Service Line Inventory & Webpage Information

Amy Bleekman, REHS Oregon Health Authority Drinking Water Services October 10, 2024



Presentation Overview

- Brief review
- Statistics
- Issues-Challenges-Other Stuff
- Resources-Web Site-Consumer Notices
- Funding specific to Lead Service Lines
- Technical Support Coordinator
- Questions





Lead and Copper review



- Lead and Copper Rule Revisions (LCRR) finalized in 2021
- Lead and Copper Rule Improvements (LCRI) proposed 12/2023, release on October 8, 2024
- Service line inventory requirements:
 - Inventory of ALL services lines due October 16, 2024
 - Categorize lines as Lead, Non-lead, Galvanized requiring replacement (GRR) - downstream of lead, or unknown
 - Goal: identify and remove any lead service line or GRR
- Consumer notification and public education will be done per original LCRR until LCRI is reviewed



Oregon's Lead Ban

- In July 1985, Oregon banned all future use of lead components in public water systems
- There *should not* be any <u>known</u> lead components in a PWS (public side)
- Service connections installed in 1986 or later will be considered non-lead.



Statistics



Statistics

- Public Water Systems numbers:
 - Total systems (including OVS): 3,305
 - Lead Service Line Inventory applies to:
 - Community = 933
 - -NTNC = 349
 - Combined = 1,282
- Date first inventory was received: March 2, 2023, from Wickiup WD



Statistics Continued

Number of submissions by month:

Year	Month	# Entered & In Review			
2023	March	1			
2023	April	0			
2023	May	11			
2023	June	6			
2023	July	3			
2023	August	1			
2023	September	3			
2023	October	6			
2023	November	17			
2023	December	5			
2024	January	12			
2024	February	10			
2024	March	14			
2024	April	15			
2024	May	20			
2024	June	21			
2024	July	32			
2024	August	83			
2024	September	173			
2024	October	94			
Total		527			

On September 25th we started using Smartsheet to distribute and track the inventories:

- -99 still in review
- -62 accepted
- -14 rejected

Still need approximately 655 inventories



Issues – Challenges – Other Stuff



Issues and Challenges

- Issues seen with submissions
 - Using EPA template instead of OHA's template
 - Creating their own template or submit a PDF
 - Reorganizing template and deleting sections they shouldn't
 - Not including all service lines
 - Large discrepancy in connections compared to data online
 - Filling out drop down options incorrectly (statistical)
 - Not filling out methodology tab
 - Unresponsive systems



OHA Template

	U	L	0	L				· · ·	· · · ·	
Lead Service Line	(LSL) Inventory			color key						revis
PWS ID (OR41#####)		Heal	th	Black - required	Summary					
PWS name		неа	Blue: mor	nitoring location determinations	Lead	GRR	Unknown	Non-Lead	Error*	
Operator submitting report			Authority	Green: good to know		0	0	0	0	
Date completed		- '	Purple: calcula	ted by spreadsheet - do not edit	and the second se	GRR=Galvanized requiring replace	-	<u> </u>	* resolve all errors pr	rior to s
Has lead pipe ever been		-	r urprer curculu	tea by spreadsheet ad not can		onn-ourvanized requiring replace	mene		resolve un errors pr	101 10 2
documented in the water										
system service lines?	No									
system service lines:	NO	_								
	Required for Lead service line inventory	1	1	1	1.	1	Useful for	tap monitoring lo	cation determination -	- OPTIC
					If customer service			Connector		
	Location Identifier	Water system owned service	Water System service line	Customer owned service line	line is galvanized,	Customer service line material	Service type of	material to	Interior plumbing	Isthe
Site ID	(Required for Lead and GRR status only -	line current material	material identification method	current material	was upstream	identification method	connection	water main (i.e.		treat
	optional for other service lines)	inte carrent material		carrent material	service line		connection	goosenecks)		, and a
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Example:	123 Example Way	Non-lead - UNK - post 1985	On site inspection only	Non-lead - unk - post 1985	No	Records only	Single family	Non-lead	Copper	No
1										
										+
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1										
					L	1				+
✓ ► Descriptions In	wentol				: •					Þ



Where to find on Data Online

More information for this water system: SDWIS ID 3499
System Info :: Report for Lenders :: Alerts :: Violations :: Compliance & Enforcement :: Contacts & Advisories :: Site Visits :: Public Notice
Coliform Summary :: Coliform Results :: Coliform Schedules :: LT2 :: GW/GWUDI Source Details :: Plan Review :: Annual Fee
Chemical Summary :: Chemical Results :: Chemical Schedules :: Chemical Schedule Summary :: Arsenic RAA :: Cyanotoxins :: PFAS
Lead & Copper : DBP Sample Sites :: FANLs :: MRDL :: GWR 4-Log :: Turbidity :: SWTR :: LRAA :: DW Source Protection
New! Visit our new Drinking Water Source Protection page.





Inventory that has been submitted and accepted

Oregon Public Health Drinking Water Data Online								
Introduction :: Data Search Options :: Water System Search :: DWS Home :: DWS Rules :: Quick Data Links								
PWS ID: 00994 RIVERWOOD MHP LANE CO OR41 Lead & Copper OR41								
More Information Summary Results Detailed Results Corrosion Control Service Lines Service Line Inventory Service Line Inventory Service Line Inventory Service Line Inventory								
Report Date	Report DateLeadCalvanizedLeadTotalRequiringStatusNon-leadNumberReplacementUnknownReported							
9/26/2024	0	0	0	126	126			
This system has 1	120 connections							

-

See Also

- Service line inventory resources
- Service line inventory summaries for all water systems



Next

- Depending on water system size, inventories may need to be made available to the public if there are any Lead Service Lines or Galvanized Requiring Replacement
- Most likely future inventory submissions will be required
- Must include ALL service connections: residential, commercial, branched, etc.
- Eventually, all unknowns must be identified. A system can list service lines without documentation as "lead status unknown" in the initial inventory, but unknowns must be determined



Making the inventory accessible

- Water systems 50,000 and over in population must have the service line materials inventory publicly accessible if there are unknowns, LSLs, or GRRs
- Water systems under 50,000 population are not required to post online but the inventory must be publicly accessible – water system newsletter, snail mail, posted in an office, social media, etc.
- For LSL and GRR: The inventory must include an associated location identifier, such as a street address, block, intersection, landmark or GPS



No Lead Service Lines or GRR's

- Water systems serving 50,000 or more people must post a written statement instead of making the inventory publicly available online.
- Water systems serving 50,000 or fewer people are not required to ۲ post their inventories online, as long as they are publicly accessible in some fashion. This may include availability by mail or in-person at the water system's office. Providing online inventory access is encouraged. For smaller water systems that do not currently have a website, providing their inventory online could be as simple as uploading a list, spreadsheet, or a simple map to a free filesharing service or publicly viewable social media account for the system. NTNCWSs that do not have a website could consider using email, posting the information in frequented locations (e.g., breakroom or notice board), or include the information in a newsletter. In addition, systems that do not have a website can check if their state has an option to host the inventory.

Resources-Website-Consumer Notices



Resources

- Two hands-on providers:
 - OAWU: SW and Central OR 503-837-1212
 - HBH: North and Eastern 503-554-9553
- Free to systems serving <10,000 people
- Training and outreach on service line inventory, methodologies, and reporting requirements
- Individual assistance to public water systems
- Receiving assistance is voluntary
- Alternative inventory submission vendor 120Water: Data portal



Resources

- Records review
- Records compilation
- Use of spreadsheet to track data
- Develop a strategy for identifying unknowns
- Assistance with reporting
- Will not conduct physical inspections/ excavation
- Check <u>www.oregon.gov/lcrr</u> to get help!









Oregon Drinking Water Services

Working to keep drinking water safe for Oregonians

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out Ol	HA 🗕	Programs and Services		Health System Reform 👻	Licenses and Certificates 👻	Public Health 👻 Jobs 👻

Services

- <u>Cross Connection & Backflow Prevention</u>
- Emergency Planning and Response
- Groundwater & Source Water Protection
- Monitoring & Reporting
- Operator Certification
- Plan Review
- Drinking Water Funding
- Water System Operations
- <u>Capacity Development</u>

Resources

- <u>County & Department of Agriculture Resources</u>
- Data Online
- Domestic Well Safety Program
- Drinking Water Advisory Committee (DWAC)
- For Consumers
- Online Maps
- Rules & Implementation Guidance
- Training Opportunities
- Site Map
- <u>Contact Us</u>

✤ News and Hot Topics

- Link
- New! Drinking Water Source Protection Award
- Disadvantaged Community Definition Virtual Open House
- Per- and Polyfluoroalkyl Substances (PFAS) Rule
- 2024 Source Protection PPL
- Annual Water System Fee Info
- Startup tips for seasonal systems
- Bipartisan Infrastructure Law Funding
- Compliance Monitoring Data Portal
- Current Rulemaking: Proposed Rule Amendments
- Cyanotoxin Resources for Water Systems
- DWS Annual Compliance Report
- LCRR Service Line Inventory Requirements
- Wildfire Information for Water Systems
- View archived hot topics and news items



Resources: Drinking Water website



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Resources:

Drinking water website (cont.)

Oregon Drinking Water Regulations

Drinking Water Rules

Oregon's Drinking Water Quality Act and Administrative Rules for Public Water Systems serve to ensure safe drinking water for Oregonians.

Rule Implementation Guidance

Service Line Inventory requirements in the Lead and Copper Rule Revisions (LCRR)

The Lead and Copper Rule applies to all community (CWS) and non-transient (NTNC) public water systems. EPA adopted revisions to the Lead and Copper Rule in 2021 that include a requirement for public water systems to conduct inventories of service lines and to identify service line material type. The intent of the service line inventory requirement is to identify those service lines made of lead so that they can be scheduled for removal and replacement.

Public water systems must conduct an inventory of all service lines, on both the water system side and the homeowner side of the meter, and to submit the results to OHA– Drinking Water Services (DWS) by October 16, 2024.



Resources: Drinking water website (cont.)

Drinking Water Services

Rules and Implementation Guidance

Lead and Copper Rule Revisions

Per- and Polyfluoroalkyl Substances (PFAS) Rule

Oregon Very Small Systems

Ground Water Rule

Long Term 2 Enhanced Surface Water Treatment Rule (LT2)

Stage 2 Disinfection Byproducts Rule

Contact Us

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Frequently Asked Questions (FAQ) - Updated September 2024

Update includes clarifying when a galvanized line can be classified as non-lead.

 Statistical Guidance for Evaluating Unknown Service Lines - Updated April 2024 (for Community public water systems only)

 Update includes revised Appendix A (number of lines requiring inspection).

Provide the second seco

This training module is intended to assist water system personnel operating a Community or Non-Transient Non-Community water system with completing their inventory. Please note that this presentation contains an audio commentary for each slide and is a very large file. As a result, the download will take several minutes to complete even for those with a high-speed data connection.



Resources: Drinking Water Website Cont.

Inventory Templates and Online Data Portal Information (must submit inventory using either one of the templates below or the online data portal)

- For Community public water systems (updated September 2024)
- Community public water systems (under 40,000 connections)
- End For Non-Transient Non-Community public water systems

To submit your inventory, please email the Excel file to DWP.DMCE@odhsoha.oregon.gov.

Online data portal

OHA has contracted with <u>120Water</u> to create an online data portal for all Community (CWS) and Non-Transient (NTNC) public water systems in Oregon that are required to complete the service line inventory. This service is provided free of charge to Oregon water systems required to complete the inventory, and the service includes technical support for users of the portal.

Water systems will be granted access to their accounts after completing the free training program.

- Jertal Information: 120Water Oregon Training Resource
- Register for training: https://120water.com/or-state-training-registration-qr/
- Portal questions and support: email support@120water.com
- · Telephone: 1-800-674-7961



Resources: Drinking Water Website Cont.

Service Line Inventory Technical Assistance

Assistance is available from three organizations to assist your water system in completing and submitting the service line inventory. Information will be sent to water systems relaying contact information and how they can assist you with the inventory requirement. You can check the Excel file below to see your water system vendor information.

- Zone 1 (mostly SW Oregon South of Salem)
 - Oregon Association of Water Utilities (OAWU): 503-837-1212
- Zone 2 (mostly NW to NE Oregon)
 - HBH Consulting Engineers: 503-554-9553

Funding Resources

BIL Lead Service Line Replacement (BIL-LSLR) Funding

OHA in partnership with Business Oregon is intending to apply for federal funding to support lead service line inventory work and for the replacement of lead service lines, galvanized requiring placement and connectors. Eligible water systems include publicly and privately owned community systems and non-profit non-community systems.



Inventory not Submitted?

- A Tier 2 (30 days) public notice will be required to be sent out and a treatment technique violation will be issued on the water system.
- This includes all unresponsive systems.



Unknowns and Galvanized requiring replacement (GRRs)

 Until the unknowns are identified, they must be treated as a lead service line until it is identified or replaced

Which requires:

 Targeted customer notification 30 days after inventory is complete (or Nov 15th, 2024), and annually



Resources: Drinking Water website cont.

Resources and Forms

Drinking Water Services

Monitoring and Reporting

Laboratory Lists and Reporting Information

Resources and Forms

Consumer Confidence Reports

Health Effects of Contaminants

Contact Us

Compliance Monitoring Data Portal

Lead and Copper

Community-Wide Notification Template for Community Water Systems (CWS)

• Entire CWS exceed lead action level exceedance Tier 1 public notice template MS Word -or- MPDF -or-

MS Word Spanish

• Exceedance Sheet: Requirements for Tier 1 Public Notice Following a Lead Action Level Exceedance

- Service Line Inventory (lead, GRR, unknown) line classification public notice MS Word
- Lead and Copper Public Education Requirements: If lead is present above the action level, public education must be delivered to water users. For brochure templates and other public notice materials, visit <u>Public Notice Resources & Templates</u>.
- *3 templates available within the document



*Pathway: Drinking Water Services-Monitoring and Reporting-Resources and forms-Lead and Copper

Scroll down to Lead and Copper

Public Notices

United States Environmental Protection Agency Templates for Notification of Known or Potential Service Line Containing Lead

Notice of confirmed lead service line

<u>< Public Water System (PWS) name ></u> is focused on protecting the health of every household in our community. This notice contains important information about your drinking water. Please share this information with anyone who drinks and/or cooks using water at this property. In addition to people directly served at this property, this can include people in apartments, nursing homes, schools, businesses, as well as parents served by childcare at this property.

< PWS name > has determined that < a portion of or the entire > water pipe (called a service line) that connects your < home, building, or other structure > to the water main is made from lead. People living in homes with a lead service line may have an increased risk of exposure to lead from their drinking water.

< The figure below represents a typical scenario for a residence in many cases but does not represent all scenarios. Water systems may wish to replace the image with one of their own or remove it.>



Resources: public notice template titles

- Notice of confirmed lead service line
- Notice of confirmed galvanized service line (that is or was downstream of a lead service line)
- Notice of unknown service line material



Funding



Bipartisan Infrastructure Law (BIL)

- Money is coming to states to fund lead service line replacements. Funding will be in the form of loans with low to 0% interest rates. For Disadvantaged communities, a portion of the loan (potentially as much as 49%) will be provided as principal forgiveness
- If lead service lines are found, BIL funding will be available to fund replacement. (Including a GRR if it ever was or is currently downstream of any known lead service line



Bipartisan Infrastructure Law (BIL)

 For details on Lead Service Line Replacement Funding, including what is eligible, see our Lead Service Line Replacement Eligibilities Handout located on our website:

https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRI NKINGWATER/SRF/Pages/bil.aspx



Bipartisan Infrastructure Law (BIL)

- How to Apply:
- BIL-Lead Service Line Replacement Funding: Eligible systems can submit a <u>Safe Drinking Water Revolving</u> <u>Loan Fund Letter of Interest form</u> at any time. Beginning in 2025, projects will be reviewed, rated, and ranked annually after the February 15 submission deadline.
- For specific questions related to filling out the Letter of Interest (LOI), contact the <u>Regional Development</u> <u>Officer</u> for the area in which the water system is located.
- Water systems that need further help filling out and submitting the LOI to Business Oregon can be referred to <u>OHA's Circuit Rider Program</u>.



Technical Support Coordinator

- Provide support to the DWSRF Coordinator and Business Oregon
- Perform outreach to determine project and water system capacity needs for the funding programs
- Cross-train with Environmental Review coordinator
- Outreach and assistance to water systems conducting a service line inventory and replacement
- Connect water systems to needed technical assistance resources to help them successfully apply and receive funding.





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