

# **LCRR Compliance Update: Lead Protection Program**

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**Water & Sewer Board Presentation  
May 17, 2023**



# Lead and Copper Rules Revisions (LCRR)

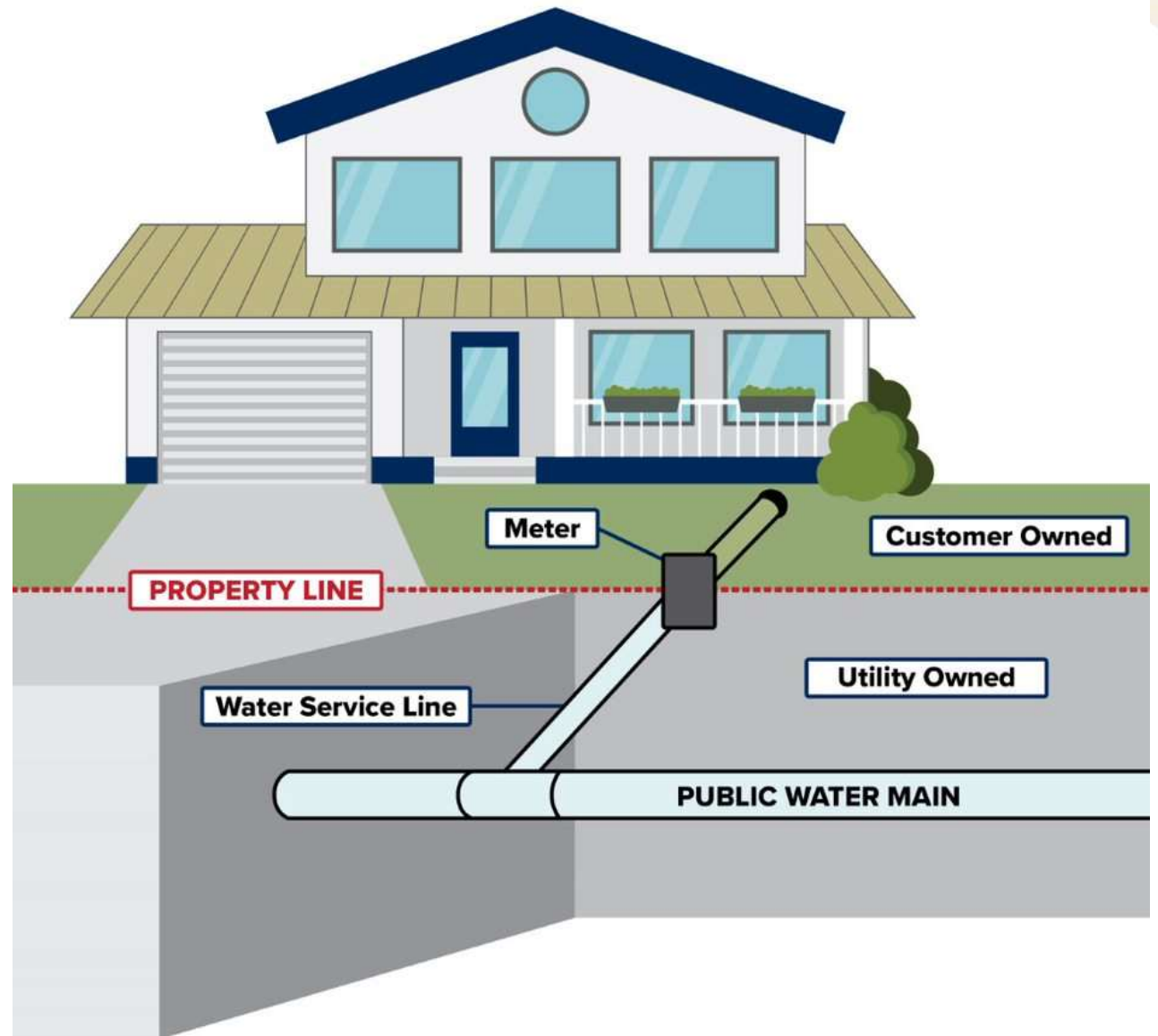
- **EPA revisions to Lead and Copper Rule, effective October 16, 2024**
  - **Establishes a "Trigger Level" at 10 ppb for regulatory sampling results**
  - **Changes to site sampling – collection procedure and site selection**
  - **School and childcare facility sampling requirements**
  - **Defines "galvanized downstream" as a lead source requiring replacement (galvanized service lines connected to current or historical lead)**
  - **Inventory of material of all service lines in distribution system (public and private)**



# Background on Service Lines

## What is a service line?

- A service line is the pipe that provides drinking water from the water main to customers homes
- Two Maintenance Responsibilities:
  - Public: From the water main to the curb stop
  - Private: from the curb stop to the internal plumbing



# Lead Protection Program

- **Program Initiation:**
  - Updated page on Greeley Water & Sewer Website
    - Email: [LeadProtection@GreeleyGov.com](mailto:LeadProtection@GreeleyGov.com)
  - Developed Communications Plan:
    - Messaging
    - Graphics
    - Education/Outreach Materials
  - Coordination with schools and childcare facilities
  - Coordination and outreach with Private Systems
  - Project: Lead Service Line Inventory and Replacement



# Lead Service Line Inventory and Replacement Project

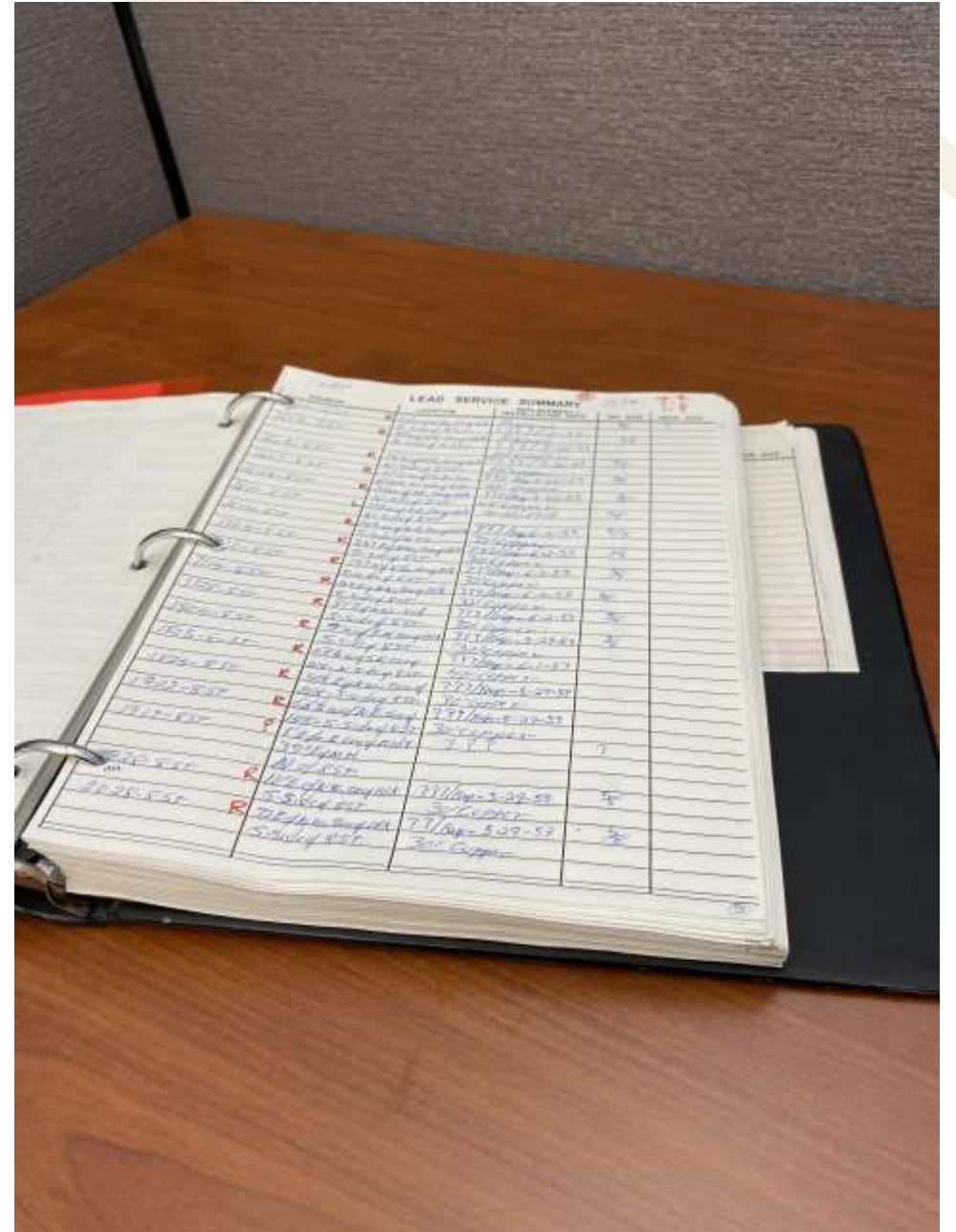
- **Project to identify and replace lead service lines in Greeley's Distribution System**
  - **Potholing**
  - **Other verification methods**
  - **Replacing lead and galvanized downstream lines**
  - **Public-facing inventory for LCRR (October 2024)**





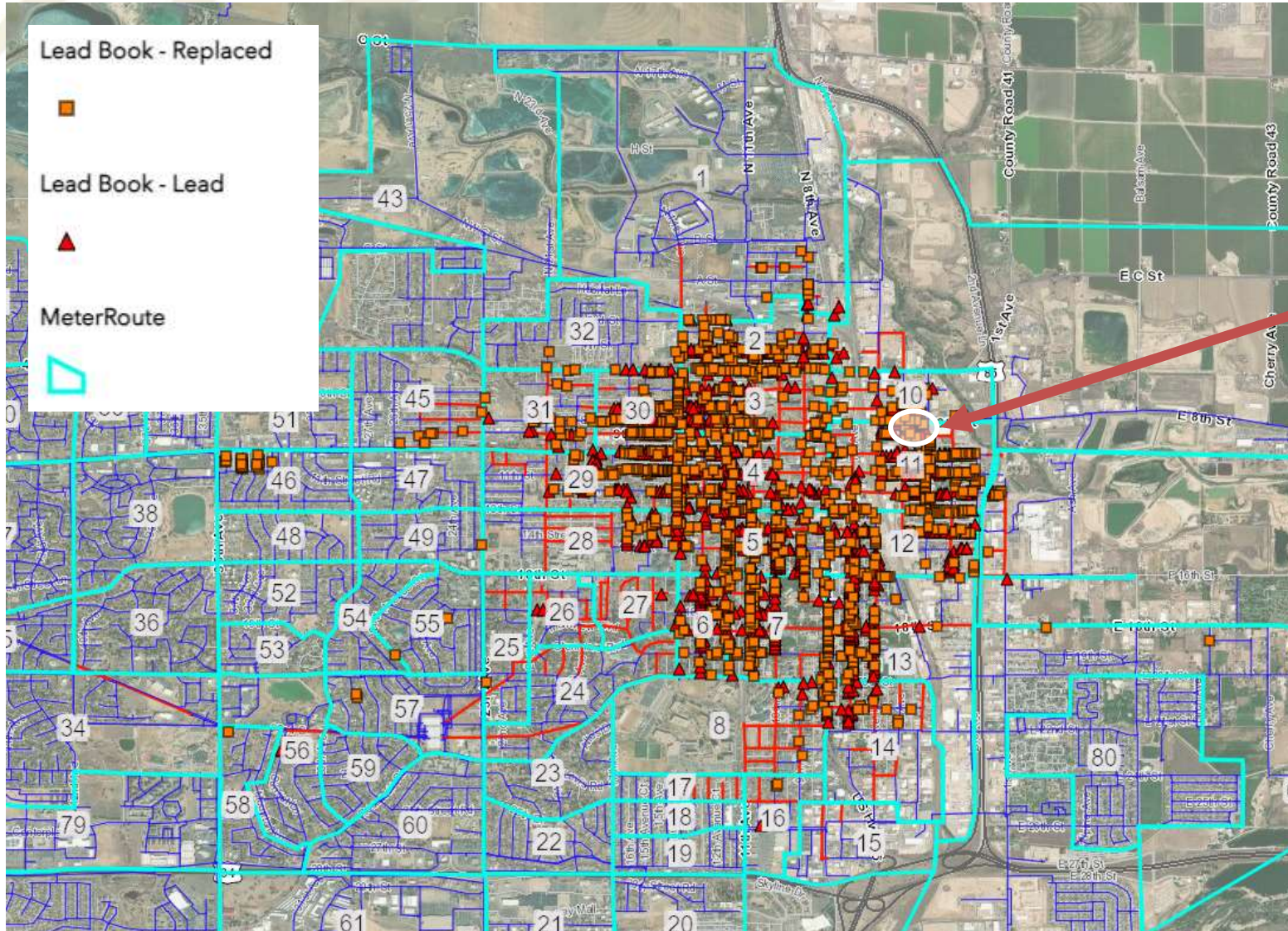
# Background: Greeley Lead

- In 1980, Greeley adopted the International Plumbing Code banning the use of lead in water service lines.
- Greeley started removing *public* lead lines in 1990's found through:
  - Meter program
  - Cement mortar lining program
  - Leak detection
- Recorded in "Lead Book"





# High Priority Locations: Lead Book



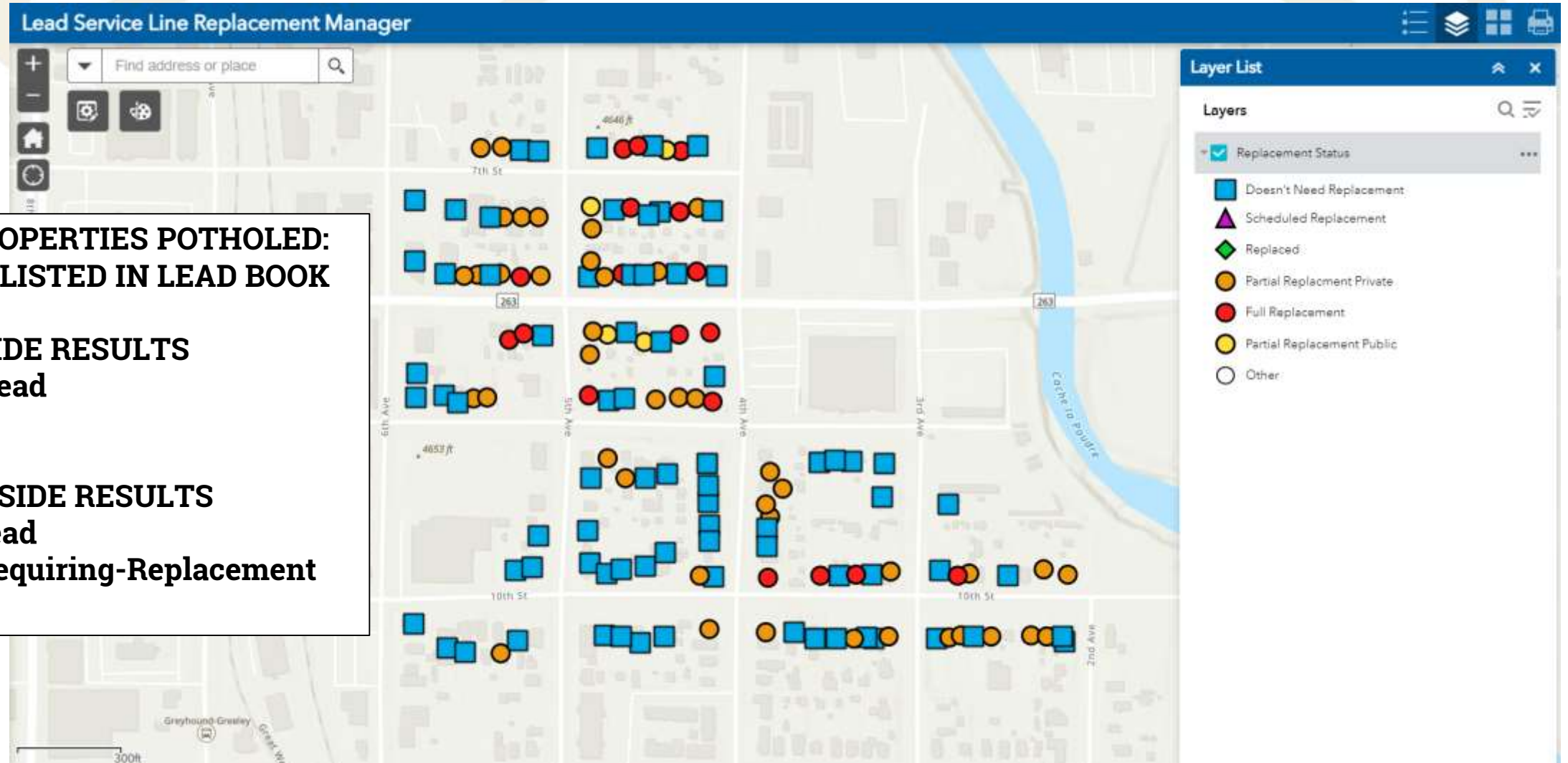
- 1,800 properties recorded
- 860 “lead”
- 975 “replaced”

## Phase 01 Initial Potholing Area

- To ensure possible risk of lead exposure is minimized, all Lead Book sites are being provided with a pitcher filter and replacement cartridges



# Phase 01 Potholing: February-March 2023



**OF 139 PROPERTIES POTHOLED:  
111 WERE LISTED IN LEAD BOOK**

## **PUBLIC SIDE RESULTS**

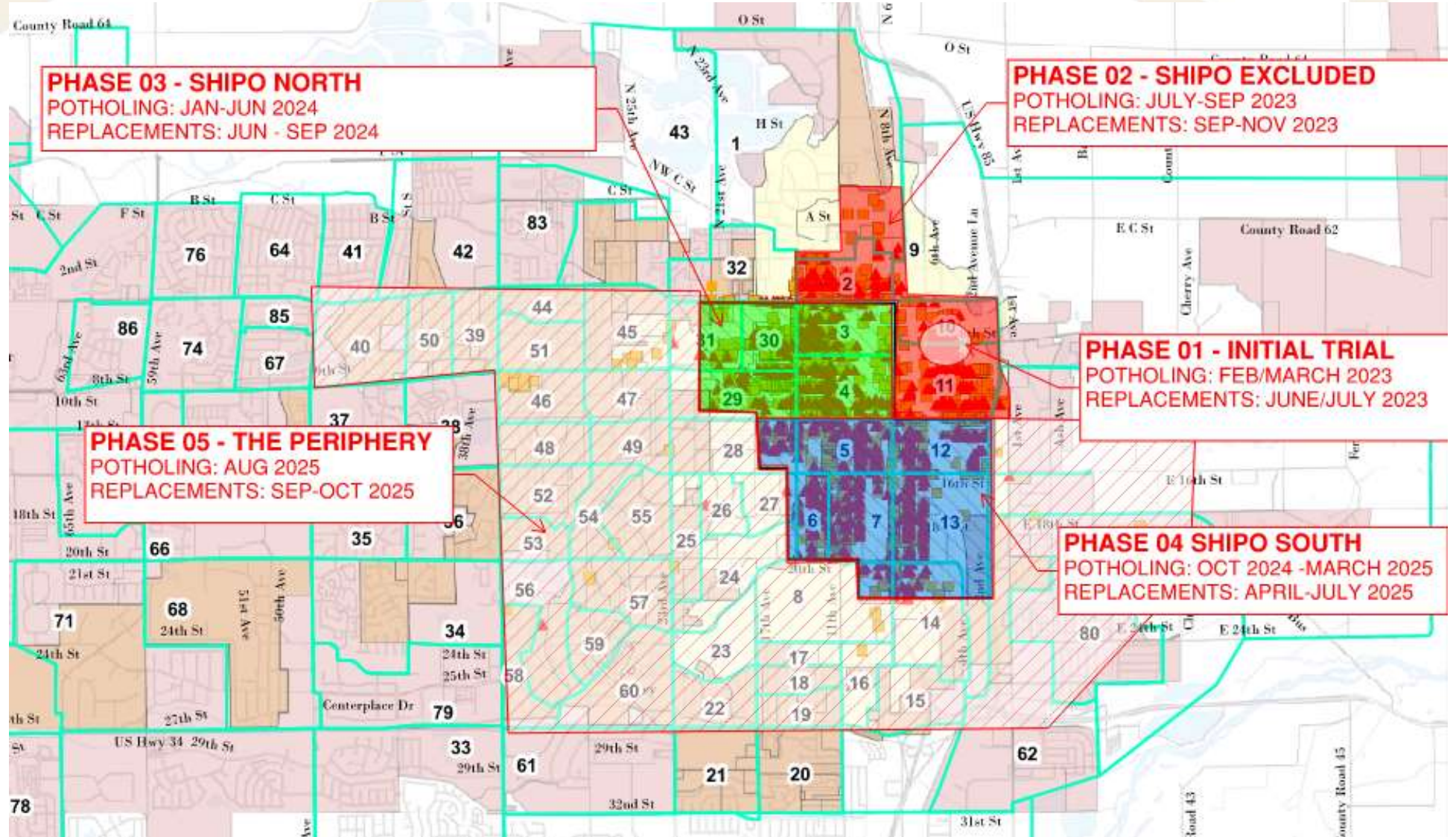
**118 Non-Lead  
21 Lead**

## **PRIVATE SIDE RESULTS**

**94 Non-Lead  
44 Galv-Requiring-Replacement  
1 Lead**



# Phasing Plan 2023-2025 (DRAFT)



# Annual Budget - Estimates

	ORIGINAL ESTIMATE	REVISED ESTIMATE
2023	\$2.0M	\$4.5M - \$5.5M
2024	\$2.0M	\$7.5 - \$8.5M
2025	\$2.0M	\$7.0 - \$9.0M
2026	\$2.0M	-
2027	\$2.0M	-
<b>TOTAL</b>	<b>\$10M</b>	<b>\$19M - \$23M</b>

## APPROXIMATE BREAKDOWN:

POTHOLING	\$4.3M
REPLACEMENTS	\$15.8M
OTHER COSTS	\$1.6M





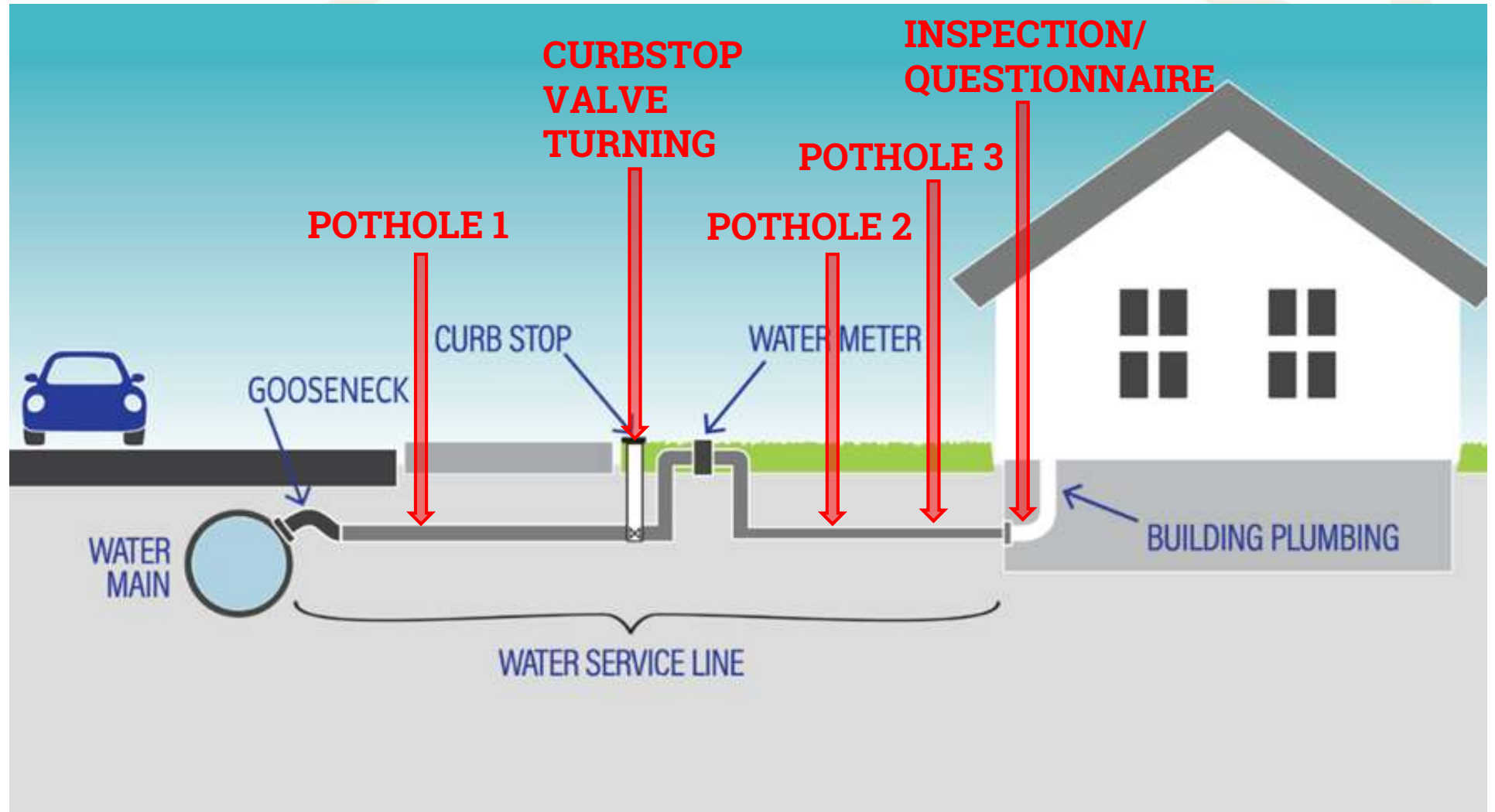
# State Revolving Fund – Grant Application

- Pursuing low interest loan and 50% loan forgiveness through State-administered Federal funds
- Eligibility requirements include:
  - Public Meeting: May 18th at 6:30 PM, City Center South Council Chambers
  - Analysis of construction project area by State Historical Preservation Office (SHPO)





# Cost Savings: Other Verification Methods

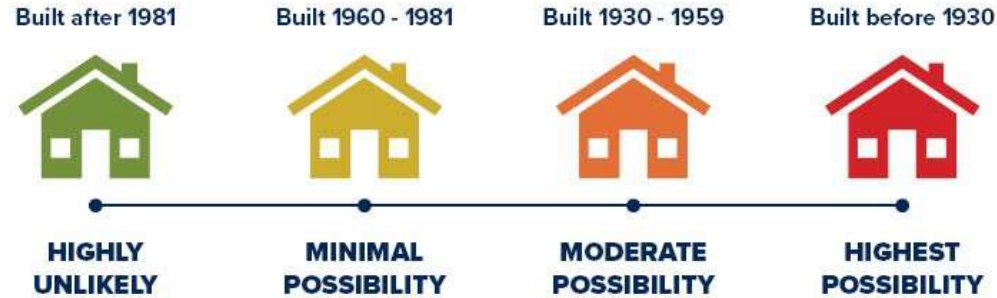


# Cost Savings: Other Verification Methods

- **Historical Records**

- Lead Book Entries
- Build Date
- Tap Cards
- Archive Cards

## Age of Greeley Homes Determines Potential for Lead Service Lines



*\*This graphic refers to customer-owned service lines only*

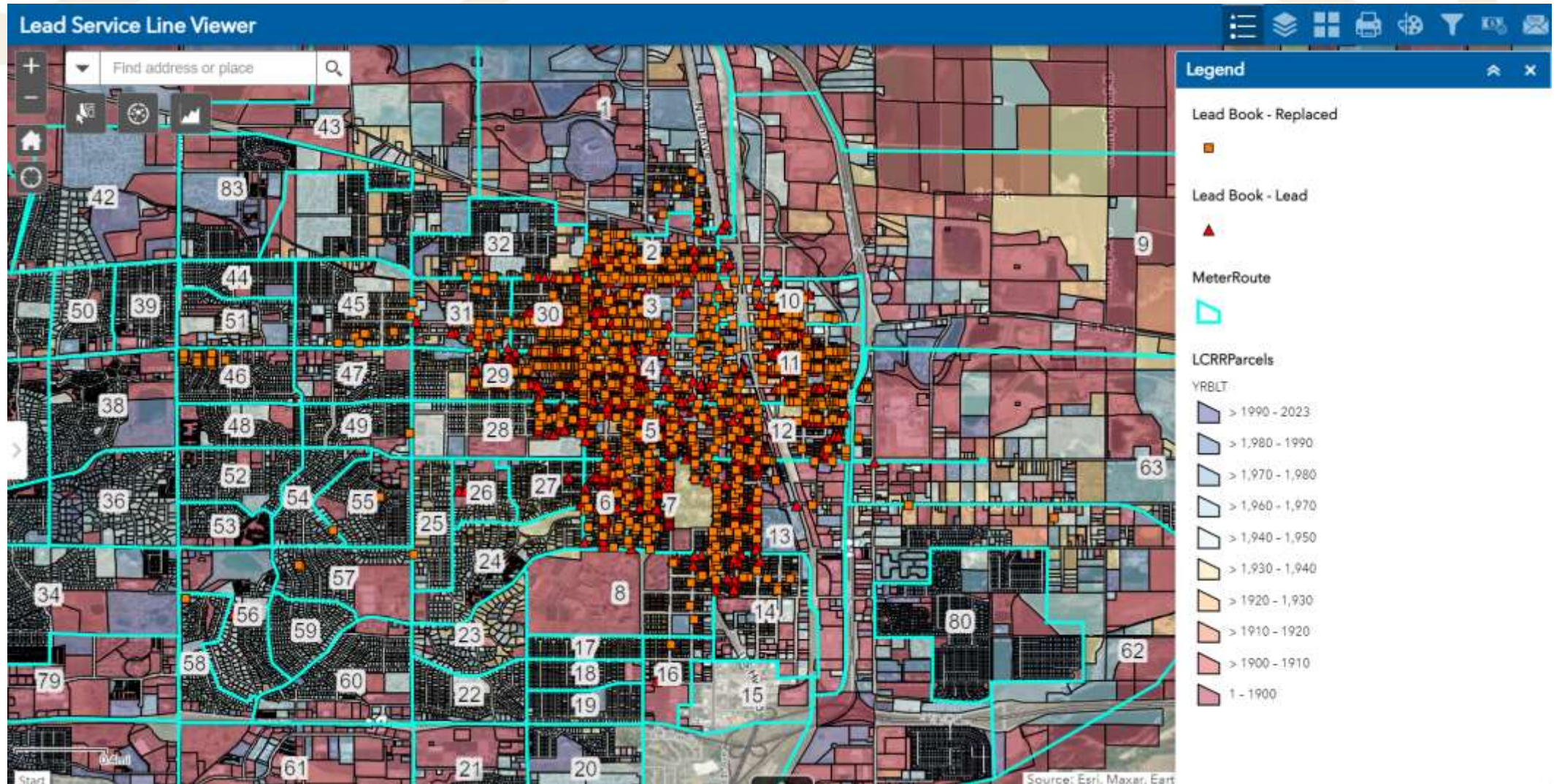
- **Service Line Questionnaire**

- Private-side material





# Data Integration & Statistical Analysis





# Next Steps

- **Pushing Service Line Questionnaire out to whole city (Pre-1981 Build Dates)**
- **Ongoing potholing and replacements – supplemented with other verification methods**
- **Contract with 120Water on pitcher filter distribution and post-replacement sampling**
- **Pipe Loop Study and optimizing corrosion control at Water Treatment Plants**
- **Partnering with Asset Management to utilize Esri ArcGIS Solution for data management, tracking project progress, and developing public-facing map**



# Questions?

