



MEMORANDUM

EUGENE WATER & ELECTRIC BOARD



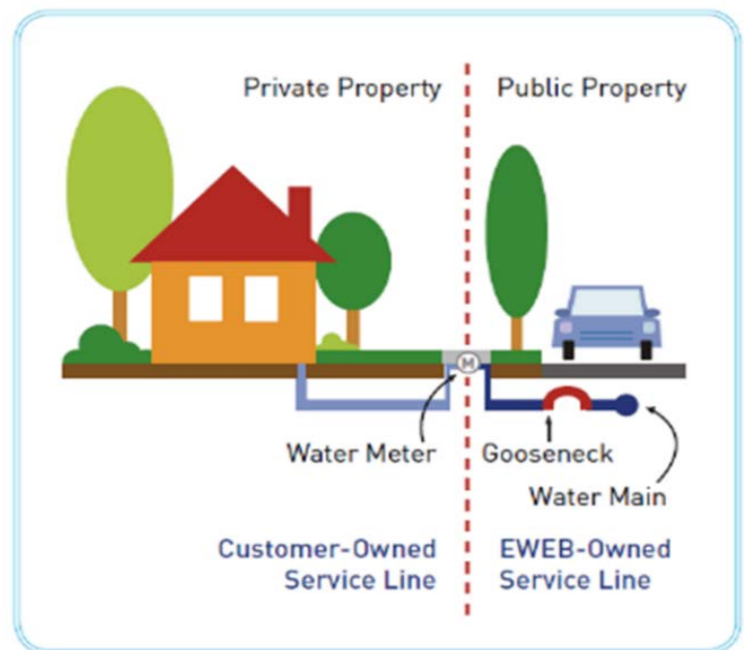
TO: Commissioners McRae, Barofsky, Schlossberg, Brown, and Carlson
FROM: Mike Masters, Water Operations Manager; Karen Kelley, Chief Operations Officer
DATE: June 14, 2024
SUBJECT: Lead and Copper Rule Revisions Compliance Update
OBJECTIVE: For Information

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) were proposed on November 30, 2023. EPA is currently reviewing public comments and the final rule is expected from EPA sometime near the service line inventory deadline of October 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

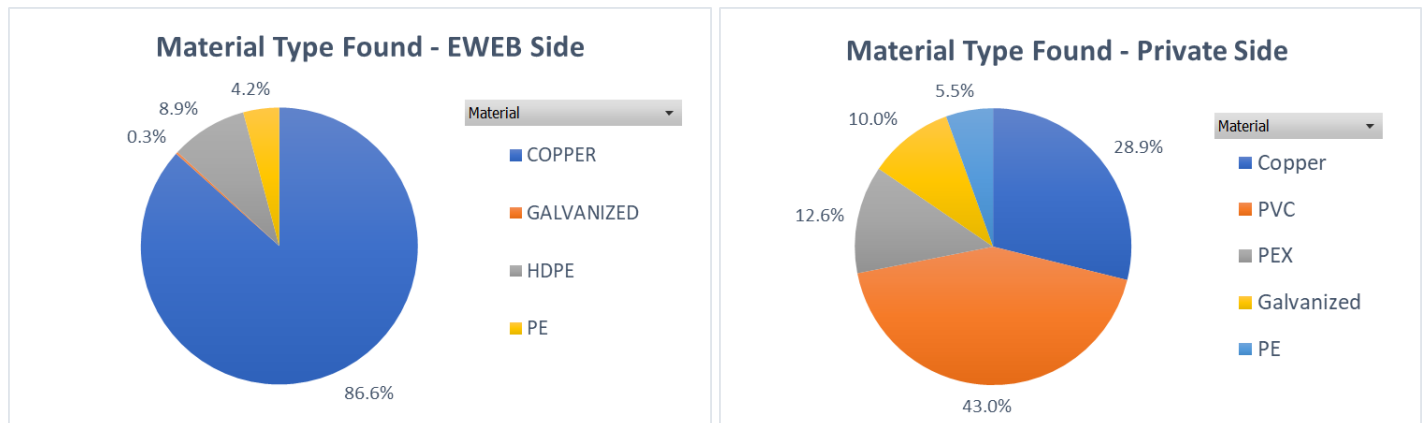
EWEB has approximately 64,000 service lines in our distribution system, each line having 2 sides, both utility and customer for a total of approximately 128,000 sections. We have no **known** lead service lines in our system. We have been working on identifying all Unknown Material Service Lines for many years. EWEB has discovered a small number of lead goosenecks over the last 3 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 approved Statistical Analysis by Random Selection as a way of completing the initial service line inventory. Water systems are required to physically verify enough Unknown material lines to reach a minimum 95%

confidence level that no lead exists in the system. EWEB completed the Statistical Analysis in early 2024 as summarized below.

Using our Service Line map application, built by EWEB’s GIS department, we calculated our 95% confidence value, generated a random list of the 381 services and systematically inspected each of those services. No lead was identified in this sampling pool. All data was entered into our service line map application and is permanently stored in our GIS system.

The following material types were identified during the inspections.



GALVANIZED = steel or iron pipes dipped in a zinc coating; HDPE = High Density Polyethylene; PE = Polyethylene; PVC = Polyvinylchloride; PEX = cross-linked polyethylene

To comply with the rule, we are focused on final data cleanup and export to the Oregon Health Authority data management system by the October 2024 deadline. OHA recommends that all systems continue identifying the statistically generated service line material types “during the course of normal operations” to ultimately create a complete inventory with all service line types identified. This recommendation will most likely turn into a requirement when the Lead and Copper Rule Improvements are finalized. Currently, EWEB is required to resubmit a report every 3 years detailing this progress. EWEB plans to make the service line inventory publicly available as required.

This summer we are also performing our every 3-year Lead and Copper compliance monitoring. These results will be available later this year.

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.