

TO: Commissioners Carlson, Barofsky, McRae, Schlossberg, and Brown  
FROM: Mike Masters, Water Operations Manager; Karen Kelley, Chief Operations Officer  
DATE: June 21, 2023  
SUBJECT: Lead and Copper Rule Revisions  
OBJECTIVE: Information

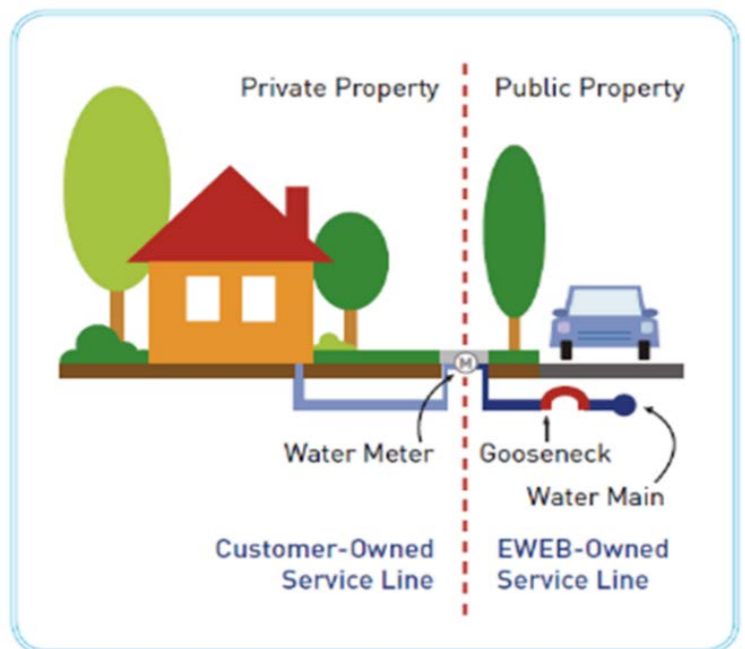
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**Issue**

There are updated drinking water regulations regarding the Lead and Copper Rule Revisions that will impact several of the departments in Water Operations. The following is a summary of those revisions and the Water Division’s current plan for compliance.

**Background**

In December 2021 the US Environmental Protection Agency finalized revisions to the Lead and Copper Rule. On February 1, 2023, the Oregon Health Authority (OHA) permanently amended Oregon Administrative Rules to add lead service line inventory requirements. EWEB must submit a lead service line inventory no later than October 16, 2024. This inventory includes **both the utility side of the meter and the customer, or privately owned, side of the meter.** Further rule improvements, known as the Lead and Copper Rule Improvements (LCRI), are expected from EPA sometime in 2024. The Oregon Health Authority has indicated that they will continue to adopt these improvements as they are released by EPA. Water Operations will be working to comply with all parts of this revised rule for several years to meet the compliance requirements.



**Discussion**

EWEB has approximately 64,000 service lines in our distribution system, each line having 2 sides, both utility and customer for a total of approximately 128,000 sections. We have no **known** lead service lines in our system. We have been working on identifying all Unknown Material Service Lines for many years. Currently we have 97.4% of our EWEB owned service lines identified and 32.3% of our customer owned lines identified. EWEB has discovered a small number of lead goosenecks over the last 2 decades. These lead goosenecks were found on properties developed prior to 1940 and were immediately replaced. These types of connectors are not considered lead service lines under the EPA Lead and Copper Rule Revisions.

The Oregon Health Authority recently approved Statistical Analysis by Random Selection as a way of completing the initial lead service line inventory. Water systems must physically verify enough lines to reach a minimum 95% confidence level.

Using our Service Line map application, built by EWEB's GIS department, we can calculate our 95% confidence value, generate a random list of services and systematically plan our visits to each site. Shown below are the number of Unknown Services in our distribution system. The purple lines designate EWEB side and the orange lines designate customer side. If the home shows only the orange line, then only the customer side is unknown, if the orange and purple lines are showing then both sides of the meter has unknown material.



Water Operations has assigned a crew to physically identify the service line material from the list of 381 randomly selected services. This work is currently scheduled to start in early July 2023. All data will be entered into our service line map application and stored in our GIS system for permanent record retention.

If a lead service line is found on the EWEB side, we will immediately replace the service. If a lead service line is found on the customer side, we will immediately work with the customer on funding options to get their service replaced. For both sides of the service line, we will provide information, flushing instructions and a pitcher filter that removes lead. We will also perform several rounds of lead testing to give customers the opportunity to make informed decisions.

When the excavation work is done, we will generate a completed list of all water service lines, in an OHA specified format, to submit as a final report. OHA recommends that all systems continue identifying unknown service line material “during the course of normal operations” to ultimately create a complete inventory with all service lines identified. Currently, EWEB is required to resubmit a report every 3 years detailing this progress. EWEB will be required to make the service line inventory publicly available. The method in which we will do that is dependent on the results of the Statistical Analysis Project.

**Recommendation**

This memo is for information and awareness only. As we work towards compliance, communication and collaboration with our customers will increase. We will keep the Board routinely apprised of progress.

**Requested Board Action**

No action requested as this is for information only.