

Milwaukee Water Works

Safe, Abundant Drinking Water.

TO: Mayor Tom Barrett

DATE: June 8, 2016

FROM: Carrie Lewis, Superintendent
Milwaukee Water Works

SUBJECT: Lead Testing of Milwaukee's Water

Since the EPA's Lead and Copper Rule was first published in 1991, the agency has issued guidance to local water utilities that are designed to control lead and copper in drinking water. Over the years, a number of revisions have been made to the rule and guidance has been provided to water utilities. Both the rule itself and the guidance provided to local water utilities regarding water testing were silent as to the use of "pre-stagnation flushing" prior to testing for lead until a clarification was provided by the EPA in February 2016. This memorandum (attached) clarified the EPA's recommended tap sampling procedures for purposes of the Lead and Copper Rule. This revised guidance is the first time the EPA advised the Milwaukee Water Works (MWW) and others that pre-stagnation flushing was not recommended.

Upon receipt of the revised EPA guidance in February of 2016, the MWW promptly discontinued the practice of pre-stagnation flushing for all types of lead testing. Prior to February of 2016, MWW did instruct residents to flush their home plumbing prior to the required six-hour stagnation period, before collecting samples for regulatory compliance purposes. EPA officials confirmed to local news outlets last week that Milwaukee did not engage in distortion of testing results as purported by a recent article in The Guardian and quoted in the letter you received yesterday from State Senator Lena Taylor.

Milwaukee's record of full compliance with the Lead and Copper Rule, as demonstrated by its test results, has resulted in the EPA granting MWW a reduced monitoring status since 2003. As the Rule requires, 50 samples are collected every three years for lead. The last testing cycle was the summer of 2014. That cycle did include the pre-stagnation flushing instruction. The next cycle in the summer of 2017 will not.

Of perhaps greater importance, MWW tests daily for water quality parameters identified by EPA that demonstrate that Optimized Corrosion Control Treatment (OCCT) is being achieved by MWW's treatment process. MWW verifies that we maintain corrosion control effectiveness by additional weekly sampling and analysis for water quality parameters throughout the distribution system.

Additionally, last year MWW voluntarily began testing of properties affected by water main construction projects. This testing protocol was modified after receipt of the February EPA guidance to eliminate pre-stagnation flushing. Per your instruction, the attached informational materials were distributed to all Milwaukee properties believed to have lead water services in the MWW retail area.

