



North Carolina Department of Environmental Quality  
 Division of Water Resources, Public Water Supply Section

**EXAMPLE 3 - Request for Source Water and/or Treatment Changes Under the Lead and Copper Rule (LCR)**

This form must be completed by the system owner or designated person in responsible charge and be submitted to the Public Water Supply Section's LCR Rule Manager for approval at least **90 days** prior to the planned date of change. This form is to be completed in addition to fulfilling the requirements of 15A NCAC 18C Section .0300 "Submission of Plans: Specifications: and Reports.")

<b>Water System Name:</b>	<b>Water System Number:</b>	<b>County:</b>	<b>Date:</b>
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Note: To help you properly complete this form, example entries are shown on our website at <http://deq.nc.gov/about/divisions/water-resources/drinking-water/compliance-services#lcr>. See back of form for additional information.

SOURCE WATER CHANGES				TREATMENT CHANGES - CCT			TREATMENT CHANGES - OTHER		
List Existing Source(s)	Source Type (SW, GW)	If currently purchasing water, provide water system name and number of supplier	Date to be Inactivated	Existing Corrosion Control Treatment (CCT)	Proposed Change to CCT	Proposed Change Date	Existing Other Treatment	Proposed Change to Other Treatment	Proposed Change Date
<i>Anytown WTP</i>	<i>SW</i>	<i>N/A</i>	<i>N/A</i>	<i>Caustic, Blended Phosphate</i>	<i>N/A</i>	<i>N/A</i>	<i>Chlorine gas</i>	<i>Sodium hypochlorite</i>	<i>1/15/17</i>
List New Source(s)	Source Type (SW, GW)	If plan to purchase water, provide water system name and number of supplier	Proposed Date to be On-line	Proposed Corrosion Control Treatment		Proposed Change Date	Proposed Other Treatment		Proposed Change Date
<b>Explanation of Source Water Change:</b>				<b>Explanation of CCT Change:</b>			<b>Explanation of Other Treatment Change:</b> <i>Chlorine gas is more difficult to maintain &amp; store on-site</i>		
<b>Form prepared by:</b> <hr/> <small>(Print Name)</small>	<b>Signature:</b>	<b>Phone:</b>	<b>Email:</b>			<b>System Affiliation:</b> ( <input checked="" type="checkbox"/> check box)			
						<input type="checkbox"/> Owner or <input type="checkbox"/> Responsible person			

Return this form to: Public Water Supply Section, Attention: Lead and Copper Rule Manager, 1634 Mail Service Center, Raleigh, NC 27699-1634

## ADDITIONAL INFORMATION ON SOURCE WATER AND/OR TREATMENT CHANGES

The Lead and Copper Rule requires prior State approval prior to changes/additions in source water and treatment as follows:

- **Reference 15A NCAC 18C .1507 [§141.86(d)(4)(vii)]:**  
*(vii) Any water system subject to a reduced monitoring frequency under paragraph (d)(4) of this section shall notify the State in writing in accordance with §141.90(a)(3) of any upcoming long-term change in treatment or addition of a new source as described in that section. **The State must review and approve the addition of a new source or long-term change in water treatment before it is implemented by the water system.** The State may require the system to resume sampling in accordance with paragraph (d)(3) of this section and collect the number of samples specified for standard monitoring under paragraph (c) of this section or take other appropriate steps such as increased water quality parameter monitoring or re-evaluation of its corrosion control treatment given the potentially different water quality considerations.*
- **Reference 15A NCAC 18C .1507 [§141.90(a)(3)]:**  
*(3) At a time specified by the State, or if no specific time is designated by the State, then as early as possible prior to the addition of a new source or any long-term change in water treatment, a water system deemed to have optimized corrosion control under §141.81(b)(3), a water system subject to reduced monitoring pursuant to §141.86(d)(4), or a water system subject to a monitoring waiver pursuant to §141.86(g), **shall submit written documentation to the State describing the change or addition. The State must review and approve the addition of a new source or long-term change in treatment before it is implemented by the water system.** Examples of long-term treatment changes include the addition of a new treatment process or modification of an existing treatment process. Examples of modifications include switching secondary disinfectants, switching coagulants (e.g., alum to ferric chloride), and switching corrosion inhibitor products (e.g., orthophosphate to blended phosphate). Long-term changes can include dose changes to existing chemicals if the system is planning long-term changes to its finished water pH or residual inhibitor concentration. Long-term treatment changes would not include chemical dose fluctuations associated with daily raw water quality changes.*

**REMEMBER:** The State's Lead and Copper Rule Manager must review and approve a change in source water, the addition of a new source, or long-term change in water treatment before it is implemented by the water system. Failure to notify the State and get approval before implementing the change is a violation (code 52) under the Lead and Copper Rule. Systems should strive to submit their request **90 days** before the change is desired to allow time to resolve any comments and questions. Treatment changes to address a current MCL can be handled on a case-specific basis and the timeframes may necessarily be compressed.

### General considerations:

- **Monitoring Schedule Changes:** Any necessary changes to a system's compliance monitoring schedule will be determined on a case-by-case basis.
- **Addition of a new well:** For a groundwater system, generally, the addition of a new well from the same aquifer will not require submitting a detailed formal request if the water quality parameters (WQPs) are shown to be comparable to the other wells currently being used by that system. To demonstrate that the WQPs are comparable, samples for WQPs should be collected from the new well and a nearby existing well on the same day. If this is the case, complete the information on this form relating to the new source and attach those sample results to the form. The data will then be evaluated and approval will be handled via email from the Lead and Copper Rule Manager. If the well draws water from a different aquifer or could be expected to have different water quality, more detail will be required to be submitted with this form.
- **Changes in source water or long-term changes in treatment:** [Examples include: switching from ground water wells to a surface water source, switching secondary disinfectants, switching coagulants (e.g., alum to ferric chloride), and switching corrosion inhibitor products (e.g., orthophosphate to blended phosphate)]: Re-evaluation of the system's WQPs, chloride/sulfate ratios, if applicable, and the adequacy of corrosion control treatment, along with supporting documentation and analytical results, will be required to be submitted with a request for any changes in source water or long-term treatment change. Depending on the size of system, this may simply be the completion of a 141-C Form "Evaluation Form for Corrosion Control Treatment (CCT) For Small / Medium Systems" (updated January 2013). Larger systems may be required to submit more information. [See November 3, 2015 memo from EPA's Peter Grevatt on "Lead and Copper Rule Requirements for Optimal Corrosion Control Treatment for Large Drinking Water Systems" and Chapter 6 of EPA's "Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems" (EPA 816-B-16-003, dated March 2016)]. Both documents and other valuable resource materials and forms are located on our website at <http://deq.nc.gov/about/divisions/water-resources/drinking-water/compliance-services#lcr>.