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DATE: 12/02/2024

TO: Alicia Hughes-Skandjis, Chair  
Public Works and Facilities Committee

THROUGH: Denise Koch, Engineering and Public Works Director  
Brian McGuire, Utility Superintendent

FROM: Chad P. Gubala, Ph.D., Utility and Production and Treatment Manager

SUBJECT: Lead Service Line Inventory (LSLI) Status Update

CBJ initiated the Lead Service Line Inventory (LSLI) as legally mandated by the January 15, 2021, EPA revision to the Lead and Copper Rule (LCRR; 40 CFR 141.84). This was first presented to PWFC in a [memo](#) at the June 3, 2024 meeting. The LSLI was triggered by concerns about lead in drinking water following the 2014 Flint Michigan crisis to address threats to health caused by lead bearing materials in public water systems.

The CBJ LSLI will be conducted in three main stages: 1) internal document/plan review; 2) client self-survey; and/or 3) direct examination of residences and facilities by independent inspectors. Federal law requires that at least one of these three identification methods must be completed, and the composition of every water service line identified and reported.

CBJ completed the first two phases of the LSLI by mid-summer of 2024 with ~15% of the surveyed water clients reporting back using the self-survey option (2). All but two service lines reported to date were identified as 'non-lead.' The two unverified service lines and the ~85% of service lines not reported through phases 1 and 2 were listed as 'unknown composition,' pending identification.

CBJ Utility was preparing to commence the final 'direct examination' inventory phase (3) when the community was struck by the glacial lake outburst flood (GLOF) on August 6, 2024. Due to the impact of this event on the community, the LSLI regulators for the CBJ and the Alaska Department of Environmental Conservation (ADEC) Drinking Water Division agreed to the temporary delay in the program.

The LSLI program has now restarted and potable water clients of the CBJ with service lines of 'unknown composition' were recently (November 11, 2024) sent another mailer, providing a second opportunity to conduct and report the composition of their service lines through the self-inspection option. This option will remain in effect for CBJ potable water clients until phase 3 (direct inspections) has commenced and has been completed.

The CBJ Utility and its LSLI contractor, Geosyntech, plan to execute phase 3 of the LSLI, starting with the inspection of schools, daycares, and public and commercial facilities, followed by residential property inspections in early 2025. During this process, the Utility will also prioritize the inspection of any property that is of known or suspected concern regarding lead service lines to quickly address any existing health threats.