corrective actions you are taking. You can use the following language, if appropriate, or develop your own text:

- We conducted a lead public education program in [month, year]. You should have received a brochure explaining in more detail steps you can take to reduce exposure until corrosion control is in place.

If consumers ask for information on testing their water, you should have on hand the names of laboratories consumers can call. Tell consumers to call NSF International at 1(800) NSF-8010 or the Water Quality Association at 1(800) 749-0234 for information on appropriate filters. For more information on lead, have consumers call the EPA Safe Drinking Water Hotline at 1-800-426-4791 or the National Lead Information Center Hotline 1(800) LEAD-FYI.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met the public notice requirements within ten days after you issued the notice [40 CFR 141.31(d)].

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Lead and Copper Water Quality Parameter Monitoring Results Not Meeting Minimum Values
Treatment Technique Violation

Our water system violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what happened and what we are doing to correct this situation.

We routinely sample water at consumers' taps for lead and copper. In 2015, the tests show lead and copper levels in the water above the limits, or action level. After testing and analyses of our system, we began installation of corrosion control treatment in October of 2017. This treatment helps prevent lead and copper in the pipes and plumbing components from dissolving into the water. During the monitoring periods in 2018 and 2019, and the first monitoring period of 2020, we failed to consistently meet treatment technique requirements for our corrosion control system which is a violation of the Lead and Copper Rule and a requirement of the City's Optimized Corrosion Control Plan.

What should I do?

Although the majority of home lead testing performed identified no lead or lead below the action level set by the EPA, MSDH has issued these recommendations as a special precaution, especially for households with young children or pregnant women. These precautions should remain in place at least six months while the City continues its efforts to make required changes to stabilize the pH levels in its water system that can cause corrosion.

- *Before using tap water for drinking or cooking, run your tap on cold for one to two minutes. For details, see http://cdc.gov/nceh/lead/tips/water.htm*
- *Households should never use hot water for drinking or cooking.*
- *Residents should clean out their faucet aerators by unscrewing the aerator at the tip of the faucet and removing any particles or sediment that have collected in the filter screen.*
- *Any child five years of age or younger and any pregnant woman should use filtered water http://info.nsf.org/Certified/DWTU/ or bottled water for drinking and cooking.*
- *Baby formula should be "ready-to-feed" or prepared using only filtered water or bottled water.*
- *Parents with children five (5) years or younger should contact their child's pediatrician or primary care provided to make sure that adequate lead screening and blood testing have been performed.*

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours. Typically lead and copper enters the water supply by leaching from lead or brass pipes and plumbing components. New lead pipes and plumbing components containing lead are no longer allowed for this reason. However, many older homes may contain lead pipes. Your water is more likely to contain high lead levels if water pipes in or leading to your home are made of lead or contain lead solder. High levels of lead and copper in Mississippi are nearly always due to pipes and fittings in the plumbing.

"Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development, Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure."

What is being done?

[Describe corrective action.] We anticipate resolving the problem within [estimated time frame].

_____

_____

For more information, please contact Charles Williams at 601-960-1651 or P. O. BOX 17, JACKSON, MS 39205.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice was sent by City of Jackson MS0250008. Date distributed: _____

MISSISSIPPI STATE DEPARTMENT OF HEALTH

CONFIRMATION OF NOTICE

This confirmation must be returned to this office within 10 days of the issuance of the public notice.

Mail: MSDH, Bureau of Public Water Supply
Attn: Compliance
PO Box 1700
Jackson, MS 39215

Email: water.reports@msdh.ms.gov
Fax: 601-576-7800

PWS Name:	City of Jackson
PWS ID #:	MS0250008
Violation of Rule:	Treatment Technique Violation: Lead and Copper Rule Water Quality Parameter Monitoring Minimum Values Not Met
Occuring On (date):	Monitoring Period January – June 2020

The public water system indicated above hereby affirms that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines given by method(s) indicated below:

Distribution Method (Please check one.):

- ☐ Hand/direct delivery on (date) _____
- ☐ Mail, as a separate notice or included with the bill on (date) _____
- ☐ Alternate method if applicable on (date)_____
  - o Indicate method used (email, posting, etc.) _____

Failure to give this public notice to your customers is a violation of the Safe Drinking Water Act and carries penalties under the Mississippi Code Annotated 41-26-31 of not more than $25,000 for each violation with each day of a continuing violation considered a separate violation.

_____ _____ _____
(Print Name) ***(Signature)*** ***(Date)***

_____
(Title)

INSTRUCTIONS

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
Lead and Copper Rule Failure to Install Corrosion Control Treatment Technique Violation

Since lead and copper treatment technique violations require Tier 2 notification, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [40 CFR 141.203(b)]. You must issue a repeat notice every three months for as long as the violation persists. Your primacy agency may have more stringent requirements for treatment technique violations (e.g., it may require you to provide water from an alternate source). Check with your agency to make sure you meet all requirements.

Community systems must use one of the following methods [40 CFR 141.203(c)]:

- Hand or direct delivery
- Mail, as a separate notice or included with the bill

In addition, both community and noncommunity systems must use another method reasonably calculated to reach others if they would not be reached by the first method [40 CFR 141.203(c)]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on your system's letterhead, if available.

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You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [40 CFR 141.205(d)]. This language is also presented in this notice in italics and with an asterisk on either end.

Description of the Violation

This template is written for systems which are required to install corrosion control after exceeding lead action levels. The Lead and Copper Rule requires some large systems to install corrosion control even if they have never exceeded the lead action level. You may need to modify the template if this applies to you. The following may help you explain the violation:

- This is a treatment violation, but it does not mean there is lead in your drinking water. However, it is important that we take measures to control lead levels in the water, because ingesting lead can cause serious health consequences.

If the delay in installation is related to outside circumstances, such as funding, you should explain the delay. Consumers may be more supportive of rate increases or may pressure local authorities to provide funds if they understand the circumstances.

Corrective Action

In your notice, describe corrective actions you are taking. You can use the following language, if appropriate, or develop your own text:

- We conducted a lead public education program in [month, year]. You should have received a brochure explaining in more detail steps you can take to reduce exposure until corrosion control is in place.

If consumers ask for information on testing their water, you should have on hand the names of laboratories consumers can call. Tell consumers to call NSF International at 1(800) NSF-8010 or the Water Quality Association at 1(800) 749-0234 for information on appropriate filters. For more information on lead, have consumers call the EPA Safe Drinking Water Hotline at 1-800-426-4791 or the National Lead Information Center Hotline 1(800) LEAD-FYI.

After Issuing the Notice

Make sure to send your primacy agency a copy of each type of notice and a certification that you have met the public notice requirements within ten days after you issued the notice [40 CFR 141.31(d)].

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Lead and Copper Rule Failure to Install Corrosion Control Treatment Technique Violation

Our water system recently violated a drinking water requirement. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We routinely sample water at consumers' taps for lead. Sample results in 2015 showed lead levels in the water above the limit, or "action level," so we were required to install corrosion control treatment. This treatment helps prevent lead in the pipes from dissolving into the water. Corrosion control should have been completely installed at both O. B. Curtis and J. H. Fewell Water Treatment Plants by December 28, 2019, but installation is incomplete at J. H. Fewell due to a reassessment of the optimized corrosion control plan.

What should I do?

Although the majority of home lead testing performed identified no lead or lead below the action level set by the EPA, MSDH has issued these recommendations as a special precaution, especially for households with young children or pregnant women. These precautions should remain in place at least six months while the City continues its efforts to make required changes to stabilize the pH levels in its water system that can cause corrosion.

- *Before using tap water for drinking or cooking, run your tap on cold for one to two minutes. For details, see http://cdc.gov/nceh/lead/tips/water.htm*
- *Households should never use hot water for drinking or cooking.*
- *Residents should clean out their faucet aerators by unscrewing the aerator at the tip of the faucet and removing any particles or sediment that have collected in the filter screen.*
- *Any child five years of age or younger and any pregnant woman should use filtered water http://info.nsf.org/Certified/DWTU/ or bottled water for drinking and cooking.*
- *Baby formula should be "ready-to-feed" or prepared using only filtered water or bottled water.*
- *Parents with children five (5) years or younger should contact their child's pediatrician or primary care provided to make sure that adequate lead screening and blood testing have been performed.*

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours. Typically lead and copper enters the water supply by leaching from lead or brass pipes and plumbing components. New lead pipes and plumbing components containing lead are no longer allowed for this reason. However, many older homes may contain lead pipes. Your water is more likely to contain high lead levels if water pipes in or leading to your home are made of lead or contain lead solder. High levels of lead and copper in Mississippi are nearly always due to pipes and fittings in the plumbing.

"Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development, Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure."

What is being done?

[Describe corrective action.] We anticipate resolving the problem within [estimated time frame].

_____

_____ Corrosion control will be in place by _____.

For more information, please contact Charles Williams at 601-960-1651 or P. O. BOX 17, JACKSON, MS 39205.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice was sent by City of Jackson MS0250008. Date distributed: _____

MISSISSIPPI STATE DEPARTMENT OF HEALTH

CONFIRMATION OF NOTICE

This confirmation must be returned to this office within 10 days of the issuance of the public notice.

Mail: MSDH, Bureau of Public Water Supply
Attn: Compliance
PO Box 1700
Jackson, MS 39215

Email: water.reports@msdh.ms.gov
Fax: 601-576-7800

PWS Name:	City of Jackson
PWS ID #:	MS0250008
Violation of Rule:	Treatment Technique Violation: Lead and Copper Rule – Failure to Install Corrosion Control Equipment
Occuring On (date):	Monitoring Period July – December 2019

The public water system indicated above hereby affirms that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines given by method(s) indicated below:

Distribution Method (Please check one.):

- ☐ Hand/direct delivery on (date) _____
- ☐ Mail, as a separate notice or included with the bill on (date) _____
- ☐ Alternate method if applicable on (date)_____
  - o Indicate method used (email, posting, etc.) _____

Failure to give this public notice to your customers is a violation of the Safe Drinking Water Act and carries penalties under the Mississippi Code Annotated 41-26-31 of not more than $25,000 for each violation with each day of a continuing violation considered a separate violation.

_____ _____ _____
(Print Name) ***(Signature)*** ***(Date)***

_____
(Title)