

Lead in Drinking Water Discussion of Next Steps for LCA

Presentation Overview



- Perceptions & Clarifications About Lead in Drinking Water
- What Other Utilities are Doing
- Review of Recommendations for LCA
- Moving Forward Next Steps





Media Reports:

"Kids in Allentown have higher levels of lead in their blood than kids in Flint, MI"

- Every state makes their own rules about who gets tested for lead.
- In Pennsylvania, blood testing for lead is driven by requirements for acceptance into medical assistance programs.
- According to the Pa. Department of Health, less than 14% of children under age 7 were tested for blood lead levels in Pennsylvania in 2014.
- No demographic studies have been conducted to attempt to normalize data between states to be able to make true comparisons.



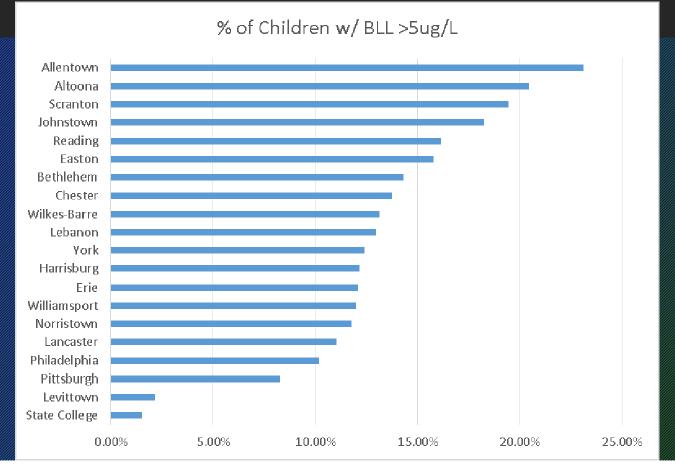


Heavy Local Media Exposure Makes People Think: "Lead exposure is coming mostly from the tap water"

- Local media has focused primarily on tap water issues following the crisis in Flint.
- However, there is no evidence to suggest that tap water is the primary contributor to lead exposure.
- Public health experts continue to say lead-based paint in older homes is their primary concern.

Highly Publicized Public Health Data

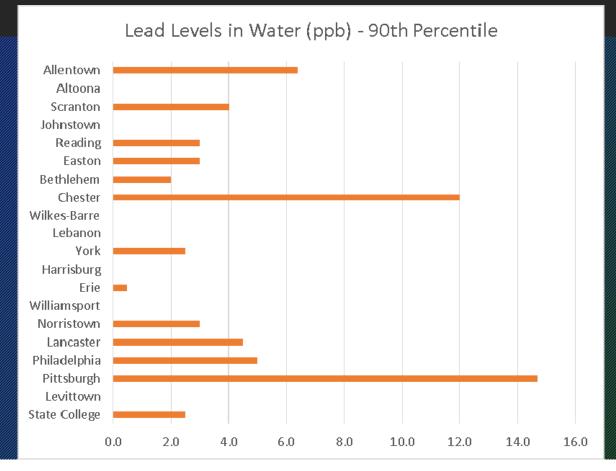




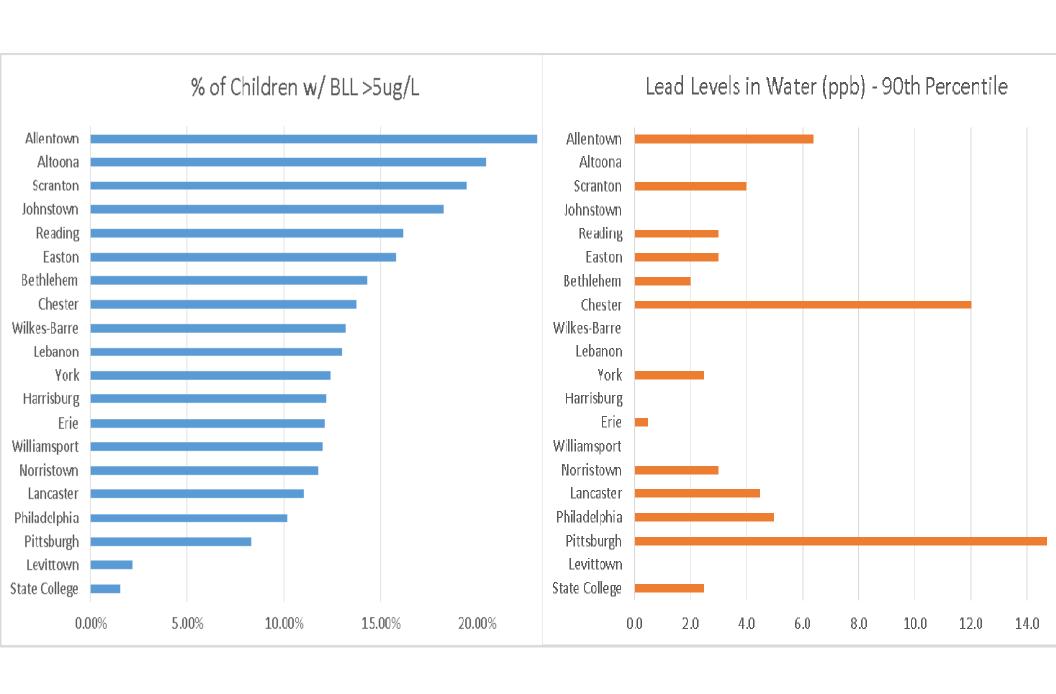
Source: Pennsylvania Department of Health

BLL Not Clearly Linked to Lead in Water





Source: Water Utility Annual Water Quality Reports







Customers / Others Think:
"LCA should provide lead-free water!"

- The water coming from LCA's water sources **IS** lead-free!
- Since LCA's water is already lead-free, our obligation under the Lead & Copper Rule is to provide water that is <u>not corrosive</u>, to minimize leaching of lead from customers' plumbing systems and lead service lines.

Ensuring LCA's Water is Not Corrosive



Natural Properties of LCA Water

Lead & Copper Rule

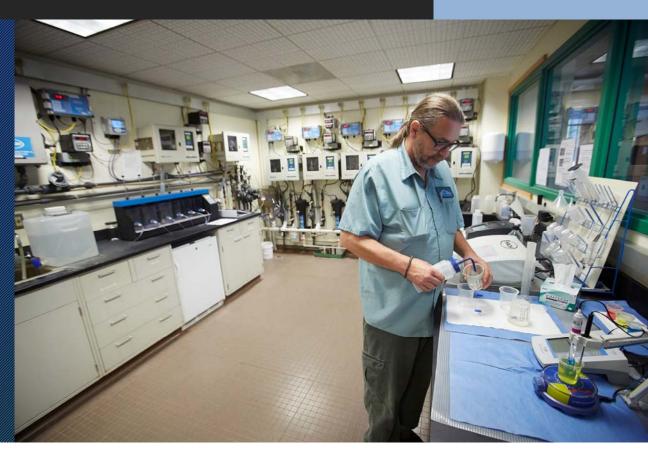
- 3-Year Testing Cycles
- Tier 1 Sample Sites "Worst Case"

Water Quality Parameters

- 24/7 monitoring
- pH & Alkalinity

Corrosion Control Treatment

• Installed & ready for use if needed!



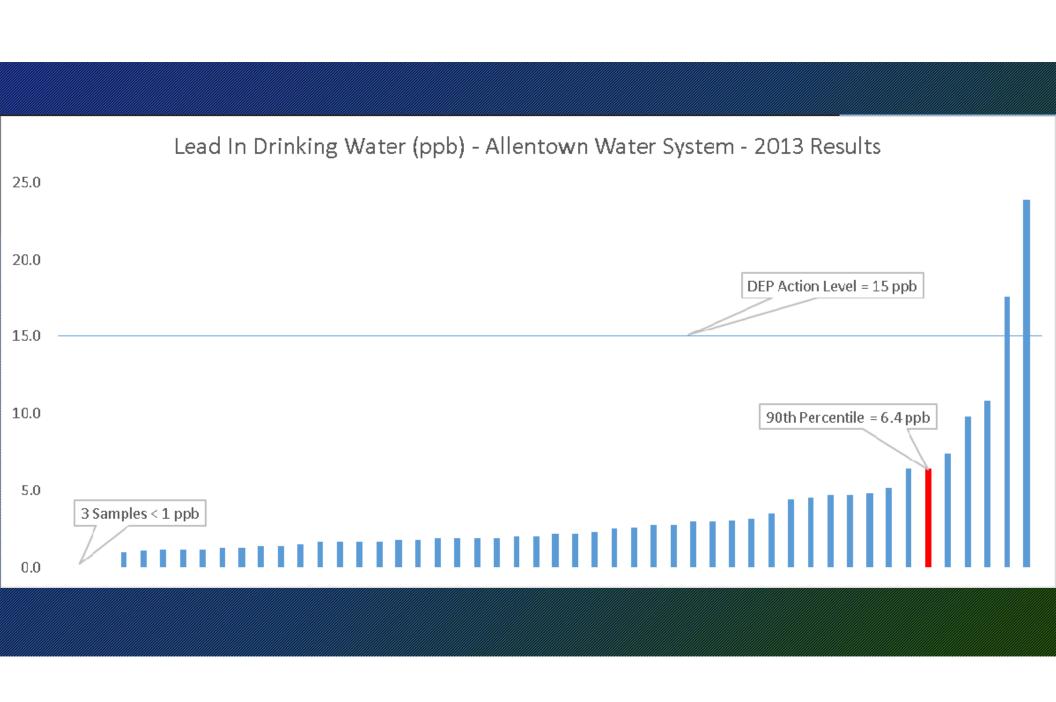
Perceptions & Clarifications

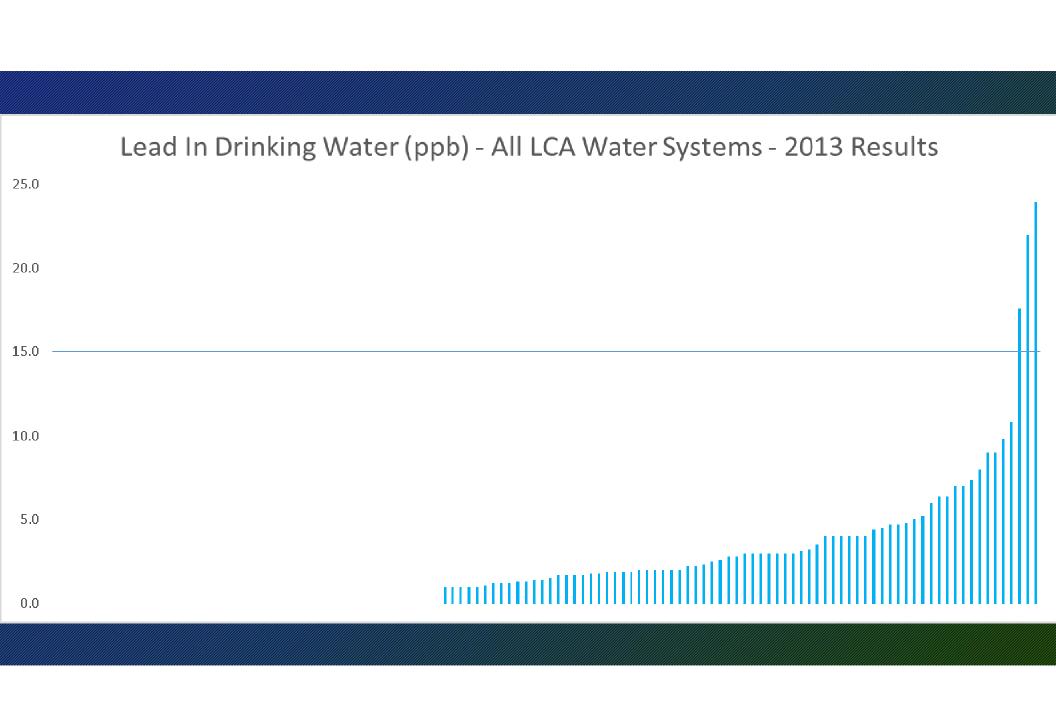


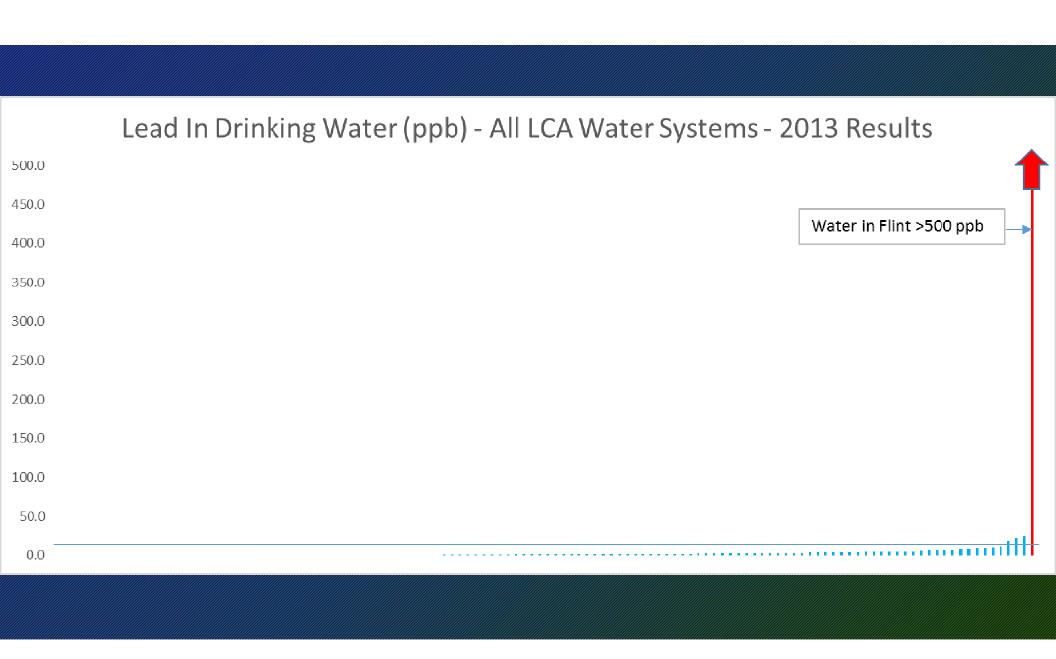
Some People Say:

"Lead service lines are the primary cause of high levels of lead in LCA's drinking water."

- All water testing completed to date show generally <u>low</u> lead levels in LCA's water at the tap, regardless of service line material.
- Some homes with copper service lines can have lead in their tap water due to other factors such as water softeners, lead solder inside the home, etc.
- Additional testing might help us understand more about why a small portion of homes do test higher for lead, and would help customers understand more about factors that impact lead in drinking water.
- EPA, AWWA, WRF, NDWAC and many other organizations are researching to learn more!











The Solution Some Have Offered:

"LCA should remove all lead service lines and the problem will be solved."

- Water quality can also be impacted significantly by interior plumbing configurations such as lead plumbing, brass fixtures, lead solder, water softeners, filter systems, and more.
- Focusing only on lead service lines draws attention away from other real issues that customers must address to reduce risk of exposure.
- Replacing a lead service line has been proven to <u>increase</u> lead levels at the tap under certain conditions.
- EPA and AWWA are working on guidance and potential regulatory changes to address lead service lines, which will help with decision-making.

Many Unknowns Remain!



- The water utility must provide water that is not corrosive and meet an "Action Level" of less than 15 ppb in 90% of homes tested. So, what's the actual "safe" level customers should try to achieve within the home?
- What is causing the high blood lead levels among some children in Allentown?
- If 100% of all lead plumbing were removed, would blood lead levels decrease?
- What's the safest way to replace a lead service line without increasing lead levels in water?
- Who pays for replacement of a lead service line that the customer owns?
- Will drinking water regulations change?
- Is the current monitoring process adequate / accurate to determine risk of lead exposure through drinking water?
- Will other laws change to address universal blood testing, lead paint abatement, etc.?

Proceed Proactively & Cautiously



- With care & empathy for the customer
- With best practices based on knowledge we have today
- With an eye out for data that may help make decisions in the future



 Avoid public health risk & financial risk of acting too quickly before questions are answered





Website Review (Pittsburgh, Harrisburg, Wilkinsburg Penn, others)

Other Conversations:

Chester Water Authority

Easton Suburban Water Authority

Erie Water Works

North Penn Water Authority

York Water Company

Philadelphia

Recommendations for LCA



Regulatory Review, Monitoring & Participation Industry Research Review, Monitoring & Participation

Build Our Network
Public Education
Lead Service Line (LSL) Inventory
Water Sampling / Testing

Conversation on Lead Requires a Network



- Local & State Health Departments
- School Districts
- Centers for Disease Control
- Municipalities Building Codes & Enforcement
- Housing & Urban Development
- Plumbers, Title Companies, Home Inspectors
- EPA, DEP, AWWA, WRF



Public Education



- Website Enhancements
- Testing Data Posted Online
- Fact Sheets
 - Scratch Test
 - Flushing Instructions
 - Aerator Cleaning Instructions
 - Tips for Water Softeners, Filters, Hot Water Usage, etc.
- Customer Billing Inserts / Newsletters
- Special Mailings
- CAUTION: Research on lead service lines is evolving! Must take care to ensure public message is clear and encourages the <u>right</u> actions.

Lead Service Line (LSL) Inventory



- Allentown Division 10,000 service lines w/ unknown material (public portion main to curb)
- Suburban Division No lead service lines (public portion), but database not populated
- All Divisions customer portion of service line (curb to house) unknown, but some data may
 exist in service records and other paper files
- Geographic Information System (GIS) use the tool we already have!
- How to get data from other sources into GIS? (e.g. service orders, meter replacement work orders, etc.)
- Data can be used to plan future main replacement programs, public outreach, and assess costs associated with potential future LSL replacement programs
- How to capture information on unknown service lines?
- Customer participation could help.
- Program Cost? Depends on how quickly inventory data is needed.





Lab Cost - \$25 per sample tested LCA administrative costs

How to predict volume of requests?

Water Testing Program - Risks/Limitations



- LCA staff fully committed between June and September for DEP monitoring program
- Local labs are also fully committed between June and September under contract with water utilities across the state!
- Lab results won't tell us where the lead is coming from
- Customer follow-up actions necessary to reduce lead if the results are high –
 LCA cannot mandate LSL replacement, removal of lead plumbing, etc.!

Water Testing Program - DEP Feedback



- Samples cannot be included in regular monitoring program for lead unless they meet specific parameters:
 - materials surveys
 - timing of sample collection
 - must be approved as a "tier 1" site
- All other results will be reported to DEP as "Special" samples.
- If any of the "special" sample results are high, DEP may request additional information or recommend additional actions to investigate source of lead in the water.

LCA Water Testing - Recommendations



Offer to all LCA customers (Allentown & Suburban)

Follow standard process for customer first-draw sample collection, 30-day process, provide results and educational information to all participants

Track results & post online (remove customer data)

Collect information from the customer about service line material & other details

Initial Testing Period: May 2-31, 2016

Ongoing Program Period: October 2016 - ??

Charge to customer?

- \$30 Fee would generally cover LCA costs
- If testing for "free" what program / operating expense do we cut?

Moving Forward - Next Steps



- Need to act quickly to put testing program details in place by May 2nd
- Board decision on cost / fee structure for testing
- Public education / outreach can begin immediately
- Efforts already under way to build network for more comprehensive discussions about lead
- Forward-looking initiatives:
 - Lead service line inventory program
 - Regulatory / industry research monitoring & participation

Discussion / Questions?

