

Standard Operating Procedures Manual Maintaining Your Lead Service Line Inventory

City of Anthony, Kansas

Created in Cooperation with JEO Consulting Group

Date: May 8, 2025

Purpose

To develop a streamlined standard operating procedure (SOP) for maintaining and enhancing the records of both publicly and privately owned components of the water distribution system for the City of Anthony. The goal is to:

- Meet the inventory requirements of the Environmental Protection Agency's (EPA) Lead and Copper Rule Improvements (LCRI) efficiently.
- Maintain an accurate record of the City of Anthony service area for publicly and privately owned water service lines.
- Support future replacement efforts for service lines that contain inadequate or prohibited material types.
- Protect City of Anthony customers and the public from unhealthy materials in the public drinking system.
- Reduce the risk of regulatory action under the LCRI by ensuring that the City of Anthony inventory is kept up-to-date and accurate.

Definitions

EPA – U.S. Environmental Protection Agency

GRR – Galvanized Requiring Replacement

JEO – JEO Consulting Group

KDHE – Kansas Department of Health and Environment

LCRI – Lead and Copper Rule Improvements

PWS – Public Water System

SOP – Standard Operating Procedure

Requirements

In 2024, the EPA promulgated the LCRI, requiring the City of Anthony to inventory and maintain records of their service area to determine any remaining lead or lead-contaminated galvanized service lines still in operation.

Key Requirements of the LCRI:

- Maintain an updated water service line inventory, initially submitted by JEO on behalf of the City of Anthony to KDHE on October 16, 2024.
- Ensure the water service line inventory is publicly accessible for viewing.
 - The City of Anthony will make the inventory accessible to the public by:
 - Providing a paper copy, updated annually, accessible at Municipal Hall located at 130 E Main St, Anthony, KS 67003.
 - EPA requirements for the inventory include the public & private service line materials, along with the gooseneck or connector material.
 - KDHE requires information on water main materials, installation dates of many system components, primary and secondary plumbing materials within a structure, a point of use or whole structure filtration system, and whether the address will be used for a water quality testing site related to lead and copper levels in the City of Anthony distribution system.
- When a publicly available service line replacement plan is created, notify customers whose service lines have been identified as needing replacement, as well as the broader community.

Following the submission of the updated inventory spreadsheet to KDHE, customers with lead or galvanized pipes requiring replacement, or those with unknown service line materials, will be notified using KDHE's '*Notification of Known or Potential Service Line Containing Lead*' pamphlet. Certification to KDHE that notifications were sent is recommended to be submitted to KDHE by March 30th each year that the updated inventory is submitted to KDHE. Certification of customer notifications will be submitted utilizing KDHE's Public Water Supply System Data Collector portal:

<https://pwsdc.kdhe.ks.gov/Home/Login?ReturnUrl=%2F>

U.S. EPA Objectives of LCRI:

- Replace 100% of lead and GRR service lines within 10 years from the compliance date of the LCRI, which is November 1, 2027.
- Improve and better inform the existing tap sampling program by targeting locations of known lead service lines for compliance sampling.
- Lower the overall Lead Action Level to 10 ppb for public water systems.
- Implement Tier-1 customer notifications for instances when Lead Action Levels exceed the maximum threshold. (Tier-1 requires 24-hour notification to residents of ALL exceedances of 10ppb)

Scope of This Plan

This plan combines national best practices with local operating procedures or standard operating procedures (SOPs) for maintaining, improving, and submitting Lead Service Line Inventory reports to KDHE.

Roles and Responsibilities

JEO Consulting Group

- Author, review and refine the SOP template for local adaptation.
- Co-creator of the PWS-specific SOP, in consultation with the City of Anthony.
- Submit finalized SOP to KDHE.

Kansas Department of Health and Environment (KDHE)

- Review and retain the customized City of Anthony SOP on record.
- Receive and retain any updates to the City of Anthony SOP.

City of Anthony

- Work in coordination with JEO to complete the customized PWS SOP document.
- Implement these procedures, ensuring compliance.
- Update the inventory as required by KDHE and the EPA.
- Update the PWS SOP document as needed and resubmit the SOP document to the KDHE Public Water Supply via email.

Public Water System Personnel

- Manage inventory and submit regular updates to KDHE.
 - Ensure this SOP document remains updated as the City of Anthony processes and procedures evolve. If changes are made, email the updated SOP to the KDHE Public Water Supply Section.
 - Submit updated SOP document to KDHE.
 - Key personnel may include, but are not limited to:
 - City Administrator
 - Water Department Head
 - Water Operator
 - Other relevant PWS roles
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Asset Management System, Documentation, and Storage Protocol Options

- Use a GIS-based inventory system to maintain and update LCRI (PWS inventory) records of operational privately owned water service lines and publicly owned water service lines. The GIS-based map will track record of such data and shall be updated no less than annually. The GIS-based asset management system data will be regularly exported for backup storage purposes.
 - Data to be used in this inventory system will be compiled by JEO and shared with the City of Anthony for integration into the asset management system for the original lead service line submission. It shall be compiled by the City of Anthony thereafter.
 - PWS to maintain water service request records, which will be utilized for updating the GIS asset management system (Lead Service Line Inventory) no less than annually, with the first resubmission taking place in October 2025.
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Policies

1. New Development & Redevelopment

- New Development: Require submission of water distribution system plans and records to be incorporated into the PWS Asset Management System. Require submission of Water Service Application and Building Permits for new development and construction during the permitting stage of the designated project.
- Redevelopment: A Building Permit and/or Plumbing Permit will be required for redevelopment of designated properties. Applicant will be required to report the existing water service line material type for verification of the presence of lead service lines.

2. Utility Service Applications

- All customers requesting water service will fill out the Utility Service Application, which requires reporting of the water service line material type entering the structure.

3. Public Water System Improvements

- Engineering designs and construction plans for water systems must be submitted to the City of Anthony for review prior to construction starting. Any exposure of lead or lead-contaminated service lines (GRR) must be reported by the hired contractor if found during construction and must be included in the City of Anthony Asset Management System (LSLI).

4. Plumbing Applications

- Repair or replacement of private water service lines will requiring a Plumbing Permit Application will also be required to report the existing material type.

5. Water System Maintenance

- The City of Anthony maintenance team will report the presence of any discovered lead materials using the Service Record and will add such line information to the inventory. The city will also provide proper notification to customers when lead lines are discovered.

Future Considerations

Strengthening the City of Anthony Water Service Line Inventory leads to a more efficient and cost-effective replacement program and a healthier community and water system. Early identification and replacement of lead lines will reduce the need for further regulatory actions and testing requirements.

Upcoming LCRI Requirements:

- Develop a Service Line Replacement Plan, including strategies for identifying unknown service lines, customer notifications, and prioritizing lead and galvanized requiring replacement lines and replacements for disadvantaged populations.
- Resubmit updated inventory to KDHE annually, using KDHE's Public Water Supply System Data Collector portal: <https://pwsdc.kdhe.ks.gov/Home/Login?ReturnUrl=%2F>. The first resubmission must occur no later than January 31, 2026 (***date subject to change at the direction of KDHE***).

This document shall replace the "Standard Operating Procedures Manual Maintaining Your Lead Service Line Inventory" approved by the Governing Body on March 27, 2025. The March 27th document is hereby repealed.

Approved by the Anthony City Commission – June 3, 2025.

Acting Mayor Jan Lanie

City Administrator Cyndra Kastens