



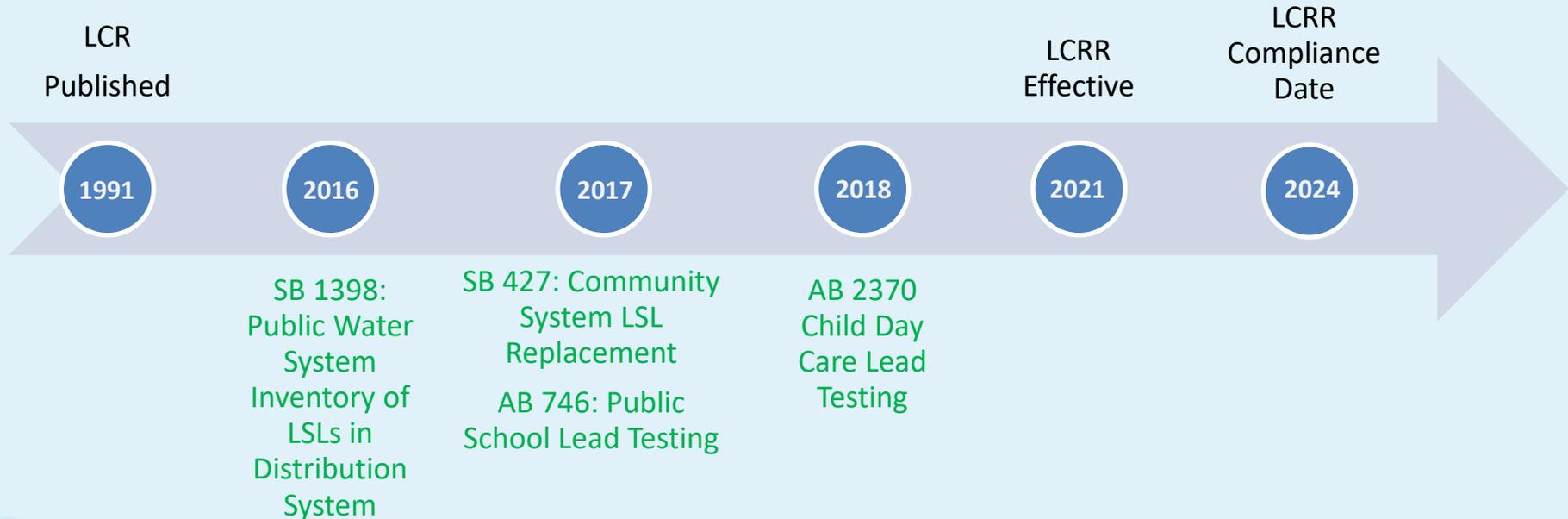
Presentation and
Discussion Item 8

LEAD & COPPER RULE REVISIONS INVENTORY

Emily Owens-Bennett, P.E., BCEE
Trussell Technologies, Inc.



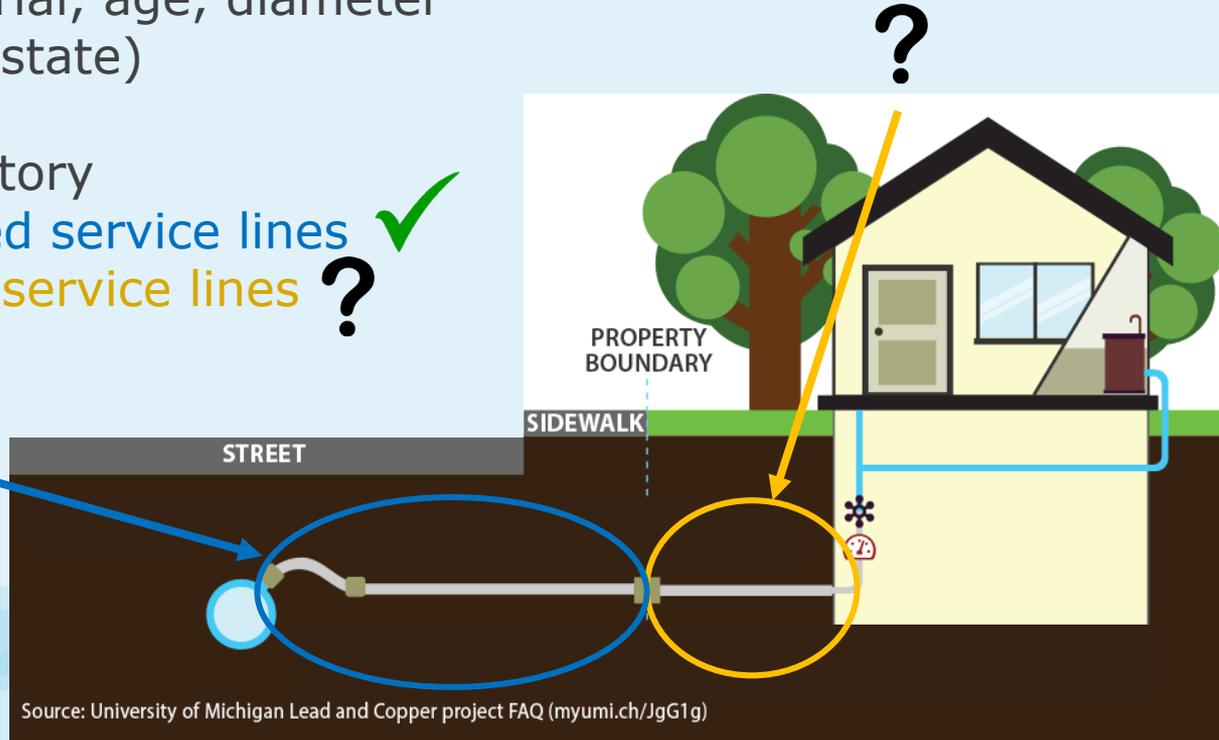
USEPA Lead and Copper Rule Revisions (LCRR)



LCRR Inventory Requirements

- Review historical records
 - Service line material, age, diameter
 - Lead bans (local, state)
- Complete initial inventory
 - Mesa Water-owned service lines ✓
 - Customer-owned service lines ?

Mesa Water successfully completed inventory of utility-side service lines per Senate Bill 1398 (2018-2020) with no lead service lines or unknown materials ✓



LCRR Inventory

Initial Inventory (by October 16, 2024)

- Categorize all service lines with available information
- Post inventory to publicly available website
- *If LSL, galvanized requiring replacement, or unknowns are identified:*
 - Annual customer notification
 - *LSL Replacement Plan must be developed and submitted to DDW*

Inventory Updates (post 2024)

- Identify unknown materials via routine meter readings or maintenance activities
- Update website
- *Once every service line is identified as non-lead, no further updates required*

LCRR Inventory

Initial Inventory (by October 16, 2024)

- Categorize all service lines with available information
- Post inventory to publicly available website
- *If LSL, galvanized requiring replacement, or unknowns are identified:*
 - Annual customer notification
 - *LSL Replacement Plan must be developed and submitted to DDW*

Mesa Water is pursuing a strategy to complete the LCRR Initial Inventory with all service lines designated non-lead.

This would eliminate customer notification requirements, development of an LSL Replacement Plan, and on-going inventory efforts post-2024.

LCRR Inventory To-Date

Records Review

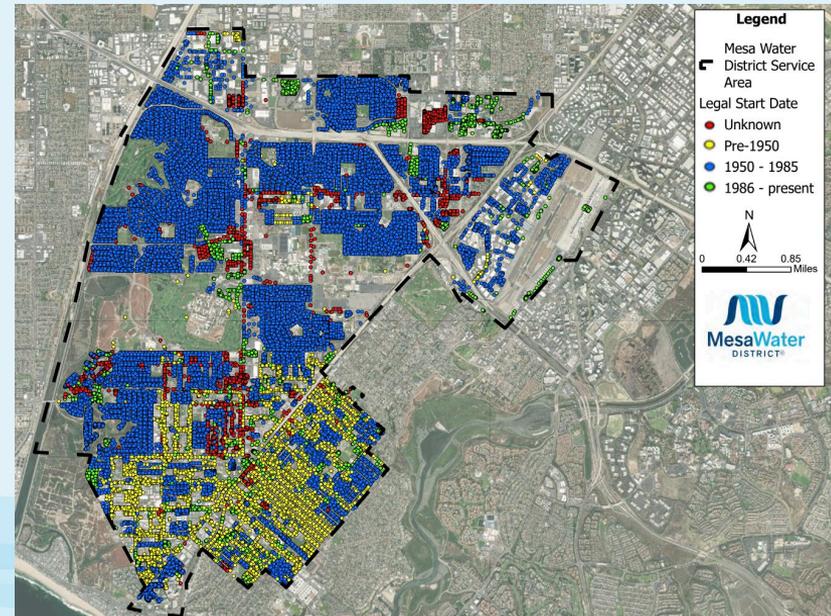
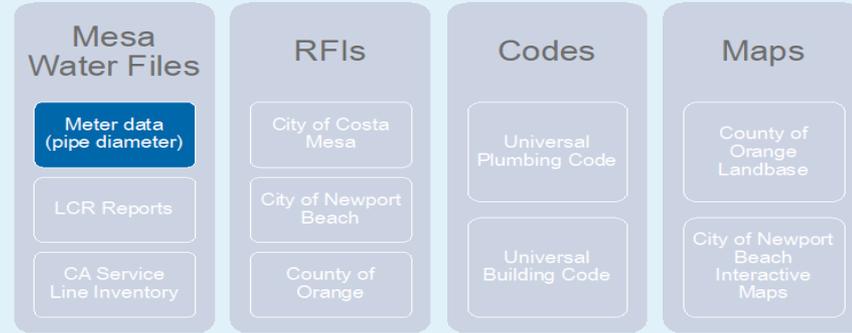
Methodology Development

DDW Meeting

Action Plan

Records Review

- Non-lead categorization
 - Records or field identification
 - Service line diameter $\geq 4''$
 - Installation date
 - 1986-present: CA ban
 - 1950-1985: lower probability of lead
- GIS parcel data
 - Legal start date as estimate of development/installation date

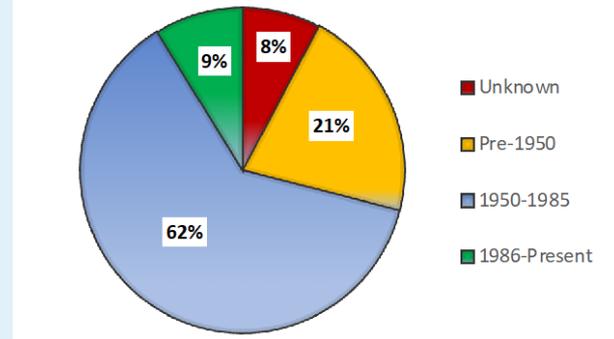


Field Verification

- Service Line Material Identification SOP
 - Step 1: Verify location information
 - Step 2: Prep meter box to access customer service line
 - Step 3: Test material at meter & house/building, if accessible
 - Step 4: Record data
- Implemented with routine maintenance, field visits
 - Data from locations throughout service area



Mesa Water service area parcels by legal start date



Action Plan

- Customer service lines
 - 24,406 service connections
- Field verification targets*

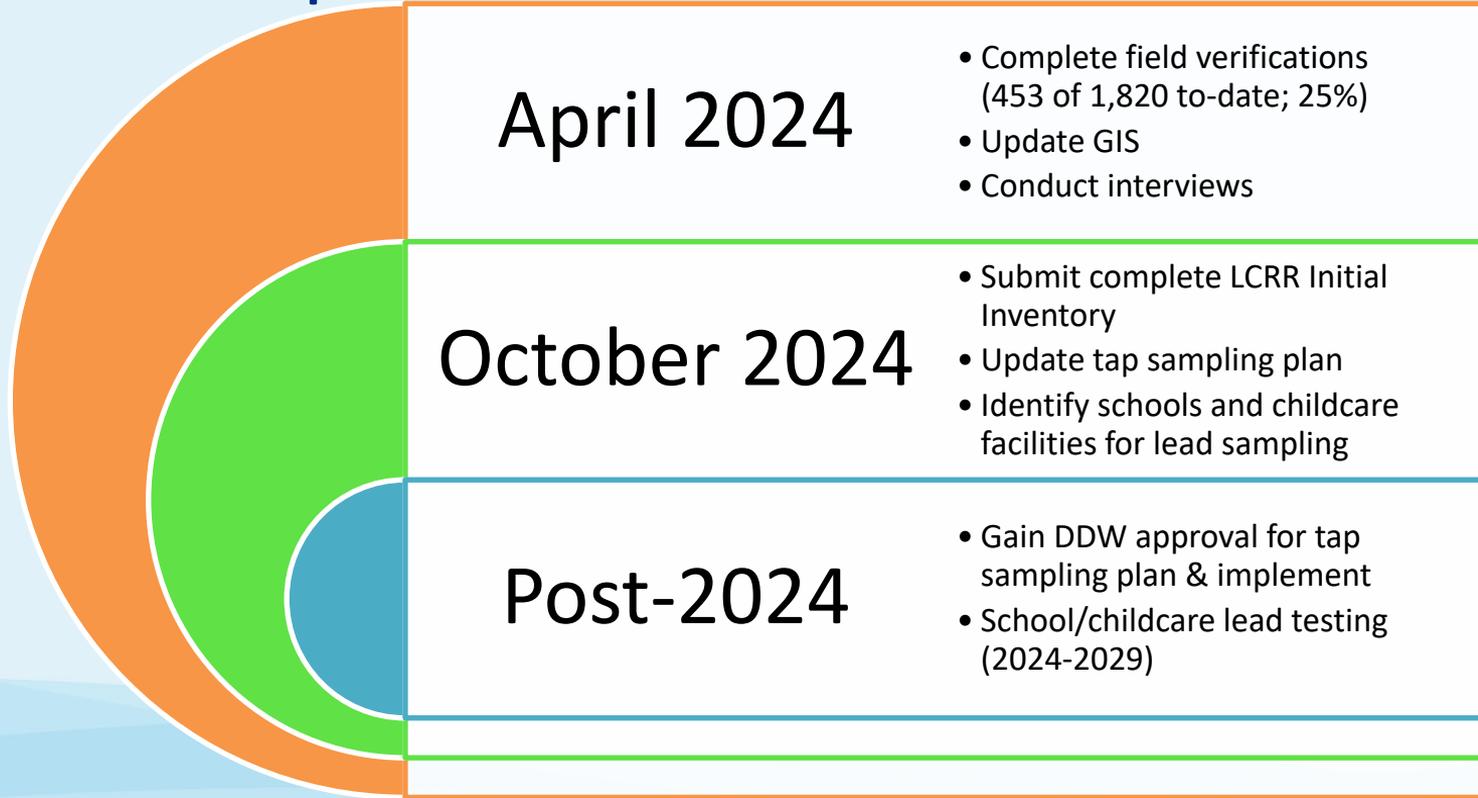
Customer Service Line Installation Date ¹	Field Verification Priority Level	Target Verification	Customer Locations
Unknown	High	15%	287
Pre-1950	High	15%	774
1950-1985	Medium	5%	759
1986 and later ²	Low	0% ²	0

¹Determined from either parcel legal start date or other historical records, where available

²California 1985 lead ban justifies 'non-lead' classification for construction starting Jan. 1, 1986.

***DDW approved the Action Plan. A total of 1,820 customer locations will be verified.**

Next Steps



April 2024

- Complete field verifications (453 of 1,820 to-date; 25%)
- Update GIS
- Conduct interviews

October 2024

- Submit complete LCRR Initial Inventory
- Update tap sampling plan
- Identify schools and childcare facilities for lead sampling

Post-2024

- Gain DDW approval for tap sampling plan & implement
- School/childcare lead testing (2024-2029)

THANK YOU!

Emily Owens-Bennett, P.E., BCEE

emilyo@trusselltech.com

Trussell Technologies, Inc.