

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

Manisha Juthani, MD
Commissioner



Ned Lamont
Governor
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Lt. Governor

Drinking Water Section

Lead and Copper Monitoring Reduction Request Form

Instructions: In accordance with the Regulations of Connecticut State Agencies (RCSA) Sections 19-13-B102(e)(8)(D)(iv), any Community Water System (CWS) or Non-Transient Non-Community (NTNC) water system that meets the lead and copper action levels may reduce the number of samples in accordance with RCSA Section 19-13-B102(e)(8)(C) or RCSA Section 19-13-B102(e)(8)(D) and reduce the frequency of sampling to once per year or once every three years, respectively. The water system is required to submit this application and provide a written justification as to why they should receive approval from the department to reduce the lead and copper monitoring. The submittal from the CWS or NTNC must include the water quality monitoring results, evaluation of treatment and operation, and other relevant information. The conditions for reduction consideration are listed in Appendix A.

PWS Name: LWPCA Ledyard Center

PWS ID: CT 0727091 Town: Ledyard

PWS Type (select one): ☒ Community ☐ NTNC

Population Served: 3,294

Type of population: ☐ School ☐ Daycare ☒ Residential ☒ Office/Business

☐ Campground ☒ Other Consecutive System to Groton Utilities

1. What is this water system's current monitoring frequency and what reduced monitoring frequency is this water system requesting? (select one)

☒ This water system is currently on 6-months (standard) monitoring and is requesting to go to annual monitoring

☐ This water system is currently on annual monitoring and is requesting to go to triennial monitoring

2. If the water system is currently on standard monitoring, why is the water system on standard lead and copper monitoring?

☐ New System ☐ New Source of Supply ☒ Other

☐ Change in Treatment ☐ New Treatment

☐ Lead or Copper Exceedance (Please explain when, why and your system's compliance status)

Please provide details (attach additional page, if needed) As a consecutive system to GU, we reverted to every-six-month sampling due to GU chem. treatment improvements and Water Treatment Plant improvements. Please see GU's application for reduced monitoring, submitted 9/16/25, approved by Lindsay Handel (DPH) - verbal - 11/5/25.

3. Does your water system have approved optimal corrosion control treatment (OCCT) installed?

☐ Yes, (type of treatment and date approved): _____

☒ No - Groton Utilities treats their finished water with 70/30 ortho/poly PO_4 at the end of their treatment train

☐ N/A

A. Has the system addressed all conditions in the DPH approval for OCCT?

☐ Yes

☐ No

☒ N/A

4. Does your water system have existing treatment systems?

☐ Yes, type & purpose of treatment(s): _____

☒ No

A. If the pH adjustment treatment is for corrosion control, is the pH at the distribution system maintained at no less than 7.0 at all times?

☐ Yes

☐ No

☒ N/A

5. Has your water system been maintaining the range of values for the water quality control parameters (WQP) reflecting OCCT?

☐ Yes, provide WQP range(s): _____

☐ No If no, explain why not: _____

☒ N/A

6. Provide the appropriate reasons that the water system qualifies for reduction of lead and copper monitoring frequency. Verify the conditions as described in Appendix A that were met by this public water system to qualify for a reduction in monitoring of lead and copper. Attach additional page(s), if needed, and any supporting documentation to this form.

Appendix A Condition (s) ☒ a ☐ b ☐ c ☐ d ☐ e ☐ f ☐ g

a) due to Groton Utilities, as noted on page 1. Please see attachments for documentation of 2 consecutive monitoring periods of results below 0.015 mg/L lead 90th percentile, etc.

Notice: False statements made in this form and justification therein are punishable in accordance with section 53a-157b of the Connecticut General Statutes.

PWS Owner: _____ (Print Name) _____ (Signature)

Phone number: _____ Date: _____

Certified Operator: _____ (Print Name) _____ (Signature)

Phone number: _____ Date: _____

Please submit completed forms to: DPH.LeadandCopper@ct.gov

Appendix A

Conditions for Lead and Copper Monitoring Reduction

One or more of the following conditions must be met for consideration of lead and copper monitoring reduction:

a) New source of supply, new treatment, change in treatment, or new PWS:

- Must meet the lead and copper action levels (AL) for at least two (2) consecutive 6-month monitoring periods, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain a pH of no less than 7.0 at all times at the entry point and at the distribution system, if system has existing pH adjustment treatment for corrosion control, but not an OCCT, unless approved by the department with a pH value below 7.0.
- Must maintain and operate within the OWQP values, if treatment is an OCCT.
- Must meet the pH standard of 6.4 to 10.0 at the entry point or the distribution system, if system has no pH adjustment treatment or pH adjustment treatment is not for corrosion control.

b) Lead and/or copper exceedance of the AL and had replaced all internal potable plumbing with plastic as their OCCT:

- Must meet the lead and copper AL for at least two (2) consecutive 6-month monitoring periods after completion of plumbing replacement, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain a pH of no less than 7.0 at all times at the entry point and at the distribution system, if system has existing pH adjustment treatment for corrosion control, but not an OCCT, unless approved by the department with a pH value below 7.0.
- Must meet the pH standard of 6.4 to 10.0 at the entry point or the distribution system, if system has no pH adjustment treatment or pH adjustment treatment is not for corrosion control.

c) Operated the OCCT outside the OWQP values

- Must meet the lead and copper AL for at least two (2) consecutive 6-month monitoring periods, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain and operate within the OWQP values.
- Must maintain a pH of no less than 7.0 at all times at the entry point and at the distribution system, if system has existing pH adjustment treatment for corrosion control, but not an OCCT, unless approved by the department with a pH value below 7.0.

d) A water system with monitoring/reporting violation(s) for lead and copper compliance sampling that was reverted to standard monitoring:

- Must meet the lead and copper AL for at least two (2) consecutive 6-month monitoring periods, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain and operate within the OWQP values, if existing treatment is an OCCT.
- Must maintain a pH of no less than 7.0 at all times at the entry point and at the distribution system, if existing pH adjustment treatment is for corrosion control, but not an OCCT, unless approved by the department with a pH value below 7.0.

- Must meet the pH standard of 6.4 to 10.0 at the entry point or the distribution system, if system has no pH adjustment treatment or pH adjustment treatment is not for corrosion control.

e) Lead or copper exceedance of the AL and had installed/modified OCCT:

- Must meet the lead and copper AL for at least two (2) consecutive 6-month monitoring periods after activation of OCCT, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain and operate within the OWQP values.

f) Lead or copper exceedance of the AL and did not install/modify OCCT:

- Must meet the lead and copper AL for at least two (2) consecutive 6-month monitoring periods, if currently on standard monitoring or must meet the lead and copper action levels (AL) for at least three (3) consecutive annual monitoring periods, if currently on annual monitoring.
- Must maintain a pH of no less than 7.0 at all times at the entry point and at the distribution system, if system has existing pH adjustment treatment for corrosion control, but not an OCCT, unless approved by the department with a pH value below 7.0.
- Must meet the pH standard of 6.4 to 10.0 at the entry point or the distribution system, if system has no pH adjustment treatment or pH adjustment treatment is not for corrosion control.

g) Any other requirements deemed necessary by the regulation, not limited to this document.