

Ohio Water Utility Council Update: Working Toward Lead Free

Tyler Converse, Superintendent
Water Department
City of Canton

Jeff Swertfeger, Superintendent
Water Quality and Treatment Division
Greater Cincinnati Water Works

Water Utility Council, Ohio AWWA

Who are we?

Northwest District

Mike Caprella, Lima
Robert Stevenson, Arcadis
Tom Hinson, Delaware
Andy McClure, Toledo

Southwest District

David Weihrauch, Oxford
Sara Van Frank
Jeff Swertfeger, Cincinnati
Chris Day, West Alexandria

At-Large: OEPA Cert. Operators

Cliff Shrive, Stantec
Brian Bisson, CT Consultants
Peter Kusky, Aqua America, Ohio
Karen Hawkins, Fairborn

Northeast District

Todd Danielson, Avon Lake
Robert Davis, Cleveland
Melinda Raiman, Cleveland
Chris Nielson, AECOM

Southeast District

Bob Ashton, Columbus
Gary Hopkins, Columbus
Richard Lorenz, Westerville
Shawn Wagner, Newark

Our Purpose



Our Purpose



Represent Ohio's PWSs on Regulatory and Legislative Issues



Our Purpose Extends Nationally



What Have We Been Up To?

- 2015:
 - Harmful Algal Blooms, (HAB's)
 - HB 64 Reservoir Buffer Zone Protection
 - HB 214 Plastic Pipe
- 2016:
 - HB 512 Lead
 - Plastic Pipe
- 2017:
 - SB 2 Technical, Financial, Managerial Capability and Asset Management.
 - Lead Rule

Challenges



Challenges

- Keeping up with the leg/reg process.
 - Getting involved very early in the process and sharing information.
- Are the legislative and regulatory requirements going to produce the desired outcome?
- Ensuring legislation & regulations are based on science.
 - Avoiding knee jerk reactions to short term public opinion.
- Protecting public health without unnecessarily eroding public confidence.
- Bringing attention to the practical reality and cost of compliance.
- Leverage...

Lead and Copper Rule

- Promulgated 1991
- Optimize corrosion control
 - Control through chemistry
- In-home monitoring
- Monitoring first liter at highest risk sites
 - 50 Lead branches (pre 1927)
 - 50 Copper branches, lead solder (1982-1987)



Lead and Copper Rule

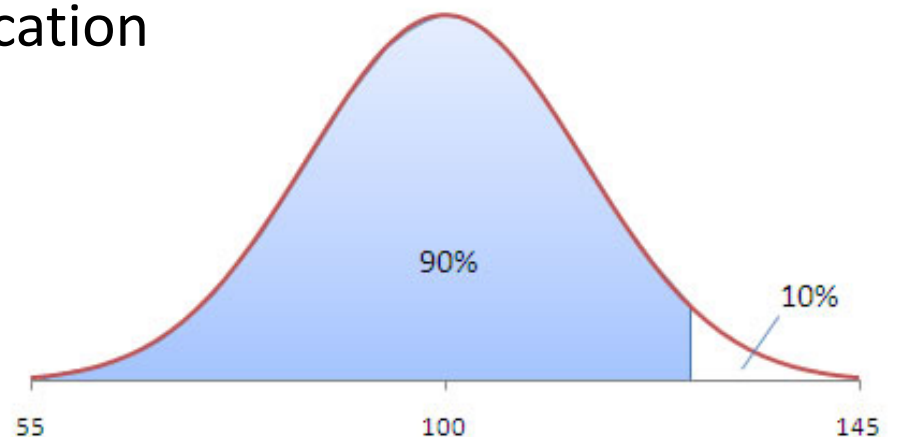
- 90th

- Acti

- If yo

But, can still have
individual homes with
very high levels

- Replace 7% of your lead service lines per year
- Aggressive public education
- Optimize treatment



Why Change?

- Most utilities are compliant with LCR
- Sources of lead not being removed
- Can become big problems, huge liabilities for cities
 - Washington DC 2000– Partial replacements
 - Chicago 2012 – Street work causes high lead levels
 - Denver 2010 and others – unexpectedly high lead
 - Flint – breakdown (lack of) corrosion control
 - Sebring

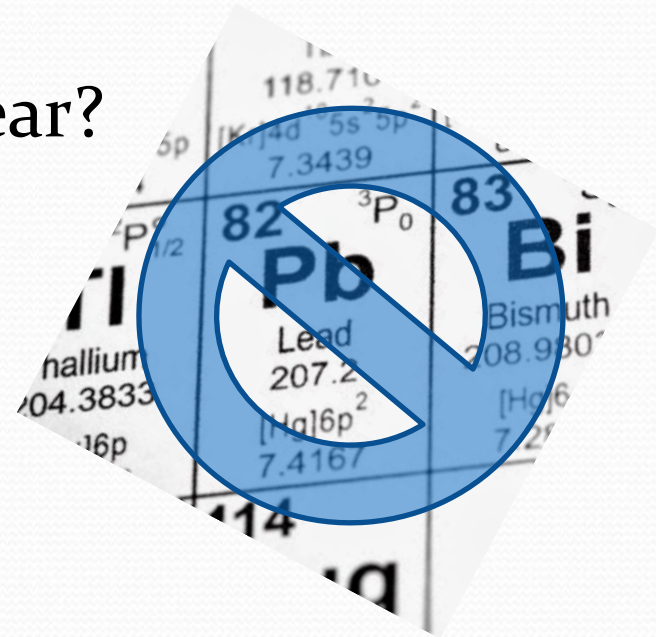
NDWAC

- LCR is a treatment technique rule
- Even when corrosion control is optimized, individual premises can have high lead
- Sources of lead exist in premises
- “Lead-bearing materials should be removed from contact with drinking water to the greatest degree possible”
- “Effective elimination of leaded materials is a shared responsibility.”
- Customers can only participate if they know
- Action Level not health based

National Changes

USEPA/National

- Revisions to LCR expected this year?
- Expect focus on
 - Improved CCT, monitoring
 - Increased communication
 - Quicker notifications
 - Programs to get lead lines out
 - Increased protection until lines out
 - Separate copper requirements

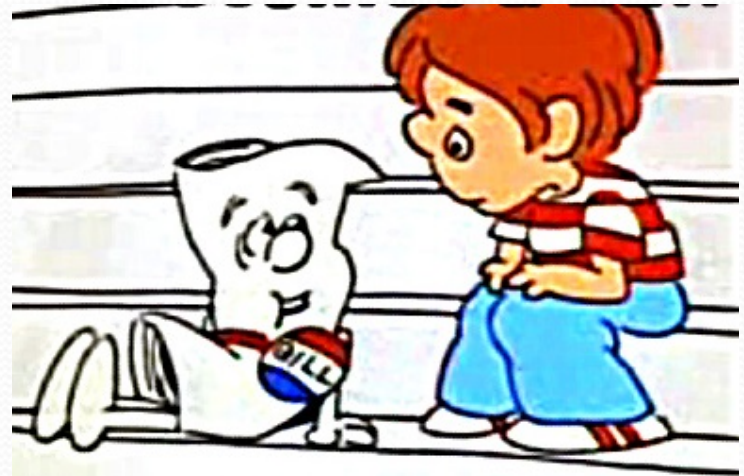


Household Action Level

- Health-based level that poses a risk to individuals
- Will be different than the 15 ug/L Action Level
- Could be much lower than Action Level
- Could be tiered for children vs adults
- Utilities must begin thinking of how to communicate

USEPA/National

- New Law
- Water Infrastructure Improvement for the Nation (WIIN) Act –
 - Maybe sooner notifications of lead levels?
 - Expectation of privacy?



OEPA Changes

OEPA Changes

- HB512
- Faster notifications for individual results
- Faster notifications for Action Level exceedances
- Mapping
- Revisiting Corrosion Control Treatment



Proposed Ohio LCR Revisions

- Comments due March 17
- **3745-81-81 – Revise Corrosion Control Treatment**
 - New source
 - New treatment
 - Exceed action level or water quality parameters
 - Other events director determines to impact corrosiveness
 - Perform studies and revise treatment
 - May have to go off reduced monitoring

Proposed Ohio LCR Revisions

- **3745-81-84 – Lead Service Line Replacement**
 - If exceed action level
 - No more testing out lines, must remove
 - Once removal starts, must do for 15 years
 - Must notify consumers in “impacted area”
 - **Must provide filters to consumers** in “impacted area”
 - Not clear if filter requirement only for systems over action level

Filters



- Schools?
- Restaurants?
- Hospitals?
- Large office buildings?

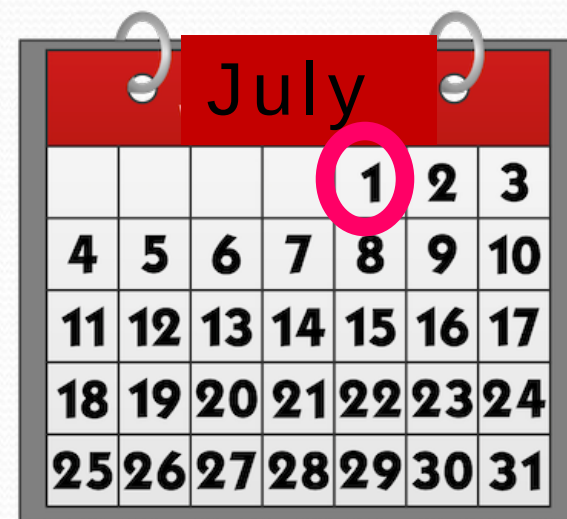


Proposed Ohio LCR Revisions

- **3745-81-85 – Response to Monitoring Results**
 - Notify customers within 2 days of their results.
 - Health department notification if high
 - Public Notification within 2 days if over Action Level or **Interim Exceedance**
 - Start public education actions sooner

Interim Exceedance - Example

- Reduced monitoring – 50 samples from June – Sept
- Gets 6th high sample July 1
- Interim exceedance
- Public Notification by July 3
- Do Public Education by July 31
- Compliance period ends Sept 31



Proposed Ohio LCR Revisions

- **3745-81-86 – Monitoring and Mapping**

- Maps due TODAY!!! NOV issued tomorrow!!!
- Start gathering service line information
- No more reduced (every 3 year) monitoring unless one of criteria met
 - Have a 90th below 5 ug/L for 5 consecutive monitoring periods
 - Maintained WQP for 5 consecutive monitoring periods
 - Does not contain lead lines, solder or fixtures
 -and written approval by director

Proposed Ohio LCR Revisions

- 3745-81-91 – Consumer notice of water main replacement
 - Notify **“customers in area impacted”** that they may **“experience changes in quality of drinking water, including a temporary increase in lead levels.”**
 - Within 5 days of work on main replacement
 - Within 24 hours after repair

Schools



Lead taints drinking water in hundreds of schools, day cares across USA

SOME 350 WATER SYSTEMS THAT FAILED LEAD TESTS IN RECENT YEARS PROVIDE DRINKING WATER TO
SCHOOLS AND CHILD-CARE CENTERS.

Laura Ungar, USA TODAY

Schools

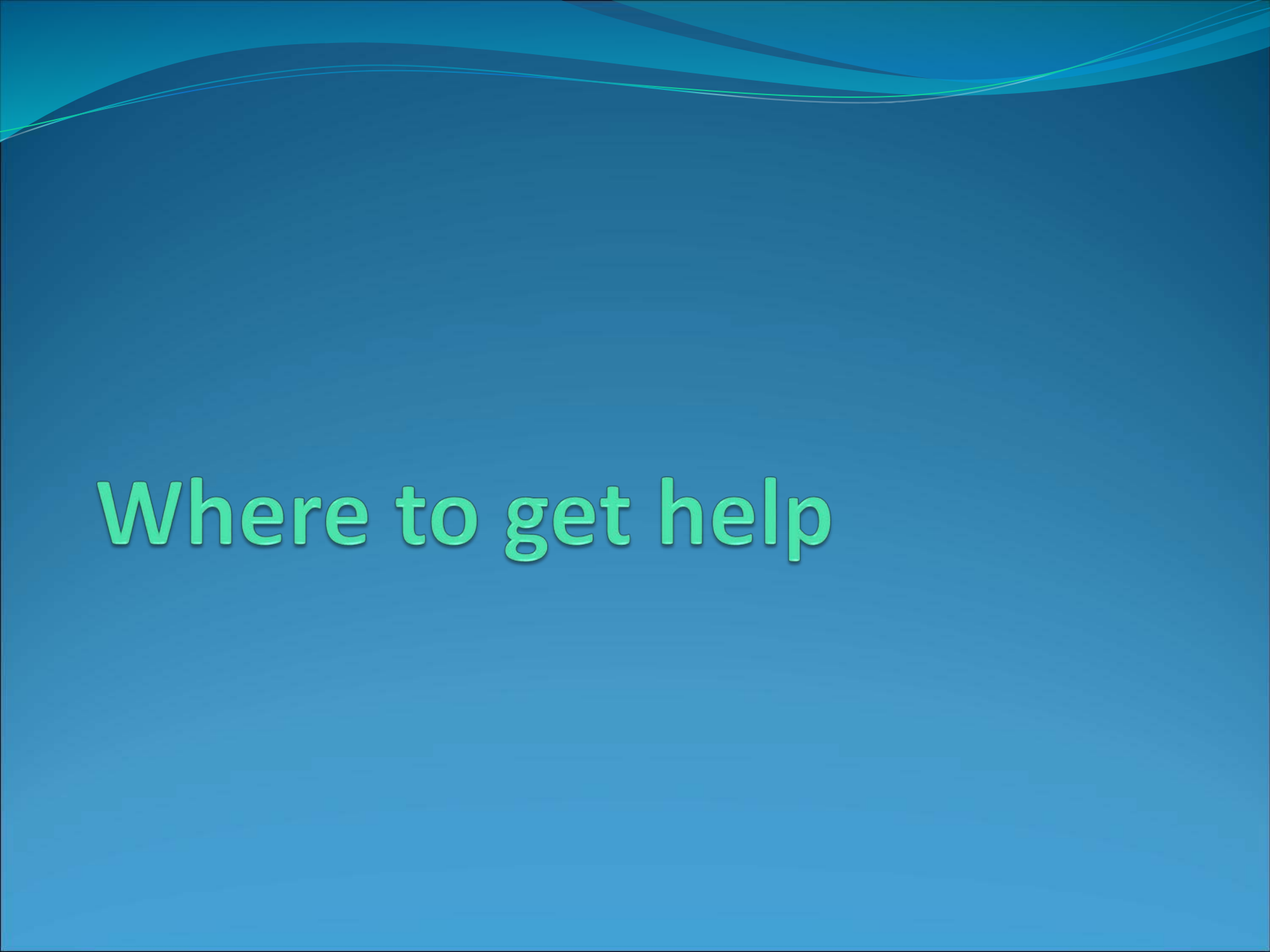
- USEPA Program
- Based on 3T
 - Training
 - Testing
 - Telling
- Identify sources
- Different sampling
- Grants from Ohio Facilities Commission



3T Program for Schools

- Must do 3T to be eligible for grants
- 250 ml samples
- 20 ppm level of concern from US EPA
- 15 ppm for Ohio Facilities Com. Grants
- Follow-up flush samples
- Sample all outlets that can be used for drinking/cooking
- Don't report samples to OEPA





Where to get help

Lead Service Line Replacement Collaborative

- Non-regulatory effort to encourage full lead line replacement
- Accelerate full lead line replacement
- Representatives from
 - Public health, children's health
 - Water utilities
 - Environmental advocates
 - Drinking water administrators
 - Environmental justice



www.LSLR-Collaborative.org

Lead Service Line Replacement Collaborative Topics

- Collaborative Roadmap – how to develop strategies for comprehensive LSL removal programs
- Best Practices – to identify and replace LSL
- Policies – evaluate current and identify new state and national policies to accelerate LSL removal
- Pilot Projects – design projects to test ideas
- Not just for lead lines

www.LSLR-Collaborative.org

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LEAD SERVICE LINE REPLACEMENT COLLABORATIVE

Our goal is to accelerate voluntary LSL replacement in communities across the United States.

What can I find on this site?

This site provides information to help communities facilitate full lead service line replacement.

Learn about the Collaborative

AWWA Resource Community

- Lead Service Line Removal Policy Statement
- New Lead Service Line Replacement Standard
- Specific tools and products to assist utilities
 - Latest in Lead Information
 - Communication toolboxes
 - Lead in Schools
 - Corrosion Control
 - Media Coverage



**American
Water Works
Association**

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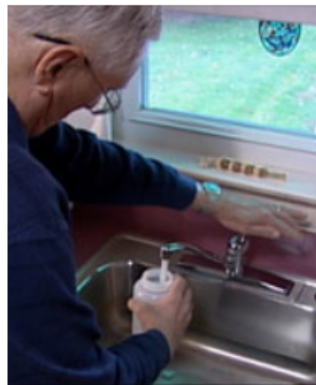
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Lead RESOURCE COMMUNITY



Welcome to the Lead Resource Community

AWWA members have worked to protect consumers against lead in drinking water for many years, creating scores of helpful communications, technical and public policy resources. In light of the ongoing situation in Flint, Michigan, these many resources are now available from this single hub. Here you will find insights on corrosion control and other lead management issues, the latest legislative and regulatory developments, and public outreach tools to help you speak with consumers and other key stakeholders.

BREAKING NEWS

[EPA signs lead-free rule](#)

Upcoming Webinar



**Unbeatable
Service
— and —
Unparalleled
Value.**

neoLogic
solutions
filtration division

[Click Here](#)

 **SHIMADZU**
Redefining



USEPA

- www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water

Ohio EPA

- <http://epa.ohio.gov/ddagw/pws/leadandcopper.aspx>

Conclusions and Recommendations

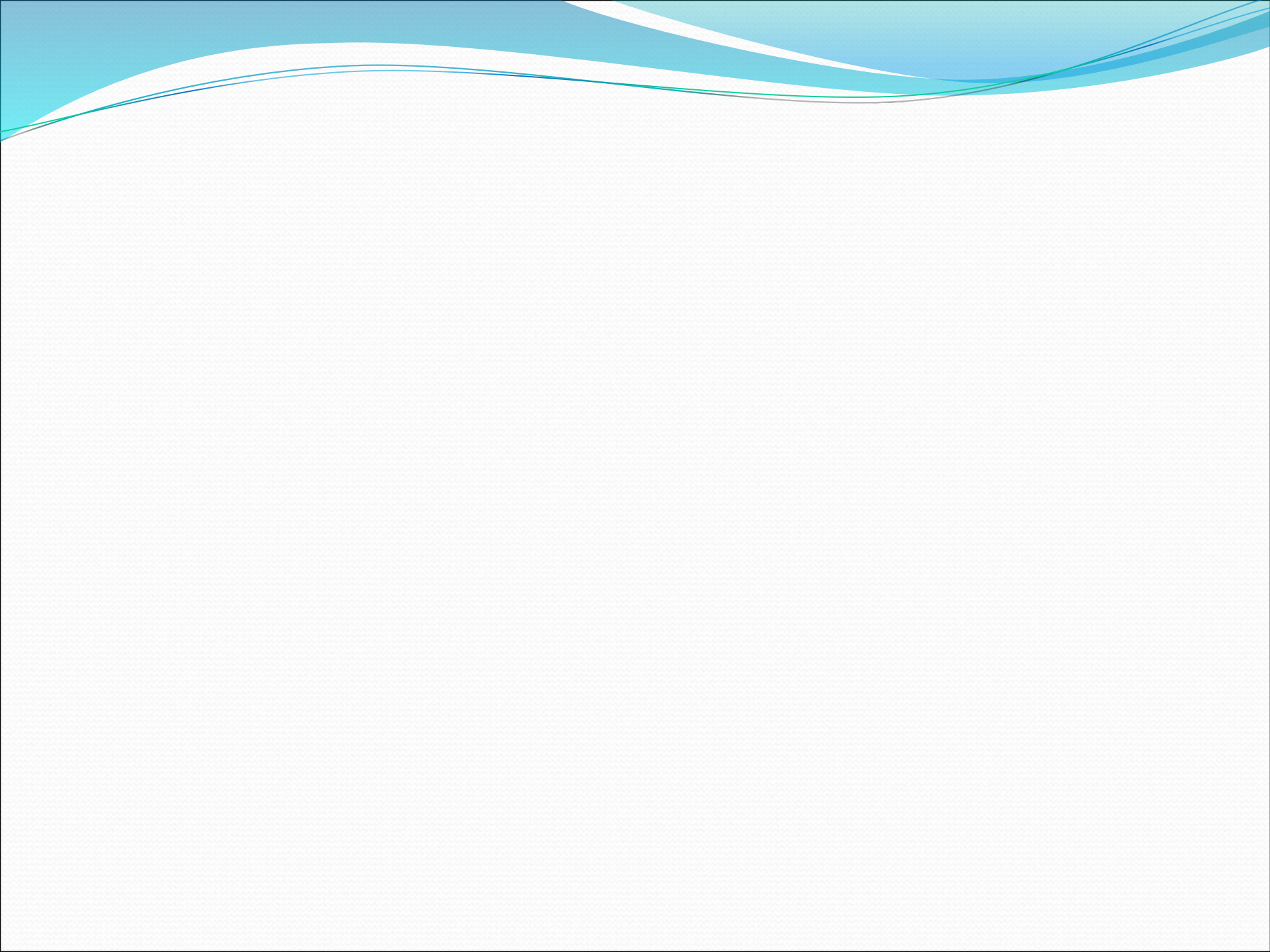
Conclusions

- Lead issue is here with us for a long time
- Water systems are not in complete control
- Public becoming aware and expect systems to act
- Major changes are coming on both the national and state fronts

Recommendations

- Comment on new regs
- Become smart about lead
- Become smart about your system
- Partner with health departments, schools, other interested groups
- Communicate proactively with public
- Be transparent
- Look to AWWA for help
- Develop plans to get lead lines out





Proposed Ohio LCR Revisions

- **3745-81-85(D) – Interim Exceedance**
 - Notify customers within 2 days
 - Interim Exceedance
 - Before end of compliance period
 - **Lead over 15 in more than 10% of required samples**
 - Lead over 15 in more than 10% of all samples if took more samples than required

