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DATE: 06/03/24

TO: Wade Bryson, Chair
Public Works and Facilities Committee

THROUGH: Denise Koch, Engineering and Public Works Director

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

SUBJECT: Lead Service Line Inventory Status Update

Introduction

On January 15, 2021, the EPA announced a revision to the Lead and Copper Rule (LCRR; 40 CFR 141.84) to address threats to human health caused by contact with lead-bearing materials in public drinking water supply systems. A public water supply (PWS) system includes both publicly owned water mains as well as privately owned water supply lines.

The first step in the LCRR requires that PWS, including the CBJ Utility, conduct an inventory of all components of the water supply system and identify by composition type for all points of contact for potable water regardless of ownership. The implementation of this inventory is referred to as the Lead Service Line Inventory (LSLI). The Alaska Department of Environmental Conservation (ADEC) is administering the LSLI on behalf of EPA in Alaska (<https://dec.alaska.gov/eh/dw/lcrr/>).

Should the CBJ be concerned?

The LCRR was triggered over concerns about lead in drinking water following the 2014 Flint Michigan crisis. Lead was released into the Flint water supply through corrosion of sections of the community's water supply pipes. Since similar conditions could exist in other communities, EPA was compelled to identify and prevent additional threats from lead in water. Even very low concentrations of lead exposure from drinking water are detrimental to public health, especially for children.

Fortunately, regular CBJ water quality monitoring has continually demonstrated that our drinking water meets safe drinking water standards for all regulated substances, including lead. Carefully regulated water treatment procedures have kept our finished water non-corrosive. However, CBJ neither owns nor maintains the individual water supply lines that service private homes and businesses. Contemporary construction (>1990) was subject to an Alaska lead plumbing ban and is assumed to be lead-free. However, the compositions of all other privately owned water supplies are unknown to the Utility.

How is CBJ responding to the LCRR?

The CBJ Utility has retained Geosyntec Consultants to conduct this inventory analysis. The study is being conducted in three phases:

- Phase 1a. Examination of CBJ Utility engineering and public records to identify and document the composition of the publicly owned water main sections of the PWS (In Progress)
 - Phase 1b. Examination of CBJ Utility and CBJ Community Development Department public records to identify, filter, and exclude from subsequent investigation privately owned service line installations that do not contain lead (screened by >1990 construction date when lead pipes were banned in AK) (In Progress)
 - Phase 2. Consumer outreach and self-reporting of privately owned water service line composition type not excluded in 1b (Beginning June 2024; Ending July 2024).
 - Phase 3. Facilitated inspections of non-reporting and/or uncertain water service line installations not captured in Phase 1b and 2 (TBA).
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Project Status and Next Steps:

Preliminary results from Phase 1a indicate that the composition of the publicly owned section of the CBJ water main system is lead-free.

Results from Phase 1b have been used to exclude ~23% of private residences from the screening list based on construction date (>1990).

The remaining 77% of private residences and businesses are now slated for the Phase 2 survey.

The materials developed for Phase 2 are attached to this memo (**LCRR Phase 2 Materials**) and are scheduled to be released for execution during the first week of June 2024. The CBJ expects ~20-25% response rate from Phase 2.

The composition of any known service lines not excluded in Phase 1 or reported in Phase 2 will then be scheduled for an in-person inspection during Phase 3 of this program.

The deadline for completion of the LSLI inventory is October 16, 2024.

Upon completion of the LSLI, the results of the inventory will be made available in the public domain through ADEC and CBJ (likely through Parcel Viewer).

Any property owner with a water supply service line that does or may contain lead will be immediately contacted, advised of the current risk, and provided with options for mitigation. It is anticipated that the EPA will be issuing additional regulations later in 2024 that will mandate that any lead service lines identified during the LSLI inventory, be replaced or removed over a ten-year period at the owner's expense. The CBJ Utility is currently developing additional methods and policies to assist our residents with testing and mitigation of potential risks posed by lead in private water service lines.

Attachments:

LCRR Phase 2 Materials

EPA 2021 LCRR Implementation Fact Sheet – April 2024