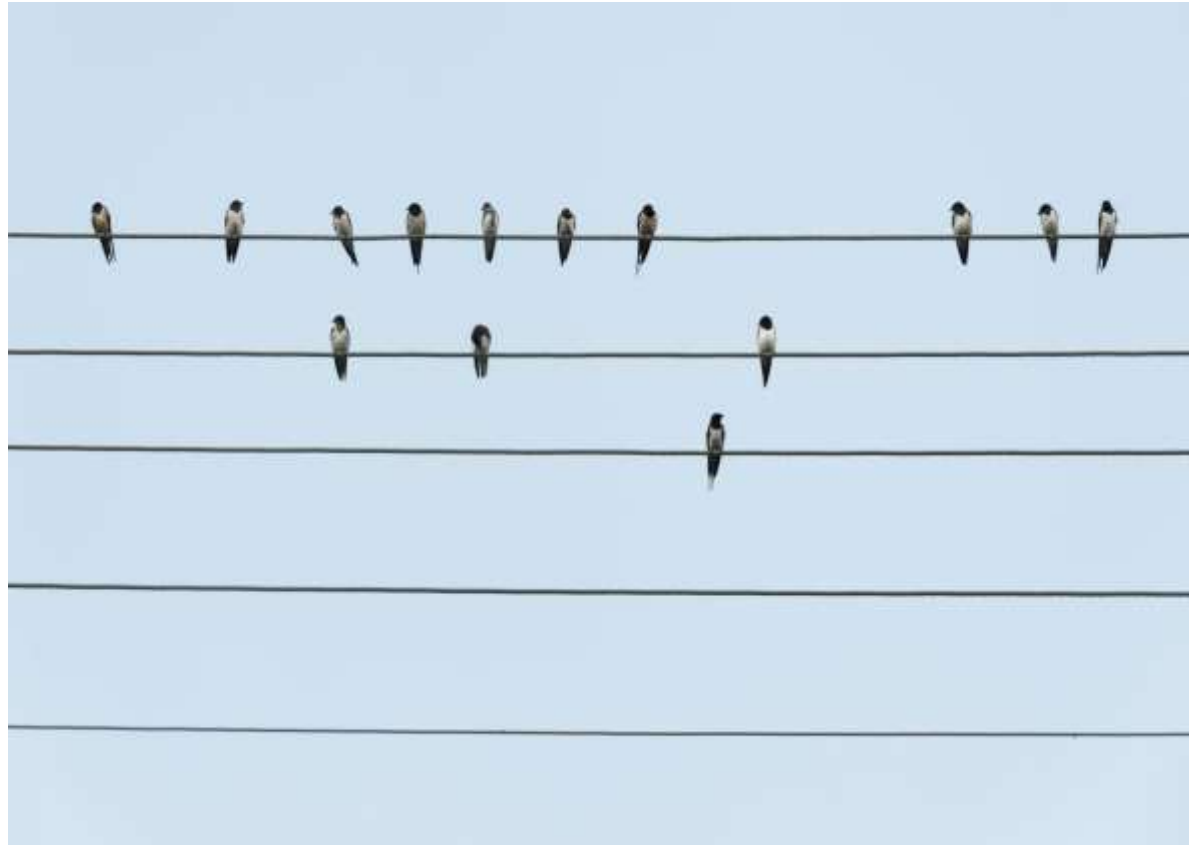


SEFLUC – LEAD AND COPPER RULE WORKING GROUP

APRIL 18, 2023

Introductions



Group Purpose – Background – Marta Rezcko

Lead and Copper Rule Revisions (LCRR)

Rule Effective Date: December 16, 2021

Rule Compliance Date: October 16, 2024 **(18 Months)**

More changes - Lead and Copper Rule Improvements (LCRI) – Before October 16, 2024- **But not the Inventory**

States have until October 2023 to set up their rules

Group Purpose – Marta Reczko

Share the most recent information

Share information resources

Share Strategies/Difficulties



Let's go on a journey to your organization's future



Today

You're piloting your organization through nonstop turbulence. The 50-year storm now strikes annually. Your most-knowledgeable workers are retiring. The pandemic, the warming planet, growing operational costs. Constant crises are keeping you from your long-term goals.

Looking for insights?



FACT SHEET

7th Drinking Water Infrastructure Needs Survey and Assessment April 2023

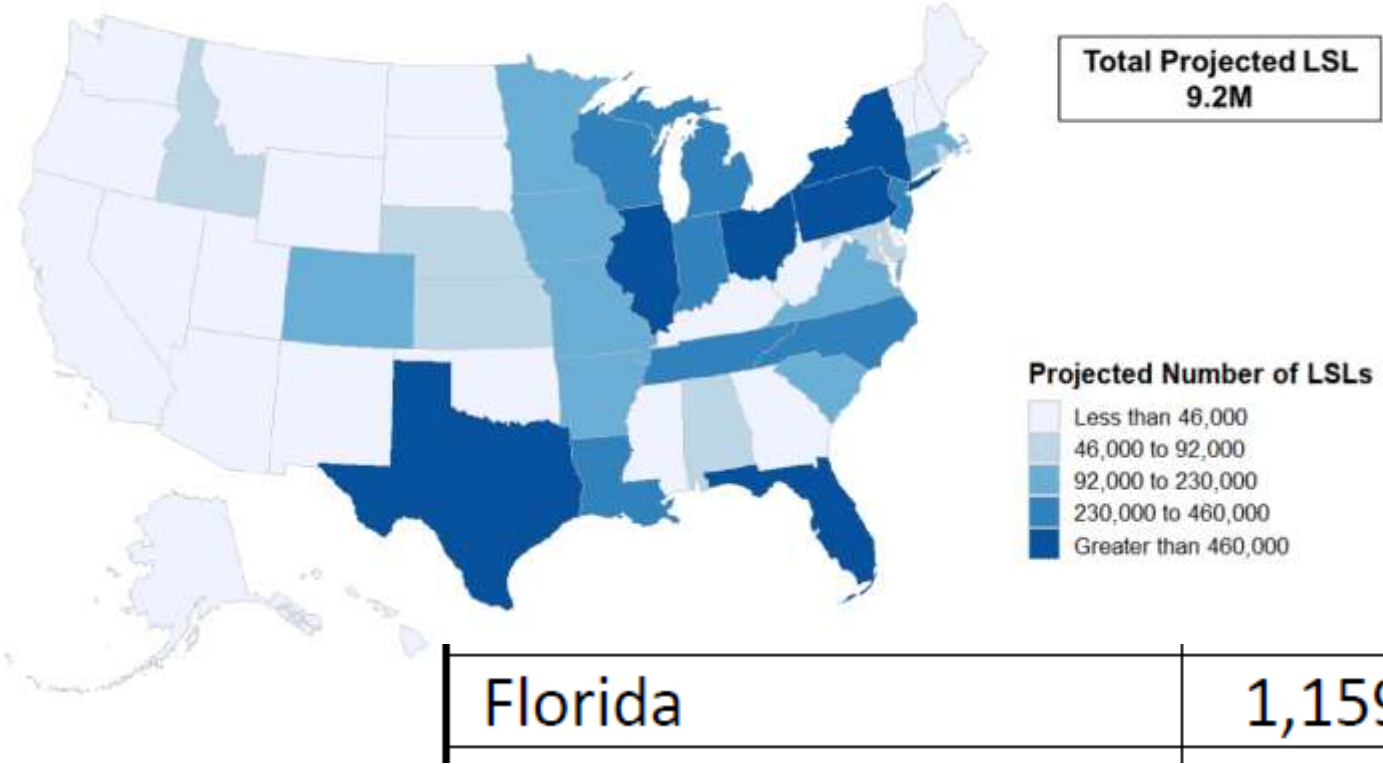
Based on the findings from the 7th DWINSA, the total projected LSL in the United States is 9.2 million (see Exhibit 4). There are also an estimated 2.8 million standalone galvanized service lines. Currently, some states require that galvanized pipe be identified, and some states require that it be removed. The 7th DWINSA provides the best available national and state-level projections of service line materials and counts. Exhibit 5 shows the distribution of LSLs across the nation and Exhibit 6 shows the total number of projected LSLs in each state, along with their percentage of the total. This information was used to develop the LSL-specific allocation formula for distributing the DWSRF BIL LSLR fund.

Exhibit 4: National Projected Service Lines by Material

Service Line Material	Projected Count
Lead Content	9,223,745
Stand-Alone Galvanized	2,800,839
No-Lead Content	87,929,975
National Total Service Lines	99,949,560

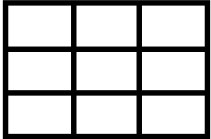
Florida #1 -

Exhibit 5: Projected Number of Lead Services Lines by State



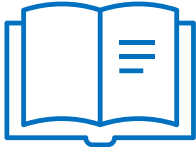
Major Requirements LCRR

INVENTORY



10/16/24

PIPE
REPLACEMENT
PLAN



10/16/24

SAMPLING PLAN



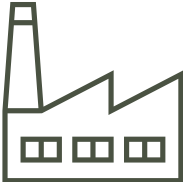
10/16/24

SCHOOLS &
DAY CARE



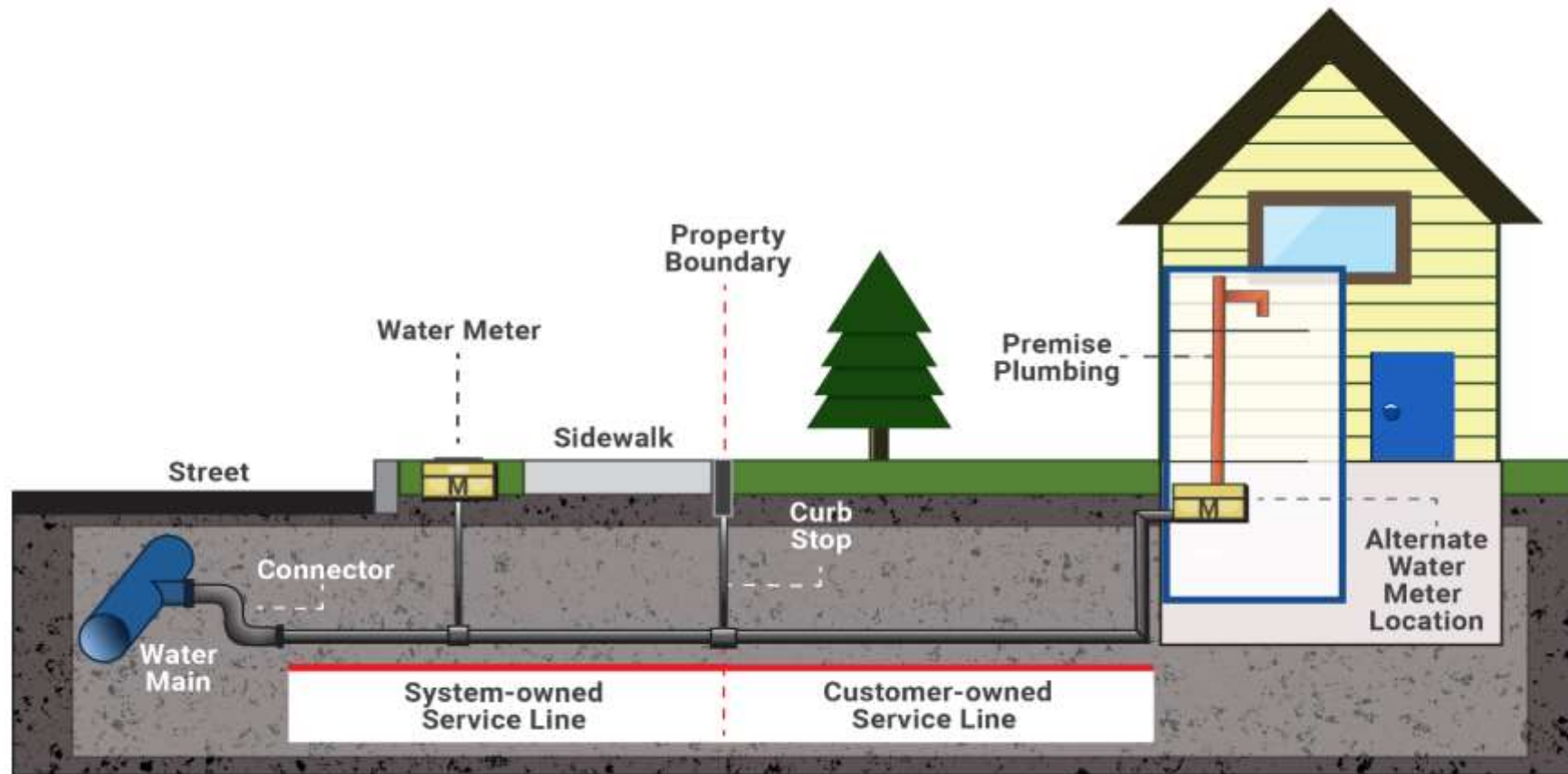
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WATER PLANT
CORROSION CONTROL



?

Example of Service Line Ownership



Classification of Service Lines

LEAD

GRR*

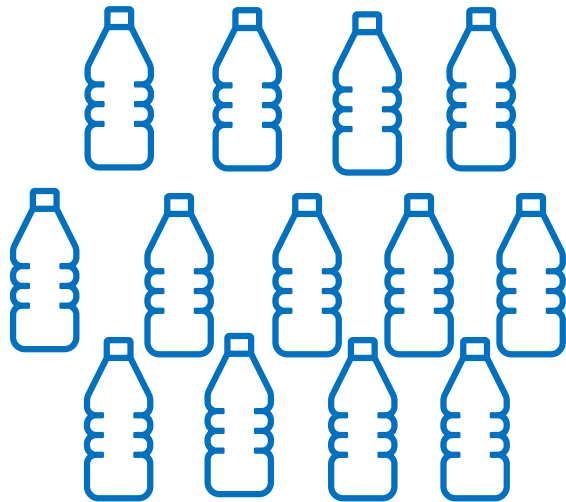
NON-
LEAD

UNKOWN

* Galvanize Requiring Replacement (GRR) – where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a “Lead Status Unknown” service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.

LSL Replacement Plan

60 Samples, 90th Percentile lead value



Required October 16, 2024 to FDEP (if Lead, GRR or Unknowns)

Will include a replacement goal should the tap sampling 90th percentile > Trigger Level TL (10 ppb) and 3% if > Action Level AL (15ppb)

Will include:

- Replacement SOPs
- Customer notification SOPs – specific timelines
- Reporting SOPs
- Testing SOPs
- Outreach Procedures
- Educational materials (lead info, flushing instructions)
- Distribution of Filter pitchers/replacement cartridges
- Financing options

% Replacement



Replacement of Utility Line (Lead, GRR, Unknown)

Full line replacement required for credit

Must inform customer and owner 45 days before replacement and offer to replace (although don't have to pay for it)

Must provide information on possible increase in lead in water due to the disturbance, information about the health effects of lead, and actions consumers can take to minimize exposure to lead (Can post for multi – family dwellings) and lead service line flushing instruction, before the line is returned to service

Must provide a pitcher filter or point-of-use (POU) device with replacement cartridges for 6 months and use instructions to every residence

Must provide notice to owner and resident of completion (within 24 hours)

Must offer to collect a tap sample between 3-6 months after completion or any partial SL replacement, and report value

For Emergencies, must provide above except 45 day notice

Document in inventory and for FDEP reporting



No endorsement of brand – certified by an American National Standards Institute accredited certifier to reduce lead

Replacement of Customer Line



When Customer notifies Utility of customer owned LSL replacement, Utility must make effort to coordinate simultaneous replacement.

Utility must complete within 45 days or notify FDEP for completion within 180 days (must notify FDEP within 30 days of failing to meet the deadline)

Utility must provide educational materials and risk mitigation materials, pitcher/POU device and 6 month of replacement cartridges, instructions and testing (30 – 60 days after)

Replacement of Customer Line (After the Fact)

When a Water System learns that a customer owned LSL has been replaced within the last 6 months, the Water System must:

Replace Utility owned SLS within 45 days of becoming aware of the replacement

Provide notification and risk mitigation measures within 24 hours

If fails to meet the 45 days, must notify FDEP within 30 days of failing to meet the deadline, and then must complete within 180 days.

If beyond the 6 months, no Utility side replacements required



Minor Disturbances



“Water Systems that cause disturbance of a lead, galvanized requiring replacement, or unknown service line that results in the water to an individual service line being shut off or bypassed, such as operating a valve on a service line or meter setter, and without conducting a partial or full lead service line replacement, must provide the persons served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance as well as instructions for a flushing procedure to remove particulate lead. The water system must comply before the affected service line is returned to service.”

Major Disturbances



“If the disturbance of a lead, galvanized requiring replacement, or ...unknown service line results from the replacement of an inline water meter, water meter setter, or gooseneck, pigtail, or connection, the water system must provide the person served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance, public education materials..., a pitcher filter or point-of-use device ..., instructions to use the filter, and six months of filter replacement cartridges.” The water system must comply... before the affected service line is returned to service.”



What about Water Loss due to Main Breaks?

SOP

Lead Goosenecks, pigtails and Connectors

Replace all found on utility side and provide information to inventory

Offer to replace customer-owned

If customer refuses, have them sign or document the verbal refusal

Removal does not count as a LSL replacement



City of Albany

LSL Replacement Plan Requirements - Rule

1. Strategy for determining composition of unknown lines in inventory
2. Procedure for conducting full lead service line replacements
3. Strategy for informing customers before a full or partial LSL replacement
4. Systems > 10,000 people, a replacement goal rate should the TL (>10 ppb) only be exceeded
5. Procedure for customer to flush service lines & premise plumbing

6. LSL replacement prioritization strategy based on disadvantaged consumers and vulnerable populations
7. Funding strategy for conducting LSL replacements to accommodate customers unable to pay

AWWA C810-17 Replacement and Flushing of Lead Service Lines

Lead Service Line Replacement Collaborative

AWWA Communicating About Lead Service Lines: A Guide for Water Systems Addressing Service Line Repair and Replacement

Sharing



What we have done up to now

Future strategies for LSL inventory or identification

Problems encountered

Solutions developed

Next Meeting

Topic – **Sampling Plan?**

Date – August 23, 2023

Time- 1:30

Location- City of Pompano Beach

Staff Needed – Lab/Samplers/
Compliance

