Water System Advisory Council
September 2024



Lead and Copper Update



2024 has seen multiple changes this year:

- The Addition of Linwood
- Bay City's Violation
- Communities in Full Monitoring
- CDSMI
- Lead Line Removals
- Lead Line Identifications

All of these things have impacted where we are in our sampling process and what can be reported at this time.

Preliminary 90th Percentiles

L&C Sampling is mid progress…

- CDSMI has pushed back getting Bangor Twp and Hampton sampling done
- However, CDSMI has identified many new Lead Service Lines
- Hampton is on deck for sampling and kits have been made
- Bangor Twp is finalizing the sample pool and will be ready to be sampled soon.
- Sampling deadline is the 30th
- To the right are the compiled 90th percentiles →
- Linwood Round 2 and Bay City Round 1 will be later this year.

Complete Distribution System Material Inventory

- **CDSMI** dead line has changed a little.
- EPA's LCRI update shortened up the time frames, this is now due **10/16/24**

Legend
No Results Yet
Plant
In Full Monitoring

2024		
Community	90th Perctile	
	Lead	Copper
AL in PPB	15	1,300
Akron	0	150
Bangor Montior	0	110
Bangor Twp	2.5	200
BAWS	<1	1.4
Bay City R1	8	200
Beaver RA	0	160
Beaver Twp	0	140
City of Pinconning	0	130
Essexville	0	180
Fraser	0	140
Hampton	3.2	210
Kawkawlin Metro	0	110
Kawkawln	0	200
Linwood, R1	0	300
Linwood, R2		
Merritt	0	190
Monitor Twp	0	160
Pinconning Twp	0	140
Portsmouth	0	160
Supply #1	4.2	110
Williams Twp	0	130
Wisner	0	190

Service Line Inventory



Complete Distribution Service line Material Inventory (CDSMI)

- Dead line has been a moving target
- EPA's LCRI update shortened up the time frames, this is now due **10/16/24**

This process has been a heavy lift in some communities.

The process has identified multiple unknown lead service lines and highlighted gaps in record keeping.

This inventory will be used to guide the development of the 10 year removal plans some communities will have.

Lead Service Line Update

Community	Total Service Lines	Known Lead Service Lines	Unknown Service Lines
Akron Township	99	0	0
Bangor Township	5,271	More?	1,400
Bangor Monitor Metro. Water District	1,242	0	15
City of Bay City	14,577	4,139	29
Bay County Supply #1 (Frankenlust, Monitor, Portsmouth Township)	3,493	0	462
Beaver Rd. Water Association	284	0	0
Beaver Township	467	0	0
City of Essexville	1,501	0	Less
Fraser Township	535	0	0
Hampton Township	3,026	More	2,578
Kawkawlin Metro.	428	0	380
Kawkawlin Township	1,303	0	0
Merritt Township	575	0	0
Monitor Township	2,222	0	0
City of Pinconning	664	2	506
Pinconning Township	611	0	0
Portsmouth Township	225	0	0
Williams Township	2,108	0	0
Wisner Township	250	0	0

Service Lines

Included in our Consumer Confidence Reports (CCR) is a data table that provides service line details for multiple communities.

← Data Table From 2023 CCR updated in March 2024

As mentioned CDSMI is locating new lead lines

Many Communities are working hard to get the lead out. Essexville got theirs out and Bay City is setting a fast pace. Hampton and Bangor Twp will be ramping up soon.

I don't current have accurate numbers on where things are…

Water Quality



Water Quality Testing

With multiple communities having lead service lines, our system is required to provide corrosion control.

Our plant feeds Orthophosphate (PO4) as its chosen method and our chemical application is closely monitored.

In 2017 EGLE established optimization levels for pH and PO4 for the water leaving the plant.

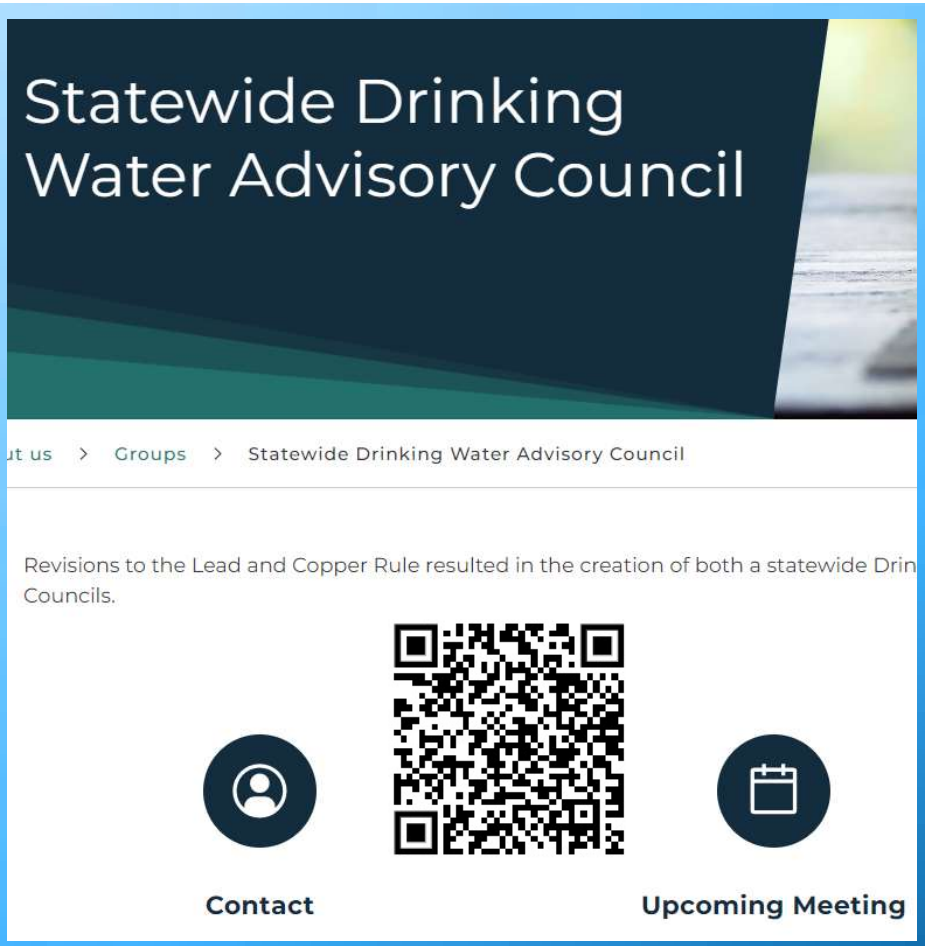
Ranges of 7.1-7.9 pH and 3.1-4.0 mg/L for PO4

Optimization levels were also established for all communities.

pH above 7.1 and PO4 above 3.0 mg/L

Testing is done quarterly and analyzed at our lab.

State DWAC



The SDWAC has put out two news letters this year, April and August.

August's Newsletter touches on a few topics:

- Ann Arbor and Battle Creek public outreach
- Upcoming changes to LCR
- Conference Updates
- Sampling time frames and limits

Meeting are open to the Public with virtual attendance. Next on 9/18 at 930 am.

The SDWAC currently has vacancy in two Public at Large positions.

EPA - LCRI

Lead and Copper Rule Improvements:

- LCRI is the latest Lead and Copper Rule
  - LCR-91, LCRR-21, EGLE LCRR-21
- 5 Key Provisions:
  - 100% Lead Removal in 10 Years
  - Locating Legacy Lead Pipes
  - Improving Tap Sampling*
  - Lowering Lead Action Level – 15-12-10
  - Strengthen Protections



https://www.epa.gov/system/files/documents/2023-12/proposed-lcri-presentation_public-webinar_12.06.23_final-slides.pdf

EPA - LCRI

Achieving 100% Lead Pipe Replacement within 10 years

- When lead service lines are present, they represent the greatest source of lead exposure in drinking water.
- The proposed LCRI would require all water systems to replace lead services lines under their control, with the vast majority completing replacement within 10 years.
- While corrosion control can be effective at reducing lead exposure, removing lead pipes provides even greater public health protection by eliminating the key source of lead.



EPA - LCRI

Locating Legacy Lead Pipes

- Knowing where lead pipes are is critical to replacing them efficiently and equitably.
- Water systems are currently required, under the 2021 LCRR, to provide an initial inventory of their lead service lines by October 16, 2024.
- Under the proposed LCRI, all water systems would be required to regularly update their inventories, validate their inventories, create a service line replacement plan, and identify the materials of all service lines of unknown material.

EPA - LCRI

Improving Tap Sampling

- The proposed LCRI would make key changes to drinking water sampling requirements.
- Water systems would be required to collect first liter and fifth liter samples at sites with lead service lines and use the higher of the two values when calculating the system's 90th percentile lead level.



EGLE already requires this!!

EPA - LCRI

Lowering the Lead Action Level

- EPA is proposing to lower the lead action level from 15 µg/L to 10 µg/L. EGLE going to 12 PPB in January
- When a water system's lead sampling exceeds the action level, the system would be required to inform the public and take action to reduce lead exposure while concurrently working to replace all lead pipes.
- For example, the system would be required to install or adjust corrosion control treatment to reduce lead that leaches into drinking water.
- EPA's proposal would eliminate the 2021 LCRR's Trigger Level to simplify implementation.
- Water systems would be required to replace all lead pipes regardless of whether they exceed the lead action level.



EPA - LCRI

Strengthening Protections to Reduce Exposure

- Water systems with multiple lead action level exceedances would be required to conduct additional outreach to consumers and make filters available to all consumers. The filters must be certified to reduce lead.



EPA - LCRI

Transparency and Trust

The proposed LCRI would strengthen the requirements for water systems to communicate with consumers.

- The proposed rule would require water systems to communicate more frequently and proactively about lead service lines and the system's plans for replacing these lines.
- The proposed rule would revise the Consumer Confidence Report language to increase clarity about the health effects of lead, the water system's efforts to sample for lead in schools and child care facilities, and how consumers can access the water system's lead service line replacement plan.
- Systems would be required to notify the public within 24 hours if systemwide lead levels exceed the proposed lower action level, and EPA would continue to require systems to collect follow-up samples at sites with higher levels of lead.

EPA - LCRI

Lead and Copper Rule Improvements:

- Rule Published on 12/6/23
- Held public comment for 60 days
- Final Rule set to be published in October 2024
- Compliance Starts 3 years later in 2027
- Removal Completed by 2037



https://www.epa.gov/system/files/documents/2023-12/proposed-lcri-presentation_public-webinar_12.06.23_final-slides.pdf


WSAC
September 2024