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December 21, 2018

CERTIFIED MAIL/RRR
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Nicholas Wendling
Belleville Water Department
429 Stephens St.
Belleville, NJ 07109

RE: Recommended Actions for Newark Water Department's Consecutive Systems
Belleville Water Department
PWSID No. NJ0701001
Letter No. LCR180005

Dear Nicholas Wending:

The purpose of this letter is to recommend specific actions that Belleville Water Department (Belleville) should consider implementing because it purchases water from the Pequannock Gradient of the Newark Water Department (Newark) (PWSID NJ0714001). Pursuant to 40 C.F.R. § 141, Newark currently has a lead action level exceedance (ALE), a Maximum Contaminant Level (MCL) for Total Haloacetic Acids (HAA5s), and elevated Total Trihalomethane (TTHM) levels at several locations within its system.

Additionally, in early October of 2018, the New Jersey Department of Environmental Protection (DEP) was informed that new data collected by Newark demonstrated that the chemical used to control corrosion within their Pequannock Gradient is no longer effective and that the protective lining of the lead service lines is sloughing off, potentially carrying lead particles in the drinking water to consumers' taps. Newark submitted a draft corrosion control study report to the DEP, which recommended Newark switch its corrosion control inhibitors to address this issue; however, Newark must further evaluate their treatment system and conduct additional sampling and studies.

In the meantime, Newark has issued a public notification providing additional guidance on reducing one's exposure to lead and are providing point of use (POU) filters to those customers that may be affected as an interim measure as described on their website, https://www.newarkleadserviceline.com/, and on the DEP's website, https://www.nj.gov/dep/watersupply/.

In accordance with the Federal Lead and Copper Rule (LCR) at 40 C.F.R. § 141.80 et seq., the DEP completed a technical review of Newark's consecutive systems. Within this letter are the DEP's findings and recommendations specific to Belleville.

Belleville Findings

- Belleville only has a distribution system with no treatment, no storage, and receives all of its water from Newark's Pequannock Gradient.
- Lead ALEs occurred in Belleville during 2003, 2004, 2005, 2007, 2009 and 2011. The last sampling event occurred in 2017.
- The Environmental Protection Agency (EPA) issued an Administrative Order (AO) to Belleville on November 15, 2018 requiring Belleville to take a number of actions to come into compliance with the Safe Drinking Water Act.
- The total number of lead service lines in Belleville is unconfirmed at this time.
- The Lead and Copper Sampling Plan requested by the DEP in April of 2018 is significantly deficient due to an inadequate materials evaluation of the entire distribution system. Paragraph (41)(d) of the AO requires a revised and compliant Lead and Copper Sampling plan to be submitted for review and approval by January 31, 2019.
- Paragraph (42) of the AO requires Belleville to submit a Water Quality Sampling Plan by January 31, 2019 for review and approval.
- Pursuant to paragraph (43) of the AO, Belleville is required to conduct standard lead and copper monitoring beginning January 1, 2019.
- Belleville exceeded the MCL for HAA5s during the 2nd quarter and 3rd quarter of 2018.
- Paragraph (40) of the AO also required Belleville to submit a corrective action plan for the HAA5 MCL violation by January 31, 2019.

Lead Recommendations

Based on the information the DEP currently knows about the ineffectiveness of Newark's corrosion control treatment in the Pequannock Gradient, Newark's sampling data, and the fact that DEP does not have detailed data, demonstrating whether the corrosion control treatment is effective within Belleville, DEP strongly recommends the following actions be taken by Belleville as soon as practicable for the protection of the public health:

Public Education/Public Notification

- Provide public education to customers with known lead service lines, lead interior plumbing materials, those customers suspected of having either, and/or individual lead sample results greater than the lead action level of 15 parts per billion (ppb).
- In the public education materials, address the following:
    - Flushing may not reduce lead levels in drinking water for those with lead service lines and that those customers with lead service lines or with unknown service lines should consider using bottled water or a POU filter that is approved to reduce lead certified by National Sanitation Foundation (NSF) International until further notice.
    - Flushing is still an effective means of reducing exposure for those without a lead service line, i.e., internal pipes and fixtures with lead-containing materials.
- Prior to the POU filters being installed, for those with known or unknown lead service lines, the New Jersey Department of Health recommends that bottled water be used for infants who are being fed with formula, and for all children under the age of six.
- Provide information on how customers can have their water tested.

- Note that the New Jersey Department of Health recommends that children under the age of six have their blood lead levels screened as soon as possible regardless of previous blood lead testing history by their primary health care provider and include information on how testing can be done for free by the local health department for those without insurance.
- Provide an overview of Newark's corrosion control treatment and the potential impacts on the Belleville water supply.

Water Testing

- Offer water quality testing for lead to its customers.

Coordination with Newark

- Coordinate with Newark to evaluate potential impacts to Belleville's system from proposed changes to Newark's corrosion control treatment and disinfection treatment processes, including additional water quality parameter monitoring, sequential sampling, and conducting a demonstration study in accordance with EPA's *Corrosion Control Treatment Evaluation Technical Recommendation for Primacy Agencies and Public Water Systems*, dated March 2016.

Additional information pertaining to the recommendations above may be found on the Division's website at https://www.nj.gov/dep/watersupply/dwc-lead-public.html.

<u>TTHM & HAA5 Recommendations</u>

- Belleville should continue to evaluate remedial measures to address its own disinfection byproduct issues while working closely with Newark. Belleville's Remedial Measures Report for the 3rd quarter 2018 HAA5 violation has been received and will be addressed under separate correspondence.

Remedial measures undertaken to address a particular contaminant can adversely affect other contaminants within the treatment train and/or distribution system. The United States Environmental Protection Agency prepared a guidance document, *Simultaneous Compliance Guidance Manual for the Long Term 2 and Stage 2 DBP Rules*, to assist water systems that need to address multiple contaminants within their water system. This guidance manual can be accessed at https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=60000E2Q.txt.
It is recommended all communications/notifications concerning issues in this letter involve both Newark and the DEP.

To ensure adequate communication and coordination between Newark and Belleville, the DEP is requesting a written response to this letter from Belleville to be submitted electronically to watersupply@dep.nj.gov **on or before January 11, 2019**. In addition, Belleville shall provide an update on the sampling plans in its response, including an update on the number of known lead service lines within Belleville's service area.

Your prompt attention to this matter is both necessary and appreciated. Note that it is possible additional information and/or action may be necessary as both the Federal and State Safe Drinking Water programs continue to assess the implementation of the Federal Lead and Copper Rule to ensure the continued protection of public health.

If you have any questions regarding the above, please contact Laura Scatena at 609-292-2957 or by email at laura.scatena@dep.nj.gov. When contacting the DEP please reference the PWSID No. 0701001 and Letter No. LCR180005.

Sincerely,

Patricia L. Gardner
Director, Division of Water Supply & Geoscience

cc: Northern Bureau of Water Compliance and Enforcement
Thomas Herits, Licensed Operator, 26 Michael Dr., Metuchen, NJ 08840
Jerry Notte, Licensed Operator, Newark Water Department
Kareem Adeem, Assistant Director of Public Works, Newark Water Department
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