T-MINUS 12 MONTHS: LESSONS LEARNED AND INFORMATION GAPS FOR INITIAL LSL INVENTORIES



WEBINAR PANELISTS

- Brenden Obrien, Stantec
- Richard Lettchau, Mott MacDonald
- Lauren Wasserstrom, Jacobs
- Becki Rosenfeldt and Rusty Nigro, Hazen & Sawyer
- Pierre Kwan, HDR
- Chad Seidel and Shonnie Cline, Corona Environmental Consulting
- Sandy Kutzing, CDMSmith
- Caroline Russell, Carollo Engineers
- Katie Porter, Brown & Caldwell
- Erica Walker, Arcadis
- Kiran Udayakumar, AECOM



History of Lead and Copper Rule(s)

LEAD AND COPPER RULE (LCR)

 Currently being implemented by most states

REVISIONS (LCRR)

- Finalized January 2021
- Pulled for agency review and re-confirmed in December 2021
- LSL Initial Inventories due in 2024
- Additional components of the rule may change with LCRI
- States working on primacy applications/extensions

LEAD AND COPPER RULE IMPROVEMENTS (LCRI)

- Increasing the pace of lead service line replacement
- Streamline action level and trigger level requirements
- Proposal was to be in September 2023
 - November is likely
- Final needs to be before October 16, 2024



Lead Service Line Inventories

- All systems should be working on initial inventories now
 - Not sure about a strategy of 100% unknowns for initial inventory
- Lots of questions/details
 - Records versus field work for validation
 - > EPA guidance
 - > ASDWA inventory framework
 - > ASDWA webinar recordings
- BIL funding helping/complicating
- Knowledge continues to evolve



INITIAL INVENTORY REQUIREMENTS

§ 141.84-Lead service line inventory and replacement requirements

- Required to investigate
 - All construction & plumbing codes, permits, and existing records pertaining to service lines connecting structures to the distribution system
 - All water system maps & records, including each service connection, meter installation records, past capital improvements, and std. operating procedures
 - All inspections and records of distribution system materials
 - Any resource, information, or identification method provided or required by the State to assess service line materials
- Required to identify and track surface service line materials encountered in normal operations, e.g., checking materials when reading meters, etc.



INITIAL INVENTORY REPORTING

- State spreadsheets are tracking many more data elements than the four to be reported to EPA
 - States are working on how to organize the spreadsheets into actionable information to track changes in the inventories as well as replacements
 - > A significant data management effort by states
- Four (not eight) data elements to be reported to EPA
 - Lead, galvanized requiring replacement (GRR), lead status unknown, non-lead
 - Assuming annual reporting based on updated inventories
- 30-day Public Notification (PN) requirement
 - What is the date that the 30-day clock starts ticking?



EXISTING TOOLS & RESOURCES

- Feb. 2022 ASDWA State Implementation Framework for the Lead Service Line Inventory Requirements under EPA's LCRR link
 - Companion Excel spreadsheet template
 - 2022 LSLI Symposium & additional webinars latest on 10/16/23
- Aug. 2022 EPA Guidance for Developing and Maintaining a Service Line Inventory - <u>link</u>
 - Also a companion Excel spreadsheet template
- Most states have developed inventory templates, FAQs, and additional resources
 - Systems need to listen to what their state is telling them
- Technical Assistance Providers & Consultants



TWO POLLEVERYWHERE QUESTIONS

- What is your estimate of the percentage of systems that will make the October 16, 2024 deadline for initial inventories?
 - 0%-25%
 - **25%-50%**
 - **50%-75%**
 - **75%-90%**
 - **90%-100%**
- What is your estimate of the percentage of systems that will have 100% unknows?
 - Same percentages



Poll Questions for Today's Call

Visit: pollev.com/asdwaa436

or

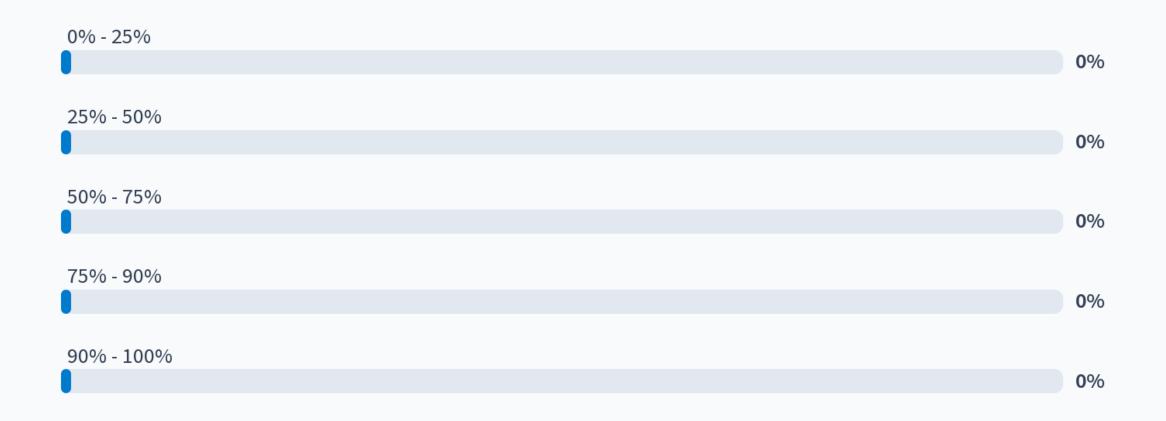
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To: <u>22333</u>

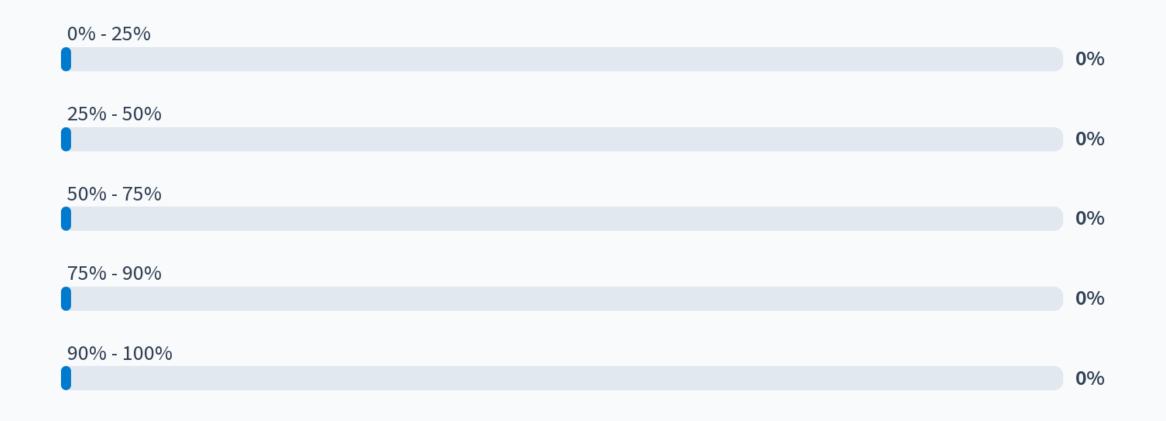
Or use QR code



What is your estimate of the percentage of systems that will make the October 16, 2024 deadline for initial inventories?



What is your estimate of the percentage of systems that will submit an inventory with 100% "unknown" service lines?



ALAN'S OBSERVATIONS ON INVENTORIES

- States are taking different approaches on some issues
 - And that's OK as almost all systems operate in only one state
 - > There are some exceptions
- States are developing inventory templates with some differences
- Three(ish) lead service line categories for systems
 - A fair amount of lead Upper Midwest and Northeast
 - Some lead many of the older cities across the country
 - Limited or no-lead new areas or lead wasn't the common practice
 - > Approaches will vary between these categories
- EPA guidance on inventories and public notification templates still leaves many questions to be answered



MANY INVENTORY QUESTIONS

- What is good enough for the initial inventory?
 - Does a system have to go beyond the initial records search?
 - Is a narrative for what the system did needed for the initial inventory?
 - What's the appropriate response for systems that submit an initial inventory with 100% (or 98% or 90%) unknown materials?
 - > Unknown service lines public notifications (PNs) 30 day regulatory requirement
 - How are the PNs going to be tracked & violations issue?
 - What's the appropriate response for systems that miss the deadline?
- What will Year 2 & 3 updates look like?
 - How many customers are interested? (inventory & eventual replacement)
 - How many services lines are going to be need to be potholed?
 - > How many holes per service line both public and private sides?
 - > How might modeling be used to reduce the number of necessary excavations?
 - How much will the percentage of unknowns decrease? annual PNs
 - > What is good enough for the decrease?



PANEL DISCUSSION

- Ten national engineering consultants will provide their experiences so far, followed by Q&A
 - Some pre-prepared questions and looking for audience questions





Lead Service Line Inventories T-Minus 12 Months Lessons Learned and Data Gaps





LESSONS LEARNED

LSL IDENTIFICATION

Collecting evidence: 3 methods



Historical records review

Previous materials evaluation

Construction records and plumbing codes

Water system records

Distribution system inspections and records



Identify service line material during normal operations

Water meter readings

Repairs and replacements of water meters, service lines, or mains

Backflow prevention device inspection



Service line investigations

Visual inspection at meter pit

Customer self-identification

CCTV inspections at the curb box

Water quality sampling

Mechanical or vacuum excavations

Collecting evidence: 3 tiers



Bronze: Historical records

Installation record (e.g., tap card)
Water sampling only with no records
Field inspection only with no records
Previous materials evaluation
Installation date is after the lead ban
SL diameter > 2 inches
SL repair or replacement record



Silver: Indirect Verifications

Visual inspection at meter pit
Customer self-identification
CCTV Inspection at Curb Box - Internal
or External
Water Quality Sampling – Targeted.

Water Quality Sampling – Targeted, Flushed, or Sequential



Gold: Direct Verifications

Mechanical Excavation at 1 or multiple locations

Replacement

Repair

LESSONS LEARNED

Information Holds Different Weight

- Town Ledger (1880-1950 records) shows T.L. for material: <u>tin-lined lead pipe</u>
- Department Service Report: "Leak on customer side we dug the street side and found 3/4" copper from main to curb stop. There is a concrete duct back between the curb and the water main. There is also a lead 3/4" phone line in the gutter we pulled about 60' of it by hand."

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				17.2								0		The state of the s
842	8-8-17		Emil Johnson	Cedar XII								Herry 9/8	58648	Bit Patch Required: ②N Siz
843	6-4-25	-	Mrs Nellie Dester	Bullard & Beacon					-			Empire 5/8	580438	Concrete Sidewalk to be replaced Damage to Private Property (spec
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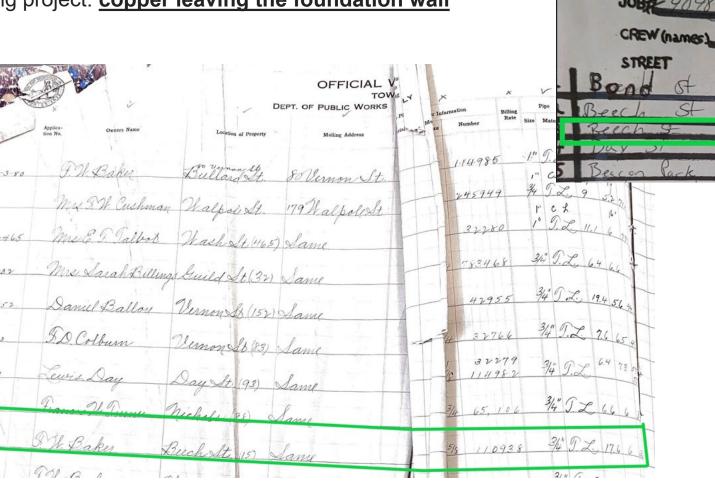
TOWN OF NORWOOD - WATER DEPARTMENT SERVICE REPORT

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	34" J. L. 7 6 K	

Information Holds Different Weight (continued)

Town Ledger (1880-1950 records) shows T.L. for material:
 <u>tin-lined lead pipe</u>

 Contractor internal meter inspection report for cleaning and lining project: <u>copper leaving the foundation wall</u>



INO.

25 sec

40 Sec 30 Sec 20 Sec 1:30 Sec

METER REPORT

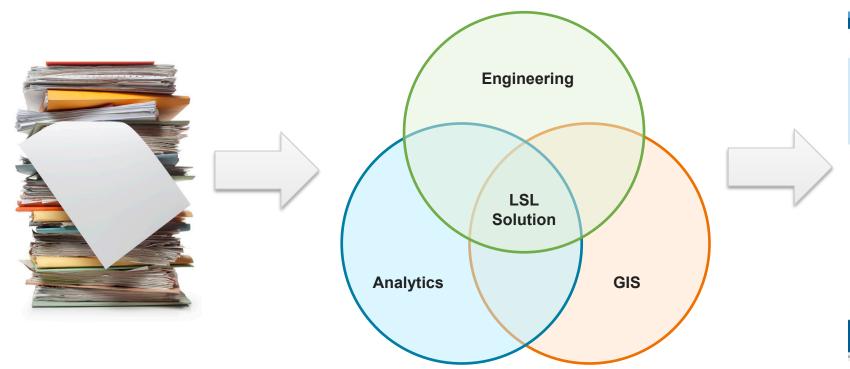
TOWN Norwood DATE 6/7

HOUSE # OUT/IN SPECIAL NOTES

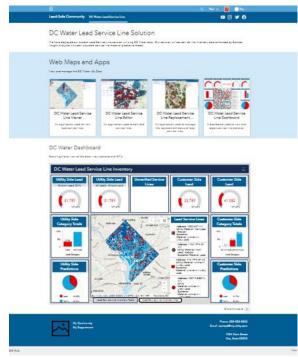
Utilizing a Centralized Hub for Inventory Development

Leveraging an existing Esri ecosystem

Ingests your data to build a living service line inventory. Accessed through a centralized hub.

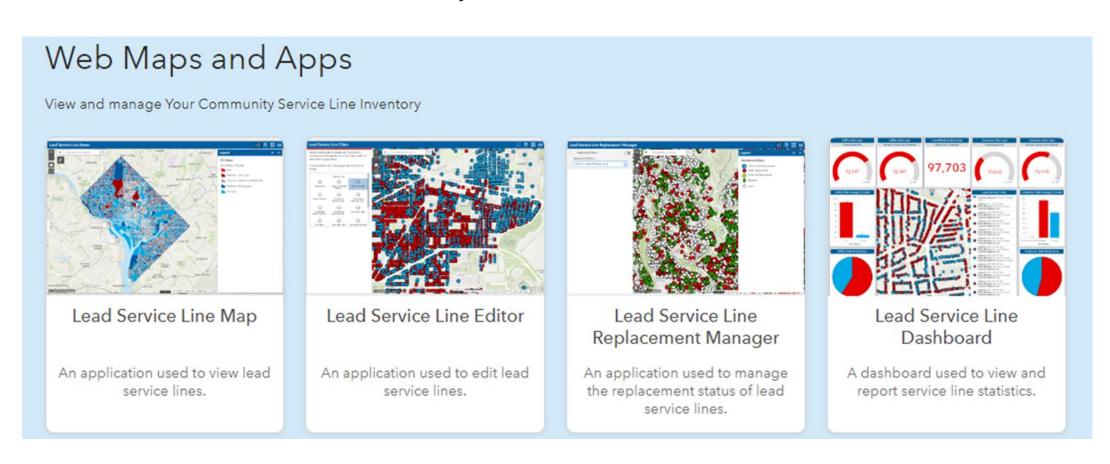


LSL IDENTIFICATION



Augmenting the solution

Choose the solution interfaces that meet your needs



22

LSL Potholing Progress

Sites Investigated

30

Potholes Dug

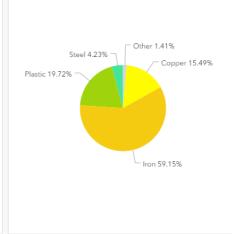
71

Phase 1 Progress 30

Count locations include Phase 1 Residental Locations & JPS

Schools.





D. . . Dadhala !..f.

Addresses Investigated: Click on an address to zoom to that location on the map. Address: Johnson Elementary School 1339 Oak Park Drive Jackson, MS 39213 Private Side Pothole Inspection Date: October 13, 2023 Address: Walton Elementary School 3200 What side of the Private Side Bailey Avenue Ext. Jackson, MS 39213 meter are you potholing? Inspection Date: October 13, 2023 Other Type: Address: Chastain Middle School 4650 St Dominio Hospital Manhattan Road Jackson, MS 39206 Test Performed: Yes-Scratch & Inspection Date: October 13, 2023 Magnet Address: McWillie Elementary School 4851 Material: McWillie Circle Jackson, MS 39206 Other Matherial: Inspection Date: October 13, 2023 Address: Wells APAC Elementary School 1120 Riverside Drive Jackson, MS 39202 Other Size: Inspection Date: October 12, 2023 Pothole End V A Center Address: Murrah High School 1400 Murrah Time: Drive Jackson, MS 39202 Inspection Date: October 12, 2023 Address: Murrah High School 1400 Murrah Drive Jackson, MS 39202 Riverside Dr Inspection Date: October 12, 2023 Address: John Hopkins Elementary School 170 John Hopkins Road Jackson, MS 39209 Inspection Date: October 12, 2023 Address: Raines Elementary School 156 Flag Chapel Road Jackson, MS 39209 Laurel St Inspection Date: October 12, 2023 Address: Galloway Elementary School 186 Idlewild Street Jackson, MS 39203 Map Legend Manship St **Lead Service Line - Pothole Locations** Carlisle St Investigated Site information E Fortification Lead Service Line - Pothole Locations

Esri, NASA, NGA, USGS, FEMA | Esri Community Maps Contributors, C...

Location: Murrah High School 1400 Murrah Drive Jackson, MS 39202

Crew Number:	One
Inspection Date	October 12, 2023

Last edited by Tking2023 on 10/12/2023, 10:57 AM.

Field Comment:

Site Info

Pothole Info



Thank you!

Questions?

Brendan O'Brien, P.E.

Project Manager
Brendan.OBrien@stantec.com



LSLI T-Minus 12 Months

Lessons Learned and Information Gaps for Initial Lead Service Lines

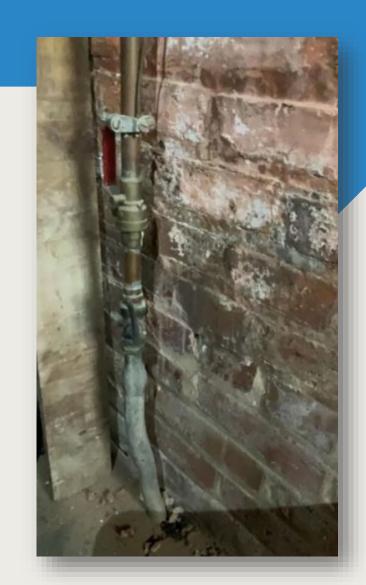
Richard Luettchau II



Lessons Learned

Lead Ban Dates

- When assuming non-lead allow for a 1 to 2 year buffer from lead ban
 - Contractors were allowed to finish projects that spanned the ban date with available materials
 - Plumbers tended to use up their available stock past the ban dates



Lessons Learned

Tap Date vs Parcel Construction Date

- Date of tap and building construction may be on different sides of the lead ban
 - Lead stub may have been installed even if the building construction occurred after the ban
- If installation eras do not match, assume unknown or lead
- Only assume non-lead if both dates indicate non-lead

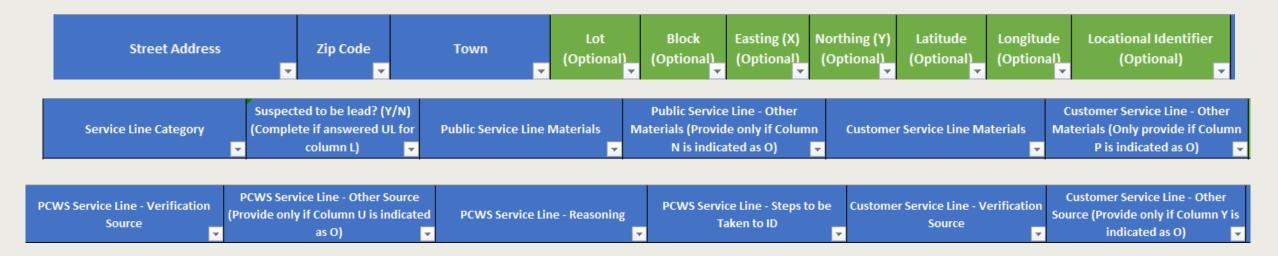


Know Your Submittal Requirements, Don't Be Surprised In October 2024

Lessons Learned

Regulatory Submittals

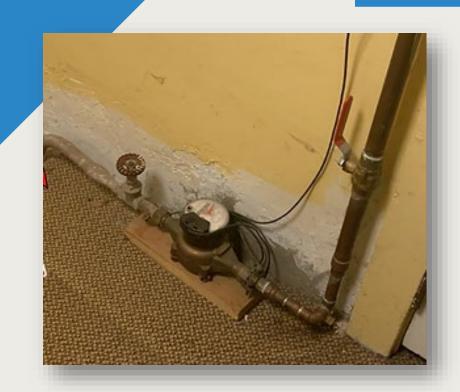
- Submittal Requirements Vary Between States
 - Review your submittal requirements
- Understand what is required and who is responsible for the information
- If there are questions now is the time to ask the regulators



Data Gaps

Meter Change-out Programs

- Meter change-outs give an opportunity to observe the point of entry
 - Train crews to identify service line material
 - Record the material and take a photo
- When the utility or its representatives enter a home, the service line material should be observed and recorded



Data Gaps

Customer Owned Services

- Engage the customer to assist in identifying service materials
 - Self-reporting of point of entry
 - Proof of previous replacements
- The easier it is for customers to provide information the more likely they are to respond
- Customer engagement early and often leads to successful LSR programs

Summary

Lessons Learned

Apply 1 to 2 year buffer to lead ban dates

Use both tap and construction year

Know your submittal requirements

Data Gaps

4

Record internal material when conducting meter change-outs

5

Encourage customer to provide internal material



Thank you

T-Minus 12 Months: Lessons Learned and Information Gaps for Initial Lead Service Line Inventories

ASDWA Webinar

October 16, 2023

LSL Inventory: Key Themes & Lessons Learned



Understand Federal & State- Specific Requirements

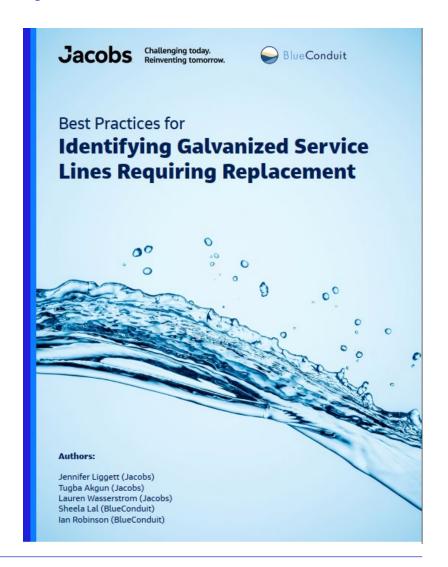




Proactive Public Outreach & Communication

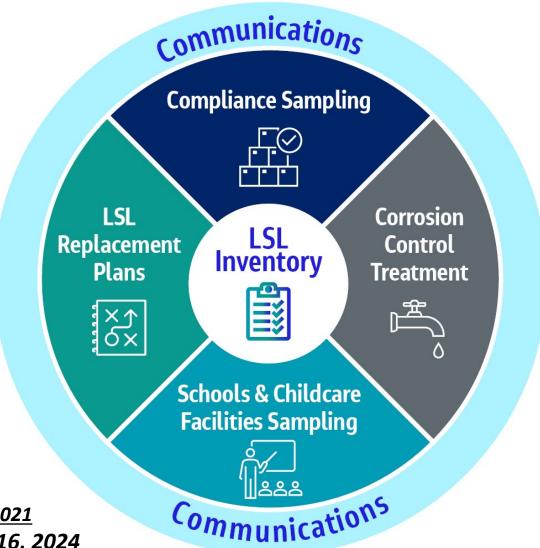
LSL Inventory: Common Challenges & Information Gaps

- Incomplete or missing records, particularly on customer side
 - Proving lead was never upstream from galvanized
- Effective strategies to engage and educate the community
- Evolving regulatory landscape



35 © Jacobs 2023

Key Aspects of the LCRR: Beyond LSL Inventory





Effective Date: <u>December 16, 2021</u>

Compliance Date: October 16, 2024

^{*}Lead and Copper Rule Improvements (LCRI) will be promulgated by October 16, 2024, and may impact requirements of the LCRR, including compliance dates and other key aspects of the rule, excluding the initial LSL Inventory requirements.

Thank You

Lauren Wasserstrom

National Practice Leader for Lead and Copper Rule Compliance

lauren.wasserstrom@jacobs.com













Hazen & Sawyer

Becki Rosenfeldt and Rusty Nigro



Hazen



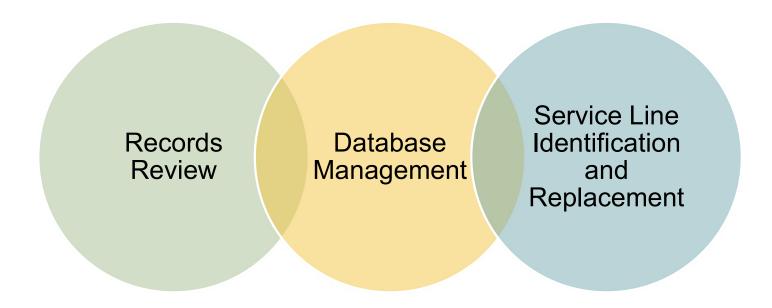
ASWDA Monthly LSLI/LSLR Webinar Series

LSLI - T-Minus 12 Months:

Lessons Learned and Information Gaps for Initial Lead Service Line Inventories

October 16, 2023

Lessons Learned



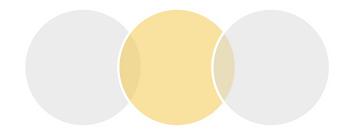
Records Review

 Complete a thorough records review (possibly establish multiple eras where lead was banned).

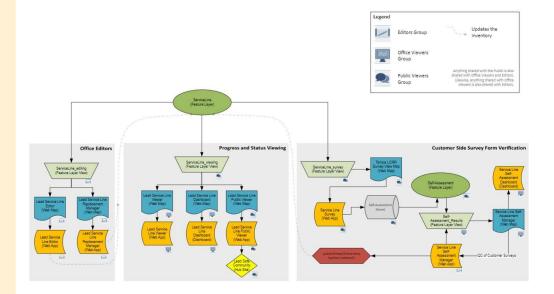
LSL Likelihood Eras											
Municipality	1895- 1925	1925-1931	1932-1943	1944-1949	1950-1956	1957-1975	1976-1988	1988-2021			
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Miami	Allowed*	Allowed*	Allowed*	Allowed*	Allowed*	Allowed	LSL Not Allowed	LSL Not Allowe			
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				Cutler Bay			Allowed* Allowed*		

Database Management Plan



- Create a Data Management Plan-
 - Establishes a roadmap for managing the inventory database
 - Sets schema prior to launching inventory
 - Streamlines population of Inventory Template
 - Reduces time needed to review data and populate the service line inventory
 - Build a data dictionary



Service Line Identification and Replacement

- High lead likelihood or disadvantaged areas may present challenges requiring an alternate approach.
- · Language Barriers (tailored communication)
- Crime
- · Material Survey: photo is valuable in QC process
 - Photo quality is important for QC
 - Need to have clear messaging on how they need to be taken and what information is trying to be obtained.
- Cases where bylaws and ordinances need to amended to gain access to private property
- Providing funding to private homeowners.
- Machine Learning is not always the answer.
- Not all pitcher filters are created equal.

Water Service Line Inspection

YOU MAY HAVE NOTICED CITY CONTRACTORS INSPECTING SERVICE LINES NEAR WATER METERS.

Tempe is working on a service line inventory project as part of a nationwide effort under the Environmental Protection Agency's (EPA) Lead and Copper Bule Revisions to protect public health and reduce exposure to lead and copper in drinking water. You may be asked by city contractors to briefly move your vehicle as inspections are conducted.

The EPA revised the 1991 Lead and Copper Rule (LCR)

Tempe has been monito in accordance with the compliant with the LCR regulatory action levels LCRR now requires Tem line material on Tempe' customer service lines I and the house.

Lead is a naturally occu serious health problem:

Inspección de la Línea de Servicio de Agua

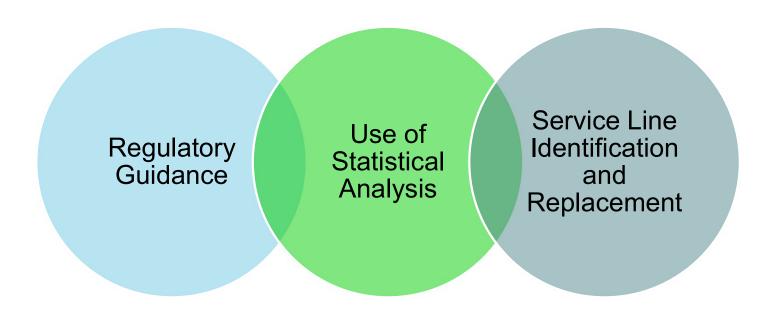
ES POSIBLE QUE HAYA NOTADO CONTRATISTAS DE LA CIUDAD INSPECCIONANDO LAS LÍNEAS DE SERVICIO CERCA DE LOS MEDIDORES DE AGUA. Tempe está trabajando en un proyecto de inventario de líneas de servicio, como parte de un esfuerzo a nivel nacional bajo las Revisiones de la Regla de Plomo y Cobre de la Agencia de Protección Ambiental (EPA), para proteger la salud pública y reducir la exposición al plomo y cobre en el aqua potable. Es posible que los contratistas de la ciudad le pidan que mueva brevemente su vehículo mientras se realizan las inspecciones.

La EPA modifico la Regla de Plomo y G a través de las Revisiones de la Regla (LCRR) para proteger la salud públice la exposición al plomo y cobre en et a ha estado monitoreando el plomo y el de acuerdo con la LCR desde 1992, ha y no ha excedido los niveles regulator plomo ni et cobre. La LCRR requiere q material de la línea de servicio de agu de los medidores de agua, y las limes (ubicadas entre el medidor de agua y





Identified Gaps



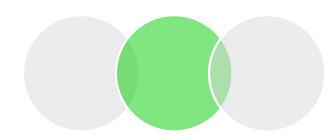
Regulatory Guidance



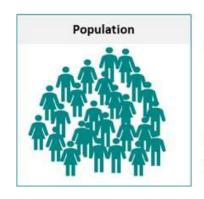
- State Regulatory Guidance:
 - Inconsistences
 - Understanding approaches to compliance
 - Additional training/understanding of options is required prior to making decisions.
- · More Guidance is Needed on:
 - Use of statistical analysis
 - · Identification and replacement
- Lead and Copper Rule Improvements
 - The unknown is a challenge for utilities and consultants

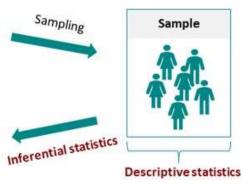
State	Formal Guidance Available	State-Specific LSL Inventory Template Available	LSL Inventory Template Required	Machine Learning or Statistical Analysis Accepted	Misc. Updates:
Arizona	X (corrosion control)	ADEQ doesn't want a detailed inventory		X (needs approval)	
California	×	×		X (needs approval)	No additional ID required after modeling
Colorado	comment period done end of July	x		X (needs approval)	considering sequential sampling for designation of "Non- Lead"
Connecticut	waiting for EPA	x		X (needs approval)	30-day notification following posting of LSL Inventory (not necessarily oct 2024)
Florida	No- but coming soon	No- Using EPA	x	Not Approved for Material Verification	FDEP is considering sequential sampling for designation of "Non-Lead" Requiring all GRR and LSLs to be replaced (no timeline yet
Georgia	×	×	×	X (needs approval)	120Water is developing a software for GA-EPD for Templat Submission. Minimum # of verification points= 1 on each side.
Maryland	x	x	×	X (needs approval)	interpolation accepted, but Mi. needs approval- materials of be designated as non-lead Requiring 18"pothole on BOTH sides of meter box
Massachussetts		x	×	X (needs approval)	
Michigan	X- New LSLR guidance available and inventory Guidance	x	×	×	Complete inventory due Jan. 1, 2025.
New Hampshire		×	×	X (needs approval)	GRR- Galvanize Line Downstream of Any Lead (LSL or Lead Connector)
New Jersey	×	×	×	X (needs approval)	
New Mexico	×		-		
North Carolina		x	×	?	
Oregon	×	×	×	X (interpolation accepted)	Only 95% confidence required for interpolation-materials designated as non-lead
Virginia	X (short)	in the works	X (EPA may be accepted)	2	Requiring the Use of 1988 for Non-Lead Designation
			X (EPA template		

Use of Machine Learning and Statistical Analysis



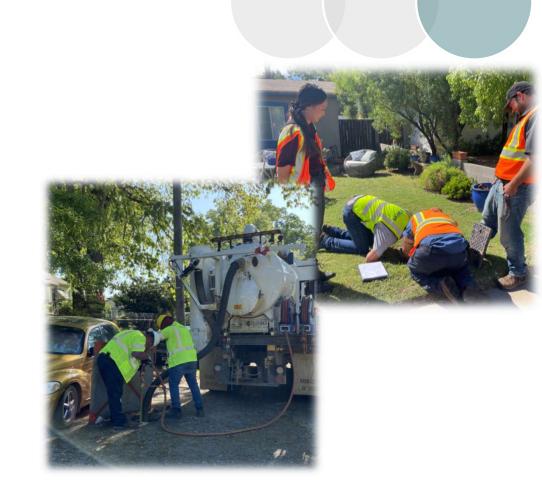
- Appropriate use of Machine Learning
 - · Training on appropriate use of statistical modeling is needed
 - Use of Machine Learning generally requires 5% positive (LSL/ GRR) in population.
 - Significant field verification is usually needed to develop an accurate model with a high recall rate.
- Alternative Statistical Analysis- needs to be better understood (Interpolation, Extrapolation, Inferential)
 - · Approach varies widely.
 - When it is appropriate to apply statistical analysis?
 - Requirements for both confidence level (CL) and margin of error (MoE) need to be established
 - Population size makes a big difference. What is the maximum allowable population size for statistical analysis?





Service Line Identification and Replacement

- Utilities need guidance on options for obtaining private property access.
- Additional guidance is needed on how utilities can get private property owners to replace service lines.
- Federal/ State Mandate?
- Identification and replacement at homes with tenants and short-term rentals (Airbnbs) can present challenges. More guidance is needed.
- Additional resources may be needed for LCRI
 - Funding/ mechanisms/ programs
- More guidance and utility-specific testing is needed on appropriate use and effectiveness of point of use filters.



Thank you



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Lessons Learned and Information Gaps for Initial LSL Inventories

Pierre Kwan, PE pierre.kwan@hdrinc.com 206-826-4735



October 16, 2023 ASDWA Webinar

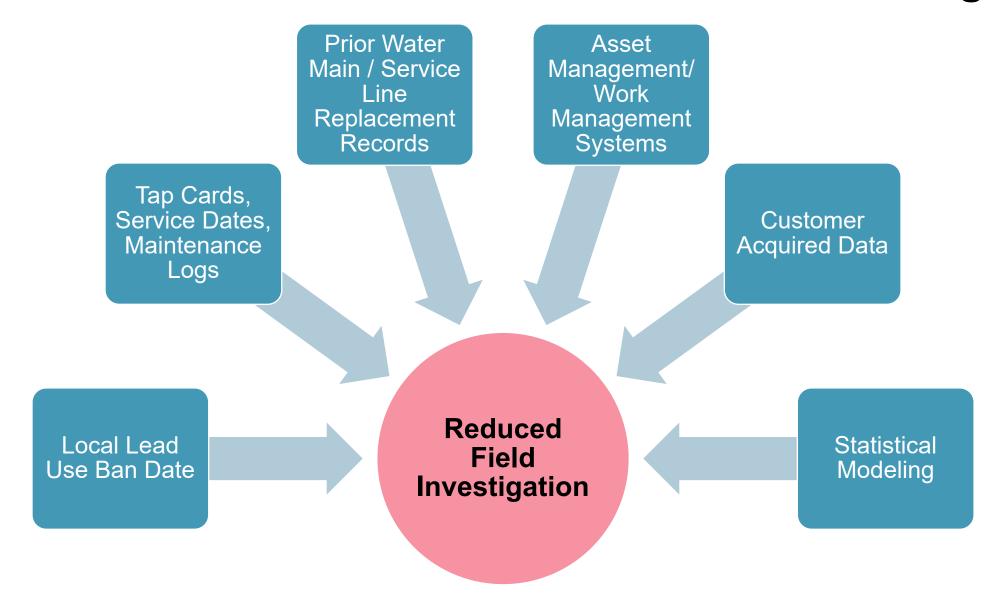


Inventory Preparation

- Carefully review your primacy agency's inventory template may deviate from EPA template.
- Plan your collection and recording strategy to gather information in one pass.
- Avoid going back for additional data gathering or rework.
- "Living" document submitted annually make it easy to update

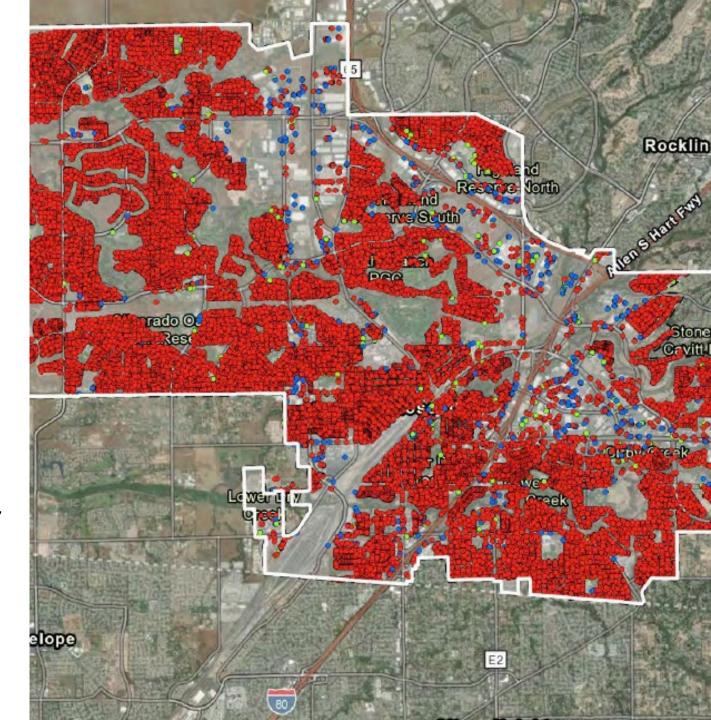
	La	ocation Informatio	on						System-Owned Po	rtion				
Unique Service Line ID	Location Street Address		Sensitive Population? (Yes/No)	Disadvantaged Neighborhood? (Yes/No)	System-Owned Portion Service Line Material Classification	If Non-Lead in Column G Was Material Ever Previously Lead?	' Service Line Installation Date	Service Line Size	Basis of Material Classification	Was the Service Line Material Field Verified?	If "Yes" Service Line Mat Describe the Field Verification Method	erial Was Field Verified: Enter the Date of Field Verification	Notes	Customer-Owned Portion Service Line Material Classification
A Unique ID is recommended for each service line.	Water systems must trac lines in their internal in accessible version, location lead and galvanized requ system does not use add identifier, other optio coordinates, landmark, in details to specify se	ventory. For the publicly identifiers are required for viring replacement. If the fresses for their location ins could include GPS tersection, block, or other	Select Yes if sensitive subpopulation, e.g., day care, school, multifamily home. If Yes-Other, describe in the Notes field.	Does location meet state affordability auidelines or	Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field	Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement	Date, year, or estimated date range when the service line was installed or replaced	i	Select option from drop down list. If "Other," describe in the Notes field	Select Yes or No	Select option from drop down list. If "Other," describe in the Notes field	Enter approximate date of field verification or date that the record was updated	Can use this field for documenting additional relevant information, including when classification changes.	Dropdown list includes recommended subclassifications. If non-lec other, describe in Notes fiel
Example 1	1234 Test St., City, State, Zip Code	Intersection of Test and Elm St.	No	No	Non-Lead - Plastic	Yes	1997	2	Installation date after lead ban	Yes	Visual inspection at the meter pit	5/1/2019		Non-Lead - Plastic
Example 2	4321 Test St., City, State, Zip Code	Intersection of Test and Main St.	No	No	Non-Lead - Plastic	No	Fall 1980	2	Installation record (e.g., tap card)	Yes	Mechanical excavation at one location	9/10/2020		Galvanized
Example 3	16 Capital St., City, State, Zip Code		No	No	Non-Lead - Copper	Don't know	1985	1 1/2	Service line repair or replacement record	No				Galvanized
Example 4	1 Water Avenue, City, State, Zip Code		No	No	Unknown - Likely Lead		1940's	2		No				Galvanized
Example 5	67 Children's Place, City, State, Zip Code		Yes - Day Care	No	Unknown - Material Unknown		1950-1960	3/4		No				Unknown - Material Unknov
Example 6	30 Price Street, City,		No	No	Lead-lined galvanized		1955	2	Installation record (e.g., tap	Yes	CCTV investigation at curb	8/8/2020		Lead-lined galvanized

Prioritize Low-Cost Methods to Reduce Field Investigations



GIS Software Integration

- Collected data typically has to go into a GIS model → except small/very small systems.
- Major mapping coordination.
- Does your GIS staff have the bandwidth and training to accomplish this?
- If not, set aside funds in 2024 to immediately hire and train staff, or hire consultants.





Communication Requirements for Unknown Services

- All customers with unknown service line materials must be notified of status within 30 days after each inventory submission.
- Some customers would be notified annually.
- Potential public relations "penalty" for submitting inventory with many unknowns.
- Be prepared for questions, especially from Realtors, HOAs, and activist/environmental groups.



T-Minus 12 Months:

Lessons Learned and Information Gaps for Initial LSL Inventories

October 16, 2023

Chad Seidel, Ph.D., P.E.
Nathan MacAurthur
Brittany Gregory, P.Eng
Shonnie Cline

No records, or records are difficult to access

- Inventories require collaborations between utility and city departments that don't often interact
 - It is important to get the right people together from the start to ensure all valuable data is obtained and to determine how the data can be paired together

No records, or records are difficult to access

 Utilities, asset management, meter billing, GIS, etc. often have incomplete datasets with missing meter and service lines identifiers, addresses and parcels that can be difficult to pair and QC

Duplicated data requiring further QAQC:

FullAddr	† CommonAddr	GISMeter_Year *	GISMeterType	GISMeterSize	GISMeterPlan_G	ServiceLineID
3018 E LONGHORN DR	3018 LONGHORN	2012	Service Meter	0.75	1-0940	68846
3017 E LONGHORN DR	3017 LONGHORN	2012	Service Meter	0.75	1-0940	68846
3026 E LONGHORN DR	3026 LONGHORN	2012	Service Meter	0.75	1-0940	68847
3029 E LONGHORN DR	3029 LONGHORN	2012	Service Meter	0.75	1-0940	68847
4915 S LEISURE	4915 LEISURE	2014	Service Meter	1	1-0973	71133
4912 S LEISURE	4912 LEISURE	2014	Service Meter	1	1-0973	71133

Mismatched addresses for a given service line between data sources :

ServiceLineID =	CommonAddr_L	CommonAddr_Meter	CommonAddr_MC	CommonAddr_G	FullAddr_L	FullAddr_Meter
122764	510 MONDEL	510 ACACIA	515 ACACIA	510 ACACIA	510 N MONDEL DR	510 N ACACIA DR
122764	510 MONDEL	510 ACACIA	1431 COMMERCE	510 ACACIA	510 N MONDEL DR	510 N ACACIA DR

Communication

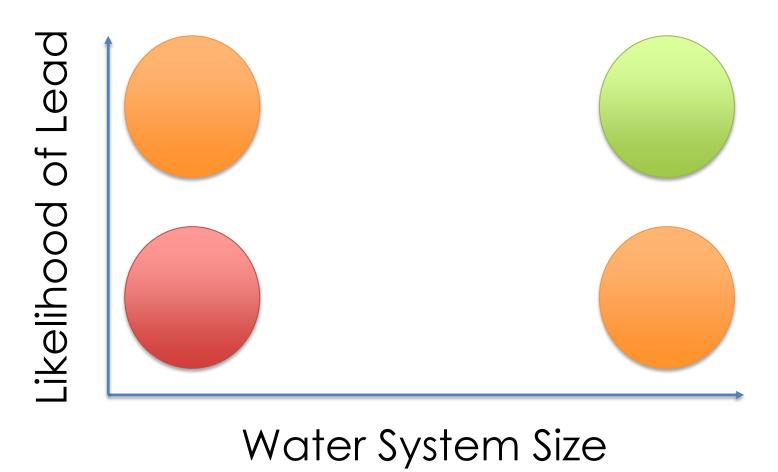
- Many utilities do not have legal authority to access water service lines on private property
- Challenges in some community participation due to lack of trust in government and other factors
- Failure to communicate effectively within water system often results in breakdown in communication with customers and property owners

Regulatory Implementation Clarity

- Primacy agencies hold the keys to answer what will comprise accepted inventories
- Standardizing menu of acceptable approaches is needed across states
- e.g. Colorado Water Quality
 Control Division developed an
 initial service line inventory
 policy to ensure an accurate
 inventory that meets
 minimum requirements

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Universe of LSL Inventories...





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Lessons Learned and Gaps

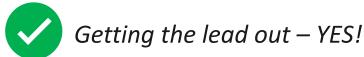
Lessons Learned

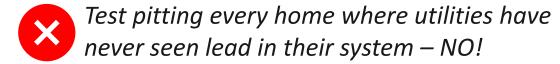
- 1. A 3D network of piping does not fit neatly in the state inventory templates
- Inventories are dynamic and it will be a long time before they are "final" – Need a good data management system in place
- Never overwrite data keep sources in individual fields (i.e. record data, test pit inspections, customer provided information, etc.)

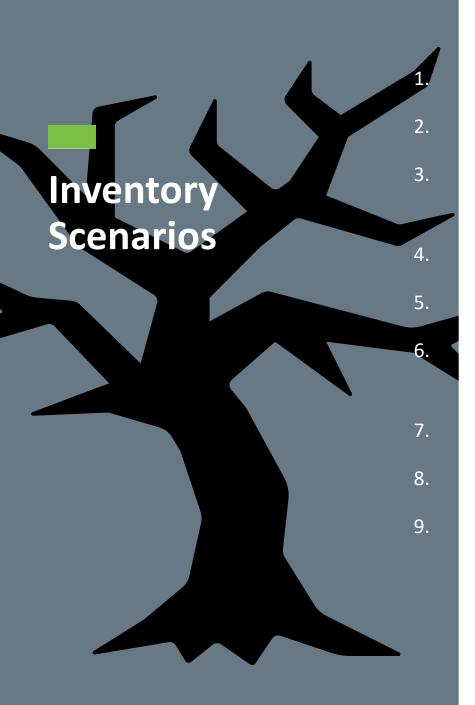
— Gaps

- 1. Private side configuration knowledge
- 2. Additional guidance on handling galvanized piping on the private side
- 3. Greater acceptance of statistical analysis and machine learning is needed....and fast

Let's use all available tools and focus funding where it provides the most benefit!







Public Main with Single Meter and Public/Private Service

Public Main with Multiple Facilities on a Parcel and Single Private Meter

TWO Public Services to Private Mains to Several Private Services (Assume Looped)

Public Main with Irrigation Downstream of Public Meter

Public Main with Individual Public Meters (single connection at main)

Private Main with Master Public Meter and Multiple Facilities per Parcel

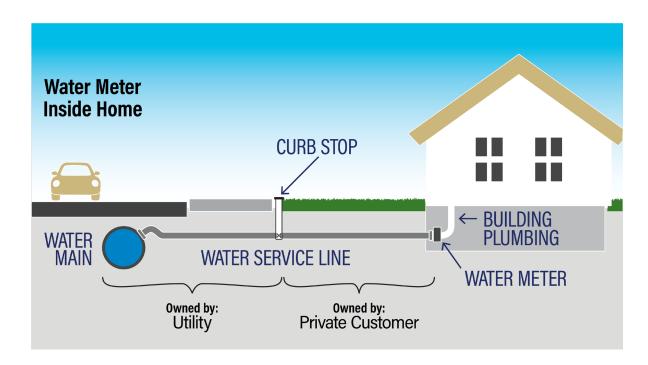
Two Public to Three Private Service lines

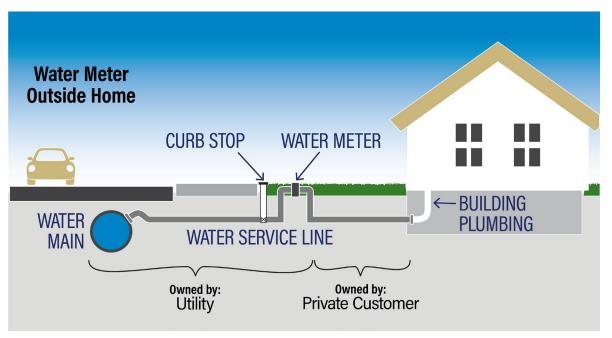
Service Lines that Do Not Enter a Building

Military Base Example

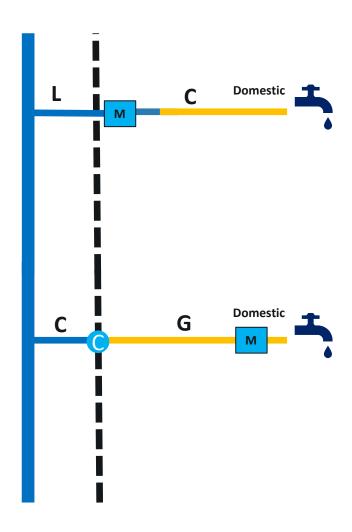
Service Line Definition

"...connects the water main to the building inlet"



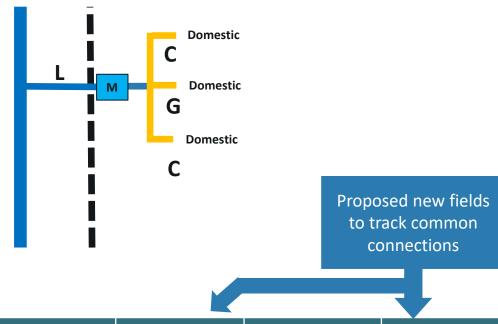


1. Public Main with Single Meter and Public/Private Service (Ideal Scenario!)



Address	ID	SL Overall	Public Material	Customer Material	Building Type
1 Main St	123	Lead	L	С	Single Fam
3 Main St	124	Galv	С	G	Commercial

2. Public Main with Multiple Facilities on a Parcel and Single Private Meter



Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St, unit A	123-1	Lead	L	123-A	С	123-B1	Mobile Home
1 Main St, unit B	123-2	Lead	L	123-A	G	123-B2	Mobile Home
1 Main St, unit C	123-3	Lead	L	123-A	С	123-B3	Mobile Home

2. Public Main with Multiple Facilities on a Parcel and Single Private Meter (One Public SL)



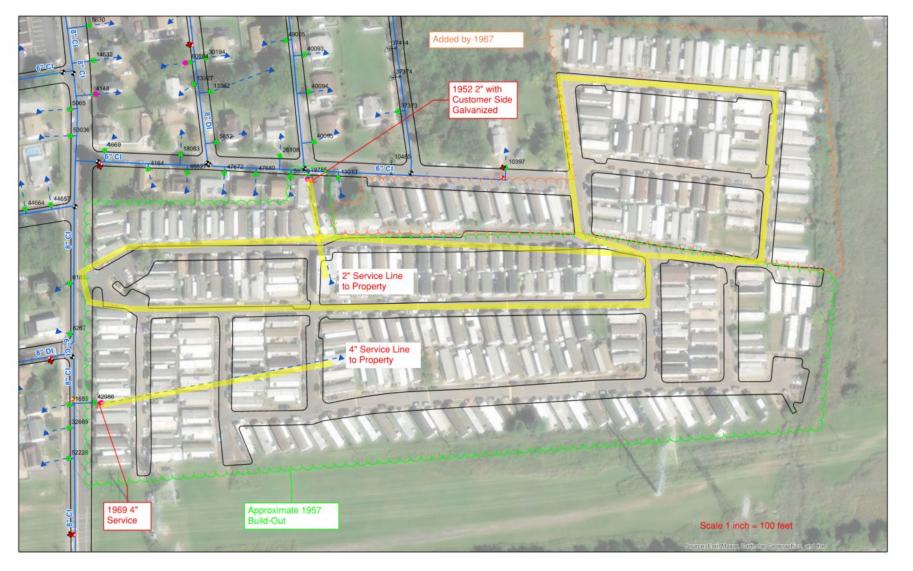
A service line
"...connects the water
main to the building
inlet"

2. Public Main with Multiple Facilities on a Parcel and Single Private Meter (One Public SL) – Recommended Approach



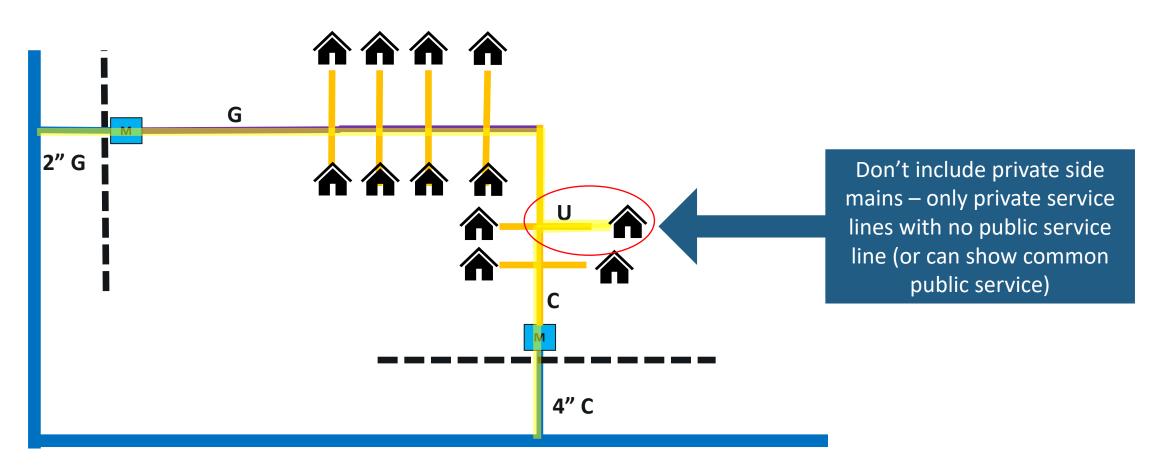
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St, unit A	123-1	UX	NA		UX	123-B1	Mobile Home
1 Main St, unit B	123-2	UX	NA		UX	123-B2	Mobile Home
1 Main St, unit C	123-3	Lead	NA		L	123-B3	Mobile Home
etc							

3. TWO Public Services to Private Mains to Several Private Services (Assume Looped)

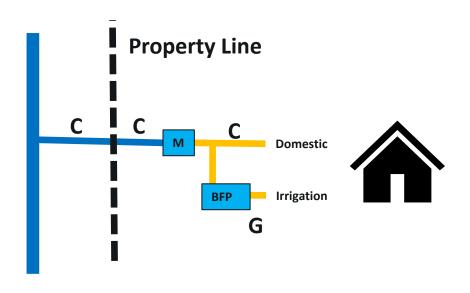


3. TWO Public Services to Private Mains to Several Private Services (Assume Looped) – Recommended Approach

Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St, unit B	123-2	UX	NA		UX	123-B2	Mobile Home

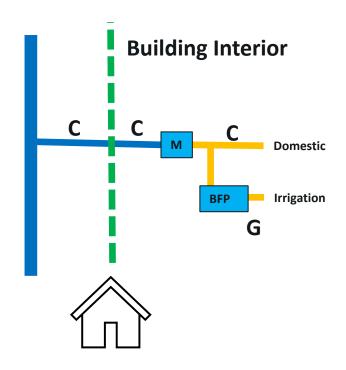


4. Public Main with Irrigation Downstream of Public Meter



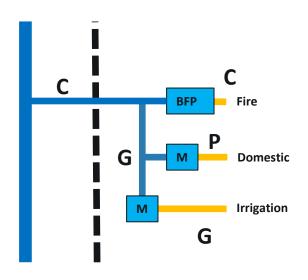
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St	123-1	NL	С	123-A	С	123-B1	School
1 Main St	123-2	Galv	С	123-A	G	123-B2	School

4. Public Main with Irrigation Downstream of Public Meter



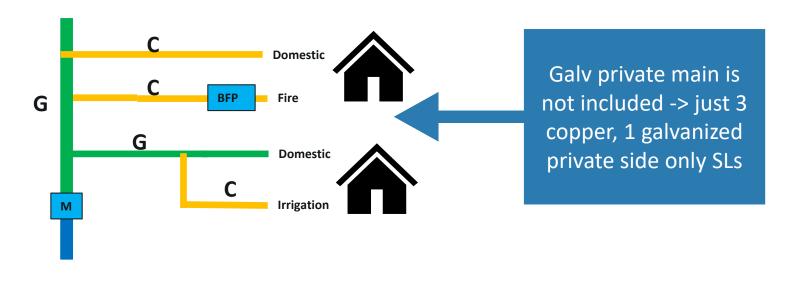
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St	123	NL	С	123-A	С	123-B	School

5. Public Main with Individual Public Meters (single connection at main)



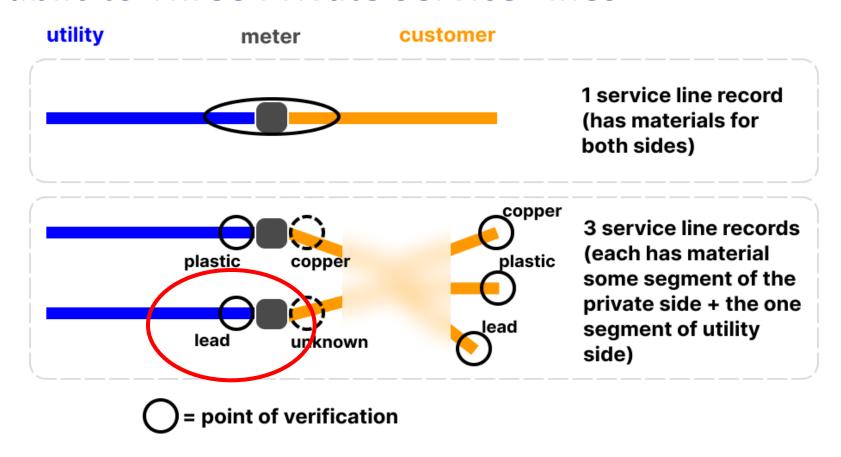
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St	123-1	NL	С	123-A	С	123-B1	Commercial
1 Main St	123-2	Galv	G	123-A	Р	123-B2	Commercial
1 Main St	123-3	Galv	G	123-A	G	123-B3	Commercial

6. Private Main with Master Public Meter and Multiple Facilities per Parcel – Recommended Approach



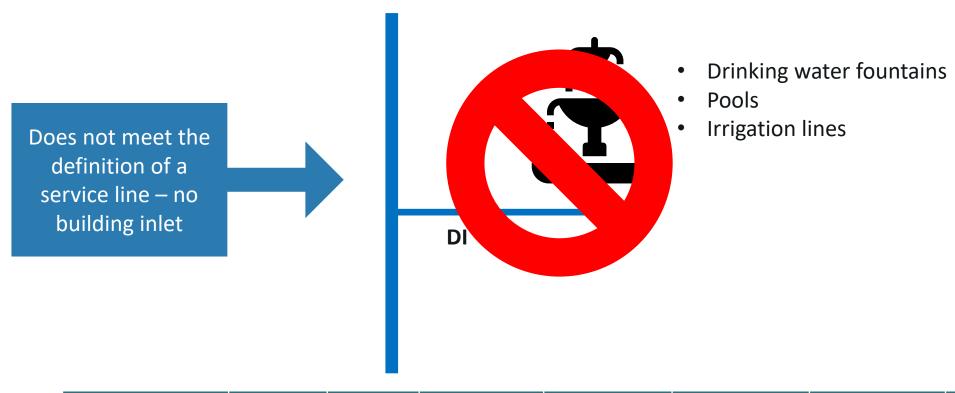
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St	123-1	NL			С	123-B1	Campus
1 Main St	123-2	NL			С	123-B2	Campus
1 Main St	123-3	Galv			G	123-B3	Campus
1 Main St	123-4	NL			С	123-B4	Campus

7. Two Public to Three Private Service Lines



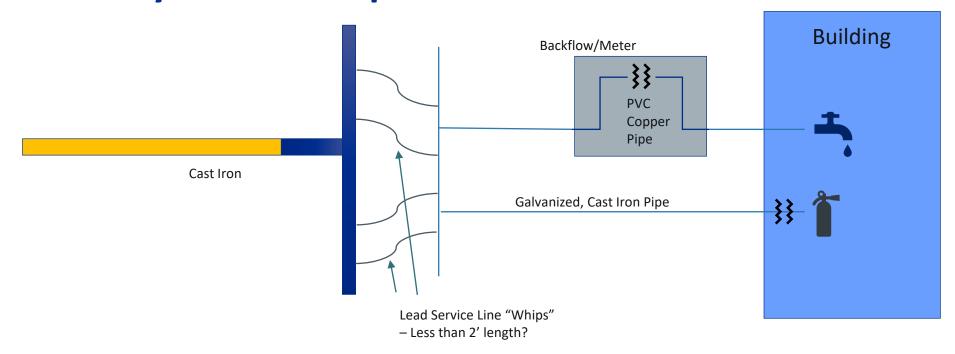
Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type
1 Main St	123-1	NL	С	123-A	С	123-B1	Residential
1 Main St	123-2	Lead	L	123-B	P	123-B2	Residential
1 Main St	123-3	Lead	L	123-B	L	123-B3	Residential

8. Service Lines that Do Not Enter a Building



Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type

9. Military Base Example



Address	ID	SL Overall	Public Material	Public Side ID	Customer Material	Customer Side ID	Building Type	Gooseneck
1 Liberty Ave	123-1		NA		NL	123-B1	Military base bldg.	Yes
1 Liberty Ave	123-2		NA		G (worst case)	123-B2	Military base bldg.	Yes

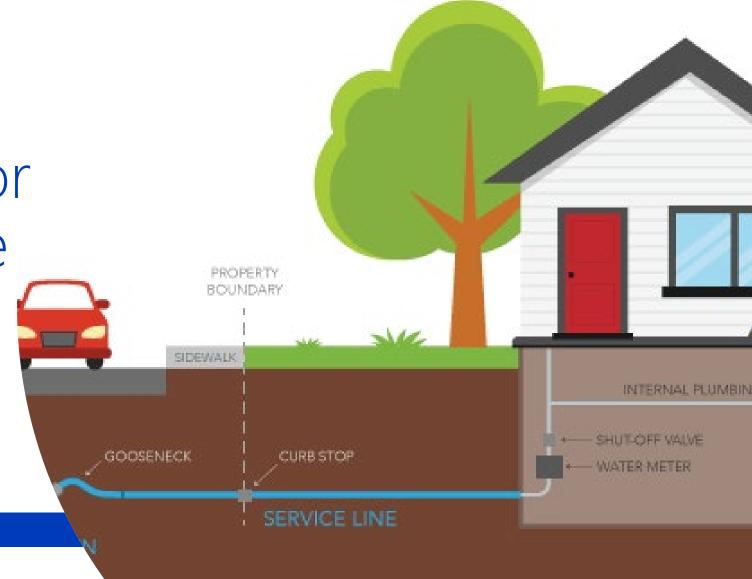
Summary

- When in doubt...remember the definition of a service line from main to inlet of building
- Recommendations presented herein confirm with your primacy agency
- If desire for accurate count of actual <u>pipes</u> on each side (public and private), track with unique IDs <u>per side</u>
- Add notes to inventory to make things clear to regulators
- Send a request to your regulators to add fields in the spreadsheet or add selections to dropdowns (i.e. private campus, private community, etc.)
- ...but first we need to GET the data on the private side...



LSL Inventory: Lessons Learned and Data Gaps for 2024 Compliance

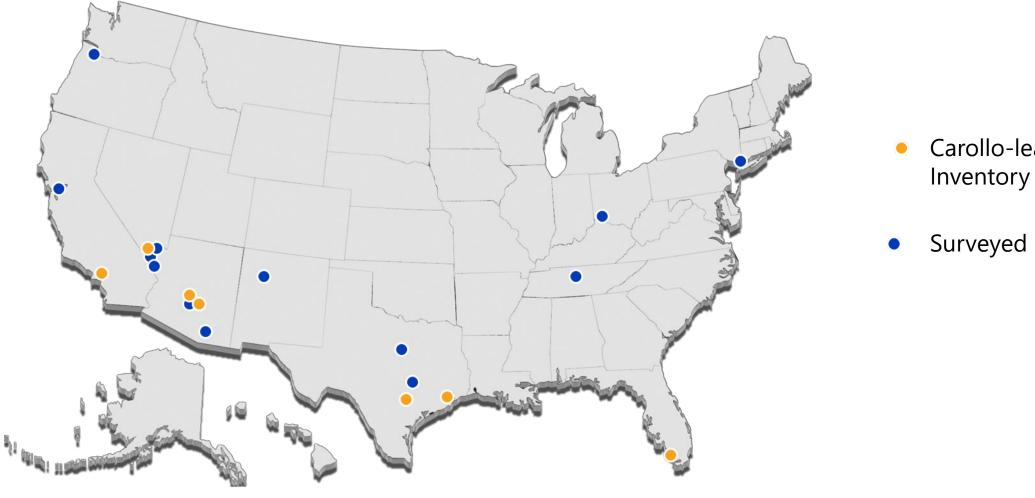
Caroline Russell, PhD, PE, BCEE



October 16, 2023



Carollo Is Helping a Diverse Group of Water Systems Develop their LSL Inventory



Carollo-lead LSL

Surveyed Utilities

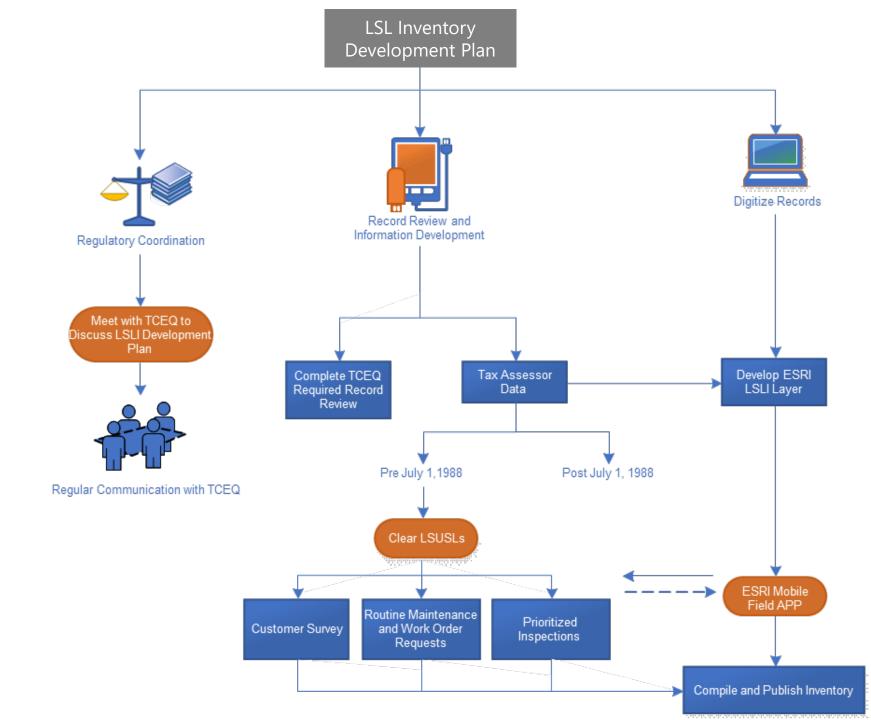
Variability in State Implementation Impacts LSL Inventory Development Approach

Property	AZ	CA	FL ⁽¹⁾	NV	TX	
Effective Date of Lead Ban	12/31/1987	1/1/1986	1/18/1989	9/30/1989	7/1/1988	
Pipe Diameter Criteria for Non-Lead		≥ 4 inches		> 2		
Methods Allowed for SL Material Ide	entification:					
Scratch/magnet & swab testing	•	•		ed on a case-		
Meter box inspection	•	•	basis. Eme	basis. Emerging methods require pilot testing		
CCTV	•	•				
Excavation	•	•	•	•	•	
Sequential sampling		(●)	•	(●)		
Predictive modeling (ML)		(●)	•	(●)		
Geospatial/interpolation	•	(●)	•	(●)		
Electrical resistance		(●)	•	(●)		

⁽¹⁾ FL is still developing its LCRR implementation approach; dots reflect federal guidance.

Three-Pronged LSL Inventory Development Approach

States vary on inventory submittal requirements.



EPA requires that all systems review records

(3) A water system must use any information on lead and galvanized iron or steel that it has identified pursuant to § 141.42(d) when conducting the inventory of service lines in its distribution system for the initial inventory under paragraph (a)(1) of this section. The water system must also review the sources of information listed in paragraphs (a)(3)(i) through (iv) of this section to identify service line materials for the initial inventory. The water system may use other sources of information not listed in paragraphs (a)(3)(i) through (iv) of this section if approved by the State.

(i) All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution

system.

(ii) All water system records. including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.

Construction/plumbing codes and permits

Historical records including maps and drawings

Service and meter installation records

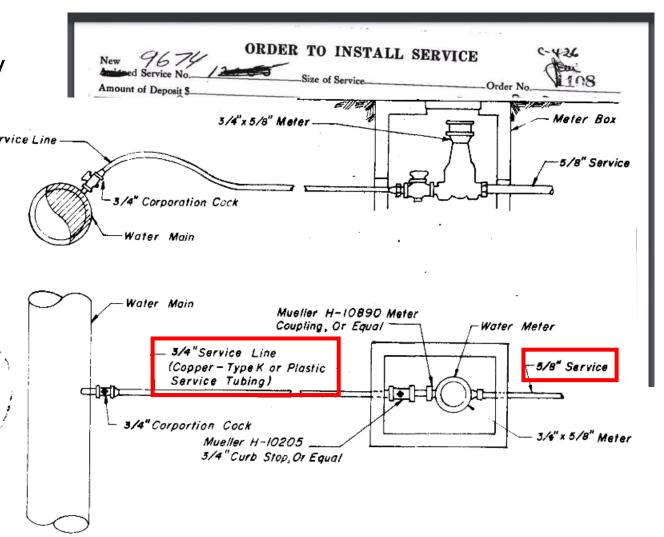
Other resources required or approved by the Primacy Agency

Records Identification Can Be Challenging

• Information often exists across City departments and even agencies

Tax assessor records provide an^{3/4} clearing LSUSLs

- » For one county, the records w available in a consolidated fo
- Available records that provide usinformation vary across systems
 - » None of the systems we work cards



__

Recommendations

- Initiate public outreach early
 - » Many systems will have significant # of LSUSLs
- Take the time to thoroughly review records; this step checks a box for LCRR compliance and may save time in the long run
- For field inspections, start with a <u>pilot program</u> and meet with regulators for approval of recommended approach

October 16, 2023

Lead Service Line Inventories – Lessons Learned









Records Availability Varies Widely

Record Type	Utility 1	Utility 2
Plumbing code history	\	V
Construction and Plumbing Records (Permits)	\	×
Distribution system maps and drawings	×	~
Historical records for each service connection (tap cards)	×	~
Meter installation records	X	×
Historical CIP or master plans	×	×
SOPs	×	~
Distribution system inspections and records	×	×

Document Everything Reviewed For Future Reference

- If records are too inaccurate to use, document review and why they aren't used
 - Different levels of confidence in each type of record
 - Different levels of confidence for specific date ranges
- Document which records don't exist
- Some records that may not be sufficient to use on their own, could still provide evidence towards classification
- Don't wait to get started these efforts can take time

Customer Surveys Benefit from Additional Education

- Educate customers about service line identification
 - Utilities have received photos of gas lines, dryer vents, etc
 - Swab kits May have been tested on lead solder
- Rather than asking for service line materials, ask for photos or permission for trained utility staff to inspect.
- Keep it Simple!



Photo submitted in response to Customer survey

Obtaining Agreements Can Be Challenging

- Customer responsiveness
 - Letters < Door hangers < Utility staff going door-to-door
- Getting access agreements signed for potholing has been much slower than getting initial volunteers.
 - Minimize the need for access agreements
 - Obtain signatures during the same initial outreach to ask for permission to pothole.



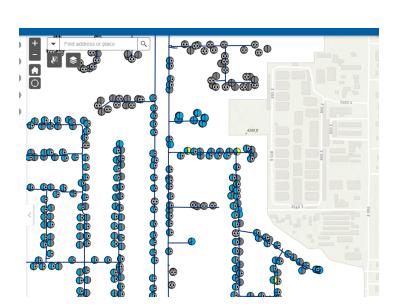
Statistical Approach to Field Verification May Be Helpful for Systems with No Known LSLs

- If systems have LSLs or GRR, use of statistical selection of field verification sites may not be possible.
- If LSLs are found in the random verification, further categorization may be used to help verify that certain bins are non-lead (state dependent).



Early Planning for Data Management Can Provide a Smoother Process

- Involve GIS people early
 - Many different ways to structure data
 - Anticipate data entry methods (e.g. tablets, etc.)
- Publishing maps early provides better customer involvement
- ESRI template needs to be customized for State requirements
- Additional data fields
 - Level of confidence in classification
 - Lead goosenecks
 - Compliance site (Tier)
 - Past compliance site



Overall LCRR Approaches Will Vary

Location	No. LSL	No. Lead Status Unknown	Verification Method
Utility 1	0	10-400	Potholing
Utility 2	0	11,023	Premise plumbing investigation, statistical verification, tap cards
Utility 3	0	20,808	Meter pit inspections, statistical verification
Utility 4	28,000	72,000	Focus on good corrosion control and systematic replacements
Utility 5	64,000 - 84,00	0 expected LSL	Systematic potholing and replacements to maintain >7% per year schedule



Thank you.

Questions?





Service Line Inventories



Lessons Learned



1. Identify Team, Roles, Goals & Responsibilities Early



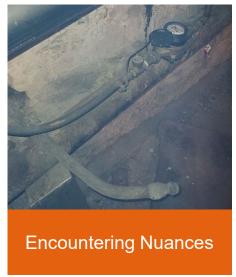
2. Align Approach with Goals & Guidance



3. Document Methods & Outline Plan







Service Line Inventories





Monroe County Water Authority Water Service Line Material Inspection

DATEADDRESS	
An investigation of the material of y Material(s) Identified: Lead Galvanized steel Copper	our water service line was completed a Plastic Material could not be dete
If lead or galvanized m	aterials were identified:

MCWA will contact you within the next five (5) business days to discuss next steps. In the meantime, please review the enclosed fact sheet containing simple tips to reduce lead exposure in your home. More information and frequently asked questions are available on our website at www.mcwa.com.





Water Service Line Investigation Notification

The Monroe County Water Authority (MCWA) is working to identify the material of water service lines as part of our Water Service Line Inventory, a regulatory requirement. Our contractors will be in your neighborhood in the coming days to conduct water service line investigations.

WHAT TO EXPECT

MCWA contractors Arcadis and Villager Construction will expose your water service line in the vicinity of the property line, near your shut off valve. You do not need to be home during the investigation and your water service should not be interrupted. Results of the investigation (service line material determination) will be left at your door the same day. Restoration of the area will be completed following the investigation.



Questions? Please contact Monroe County Water Authority 585-442-7200

M-F, 8:30am-4:30pm







1. How to approach inventories for systems with no suspected lead



2. Planning for unknowns: timing, communication, process



3. Funding guidance & connection with regulatory process

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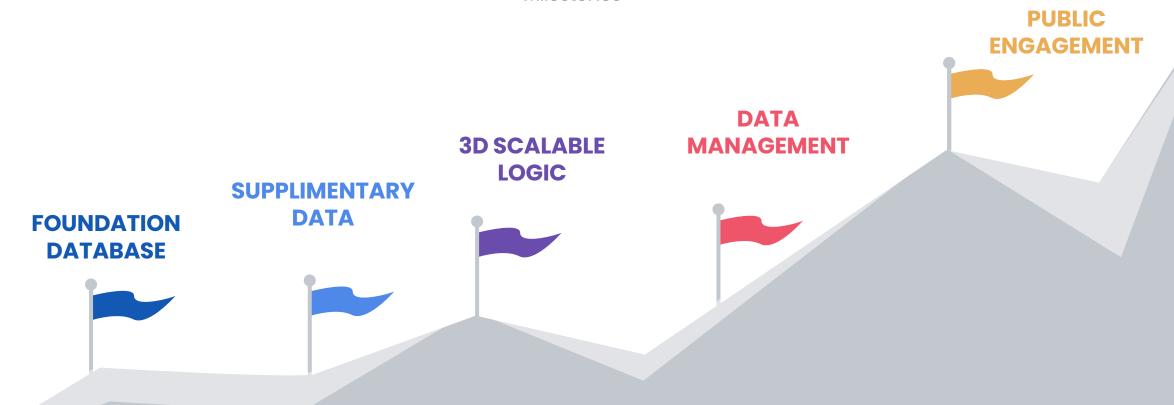
Charting the Course: A Roadmap for Lead Service Line Inventory Management

Kiran Udayakumar



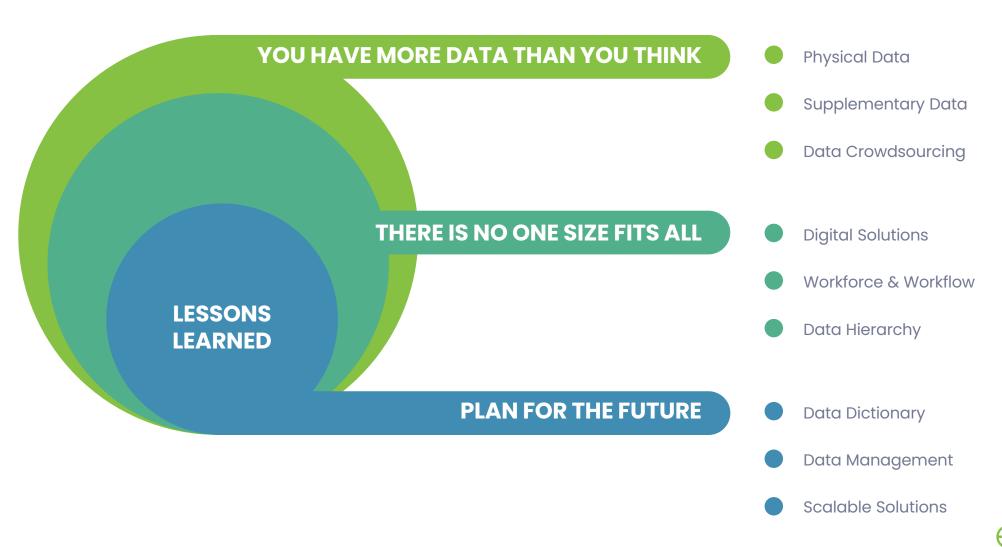
LEAD SERVICE LINE INVENTORY

Milestones



LEAD SERVICE LINE INVENTORY

Lessons Learned & Data Gaps





YOU HAVE MORE DATA THAN YOU THINK



Customer Billing System

Customer billing system will provide the most accurate base information of service area



Tax Parcel

County tax parcel can enhance that information with supplementary data



Data Clearinghouse

Data clearing house are available to add meta data



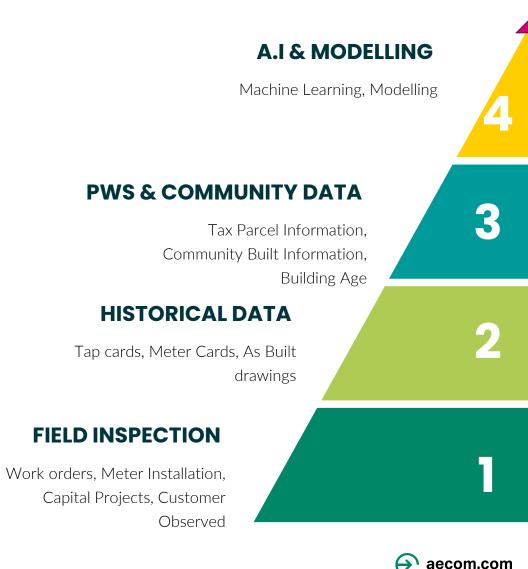
As-Built Information

As-built information can enhance the inventory with surrounding assets



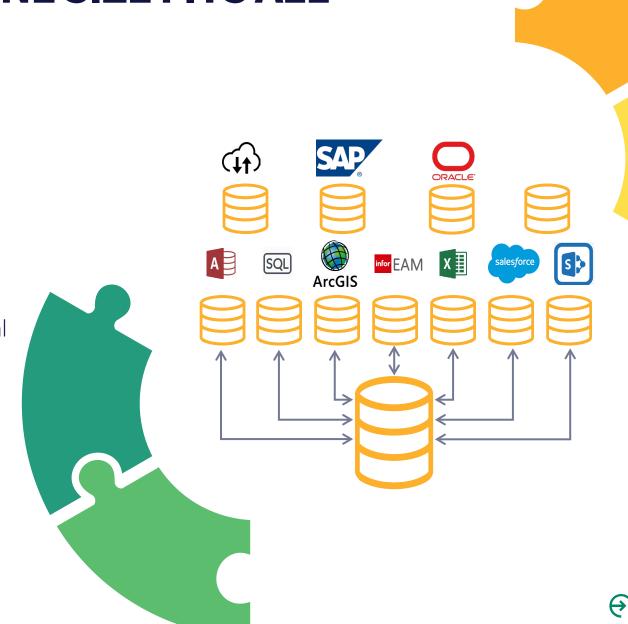
Work Order Management

Work order management system adds QA/QC



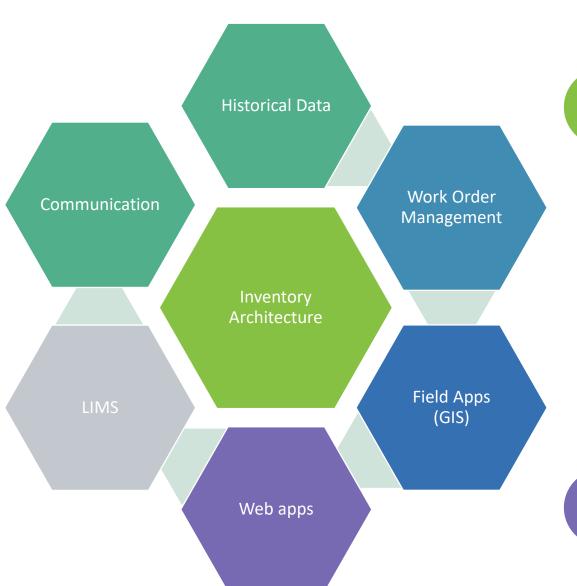
NO ONE SIZE FITS ALL

- Finding an ideal program that works is tedious
- Customized workflow adaptations with key stakeholders
- Building custom digital solutions are ideal
- Data hierarchy helps
- Scalability is key





PLAN FOR THE FUTURE





Data dictionary help you identify & supplement data



Data Management

Establishing data management protocols is key



Scalable solutions

Having solutions that can be scaled in the future



Customer Communication

Customer communication helps improve your inventory.



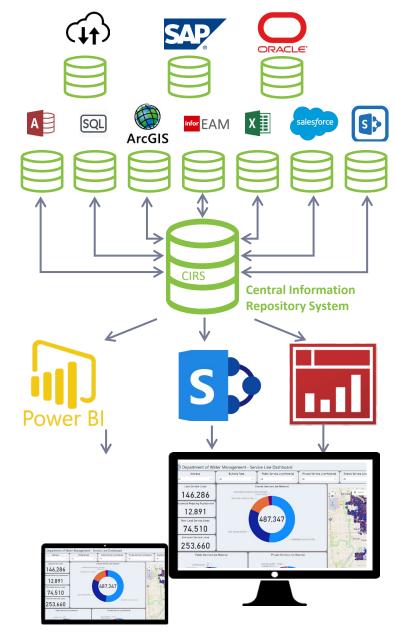
Federal & State Regulations

Accounting for regulatory changes



Chicago Case Study

- ~489,000 Service lines
- Large amounts of physical & digital data
- CIRS Central Information Repository System
 - Integration between platforms
 - Data transfer between platforms
 - Supplementary data storage
 - Customized tables & views
- On Premise System
- Private Network with Web Interface
- Customized Security & Access
- Current Data
 - Approx 12,000,000 Work Orders available digitally
 - 5,000 unique data fields
 - Over 18 different data input platforms





Chicago Data Dictionary

Category	Confidence Value	Туре	Example Source(s)	Fields	Public or Private
	100	Service Installation Records	Homeowner initiated LSLR, Equity LSLR, WSI-W601, etc.	Material, Size/Diameter, Install Date	Both, either
	101	Resident Engineer field verified with photos	CIP	Material, Size/Diameter	Both, either
	102	Meter shop field verified	Meter / Meter vault app	Material, Size/Diameter	Both, either
Field Verified	103	WQ Field Verified	WQ		
riela verifica	104	Plumbing inspector field verified	BAN		
	105	Foreman field verified	BOD		
	120	Plumbing inspection (post-WSI)	GIS as premise layer (records apps)	Material, Size/Diameter	Private
	130	Customer observed	WQWCA1, WQWCA4, self-identification website	Material	Private
	200	Identified from tap permit	Historical tap cards	Material, Size/Diameter	Public
Water dead Bare	210	Identified from meter card	Historical meter cards	Material, Size/Diameter	Private
Historical Data	220	Identified from as-built drawing	GIS data	Material, Size/Diameter	Public
	230	Rehab premits	DOB EAM		
SL Install Dates	400	Identified based on applied rule - lead ban	SL installation date and lead ban	Material	Both, either
	500	Identified based on applied rule - diameter larger than 2"	If only service size, diameter > 2" as non-lead	Material	Both, either
Service Size	510	Identified based on applied rule - new service diameter less than 2"	If only WSI - W601 service size, diameter < 2" as copper	Material	Both, either
Build Dates	600	Identified based on applied rule - lead ban	Year built and lead ban	Material	Both, either
	700	Based on association to surrounding features - water main installation date (original/new)	Water main GIS layer	Material	Public
	710	Based on association to surrounding features - water main material	Water main GIS layer	Material	
Surrounding assets	720	Based on association to surrounding features - hydrant installation date	Hydrant GIS layer	Material	
	730	Based on association to surrounding features - hydrant manufacture date	Hydrant GIS layer	Material	
Building type	800	Identified based on applied rule - new service building type	W601 - If a new service SFH, 2-Flat, etc. then assume as copper	Material	Both, either



Questions?



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