



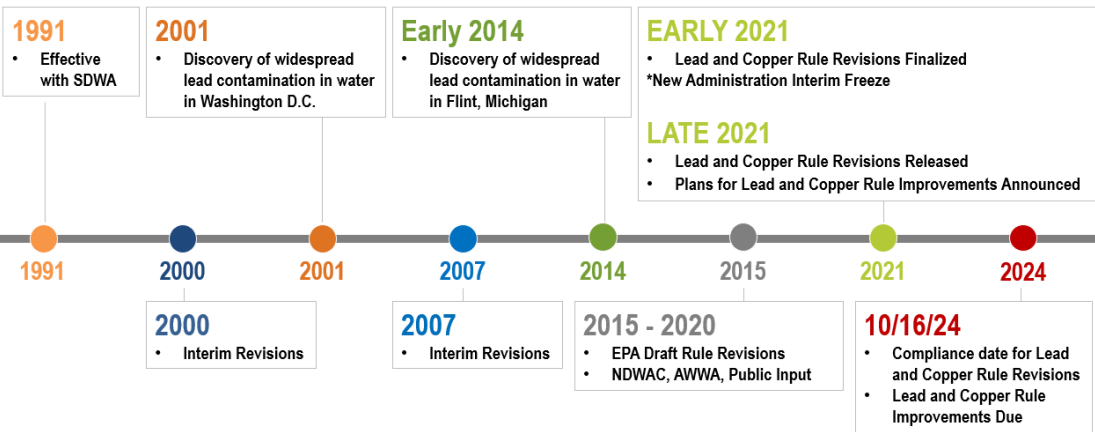
REVISED LEAD AND COPPER RULE GUIDANCE City of Great Falls

March 1, 2022

AE2S

Important Dates

LEAD AND COPPER RULE OVERVIEW TIMELINE



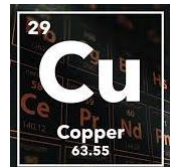
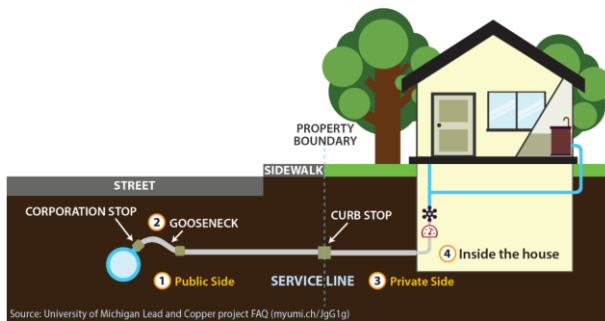
IMPLICATIONS OF RULE REVISIONS



- **Lead Service Line Inventory**
- **Water Sampling**
 - Including schools/child care
- **Lower Key 90th Percentile (P90) Concentrations**
 - Actions required at 10 µg/L instead of 15 µg/L
- **Reporting, Public Notification**
- **Corrosion Control Treatment**
 - pH/Alkalinity, orthophosphate

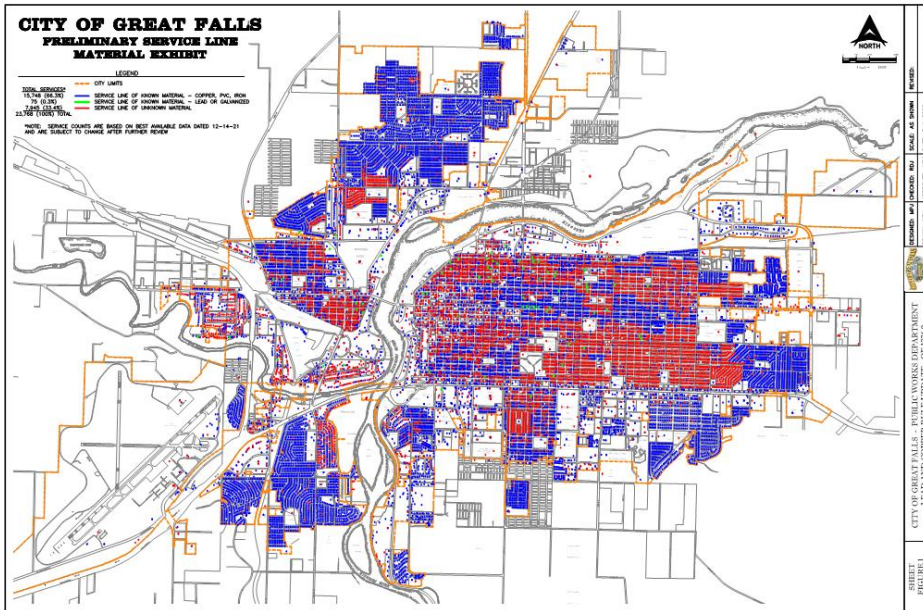
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Lead Service Line Inventory



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Lead Service Line Inventory



Methodology:

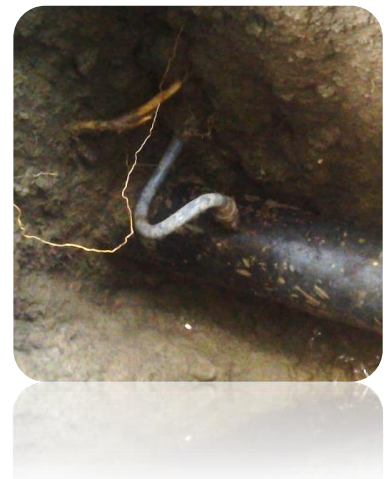
- Records
- Date of Install
- Recent Work
- Inspections

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Lead Service Line Replacement



- Changes to Replacement Protocols
 - Partial DON'T Count
 - Public Notification
 - Flushing Requirements
 - Pitchers/Filtration Kits
- Potential Cost Impacts
 - 7,500 estimated lead service lines
 - \$5,000-10,000 each
 - **Total Cost = \$37.5 - \$75 million**



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Revised Sampling Method and Frequency



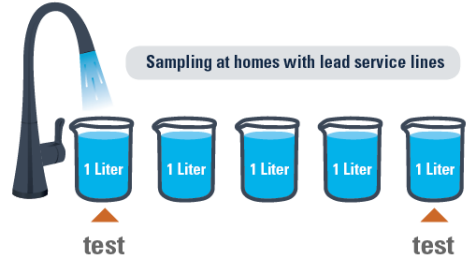
Current



30 samples every 3 years



Revised



Back to sampling every 6 months
Cost Impact = \$41/sample

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School and Child Care Sampling



- Include all primary schools and licensed child care connected to the system
- 5 samples per school, 250 mL each
 - 2 drinking water fountains
 - 1 kitchen faucet using for food or drink prep
 - 1 classroom faucet
 - 1 nurses office faucet
 - If they don't have 5 places, sample everywhere that's used for consumption
- **Cost Impact = \$41/sample**



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School and Child Care Sampling



- 2 samples per licensed childcare facility, 250 mL each
 - 1 drinking water fountain
 - 1 either kitchen faucet used for food or drink prep, or 1 classroom faucet or other outlet used for drinking
 - If they don't have 2 places, sample everywhere that's used for consumption
- **Cost Impact = \$41/sample**



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School and Child Care Sampling



- Sample other schools on request
- Only required to do 20% of list each year
- Provide results to location with guidance on action plan



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Important Limits



Medium (>10,000 & <50,000) & Large Systems (≥50,000 served)

Limit	Public Notice	CCS	CCT	Find & Fix	LSLR Rate	Sampling Schedule Change
PQL = 5 µg/L	-	X	X	-	-	-
TLE = 10 µg/L	X	X	X	X	X	X
ALE = 15 µg/L	X	X	X	X	X	X

PQL = Practical Quantitation Limit
 TLE = Trigger Level Exceedance
 ALE = Action Level Exceedance

CCS = Corrosion Control Study
 CCT = Corrosion Control Treatment

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Financial Ramifications



- 2-3 lead service line inventory FTEs
- Lead service line replacement costs (\$75M)
- Increased sampling costs per year
 - Current cost = \$600 every 3 years
 - New costs = \$2,460 every 6 months*
 - School/Daycare Sample Costs
- Corrosion Control Study = \$50,000
- Corrosion Control Treatment = \$1,500,000

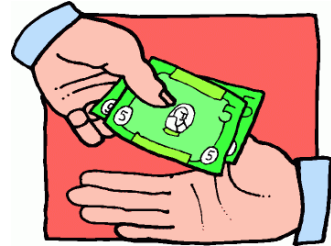


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Financial Resources



- Infrastructure Act
 - Loans/Forgiveness
- ARPA
- CDBG
- MCEP/RRGL grants
- Rate Adjustments
- Tax/Property Assessments



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What the City is Doing



1. Develop Approach to Service Line Inventory
2. Complete Preliminary List of Service Lines
3. Generate List of Schools and Child Care Facilities
4. Review Corrosion Control Treatment and Current Water Chemistry
5. Identifying FTE Needs/Cost Increases
6. Identifying Potential Funding Sources/Strategies

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QUESTIONS?