

Positioning operations for future lead regulations and legislation



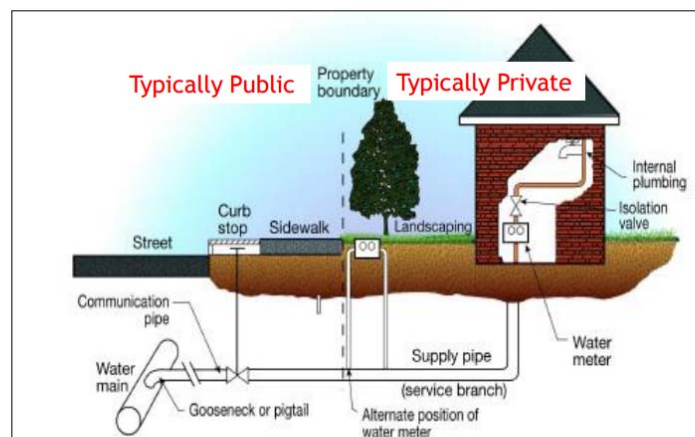
April 21 Water Research Foundation webcast

- Gave forecast for future EPA lead regulations, as recommended by the National Drinking Water Advisory Council.
- AWWA board unanimously endorsed recommendations of NDWAC
- Consensus is, while regulations will change somewhat from current recommendations, the presentation is more or less accurate.
 - We are three years or more from implementation.
 - EPA has announced a 2017 target date for revised LCR draft rule.
- Webcast: <http://www.waterrf.org/resources/webcasts/pages/PublicWebcasts-detail.aspx?ItemID=60>
- Slides: http://www.waterrf.org/resources/webcasts/Lists/PublicWebcasts/Attachments/60/042116Webcast_FINAL.pdf
- NDWAC recommendations: <https://www.epa.gov/sites/production/files/2016-01/documents/ndwaclcrwgfinalreportaug2015.pdf>

Primary change – mandated lead replacement

- Replacement of five percent of your lead service lines annually, meaning total replacement over 20 years, regardless of lead test results.
 - Time to develop accurate inventory, policies and communications programs!
- No partial lead line removal, but no credit for trying, either.
- Assumed lead line before certain dates.
- Three-year reporting on lead removal, with no penalty for failing to meet 15 percent at that time, but mandated additional steps to accelerate removal.
 - Additional incentives like financial credits to ratepayers and increased communications
 - Communications toolkit to be developed by EPA.

Lead Service Line Replacement Background



Source: Sandvig, A., P. Kwan, G. Kirmeyer, B. Maynard, D. Mast, R. R. Trussell, S. Trussell, A. Cantor, and A. Prescott. 2008. *Contribution of Service Line and Plumbing Fixtures to Lead and Copper Rule Compliance Issues*. Denver, Colo.: Water Research Foundation. Adapted with permission.

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Additional changes

- **Household Action level** of 5 ppb -- communication to homeowner and state/local health department.
- Rolling three year samples with customer complaint sampling included. System action level remains at 15 ppb. Failure to meet that means increased removal pace and communications/incentives mandated.
- Goosenecks would only be replaced if exposed during construction or leak repair.
- Split in lead and copper rule
 - Lead is a risk in older homes, while copper is a risk in newer ones
 - Copper – source water corrosivity

Lead-related bills

PA LEGISLATURE

- HB 1917 – would mandate blood testing for lead in children under 6. House Health Com.
- HB1918 – require more sample sites for water systems' lead testing, would increase testing to annual. House Environmental Resources and Energy Com.
- SB 16, creation of a "lead task force" to study issue and make recommendations –Senate Appropriations
- SB 17, testing for lead in schools – Education Com.
- SB 18, mandates lead testing for day care facilities – tabled
- SB 20, disclosure of lead paint and lead service lines in real estate transfers – tabled
- Lead "superfund" bill in draft

CONGRESS

- [H.R.4542](#) - Low Income Sewer and Water Assistance Program Act of 2016
- [S.2466](#) – Mandate EPA secretary to inform public if state agency or Public Water System are not properly addressing public health risks.
- [S.2848](#) – Currently requests \$170 million for Flint, requires 20 percent match. \$100 m grant, \$70 m subsidies

Model communications programs

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The Lead Replacement Incentive Program

 - Lead Services Map
 - Lead Hotline
 - Brochure
 - Offer \$2,000 credit
 - http://www.bwsc.org/SERVICES/Programs/Lead_Brochure.PDF
 - http://www.bwsc.org/COMMUNITY/lead/lead_toc.asp
 - <http://www.awwa.org/portals/0/files/resources/publicaffairs/pdfs/finalleadservicelinecmmguide.pdf>
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 - Scratch test, laboratories, requesting removal
 - Offers \$1,000 rebate
 - 11-year program
 - <http://www.cityofmadison.com/water/water-quality/lead-copper-in-water/lead-in-water-what-you-should-know>
 - <http://www.denverwater.org/docs/assets/0E69107-146D-01CB-0C63DF-666073CCB0/lead-flushing-instructions.pdf>

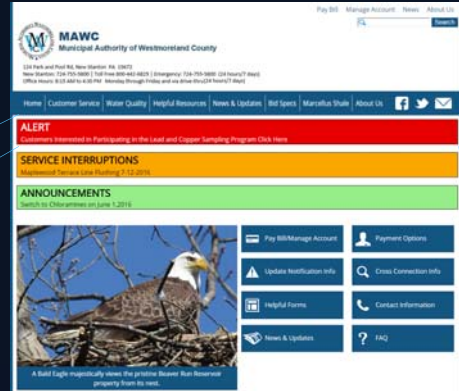
Removal cost ranges/estimates

- May not be typical, but ...
 - Madison, Wisconsin; 5,500 lines, cost just under \$20 million
 - Lansing, Michigan; 14,500 lines, cost \$40 million
 - Projected cost
 - Flint, Michigan; 15,000 lines, projected to cost \$55 million
 - Math says, approximately
 - \$3,600 per line in Madison, \$2,750 in Lansing (where they own the entire line)
 - Flint, Michigan estimating \$3,700 per line ... inflation?
- Estimated cost, nationwide \$30 billion

https://www.washingtonpost.com/national/health-science/one-citys-solution-to-drinking-water-contamination-get-rid-of-every-lead-pipe/2016/05/10/80cd842-0814-11e6-bdc6-a2394a121701_story.html

MAWC policies and approaches to LSLs

- MAWC won't reconnect to LSLs
- Examining account cards
- Discussing prevalence of LSLs with distribution
- Developing policy, i.e. – incentives
- Identifying additional sample sites
- Mandatory LSL field for meter readers
- Customer Education



ALERT

Customers Interested in Participating in the Lead and Copper Sampling Program Click Here

Potential Funding Mechanisms

- Existing
 - Community Development Block Grants (CDBG or CD)
 - Run through counties or municipalities, typically used for street repavings, economic development projects
 - Weatherization
 - Redevelopment
 - Health Departments
- Future
 - Lead Superfund bill-PA Legislature
 - LIHEAP-style water bill from Congress
 - **Water Infrastructure Finance and Innovation Act Program (not funded yet) \$20 million or more**
 - Bring Back WAMs like DEP Safe Water grants
 - From you

