**CITY OF MINNETRISTA**

**CITY COUNCIL AGENDA ITEM**

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**Subject:** **Approve AE2S Task Order #16 for Optimized Corrosion Control Treatment Plan (OCCT Plan)**

**Prepared By:** **Gary Peters, Public Works Director**

**Meeting Date:** **June 16, 2025**

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**Issue:**
The City of Minnetrista needs to implement an Optimized Corrosion Control Treatment Plan (OCCT Plan) as per the Minnesota Department of Health.

**Background/History:**
As per the Minnesota Department of Health (MDH), all cities are required to perform Lead & Copper sampling at resident homes every three years. Over time, water can break down the molecules in the copper and lead solder, so the City adds a phosphate to the water supply to help with pipe corrosion. How this program works is that the City seeks out 20 homes that would like to volunteer for this free test. We try to get as many homes built before 1986, since these homes are the most likely candidate for having copper piping with lead-based joint solder. Sample bottles are dropped off and the resident is asked to fill them to a certain level right away in the morning before any water is run in the home. They are then asked to fill out paperwork and the label on the bottle and place the sample on the front step for pick up. These samples are then collected and taken to PACE Labs in St. Paul for testing.

Test results are sent back to the City and results are sent out to the homeowners. The City of Minnetrista has been doing this testing as required and had a failing test in 2017 due to one sample being missing from the shipment. We know this was not correct but had no way to prove ourselves and were subject to yearly testing and were back to a 3-year cycle in 2020. In 2023 we had three samples over the reporting limit and deemed a failed system once more. There is no retesting, the City just gets a complete system fail rating. As "punishment" for have three samples over the Copper level, the City must now take 40 samples every six months until the MDH feels that Copper levels are being controlled. Public Works staff have argued with MDH that re-sampling should occur to rule out sampling errors, but they do not agree with this. Staff also pointed out that past sampling charts show large fluctuations in the results for homes being tested over the years, both up and down. This spreadsheet chart is attached. In some cases, the result increased 100% or higher in a 6-month period; with one home going from <2 parts per million (ppm) Copper to 199 ppm Copper. This is a 9,850% increase in just a 6-month period which Public Works staff does not agree with. MDH did not respond to our email with this data.

**Overview:**
As part of this system failure, the City must perform an Optimized Corrosion Control Treatment Plan (OCCT Plan). All documentation that the City received on this from the MN Department of Health is attached. AE2S is familiar with OCCT Plans and will help staff in getting this plan in place and documented. There are two phases to the OCCT Plan: Phase 1 being the OCCT Plan itself, and Phase 2 being the OCCT Study. Phase 2 may not be required.

**Fiscal Impact:**
The two phases the OCCT Plan will be funded out of the 601 Water Operations Fund, with Phase 1 cost is invoiced hourly and not to exceed $9,300.00 and Phase 2 (if needed) is invoiced hourly and not to exceed $32,100.00.

**Recommended City Council Action:**
Motion to approve AE2S Task Order #16 to implement the Optimized Corrosion Control Treatment Plan (OCCT Plan).

# Lead and Copper – Optimal Corrosion Control Treatment Plan

**Answer each question completely.**

**Be detailed in your descriptions.**

Your system staff, or a consulting engineer if your system is working with one, should review the EPA's "**Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems**" guide on their website (https://www.epa.gov/dwreginfo/optimal-corrosion-control-treatment-evaluation-technical-recommendations). The guide covers essential information when it comes to evaluating corrosion control treatment and can help provide an initial recommendation for treatment.

In response to your system's recent action level exceedance, the system is required to propose an optimal corrosion control treatment (OCCT) plan to the state to address the elevated lead and/or copper levels. Complete this form and detail context for the exceedance, the current state of the system's treatment, and what action the system can take to reduce corrosion and ultimately maintain the action levels in the future.

## Water System Information

PWSID: _____ PWS Name: _____

Contact Person: _____ Contact Phone Number: _____

## Monitoring Period Results

Monitoring period where exceedance occurred: Base Interim Reduced

- Begin date: _____ End date: _____
- Number of samples collected: _____

| | Lead | Copper |
|---|---|---|
| Minimum concentration (µg/L) | | |
| Maximum concentration (µg/L) | | |
| 90$^{th}$ percentile | | |

## Source Water and Entry Point Samples

Are there detectable levels of lead or copper in your source(s)?

☐ Yes, list which source and the lead/copper levels (attach the lab report of results):
_____

☐ No

### Water Quality Parameters (WQPs)

If your system is already required to collect WQP samples, please use those results to fill out this section. You may request results from MDH. Systems who have not been collecting routine WQP samples will need to collect two samples at each entry point and one or more sample(s) in the distribution system, depending on system size. Refer to your Action Level Exceedance letter for when your WQP schedule starts. **WQP data is essential for properly evaluating OCCT options and must be included in this form**.

Entry Point WQP results (treated supply). Two samples are required to be collected at each entry point to the distribution system. These samples should be collected on different days under normal operating conditions. **Copy the information listed for each entry point if needed.** Attach additional sheets if needed.

1. Entry Point Data.
   Name of Entry Point: _____
   a. Sample 1 Collection date: _____
      i. pH (pH units): _____
      ii. Alkalinity (mg/L as $CaCO_3$): _____
      iii. Orthophosphate* (mg/L as $PO_4$): _____
      iv. Silicate* (mg/L as $SiO_2$): _____
   b. Sample 2 Collection date: _____
      i. pH (pH units): _____
      ii. Alkalinity (mg/L as $CaCO_3$): _____
      iii. Orthophosphate* (mg/L as $PO_4$): _____
      iv. Silicate* (mg/L as $SiO_2$): _____

      *Only report parameter if the system currently uses this inhibitor.

2. Distribution Data. Two samples are required to be collected at each distribution system site. Please provide the result at a single sample site, or the range of sample results if you are required to collect at more than one distribution WQP sample site. Refer to 40 CFR 141.87(a) for the required number of distribution WQP sample sites.
   Number of samples required: _____
   a. pH: _____
      or
      min: _____max: _____
   b. Alkalinity (mg/L as $CaCO_3$): _____
      or
      min: _____ max: _____

c. Orthophosphate* (mg/L as $PO_4$): _____
or
min: _____max: _____

d. Silicate* (mg/L as $SiO_2$): _____
or
min: _____max: _____

*Only report parameter if the system currently uses this inhibitor.

### Distribution System Information

Does the system have lead service lines in the distribution system? Note: MDH will have accurate data up to your last service line inventory submittal. Please provide the most up-to-date estimate.

☐ Yes, provide number: _____

☐ No

☐ Unknown

Are there homes with lead plumbing in the distribution system?

☐ Yes, provide estimate: _____

☐ No

☐ Unknown

### Existing Treatment

What existing water treatment is your system currently using? Check all that apply and provide the names of chemicals and ratios of any blended/diluted treatment processes. If your system can provide a visual diagram of the sequence of treatment, please include that with your OCCT plan.

☐ Disinfection:

Chemical Type/Name: _____

Other treatment information: _____

☐ Softening:

Chemical Type/Name: _____

Other treatment information: _____

☐ Filtration:

Chemical Type/Name: _____

Other treatment information: _____

☐ Other

- Aeration
- Pre-chlorination

☐ Coagulation

☐ Sedimentation

☐ Fluoride

☐ Other treatment: _____

What Corrosion Control Treatment is currently being used?

☐ None

☐ Inhibitor (phosphate-based or silicate-based)

Date initiated: _____

Is the inhibitor phosphate-based or silicate-based? Circle one.
Phosphate Silicate

Present dose at treatment plant (mg/L as $PO_4$ or $SiO_2$): _____

Residual in distribution system (mg/L as $PO_4$ or $SiO_2$):
min _____ max _____

Brand name/chemical name: _____

Is it a blended phosphate? Circle one. Yes No

If yes, what is the ratio of orthophosphate to polyphosphate?
_____

Has it been effective? Please provide detailed information. You may attach additional sheets if needed.

_____
_____

☐ pH/Alkalinity Adjustment

Date initiated: _____

pH Target (pH units):
min _____ max _____

Alkalinity Target (mg/L as $CaCO_3$):
min _____ max _____

Brand name/chemical name: _____

Has it been effective? Please provide detailed information. You may attach additional pages if needed.

_____
_____

## Evaluation

From the PWS perspective, why do you believe the PWS exceeded the action level? Describe what you believe is the root cause and why. Your system should summarize the water quality characteristics that is causing elevated levels of corrosion along with context and circumstantial events that may have

contributed to the exceedance. Please note that "if a system allows members of the public to sample, the system cannot challenge the accuracy of the sampling results based on alleged sample collection errors." (40 CFR 141.86(b)). Therefore, indicating that the action level exceedance is a result of improper sampling is not an acceptable response. You may attach additional pages if needed.

_____
_____
_____
_____
_____
_____

### Corrosion Control Study

Do you believe that a corrosion control study is necessary to evaluate and recommend OCCT?

☐ Yes

☐ No

Regardless of your answer, MDH may require any system to conduct a corrosion control study if we believe it necessary to identify OCCT. If you are required to perform a study, you will be notified in writing within one year of the end of the tap sampling period in which the action level exceedance occurred.

In the future, any system serving more than 10,000 people that has lead service lines or serving 50,000 people, regardless of service line material, will be required to perform a corrosion control study.

### Recommended/Proposed Treatment

If you do not complete this section using one of the options listed, this form will be deemed incomplete. A combination of treatment options may be needed to optimize corrosion control.

Proposed corrosion control treatment method

☐ pH/Alkalinity adjustment

Target pH: _____

Target alkalinity (mg/L as $CaCO_3$): _____

Chemical/Method proposed: _____

☐ Inhibitor

☐ Phosphate based

Brand name/Chemical type: _____

Target dose (mg/L): _____

Target residual (mg/L as $PO_4$): _____

☐ Silicate based

Brand name/Chemical type: _____

Target dose (mg/L): _____

Target residual (mg/L as $SiO_2$): _____

☐ Adjust existing corrosion control treatment

Proposed adjustment: _____

Describe how this option will be implemented to optimize your treatment. Include relevant information such as new target doses, ranges, and/or residuals. You may attach additional pages if needed.

_____
_____
_____

List your proposed operational water quality parameters for the adjustment.
*Only include parameter if the system intends on using this inhibitor.

a. pH min: _____max: _____
b. Alkalinity (mg/L as $CaCO_3$) min: _____ max: _____
c. Orthophosphate* (mg/L as $PO_4$) min: _____max: _____
d. Silicate* (mg/L as $SiO_2$) min: _____max: _____

If you have questions, please contact Hannah Mendez at (651) 201-5651 or hannah.mendez@state.mn.us. The completed form can be mailed or emailed to Hannah Mendez and MDH will follow up with the system regarding approval for the plan.

Minnesota Department of Health
Drinking Water Protection Section
651-201-4700

health.drinkingwater@state.mn.us
www.health.state.mn.us

October 2024

*To obtain this information in a different format, call 651-201-4700.*

January 17, 2025

Minnetrista City Council
c/o Jasper Kruggel, Administrator
Minnetrista City Hall
7701 County Road 110 West
Minnetrista, Minnesota 55364

Dear Council Members:

SUBJECT: Lead/Copper Tap Water Monitoring Report, PWSID 1270036

This letter is to report the results of your recent lead/copper monitoring that is required by the Safe Drinking Water Act. The results revealed the following 90th percentile levels:

90th percentile lead level = <1 µg/l (rounded as < 0.001 mg/l).
The action level for lead is 15.0 µg/l.

90th percentile copper level = 1710 µg/l (rounded as 1.710 mg/l).
The action level for copper is 1300 µg/l.

Based on these results, your public water system **has not exceeded** the action level for lead and **has exceeded** the action level for copper.

By federal rule, 40 CFR 141.85, you are required to provide the lead/copper results to persons served at the sites that were tested. In addition, you must provide them with an explanation of the health effects of lead/copper, list steps consumers can take to reduce exposure to lead/copper in drinking water, and water utility contact information. The notification must also provide the maximum contaminant level goals, the action levels for lead/copper, and the definitions for these two terms.

Notification must be made within 30 days by U.S. Mail. If the residence is a rental property, both the occupant(s) of the residence and rental property owner must be notified. To assist you in meeting the notification requirements, we have enclosed a sample letter and a fact sheet on lead/copper in drinking water. All of the information contained in the sample letter is EPA required language and must be included in your letter and provided to the homeowner. If you would like to receive any of the enclosed documents via e-mail, please send your request to Stephanie.Voeller@state.mn.us.

The lead/copper sampling site addresses are private data. This information was classified as "nonpublic" by the Minnesota Department of Administration in October 2004, upon the request of Minnesota Department of Health (MDH) and Minnesota community water supply

systems. When notifying the persons served at the sites that were tested, provide them with the results for that address only.

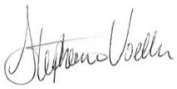
Within 10 days after notifying the residents of their results, you must complete the enclosed Lead/Copper Results Delivery Certification form and return it to us along with a copy of the letter that you sent to the residents notifying them of their results. A return envelope is enclosed for your convenience.

Please note that all enclosures are sent to the addressee of this letter. Persons receiving a copy (cc) of the letter do not receive any enclosures. It is the responsibility of the addressee to follow through with the requirements.

A sampling kit will be sent to you prior to your next scheduled sampling date. The enclosed report should be placed in your records and a copy maintained on or near the water supply premises and available for public inspection for not less than ten (10) years.

If you have any questions, please contact me at 651-201-3974, or Michael Bourland at 651-201-5928.

Sincerely,



Stephanie Voeller
Community Public Water Supply Unit
Environmental Health Division
P.O. Box 64975
St. Paul, Minnesota 55164-0975

PAW
Enclosures
cc: Water Superintendent

| South System Address | South System Address | 2011 | | 2014 | | 2017 | | 2018 | | 2019 | | 2020 | | 2023 | | June 2024 | | October 2024 | | 2024 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Difference | % Increase |
| 5800 Lakeview Dr | Lakeview Dr | | | | | 37.3 | 7/18/17 | 806 | 7/25/18 | 1160 | 6/13/19 | | | | | 26 | 6/13/24 | 121 | 10/10/24 | up 95 | 365% |
| 5815 Lakeview Dr | Lakeview Dr | | | 66 | 8/7/14 | | | | | | | | | 429 | 9/22/23 | 352 | 6/13/24 | 3540 | 10/10/24 | up 3188 | 906% |
| 5875 Lakeview Dr | Lakeview Dr | | | | | | | | | 111 | 6/13/19 | | | | | 263 | 6/13/24 | 142 | 10/10/24 | drop 121 | |
| 5900 Lakeview Dr | Lakeview Dr | 386 | 6/23/11 | 268 | 8/7/14 | | | | | | | | | 523 | 9/22/23 | | | | | | |
| 5925 Lakeview Dr | Lakeview Dr | | | 245 | 8/6/14 | 58.9 | 7/18/17 | | | | | 251 | 7/15/20 | 398 | 9/22/23 | 390 | 6/12/24 | 370 | 10/10/24 | drop 20 | |
| 5930 Lakeview Dr | Lakeview Dr | | | | | | | | | 751 | 6/13/19 | | | | | 259 | 6/13/24 | 635 | 10/10/24 | up 376 | 145% |
| 5931 Lakeview Dr | Lakeview Dr | | | | | 42.1 | 7/18/17 | | | 25 | 6/13/19 | | | | | 30 | 6/13/24 | 5 | 10/10/24 | drop 25 | |
| 5950 Lakeview Dr | Lakeview Dr | 29 | 6/23/11 | | | | | 589 | 8/7/18 | 545 | 6/14/19 | 322 | 7/15/20 | 65 | 9/22/23 | 369 | 6/13/24 | 543 | 10/10/24 | up 174 | 47% |
| 5960 Lakeview Dr | Lakeview Dr | | | | | 586 | 7/18/17 | | | | | | | | | | | | | | |
| 5965 Lakeview Dr | Lakeview Dr | | | | | | | | | | | | | 261 | 9/22/23 | 231 | 6/13/24 | 357 | 10/10/24 | up 126 | 55% |
| 5999 Lakeview Dr | Lakeview Dr | | | | | 81.3 | 7/27/17 | 1830 | 7/14/18 | | | | | | | | | | | | |
| 4330 Margaret Cir | Margaret Cir | | | | | 459 | 7/27/17 | | | | | | | | | | | | | | |
| 4370 Margaret Cir | Margaret Cir | | | | | 84 | 7/19/17 | 111 | 7/24/18 | 176 | 6/13/19 | 24 | 7/15/20 | 124 | 9/22/23 | 35 | 6/13/24 | 180 | 10/10/24 | up 145 | 414% |
| 4385 Margaret Cir | Margaret Cir | | | | | | | | | 1730 | 6/13/19 | 686 | 7/15/20 | | | 667 | 6/13/24 | 1530 | 10/11/24 | up 863 | 129% |
| 4400 Margaret Cir | Margaret Cir | | | 58 | 8/8/14 | 173 | 7/19/17 | 1480 | 7/24/18 | | | 543 | 7/15/20 | | | 490 | 6/13/24 | 1970 | 10/10/24 | up 1480 | 302% |
| 4405 Margaret Cir | Margaret Cir | | | | | | | 64 | 7/24/18 | | | | | | | | | 142 | 10/10/24 | | |
| 4425 Margaret Cir | Margaret Cir | 445 | 7/1/11 | | | 1040 | 7/19/17 | 2470 | 7/26/18 | | | | | | | | | | | | |
| 4375 Shady Ln | Shady Ln | | | | | | | 174 | 7/14/18 | | | | | | | | | | | | |
| 4380 Shady Ln | Shady Ln | | | | | | | 92 | 8/7/18 | | | | | | | | | | | | |
| 4244 Stonebridge Cir | Stonebridge Cir | | | | | 35.1 | 7/24/17 | | | | | | | | | 65 | 6/13/24 | 13 | 10/10/24 | drop 52 | |
| 4260 Stonebridge Cir | Stonebridge Cir | | | | | 367 | 8/16/17 | 2510 | 7/25/18 | | | | | | | | | | | | |
| 4280 Stonebridge Cir | Stonebridge Cir | 88 | 6/30/11 | 92 | 8/7/14 | | | | | | | | | | | | | | | | |
| 5950 Stonebridge Rd | Stonebridge Rd | 7 | 6/23/11 | 8 | 8/7/14 | | | | | | | | | | | | | | | | |
| 6051 Hermitage Tr | Hermitage Tr | | | | | | | | | | | | | 26 | 9/22/23 | | | | | | |
| 4255 Trillium Ln E | Trillium Ln E | | | | | | | | | | | | | 666 | 9/22/23 | 634 | 6/19/24 | 1710 | 10/10/24 | up 1076 | 170% |
| 6915 Pinnacle Way | Pinnacle Way | | | | | | | | | | | | | 1720 | 9/22/23 | 1480 | 6/13/24 | 2290 | 10/10/24 | up 810 | 55% |
| 6482 Willow Ct | Willow Ct | | | | | | | | | | | | | 452 | 9/22/23 | | | | | | |
| 8321 Pondview Dr | Pondview Dr | | | | | | | | | | | | | 470 | 9/22/23 | | | | | | |
| 3801 Eagle Nest Dr | Eagle Nest Dr | | | | | | | | | | | | | | | 141 | 6/13/24 | 164 | 10/10/24 | up 23 | 16% |
| 9393 Glacier Rd | Glacier Rd | | | | | | | | | | | | | 2940 | 9/22/23 | 410 | 6/13/24 | 312 | 10/11/24 | drop 98 | |
| 9381 Glacier Rd | Glacier Rd | | | | | | | | | | | | | 2460 | 9/22/23 | 1910 | 6/12/24 | 2100 | 10/10/24 | up 190 | 10% |
| 3925 Games Dr | Games Dr | | | | | | | | | | | | | 116 | 9/22/23 | 48 | 6/13/24 | 89 | 10/10/24 | up 41 | 85% |
| 9495 Cottontail Dr | Cottontail Dr | | | | | | | | | | | | | 271 | 9/22/23 | 168 | 6/13/24 | 178 | 10/10/24 | up 10 | 6% |
| 9448 Cottontail Dr | Cottontail Dr | | | | | | | | | | | | | 340 | 9/22/23 | 176 | 6/13/24 | 254 | 10/10/24 | up 78 | 44% |
| 9184 Woodland Dr | Woodland Dr | | | | | | | | | | | | | | | 364 | 6/13/24 | | | | |
| 9228 Woodland Dr | Woodland Dr | | | | | | | | | | | | | | | 117 | 6/13/24 | 115 | 10/10/24 | drop 2 | |

| North System Address | North System Address | 2011 | | 2014 | | 2017 | | 2018 | | 2019 | | 2020 | | 2023 | | June 2024 | | October 2024 | | 2024 | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Copper Reading | Sample Date | Difference | % Increase |
| 1300 Cty Rd 110 N | Cty Rd 110 N | | | | | 195 | 7/19/17 | 67 | 7/24/18 | 91 | 6/14/19 | 78 | 7/22/20 | 124 | 9/22/23 | 97 | 6/12/24 | 278 | 10/10/24 | up 181 | 187% |
| 1185 Cty Rd 110 N | Cty Rd 110 N | 901 | 6/23/11 | 452 | 8/6/14 | | | | | | | 1820 | 7/23/20 | | | 707 | 6/13/24 | 1320 | 10/10/24 | up 613 | 87% |
| 5330 Eastview Ave | Eastview Ave | 16 | 7/21/11 | 6 | 8/11/14 | | | | | | | | | | | | | | | | |
| 5425 Eastview Ave | Eastview Ave | | | | | 1780 | 7/19/17 | 122 | 7/16/18 | | | | | | | 522 | 6/13/24 | 694 | 10/10/24 | up 172 | 33% |
| 5500 Eastview ave | Eastview Ave | 45 | 6/23/11 | 16 | 8/7/14 | | | 714 | 7/25/18 | | | | | | | | | | | | |
| 5575 Eastview Ave | Eastview Ave | | | | | | | | | | | | | | | 492 | 6/13/24 | 355 | 10/10/24 | drop 137 | |
| 5580 Eastview Ave | Eastview Ave | | | | | | | | | 26 | 6/13/19 | | | | | 27 | 6/13/24 | 27 | 10/10/24 | no change | |
| 5581 Eastview Ave | Eastview Ave | 50 | 6/23/11 | | | | | | | | | | | | | | | | | | |
| 1375 Westwood Dr | Westwood Dr | | | | | 898 | 7/9/17 | 108 | 7/25/18 | | | 110 | 7/22/20 | | | 127 | 6/12/24 | 146 | 10/10/24 | up 19 | 15% |
| 1395 Westwood Dr | Westwood Dr | | | | | 76.5 | 7/17/17 | 149 | 7/26/18 | | | 63 | 7/22/20 | 53 | 9/22/23 | <2 | 6/13/24 | 199 | 10/10/24 | up 199 | 9850% |
| 1420 Westwood Dr | Westwood Dr | 51 | 6/24/11 | | | | | | | | | | | | | | | | | | |
| 1425 Westwood Dr | Westwood Dr | | | | | 82.5 | 7/18/17 | 1100 | 7/25/18 | | | 1100 | 7/25/18 | | | 1140 | 6/13/24 | 1040 | 10/10/24 | drop 100 | |
| 1455 Westwood Dr | Westwood Dr | | | 25 | 8/9/14 | | | 131 | 7/12/18 | | | | | | | 174 | 6/13/24 | 165 | 10/10/24 | drop 9 | |
| 1500 Westwood Dr | Westwood Dr | | | | | 115 | 7/26/17 | | | | | | | | | 30 | 6/13/24 | 133 | 10/10/24 | up 103 | 343% |
| 1505 Westwood Dr | Westwood Dr | | | | | | | | | | | 110 | 7/22/20 | | | 240 | 6/12/24 | 635 | 10/11/24 | up 395 | 165% |
| 5550 Westwood Ave | Westwood Ave | | | | | 41.3 | 7/17/17 | 41.3 | 7/17/17 | | | | | | | 142 | 6/13/24 | 195 | 10/10/24 | up 53 | 37% |
| 1240 Morningview Dr | Morningview Dr | | | | | 246 | 7/19/17 | | | | | | | | | | | | | | |
| 1290 Morningview Dr | Morningview Dr | | | | | | | | | | | | | | | 876 | 6/13/24 | 801 | 10/10/24 | drop 75 | |
| 5549 Morningview Ter | Morningview Ter | | | | | | | | | 305 | 6/14/19 | | | | | 682 | 6/13/24 | <2 | 12/10/24 | drop 680 | |
| 5559 Morningview Ter | Morningview Ter | | | | | | | | | 31 | 6/14/19 | | | | | 70 | 6/13/24 | 23 | 10/10/24 | drop 47 | |
| 5569 Morningview Ter | Morningview Ter | | | | | | | 100 | 7/23/18 | | | | | | | | | | | | |
| 1210 Langewood Dr | Langewood Dr | | | | | | | | | | | | | 234 | 9/22/23 | 86 | 6/13/24 | 219 | 10/10/24 | up 133 | 155% |
| 1350 Langewood Dr | Langewood Dr | | | | | | | | | | | | | 1280 | 9/22/23 | | | | | | |
| 1532 Sunnybrook Dr | Sunnybrook Dr | | | | | | | | | | | | | | | 349 | 6/14/24 | 149 | 10/11/24 | drop 200 | |
| 940 Maple Crest Dr | Maple Crest Dr | | | | | | | | | | | | | | | 613 | 6/13/24 | 1080 | 10/10/24 | up 467 | 76% |

# Lead/Copper Consumer Notification Certification

**Municipal System (Population Greater Than 3,300)**

PWS Name: Minnetrista PWSID: 1270036

Compliance Period: July 1, 2024 - December 31, 2024

**PLEASE COMPLETE THIS FORM AND KEEP A COPY FOR THE SYSTEM'S RECORDS.**

Delivery/Notification must be completed within 30 days.

**Delivery/Notification**:
Residences were notified by U.S. Mail on _____(date). You must submit a copy of the letter that you sent to the residents notifying them of their results, along with this certification form.

Failure to provide notice of the lead/copper results to persons served at the sites that were tested and submit this Consumer Notification Certification form to the Minnesota Department of Health (MDH) will result in enforcement action, which may include fines, from the U.S. Environmental Protection Agency and/or MDH.

I certify that lead/copper results were provided to persons served at the sites that were tested along with the following information: MCLGs, ALs and their definitions, a fact sheet on the health effects of lead/copper which includes steps to reduce exposure to lead/copper in drinking water, and contact information for the water utility. I further certify that notification was completed within 30 days after our system learned of the results, and that if the residence is a rental property, both the occupant(s) and rental property owner were notified.

Signature: _____ Print Name: _____

Job Title: _____ Phone: _____ Date: _____

Email Address: _____
Please print clearly

Return this certification form and a copy of the resident notification letter to MDH, in the enclosed envelope, within 10 days after notification has been completed.

**Mailing Address:**
Minnesota Department of Health
c/o Stephanie Voeller, Compliance Officer
Community Public Water Supply Unit
Environmental Health Division
P.O. Box 64975
St. Paul, Minnesota 55164-0975

If you have any questions, please call 651-201-3974, or email stephanie.voeller@state.mn.us.

09/2021

DEPARTMENT OF HEALTH

*Protecting, Maintaining and Improving the Health of All Minnesotans*

January 16, 2025

Minnetrista City Council
c/o Mr. Jasper Kruggel, Administrator
Minnetrista City Hall
7701 County Road 110 West
Minnetrista, Minnesota 55364

Dear Council Members:

Subject: **NOTICE OF EXCEEDANCE**, Exceedance of the copper Action Level, Minnetrista, Hennepin County, PWSID 1270036

Federal rules under 40 CFR 141.86, as implemented by Minnesota Rules, part 4720.0350, require public water systems to monitor for lead and copper at a specific number of drinking water taps. Compliance with the Lead and Copper Rule (LCR) is based on an Action Level (AL) for lead and copper, as established by the United States Environmental Protection Agency (EPA) under 40 CFR 141.80, as implemented by Minnesota Rule 4720.0350. A system is in exceedance of the AL if the concentration of lead or copper in more than 10 percent of the samples collected in a monitoring period exceeds the AL (known as the 90$^{th}$ Percentile Level).

Below are the calculated 90$^{th}$ percentiles for the July - December monitoring period. **These results show your water system exceeds the copper action level of 1300 µg/L**.

Samples Collected: 40 Lead Level: < 1 µg/L Copper Level: 1710 µg/L

Water systems that have exceeded the copper action level are required to complete the following requirements:

☐ **Your system must complete public education for the action level exceedance within 30 days from violation.**

a. The steps and deadline for completing public education are detailed in the Public Education Memo included in the letter.

☐ **You must deliver the results to those who participated in sampling within 30 days of receiving this notice.**

a. Attached is the consumer letter template that can be used to provide homeowners with their individual results. Please complete the certification form and return it to MDH once completed.

☐ **You must collect source water samples by 6/30/2025.**

b. There is a chain of custody enclosed for collection of one lead and copper sample at each source sampling tap. MDH will contact your lead and copper laboratory for sending you the required number of sample bottles.

Minnetrista
PWSID 1270036
January 16, 2025

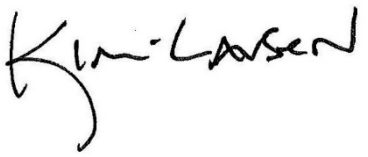
- ☐ **Per Federal Rule Requirements, your system is required to submit a plan to optimize its corrosion control treatment (OCCT Plan) to MDH by 6/30/2025.**
    a. Systems with existing corrosion control inhibitor (such as a phosphate-based inhibitor or silica inhibitor) will provide MDH with the most current information on target dose, distribution residuals (if available), and product being used.
    b. Systems proposing adding treatment are required to submit plans to MDH for approval.
    c. Since this is not your system's first exceedance of the copper action level, completing this step is mandatory. Failure to submit an OCCT Plan by the date above will result in a violation.
- ☐ **Your system will remain on standard monitoring for lead and copper. You will be scheduled to collect 40 samples during the Janaury - June 2025 monitoring period.**
- ☐ **Your system will begin collecting WQP samples.**
    a. See attached WQP memo and Annual Monitoring Schedule addition for more information.

After your system submits the OCCT Plan and completes public education, MDH will review your corrosion control treatment plan and follow up if more information is needed. Once your system receives approval for its OCCT plan, you must adhere to the timeline detailed in the approval letter.

For your system to return to reduced monitoring (collecting the reduced number of samples annually) your system must complete the required actions as part of the OCCT plan approval. Once the actions are completed, your system must then maintain the lead and copper action levels through two consecutive standard monitoring rounds and be deemed optimized for lead and copper by the state. The steps for being deemed optimized for lead and copper are shown in more detail in the OCCT Installation sheet included with your letter.

Please contact Hannah Mendez, Compliance Engineer, at Hannah.mendez@state.mn.us or 651-336-3359 for assistance with corrosion control treatment, or if you have questions about this notice and the requirements.

Sincerely,



Kim Larsen, Supervisor
Community Public Water Supply Unit
Environmental Health Division
4140 Thielman Lane, Suite 101
St. Cloud, Minnesota 56301

KL:sv
cc: Water Superintendent

Minnetrista
PWSID 1270036
January 16, 2025

Jackie Becker, Compliance Officer
Brian A. Noma, St. Paul District Office

Enclosures:

MDH OCCT Template
OCCT Flow Diagram
Minnetrista Copper_PE
Results Letter
Consumer Letter Template
Minnetrista Exceedance Results Comments

DEPARTMENT OF HEALTH

*Protecting, Maintaining and Improving the Health of All Minnesotans*

**MEMORANDUM**

Date: January 16th, 2025

To: Minnetrista City Council
c/o Mr. Jasper Kruggel, Administrator
Minnetrista City Hall
7701 County Road 110 West
Minnetrista, Minnesota 55364

Dear Council Members,

Subject: Water Quality Parameter Sampling, Minnetrista, Hennepin County, PWSID 1270036

Water Quality Parameter (WQP) monitoring is required by the Lead and Copper Rule for public water supply systems (PWS) that have exceeded the lead/copper action level or have installed a corrosion control treatment for lead/copper corrosion control. WQP monitoring is essential for evaluating the progress of the corrosion control treatment for lead/copper corrosion control.

According to our records, your system exceeded the action level for copper during the July – December 2024 monitoring period and will be put on quarterly monitoring for WQPs beginning **March 2025.** Your system will be required to complete the following schedules:

Distribution: 3 sample locations
Entry Points: 1

Please note that these are separate compliance requirements but for convenience are scheduled to be sampled at the same time.

Distribution samples must be taken at representative locations. In general, divide your system into segments based on number of required sites and choose sites from within each area to represent different areas in the distribution system. Acceptable sites include the sites without a point of use or point of entry devices, approved bacti sample sites, or accessible business locations. The number of samples you are required to collect from distribution is determined by the population of your PWS.

Entry point samples are taken from a point after treatment & before the first customer. The samples should be taken at a point after the water has mixed well as sampling too close to the chemical injector may result in inaccurate results.

The chain of custody (COC) should indicate the actual address used for sampling in the sample point location. The old generic site ID for WQPs, such as D-001, D-002 should not be

used. To obtain a WQP site plan template, please reach out to: Health.Community.LeadandCopper@state.mn.us

Please see enclosed Annual Monitoring Schedule showing the updated requirements for WQP sampling in 2025.

If you have any questions, please contact me at 651/539-3048 or Haripriya.Naidu@state.mn.us or Stephanie Voeller at 651/201-3974 or stephanie.voeller@state.mn.us.

HN:slv
cc: Water Superintendent
Haripriya Naidu, Compliance Engineer
Stephanie Voeller, Compliance Officer
Hannah Mendez, Compliance Engineer
Jackie Becker, Compliance Officer
[DE], [District] District Office

DEPARTMENT OF HEALTH

# Optimal Corrosion Control Treatment (OCCT) Installation

**STEP 1**

System is required to propose an OCCT plan to MDH within 6 months of end of monitoring period (EOM):

06/30/2025

**STEP 2**

MDH confirms OCCT or determines if CCT study is necessary within 12 months of EOM: _____

**STEP 3**

Following study approval, System conducts CCT Study within 18 months of EOM: _____

**STEP 4**

System completes CCT study and submits findings and OCCT to MDH for approval.

**STEP 5**

MDH provides approval for OCCT to system within 6 months of completion: _____

**STEP 6**

System installs CCT option within 24 months of approval (see right side flow for next steps)

**STEP 3***

MDH reviews proposal and can provide approval within:

A) Pop. <3,301, 24 months from EOM: _____

B) Pop. <50,000, 18 months from EOM: _____

**STEP 7**

System installs CCT option within 24 months of approval: _____

**STEP 8**

System conducts two consecutive 6-month monitoring rounds for lead and copper within the year following treatment install.

**STEP 9**

System conducts two consecutive 6-month monitoring rounds for lead and copper within the year following treatment install

**STEP 10**

Assuming system maintains lead and copper action levels, System is deemed optimized and given an optimal water quality parameter (OWQP) designation

**STEP 11**

System moves to annual lead and copper monitoring and begins quarterly WQP monitoring

***MDH can deny OCCT submission and require system to resubmit***