

Community Water System Grades

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Safe Drinking Water Program

- Chemical and bacteriological sample collection and analysis
- Sanitary Surveys (inspections) of water system infrastructure
- Compliance Determination and Technical Assistance
- Plans and specification reviews of water system infrastructure additions and/or upgrades
- Complaint response
- Boil Advisories
- Emergency Response (hurricane/weather events, public health emergencies)



Louisiana Water Systems

- 1,273 public water systems in Louisiana
 - o Community 954
 - Non-community 319
 - ~200 under formal enforcement for water quality, infrastructure, operation and maintenance issues
- Infrastructure Grade = D in last ASCE report
 - Estimated \$7B+ to bring up to code (\$9B+ per EPA NEEDS survey)
 - 50% of water systems have infrastructure over 50 years old
- Small systems have most difficulty
 - 92% of systems are small and/or rural (<3,300 pop)



Act 98 of 2021

- Community Drinking Water Infrastructure Act
 - Rulemaking to establish letter grades for water systems
 - Amends receivership Revised Statute and establishes consequences for "D" and "F" systems
 - Unanimously passed by House and Senate
- Provides for Accountability and Transparency



The Grade Rule

- What constitutes a grade?
 - Federal water quality violation history (health-based violations)
 - State violation history (chlorine residuals, no operator, water outage)
 - Financial sustainability (rate study, audit findings, fiscal admin)
 - Operation and Maintenance (records, flushing plan, corrosion and leaks)
 - Infrastructure violations (no backup source, missing/broken components)
 - Customer satisfaction (validated complaints, complaint logs Act 292 of 2019)
 - Secondary contaminants (Iron/Manganese > secondary contaminant level in finished water)



Calculating Grades

Category	Point Value	Max Points
Fed Violations	5 / Violation 10 / Administrative Order	30
State Violations	1 / Chlorine Violation 5 / Certified Operator issue 5 / Water Outage/Boil Order 10 / Certified Operator (surface water)	10
Financial Sustainability	5 / No rate study 5 / No audit 5 / Fiscal controls 10 / Fiscal Administrator	10
Operation and Maintenance	3 / Significant Deficiency	15
Infrastructure	5 / Significant Deficiency	20
Customer Satisfaction	1 / Water Complaint 10 / Failure to submit complaint log	10
Secondary Contaminants	5 / Iron or Manganese > SMCL at POE	5



Calculating Grades

- Systems can receive extra credit:
 - Asset Management Plan
 - Storage Assessment and Maintenance
 Plan
 - Well Assessment
 - Capacity Development
 - Management Training
 - 5 points each up to 10 points

Water System Grading Scale

Letter Grade	Point Value	
Α	≥ 90	
В	80-89	
С	70-79	
D	60-69	
F	≤ 59	

^{*}Grades are issued every May 1

^{*}LDH notifies State Bond Commission, Public Service Commission, Louisiana Legislative Auditor and Attorney General



Systems with D and F Grades

- Water revenue restricted to water system sustainability and improvement only
- Debt may be restricted to water system improvement only
- Funding oversight by Louisiana Legislative Auditor
- Receivership
 - Receiver can raise rates through rate setting authority
 - Receiver will develop plan for the system which may include consolidation



Preliminary Grades

Letter Grade	Count	Percent	Population
А	694	73%	72%
В	82	8.6%	4.9%
С	48	5.0%	14%
D	66	6.9%	6.4%
F	64	6.7%	2.5%

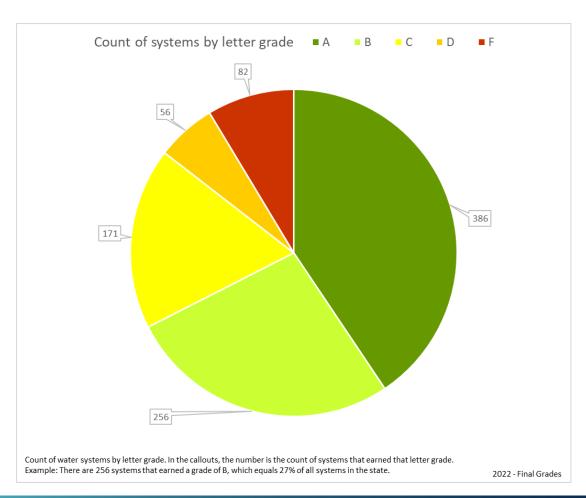
Final Grades

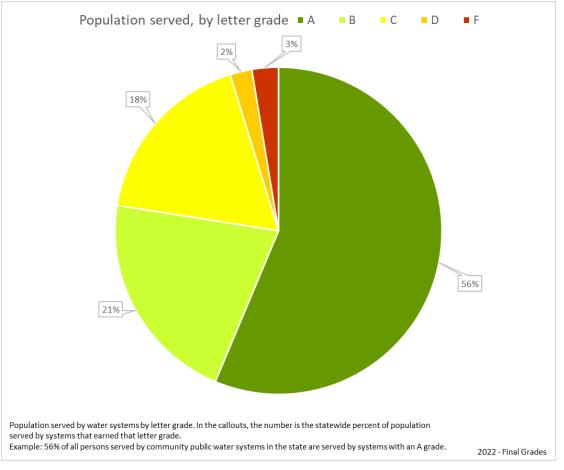
Letter Grade	Count	Percent	Population
Α	389	41%	58%
В	255	27%	19%
С	170	18%	18%
D	55	6%	2%
F	82	9%	3%

	Increase	Decrease	No Change
Total systems: 951	68	424	459
Percent of systems	7%	45%	48%
Percent of population served	10%	24%	66%



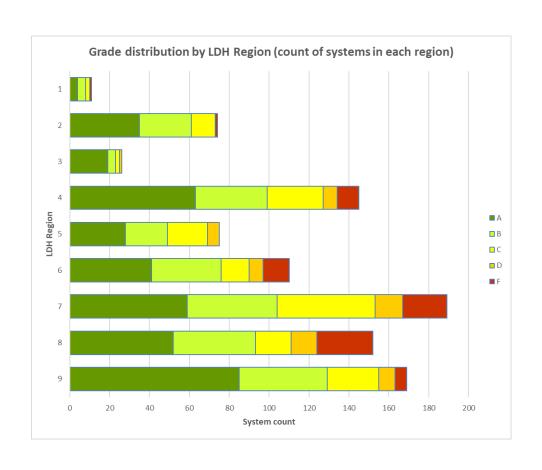
2022 Grades







Grades by LDH Region







In Summary

- Majority of water systems in Louisiana received a passing grade in 2022
 - 290 systems received extra credit
 - 51 systems had zero deductions
 - Grades will improve if water systems report necessary information
- Of the 15% of D and F grades, ~30% already have funding underway
- LDH will continue to work with poor performing systems through technical assistance, funding opportunities, and specialized trainings

THANK YOU

