

# Service Line Inventories and Lead Service Line Replacement Funding

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EMMA YOUNG, REGION 9 EPA

# Agenda

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- Background/ Service Line Inventory Requirement
- Eligible projects
- Funding Methodology
- Proposed Process to Utilize Funding
  - SLIs
  - Investigation
  - LSLR Projects
- Guidance and Proposal Forms
- Closing

# DWTSA Lead Service Line Replacement Background

## ***DWTSA Lead Service Line (LSL) Replacement***

- BIL funding to investigate and remove lead service lines.
- Projects must be otherwise DWTSA eligible and be a lead service line replacement project or associated activity directly connected to the identification, planning, design, or replacement of lead service lines.

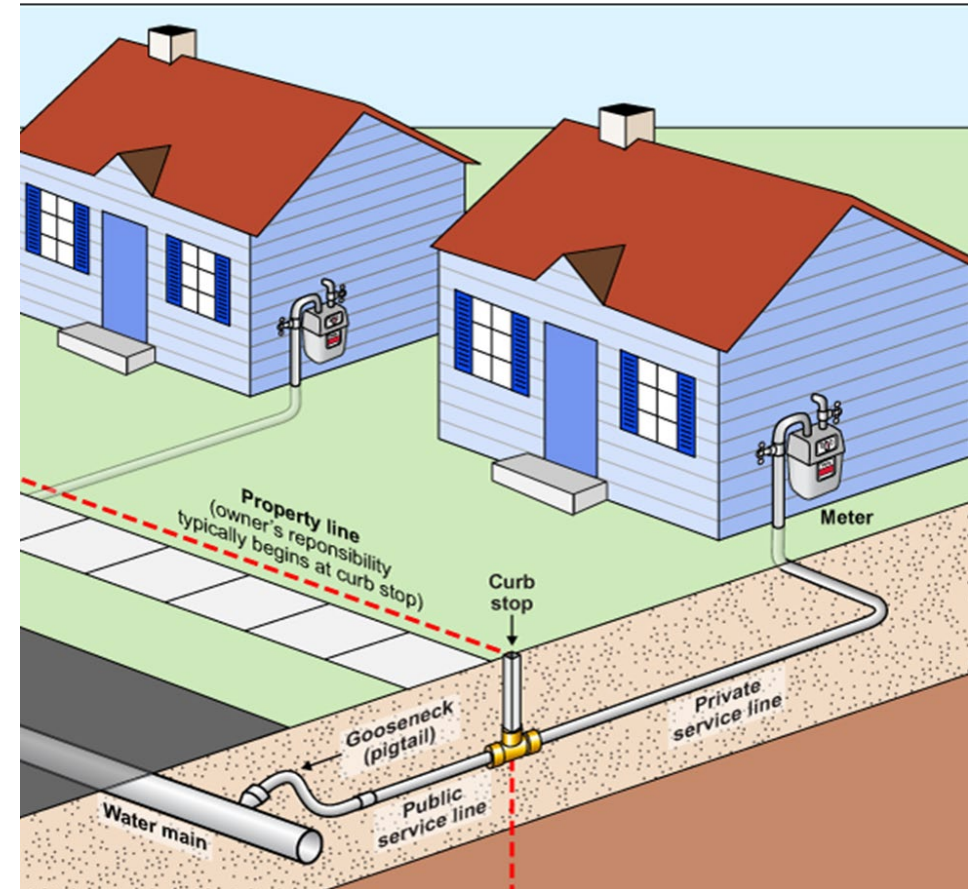
A lead service line is defined as

- *a service line made of lead*
- *a galvanized service line downstream of lead or unknown material*

Other components eligible for replacement: lead goosenecks, pigtails, and connectors

LSL=Lead Service Line

GRR=Galvanized Requiring Replacement



# Inventory categories

Every service line needs to be identified as one of the following:

- **Lead** - service line is made of lead.
- **Galvanized Requiring Replacement (GRR)** - a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a “Lead Status Unknown” service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.
- **Non-lead** - service line is determined through an evidence-based record, method, or technique not to be lead or GRR
- **Lead Status Unknown** - service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification.

# LCRR/LCRI

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LCRR Promulgated (published):  
January 15, 2021

LCRR Effective Date (codified):  
December 16, 2021

LCRR Compliance Date (enforceable):  
October 16, 2024

LCRI Proposal: December 6, 2023

# LCRI Proposal

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Comment period closes 2/5/24

3 parts of LCRR that will not be impacted by LCRI

- SLI deadline
- Annual notification to customers with lead, GRR or unknown service lines
- Tier 1 PN for lead ALEs

# Deadline

**Initial inventory is due to EPA by October 16, 2024**

Depending on make-up of inventory, updates are due at end of each tap sampling monitoring period (no more frequently than annual)\*

# Haven't achieved 100% non-lead?

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In addition to inventory reporting deadline and annual updates

- Develop service line replacement plan
  - Includes a strategy for identifying unknowns
  - Flushing procedure after disturbances (for residents)
  - Communication strategy about informing impacted customers
  - Due 3 years out (i.e. ~2027)
- Send annual notifications to all homes with LSLs, GRRs and unknowns
  - Your line is of an unknown material but may be lead
  - health effects of lead
  - steps to be taken to reduce lead exposure
  - offer to have water sampled for lead
  - info on how to see service line replacement plan (which will be required to develop if you have unknowns)
- Notification to consumers in the event of a disturbance of a LSL, GRR or unknown
  - Depending on nature of disturbance, could require providing resident with POU filter
- If system has lead ALE
  - Additional information required in PE
- System must offer sampling at any of these connections



# Practical Approach

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## **Review available information from As-builts (and/or similar documents), age of home information and/or physical verification**

As-builts need to cover entire life of line

Physical verifications need to cover at least 3 sections of pipe (18-inch each) on both public and private side



## **Develop supporting documentation (for both knowns and unknowns)**

If meters present, conduct 3-point inspection

- Both sides of meter and where pipe enters building
- Collect historical knowledge



## **Determine the data gaps (i.e., the unknowns)**

CITY BERKELEY MAP NO. 6-4  
 ACCT. NUMBER 6665-6360  
 MAKE 15 31 NORTH SIDE OF North  
 BETWEEN Sacramento AND Sacramento  
 LOCK TURN ON 22173211 METER ORDER NO. KT 52163 OTHER ORDERS  
 DEPTH TO TOP OF PIPE 19-40  
 SIZE OF MAIN 4 INCH STOP COCK ON MAIN 3/4  
 STOP COCK ON MAIN IS 295 FEET FROM NE  
 WATER MAIN RECORDS Reside: cc KIND OF STREET CUT Dil-Mac SIZE OF CUTS 2' x 6'

TAP - (COPPER) TRANSFER

ORDER No. T-3605

EAST BAY MUNICIPAL UTILITY DISTRICT

DATE 11-29-38

J. M. Aguirre (NAME)

Oregon St.

California St.

SIGNED

M.P.



DATE COMPLETED 12-23-40

3/4 INCH COCK AT CURB

3/4 INCH

Copper (KIND)

PIPE USED IN SERVICE

Oregon St.

122110

152 R. 11/29/39

# Acceptable (regulatory) documentation

- Construction and plumbing codes
- Permits
- Existing records
- 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
- Inspections and records of the distribution system
- Other resource or identification method as applicable



# Lead Ban

First lead ban effective date

- CA -1986
- Arizona – 1987
- Nevada – 1989

Any system or portion of system built after 1989 may use bulk identification

- Individual entries on inventory form may not be needed

# Characterizing unknowns

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Collect supplemental documentation

Analyze subset of unknowns

- Evaluate known and unknown lines looking for similarities
  - Similar age of buildings
  - Same builder (e.g., HUD)
  - 3-point inspection
- Potholing
  - 3 holes per/line revealing at least 18-inches of line each
  - Covers both public and private side

If unknowns are part of the inventory, system must submit SLI form with unknowns first

If future work shows assumptions incorrect, reevaluation needed



# R9 FY 2023 BIL Funding

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Award under Bipartisan Infrastructure Law (BIL) in FY2023:

<b>Funding Program</b>	<b>Region 9 Allocation</b>	<b>National Tribal Allocation</b>
DWTSA Base and BIL Supplements	\$18M	\$44M
CWISA Base and BIL Supplements	\$21M	\$44M
DWTSA Emerging Contaminants Program	\$6M	\$16M
Emerging Contaminants in Small and Disadvantaged Communities Program	\$6M	\$20M
<b>DWTSA Lead Service Line Replacement Program</b>	\$26M	\$60M

# Eligible Projects: DWTSA Lead Service Line (LSL) Replacement

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Eligible projects include:

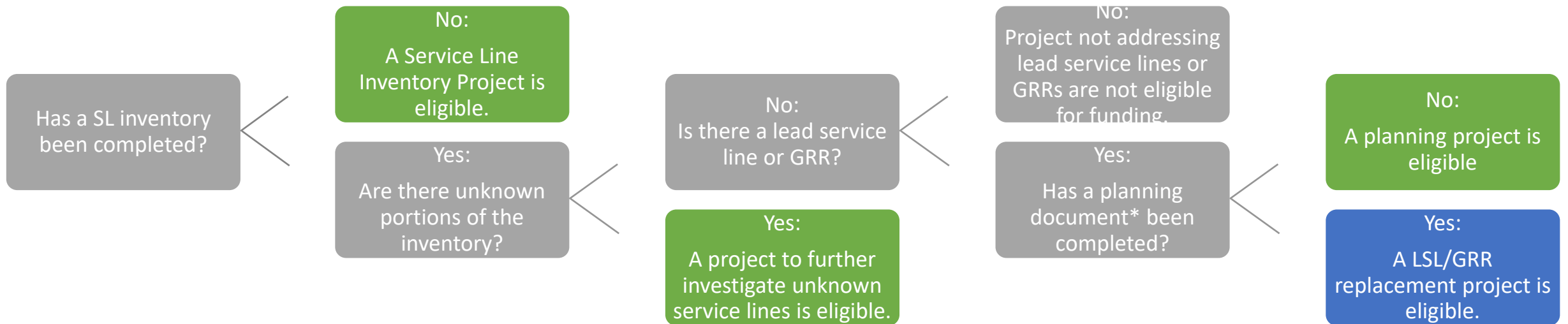
Service Line Inventory Project – Investigatory Work	Lead Service Line Replacement Project
Developing and completing service line inventories, including locating and mapping lead service lines, and investigating unknown service lines	Replacement of lead service lines, including the replacement of lead-containing goosenecks, pigtails, connectors, and galvanized service lines that are currently or ever were downstream of a lead service line or service line of unknown material.
Providing technical assistance to small water systems undertaking service line inventories	Providing technical assistance to small water systems undertaking construction projects
	Preparing planning documents for construction projects

- Replacement Projects must include the entire service line (both utility and private owned)
- Meters are not an allowable cost

# Proposed Funding Methodology: DWTTSA Lead Service Line Replacement

Region 9 anticipates that there will be sufficient funding to complete service line inventories and lead service line replacement projects for all eligible water systems.

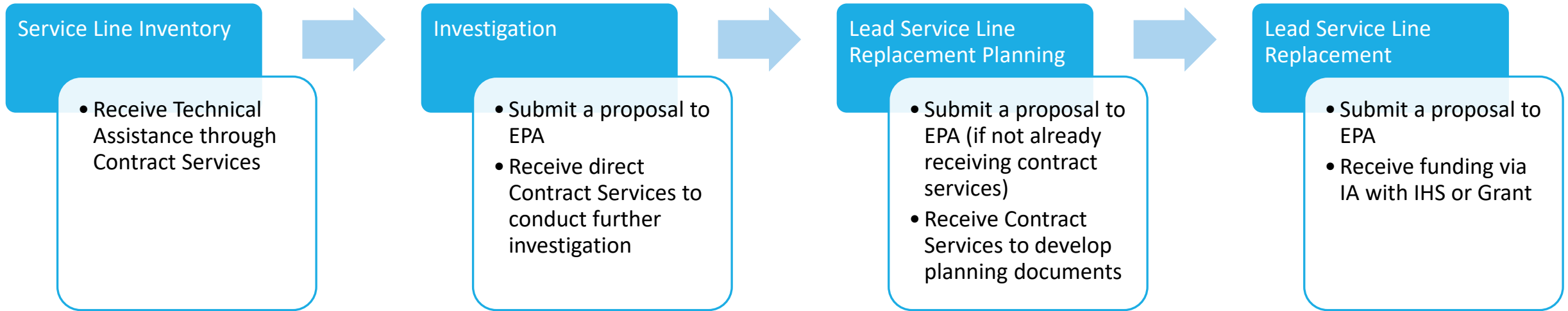
The Region developed a funding flow chart and guidelines to streamline the administrative processes:



Possible requirements for a planning document prior to construction: the description of the construction mechanism, timeline for completion, detailed cost estimate, and documentation that the required rights-of-way permissions have been secured.

# Proposed Process to Utilize Funding: DWNTSA Lead Service Line (LSL) Replacement

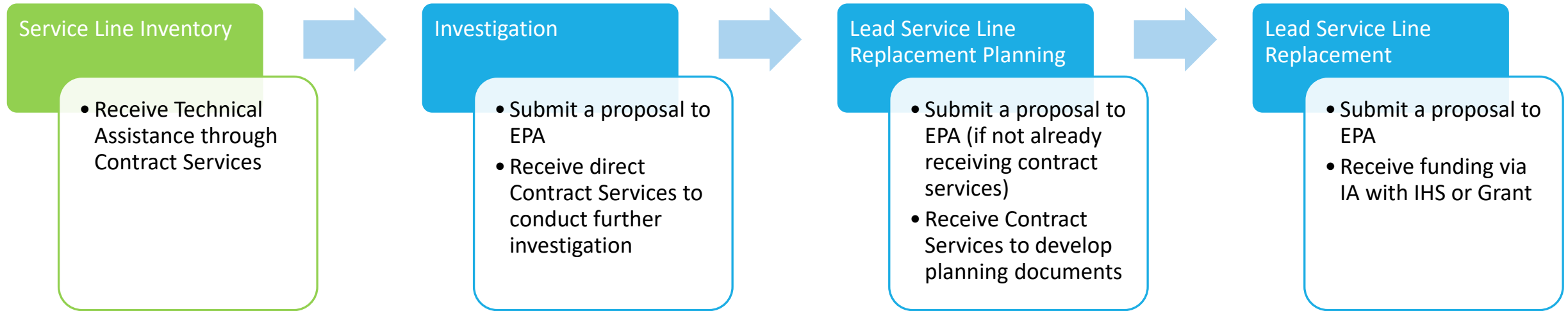
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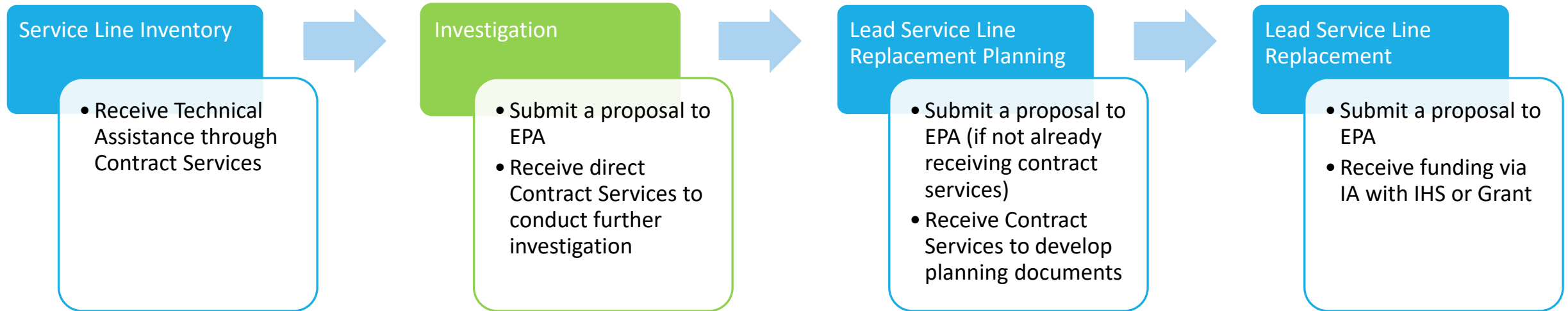
# Proposed Process to Utilize Funding: SLIs

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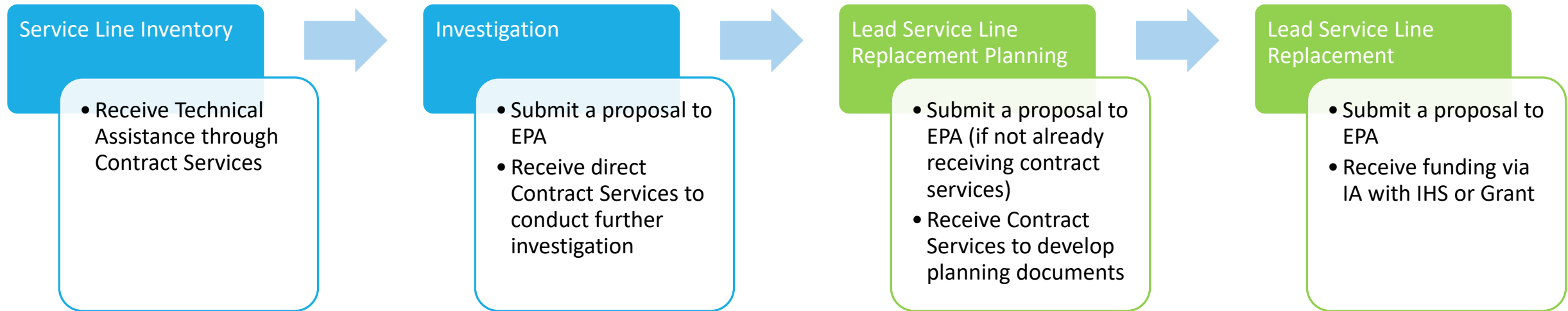
- R9 contracted with RCAC to help water systems complete the SLIs
- For initial completion of SLIs, service lines materials can be marked “unknown” – understanding scope of “unknowns” can assist in additional funding

# Proposed Process to Utilize Funding: Investigation



- The Tribe can utilize either a direct grant or an EPA managed contract to receive funding/services for investigatory work.
- IA's can also be used, but must have agreement from IHS first.

# Proposed Process to Utilize Funding: LSLR Projects



- Lead Service Line Replacement Projects are only eligible once a Lead Service Line, GRR, or eligible component is identified.
- Let EPA know ASAP if any eligible component is found.
- Lead service line replacement planning may be able to be completed via EPA managed contract, grant or IA
- Lead service line replacement construction projects may be done via grant or IA. IHS has indicated that they are willing to assist replacement projects via IA

# DWTSA-LSLR Funding Materials

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- Website: <https://www.epa.gov/tribal-pacific-sw/r9-dwtsa-lslr>
- Guidance
- Proposal Form [Project Proposal Form: EPA Region 9 DWTSA Lead Service Line Replacement Funding \(xlsx\)](#)
- Factsheet!

# DWTSA-LSLR Funding Materials: Guidance

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<b>Proposal Submission Steps</b>	
<b>Estimated timeframe</b>	<b>EPA Actions</b>
<b>Step 1: Tribe Submits Proposal</b>	
<b>2 months</b>	EPA will review applications for completeness and notify each applicant with requests for additional information.
<b>Step 2: Tribe Responds to EPA Comments</b>	
<b>1 month</b>	EPA reviews final submissions and notifies applicants of the funding decision, along with guidance letters for projects to be funded throughout the program.
<b>Step 3: Tribe submits final documents for Grant, Interagency Agreement, or In-Kind Services</b>	
<b>3 months</b>	EPA processes and awards funds for projects.

# DWTSA-LSLR Funding Materials: Guidance

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- All grant/IA proposals must include:
  - DWTSA LSLR Project Proposal form (DWTSA-LSLR Proposal Form.xlsx)
  - Tribal government endorsement
  - Detailed cost estimate
  - LSL replacement project proposals must additionally include a planning document

# DWTSA-LSLR Funding Materials: Guidance

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- Additional Guidance pending:
  - Template notice for water systems to distribute to homeowners prior to potholing
  - Template notice to homeowners for when a Service Line is identified as being lead, galvanized requiring replacement, or having a lead component. (Regulatory/DI)
  - Template notice for water systems to distribute to homeowners prior to construction
  - Template form to obtain permission from homeowner to replace entire service line & obtain right of way permission
  - Factsheet for homeowners after service line replacement (e.g., possible flushing or POU usage)

# EPA Contact Information

## Tribal Drinking Water Program Managers

Direct implementation of the Safe Drinking Water Act (SDWA) within Region 9

**Ukiah Area, Fresno Area, Palm Springs Area**

[Jason Gambatese](#)

(415) 972-3571

**Sacramento Area, Owens Valley,  
Washoe Tribe of Nevada and California**

[Joi Chu-Ketterer](#)

(415) 972-3803

**San Diego County, Yuma Area**

[Greg Gholson](#)

(415) 947-4209

**Northern and Eastern Nevada**

[Karl Banks](#)

(415) 972-3557

**Las Vegas Area, Northern Colorado River Area,  
Kaibab Band of Paiute Indians**

[Annie Wan](#)

(415) 972-3845

**Havasupai Tribe, Hualapai Tribe, Northern California**

[Ian Chinn](#)

(415) 972-3418

**Phoenix Area, White Mountain Apache Tribe,  
Tonto Apache Tribe of Arizona, Yavapai-Apache Nation**

[Bayla Fisher](#)

(415) 972-3806

**San Carlos Apache Tribe, Tohono O'odham Nation**

[Nate Delano](#)

(415) 972-3776

**Hopi Tribe**

[Emma Young](#)

(415) 972-3707

**Navajo Nation**

[Adam Ramos](#)

(415) 972-3450

For Water Systems regulated by Navajo Nation EPA,  
please contact: [Navajopublicwater.org](http://Navajopublicwater.org)



# Funding to Address Emerging Contaminants in Drinking Water

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## Two Grant Programs:

- a. Drinking Water Tribal Set Aside – Emerging Contaminants (DWTSA-EC);
- b. Emerging contaminants (EC) in Small or Disadvantaged Communities Grant (EC-SDC)

## Project eligibilities for both programs:

- Must serve a Public Water System
- Focus on addressing per- and polyfluoroalkyl substances (PFAS) in drinking water.
- Projects that address any contaminant listed in any of EPA's [Contaminant Candidate Lists](#)

# How to Apply for Emerging Contaminant Funding

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- Emerging Contaminants funding utilizes the existing DWTSAs solicitation process ([DWTSAs Website](#))
- **Applications will be accepted until funds are utilized**
- Draft Ranking Letters are typically in January/February, but this will vary depending on time the application is received.
- Final Ranking Letters will be sent in Spring
- Awards are made by end of fiscal year (Oct 1)

# EPA Contact Information

## Drinking Water Tribal Set-Aside (DWTSA) and Clean Water Indian Set-Aside (CWISA) Programs

**Emmanuelle Rapicavoli, Tribal Drinking Water Section Manager**

[rapicavoli.emmanuelle@epa.gov](mailto:rapicavoli.emmanuelle@epa.gov) 415-972-3969

**Nancy Sockabasin, DWTSA and CWISA Coordinator**

[sockabasin.nancy@epa.gov](mailto:sockabasin.nancy@epa.gov) 415-972-3772

**Emma Young, Lead Service Line Replacement Program Coordinator**

[young.emma@epa.gov](mailto:young.emma@epa.gov) or 415-972-3707

**Sara McGillewie, Emerging Contaminant Programs Coordinator**

[mcgillewie.sara@epa.gov](mailto:mcgillewie.sara@epa.gov) or 213-244-1859

## Tribal Water Infrastructure Project Officers

Geographic assignments are aligned with Indian Health Service Area and District Offices within Region 9

### Redding District

[Andrew Sallach](#)

(415) 972-3503

### Escondido and Sacramento Districts

[Madeleine Tango](#)

(619) 874-0568

### Tuscon Area

[Nancy Sockabasin](#)

(415) 972-3772

### Reno and Western Arizona Districts

[Sara McGillewie](#)

(213) 244-1859

### Eastern Arizona District

[Emma Young](#)

(415) 972-3707

### Navajo Nation Area

[Adam Ramos](#)

(415) 972-3450

