Lead and Copper Revised Rule (LCRR)

September 17,2024

CITY OF COCOA
UTILITIES DEPARTMENT

Agenda

- Lead and Copper Rule Revision
- Key Aspects LCCR / Informational Flyer
- LCCR Compliance
- LCRi – new rule?
- Customer and Utility Impacts
- Policies
- Questions

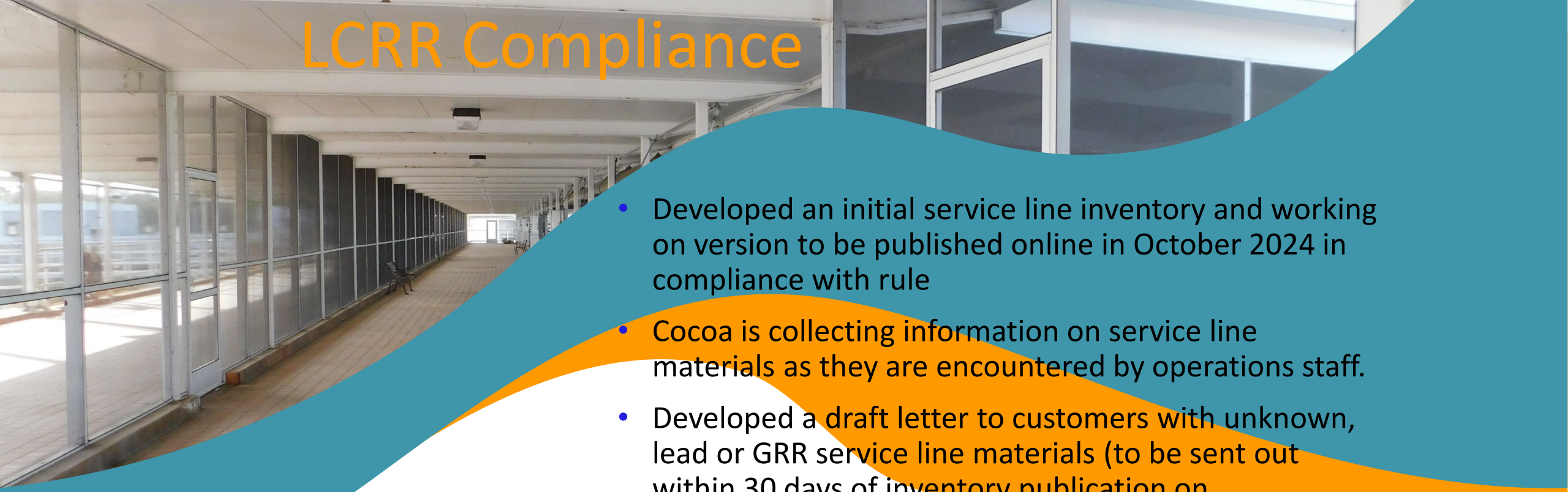
Lead and Copper Rule Revision

The US Environmental Protection Agency (EPA) promulgated changes to the Lead and Copper Rule on 12/16/2021 with a compliance date of **10/16/2024**.

<u>New Requirements</u>:

- Service line Inventory – public and private
- Replacement Plan
- Compliance Sampling criteria
- Schools and Daycare testing
- Notifications

LCCR



LCRR Compliance

- Developed an initial service line inventory and working on version to be published online in October 2024 in compliance with rule
- Cocoa is collecting information on service line materials as they are encountered by operations staff.
- Developed a draft letter to customers with unknown, lead or GRR service line materials (to be sent out within 30 days of inventory publication on 10/16/2024)
- Developed webpage ready to launch with information and resources on the Lead and Copper Rule
- Developed a customer self-reporting survey, which will be hosted on the City LCR webpage
- Cocoa and other local utilities have met with Brevard County School Board. Cocoa is investigating service line materials at schools

LCRR

https://www.cocoafl.gov/1846/Lead-and-Copper-Program

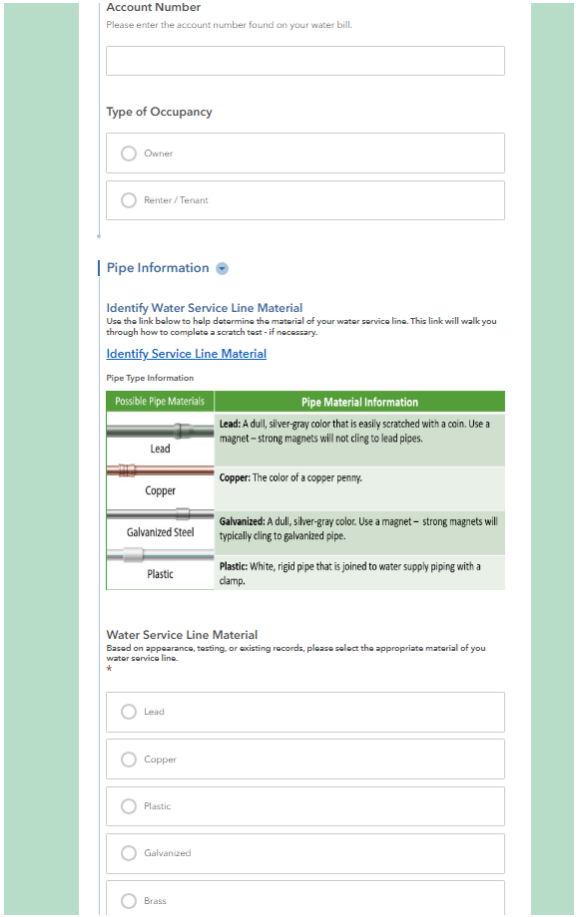
Key Aspects LCRR

- Develop an inventory identifying all service lines in system (both public and private portions) and publish online by October 16, 2024

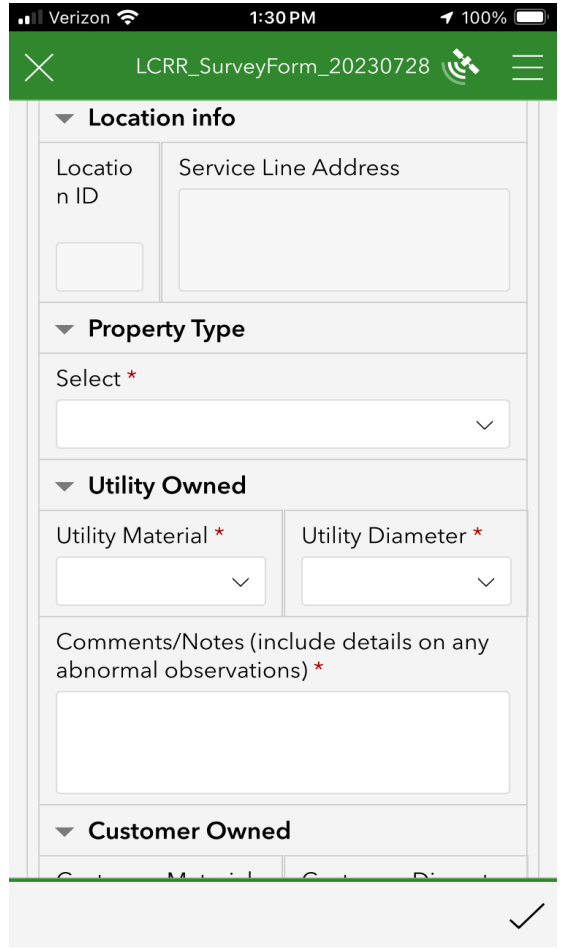
Current Stats
58,146 unknowns
29 GRRs
0 Lead

GOAL

Self Reporting Survey



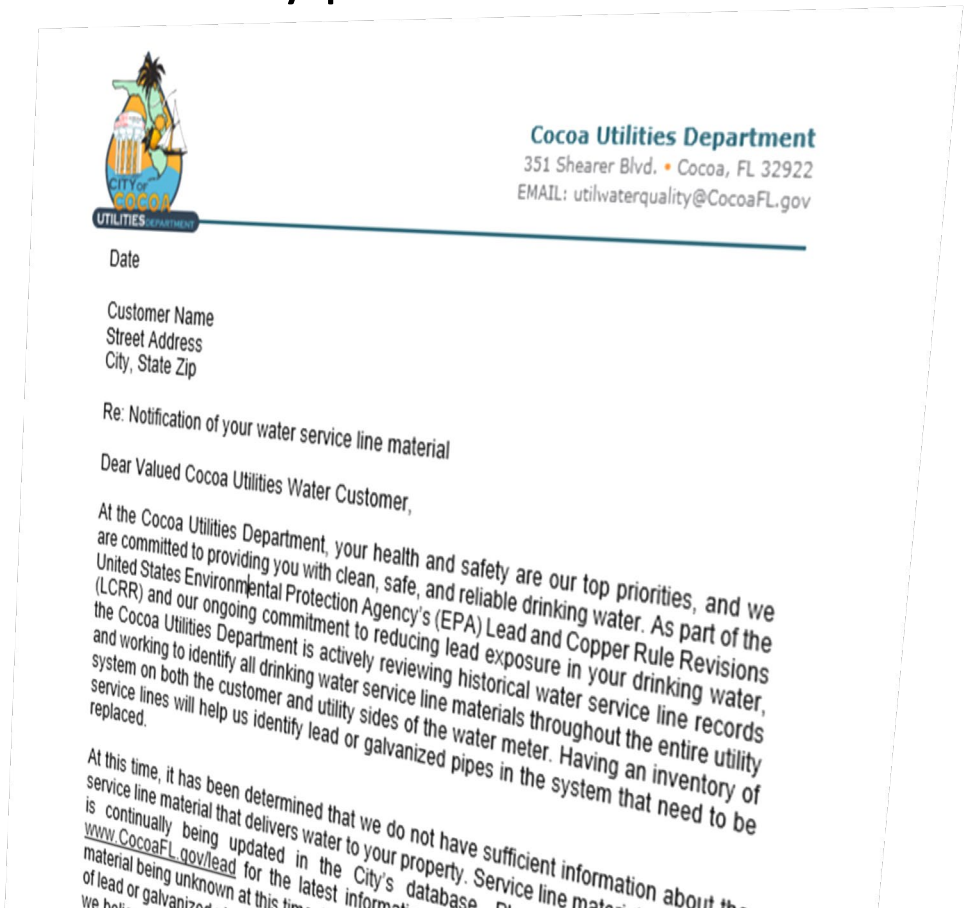
Staff GIS Collection Form



Key Aspects LCRR

- Develop an inventory identifying all service lines in system (both public and private portions) and publish online by October 16, 2024
- Notify customers with lead, GRR, and unknown service lines within 30 days of inventory publication and annually thereafter

GOAL



Cocoa Utilities Department
351 Shearer Blvd. • Cocoa, FL 32922
EMAIL: utilwaterquality@CocoaFL.gov

Date

Customer Name
Street Address
City, State Zip

Re: Notification of your water service line material

Dear Valued Cocoa Utilities Water Customer,

At the Cocoa Utilities Department, your health and safety are our top priorities, and we are committed to providing you with clean, safe, and reliable drinking water. As part of the United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) and our ongoing commitment to reducing lead exposure in your drinking water, the Cocoa Utilities Department is actively reviewing historical water service line records and working to identify all drinking water service line materials throughout the entire utility system on both the customer and utility sides of the water meter. Having an inventory of service lines will help us identify lead or galvanized pipes in the system that need to be replaced.

At this time, it has been determined that we do not have sufficient information about the service line material that delivers water to your property. Service line material is continually being updated in the City's database for the latest information www.CocoaFL.gov/lead material being unknown at this time of lead or galvanized

Key Aspects LCRR

GOAL

- Develop an inventory identifying all service lines as Lead, GRR, or Non Lead in the system (both public and private portions) and publish online by October 16, 2024
- Notify customers with Lead, GRR, and Unknown service lines within 30 days of inventory publication and annually thereafter and after ownership changes
- Compliance sampling at customer taps. First round of compliance sampling in January 2025
- Development of Replacement Plan by October 16, 2024
  - If compliance sampling exceeds trigger level or action level, water systems must initiate lead service line replacement.
- School and childcare facility sampling required. First 20% of sampling due October 2025.
  - Sample all schools and licensed childcare facilities within service area in 5 years, at rate of 20% per year

Informational Flyer
LCRR

GOAL

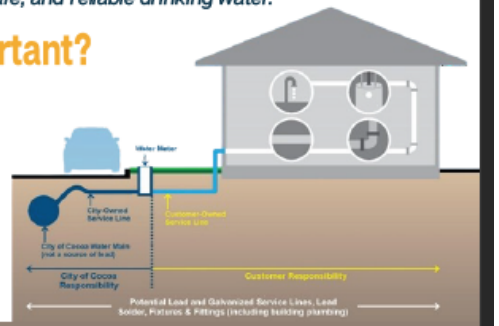
WATER SERVICE LINE MATERIAL INFORMATION

SERVICE LINE MATERIAL IDENTIFICATION AND LEAD AND COPPER INFORMATION

We are committed to providing you with clean, safe, and reliable drinking water.

Why is service line identification important?

As part of the United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) and our ongoing commitment to reducing lead exposure in your drinking water, the Cocoa Utilities Department is actively reviewing historical water service line records and working to identify all drinking water service line materials throughout the entire utility system on both the customer and utility sides of the water meter. Having an inventory of service lines will help us identify lead or galvanized pipes in the system that need to be replaced.



Sources of Lead

Your drinking water is lead-free when it leaves our treatment plants, but as water travels through the system to your faucet, lead can enter the water through the corrosion (or wearing away) of plumbing materials including brass fixtures and fitting, and lead soldered joints in home/building plumbing, as well as lead service lines. Lead is a common metal found in the environment. Although the primary sources of lead exposure for most children are deteriorating lead-based paint, lead-contaminated dust, and lead-contaminated residential soil, EPA estimates that 10 to 20 percent of a person's potential exposure to lead may come from drinking water. In Florida, lead was commonly used for water service lines and indoor plumbing solder until 1989 when it was banned.

What Can I do?

- IDENTIFY YOUR WATER SERVICE LINES AND REPLACE ANY LEAD OR GALVANIZED LINES OR MATERIALS
- RUN COLD WATER FOR 5 MINUTES TO REDUCE LEAD FROM INTERIOR PLUMBING AND USE COLD WATER FOR DRINKING COOKING, AND PREPARING BABY FORMULA
- CONSIDER PURCHASING A FILTER AND CLEAN YOUR FAUCET AERATORS REGULARLY, TEST YOUR WATER FOR LEAD AND YOUR CHILD'S BLOOD LEAD LEVEL
- INSTALL LEAD-FREE FAUCETS AND FIXTURES

Service Line Materials

LEAD GALVANIZED COPPER PLASTIC

HELP US IDENTIFY YOUR SERVICE LINE MATERIAL BY COMPLETING THIS BRIEF ONLINE SURVEY

Stay Connected • utilwaterquality@cocoafl.gov • www.CocoaFL.gov/lead

Informational Flyer
LCRR

GOAL

WATER SERVICE LINE MATERIAL INFORMATION

SERVICE LINE MATERIAL IDENTIFICATION AND LEAD AND COPPER INFORMATION

We are committed to providing you with clean, safe, and reliable drinking water.

What is lead?

Lead is a naturally occurring metal that is harmful if inhaled or swallowed. Lead can be found in air, soil, dust, food, and water.

Is my home at risk for lead plumbing?

Lead was commonly used for water service lines and indoor plumbing solder until 1986 when it was banned. Brass faucets, fittings, and valves, including those advertised as "lead-free," may also contribute to lead in drinking water. Until legislation was passed in 2014, "lead-free" plumbing could contain up to 8 percent lead. Current standards for "lead-free" fixtures allow for no more than 0.25 percent of lead content. The most common problem is with brass or chrome-plated brass faucets and fixtures which can leach lead into the water, especially hot water. Galvanized pipes can also serve as a source of lead exposure.

How can I be exposed to lead?

The most common source of lead exposure is from paint in homes and buildings built before 1978. Lead-based paint and lead-contaminated dust are the main sources of lead exposure for children. Lead-based paints were banned for use in housing in 1978.

Although the main sources of exposure to lead are ingesting paint chips and inhaling dust, lead also can be found in some household plumbing materials and some water service lines. The EPA estimates that 10 to 20 percent of human exposure to lead may come from lead in drinking water. Infants who consume mostly mixed formula can receive 40 to 60 percent of their exposure to lead from drinking water. Other sources of lead exposure include paint, ceramics, gasoline, batteries, and cosmetics.

What are the health effects of lead exposure?

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

How does lead get into my drinking water?

Lead can enter drinking water if service lines or plumbing materials that contain lead corrode. Additionally, if water stands in plumbing systems containing lead for several hours or more, the lead may be more likely to dissolve into your drinking water.

How does Cocoa test for lead in drinking water?

The Cocoa Utilities Department has been in compliance with the EPA's Lead and Copper Rule, and its revisions, since the rule was first established in 1991. We regularly test the water at a selected number of high-risk homes/buildings located throughout the distribution system. If samples show lead at or above 15 micrograms per liter, we notify the customer and provide instructions on what to do to limit lead exposure as required by Florida Department of Environmental Protection.

Can I test my drinking water for lead?

You can have your water tested for lead. Since you cannot see, taste, or smell lead in water, the only way to determine the level of lead in drinking water at your home/building is to have the water tested. The Florida Department of Environmental Protection maintains a Database of State-certified Laboratories.

I'm concerned my home may have lead plumbing. How can I find out?

We are actively working to identify all drinking water service line materials throughout the water supply. To determine the service line material at your property, we need your help! To help you check for lead, we've created a webpage to guide you through the process.

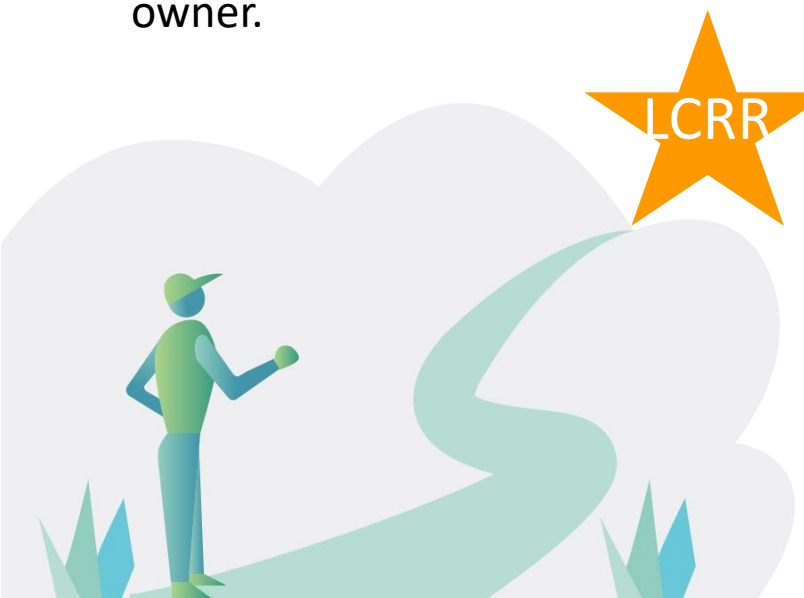
Will Cocoa replace my lead service line?

Cocoa is responsible for any lead service line from the water main to the meter located near the property line. Lead services lines from the meter to a home or building located on a customer's property are the responsibility of the property owner. Please contact a licensed plumber for this work and notify us in advance if you plan to replace your service line by e-mailing utilwaterquality@cocoafl.gov.

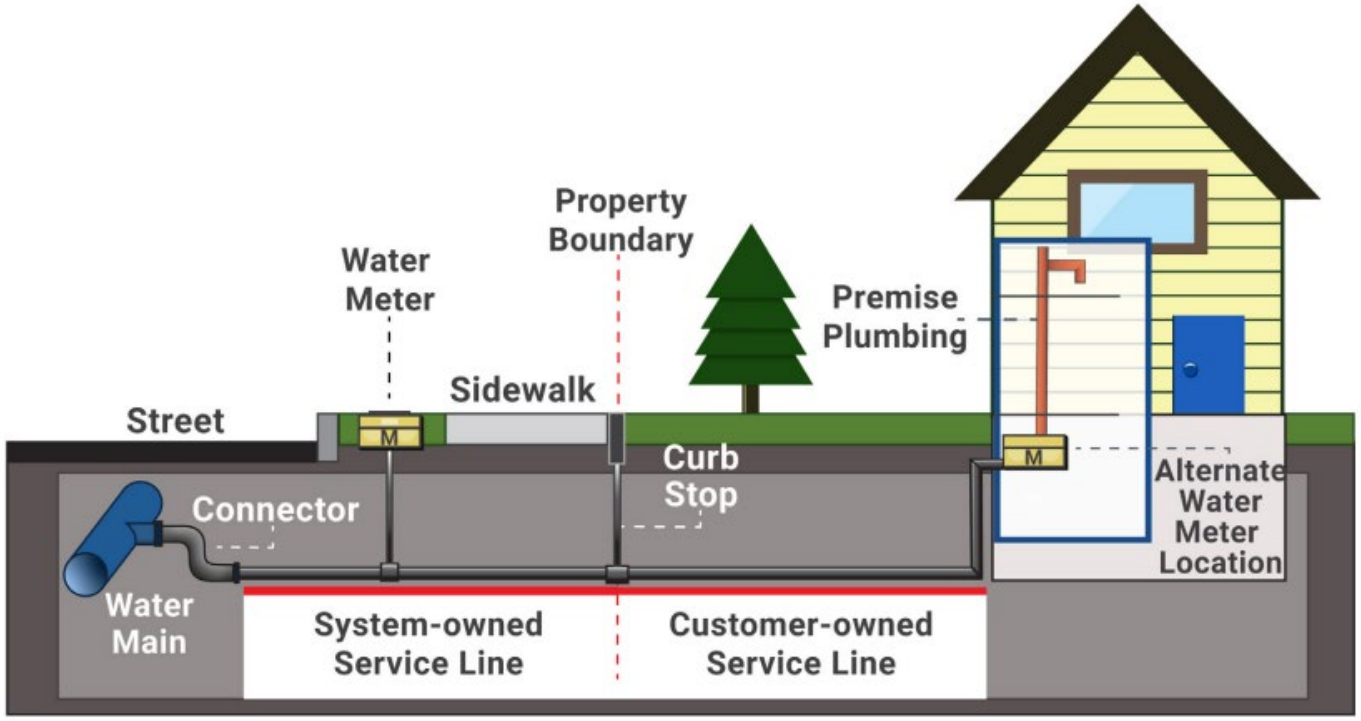
Stay Connected • utilwaterquality@cocoafl.gov • **www.CocoaFL.gov/lead**

Service Lines

- The City of Cocoa treats the drinking water to minimize the amount of lead that may leach into the water and performs routine water testing to ensure the treatment is effective.
- Service lines are the pipes connecting the water main to the interior plumbing in a building.
- Ownership of the water service line is split between the City of Cocoa and the property-owner.



Types



Proposed LCRi Rule

- Must identify all unknowns and replace all LSL or GRR within 10 years (2037). Mandatory replacement rate of 10% per year.
  - Takeaway: Identify all unknowns by 2027 to avoid excessive replacement rate.
- Lead service line replacement plans not due until 10/16/2027
- Mandatory full service line replacement (i.e. including customer side)
- Connectors (i.e. goosenecks) now required to be included in inventory
- School and childcare facility sampling requirement delayed until October 2027
- New compliance tap sampling requirements delayed until 2028 (from 2025)
- Action level goes to 10 ug/L (no more trigger level)

Customer Impacts
LCRR

- If lead or galvanized required replacement (GRR) service lines are found, it is customer's responsibility to replace their service line from meter to house/business, or opt to not replace it
- Customer must be notified if the Utility Departments identifies a service line type change (i.e. from unknown to GRR/Lead) and notified annually if unknown
- If homeowner replaces private lead service line, water system must replace public side of the lead service line within 45 days (for existing lead or GRR lines)

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Utility Impact LCRR

- If a lead or GRR is found on city side, it will be replaced (has been our policy for years)
- Continuous update of service line inventory, web site and publishing results
- Letter notifications unknowns, changes in materials and compliance letters for those who do not replace service lines as required (currently over 58,000+ unknown lines) $17K cost or less annually plus postage
- If there is a system water quality exceedance, a percent replacement of service lines is required
- Additional laboratory sampling and testing required
- Adding one full time Conservation Officer to assist with LCRR, data, customers etc.

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Financial Summary

	Impacts
 City and Customer have acceptable service line material	No cost impact
 City service line is Lead or GRR, Customer side is OK	Utility cost to replace, no cost to customer
 City service line is OK, Customer side is Lead or GRR	City must annually notify, No current grants available, Customer can defer work
 City service line is Lead or GRR, Customer side is Lead or GRR	Customer/City share costs covered by SRF Forgivable Loan 49/51%

Policies Necessary

- When full service line replacement is needed (customer and utility)
  - A policy to affirm the 49%/51% split represents an equal cost for customers and the utility regardless of actual cost distribution?
  - A policy is required for overages above the cost estimate

Note: Replacements that qualify for SRF Forgivable Loan would be typically be scheduled and executed after the funding is approved

QUESTIONS?

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