

THE PATH TO A LEAD-FREE SD

On December 16, 2021, the EPA's Lead and Copper Rule Revisions became effective, setting the Lead Service Line Inventory requirement for all community and non-transient, non-community water systems into motion. To comply with new requirements, water systems subject to this rule must develop and submit a complete materials inventory for both the privately owned and publicly owned portions of every service line to the South Dakota Department of Agriculture and Natural Resources (DANR) by **October 16, 2024**.



DANR has contracted with Bartlett & West to provide resources to assist you with completing your inventory. This statewide contract consists of 4 phases: Public Engagement, Initial Service Line Inventory, Statewide Data Compilation and Cost Estimates, and Final Inventories and Replacement Plans.

PHASE 1: PUBLIC ENGAGEMENT. This phase aims to develop public education content for water systems to inform and educate your customers on the statewide lead service line inventory. Customers are encouraged to do their part in completing the inventory with a quick 5-minute survey and by self-identifying their home's service line. Universal messaging is paramount in order for this initiative to be as successful as possible.

Systems are asked to use the prepared messaging and communication tools from **sdwaterpipes.com**. Information and documents specifically geared toward water systems can be found in the "Systems Log In" tab at this website. Simply create a log-in to access this information.

Customer-specific resources are under the first heading, and water system and operator-specific content are found by scrolling down under the second heading. Feel free to download and print the fliers, add your system information, and hang these at frequently visited public locations throughout your system. There are also various images and short videos that can be downloaded and posted to social media site(s), along with the suggested text that accompanies the media. Instructions are provided in the associated folders for helpful hints and directions. For the water system content, the Operators Pocket Guide can be a quick reference to maintain a consistent message and will be handy when questions come up while an operator is out and about in the system. The FAQ (Frequently Asked Questions) link will send you to a living document that will be updated throughout the project, so be sure to reach out with questions and check back to this site often.

PHASE 2: INITIAL SERVICE LINE INVENTORY CAMPAIGN.

There are two parts to the South Dakota inventory collection activity: the customer survey for private service lines, and the inventory database which will include both the private and the public service line information.

Water customers will upload their private service line information using the provided electronic survey tool accessed from the QR code on the fliers or directly at survey. sdwaterpipes.com. Each water system is responsible for notifying your customers of the project, and that is where the content developed in Phase 1 will come in handy. The customer



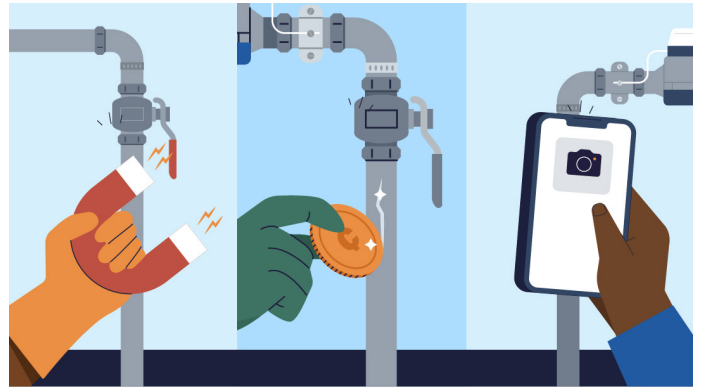
survey data will be incorporated into the inventory database. A printable version of the survey will also be available for systems to download; however, we encourage the use of the electronic survey. Each customer entry is asked to include a photo of their service line as photo verification can be a quick step in your system's validation process.

All residential services need to be included in the inventory. However, if the water system has records showing that a home was constructed after 1987 when the Lead Ban was accepted here in South Dakota, the water system can document those entries directly into the database instead of asking the homeowner to fill out the customer survey. Additionally, a photo of the service line is required for every customer survey sent to the database. If a home is constructed after 1987 and the water system is entering that information instead of the homeowner, a photo of the service line is not required. Therefore, it is beneficial for you to review historic data and identify the homes you should target for the customer survey.

A complete inventory of each water system is required, even if the entire distribution system, including the private side of the service line, was built after 1987. However, as stated previously, systems will not need to reach out to individual customers for the customer survey and private service line photos for homes built after 1987.



In unison with the customer survey data collection, systems will be able to transfer the information collected on your public service lines to the statewide database using an ArcGIS license. Systems with an ArcGIS license will have access to this database. For systems without a license, contact DANR, SDARWS, or MAP for a temporary use license. You will also receive a monthly report (spreadsheet or PDF format) of the



It's up to you!

Unlock the mystery of your property's water pipe material with the step-by-step survey at survey.SDWaterPipes.com

data pertaining to your system for review and verification. We will use this database to identify areas lacking sufficient information that may need to be picked up through field investigations and other means.


Phase 2 runs through the end of August 2023, and our goal is to assist you in obtaining as much data as possible from now until then. To do this, each water system will need to inform their customers about this health initiative, encourage use of the survey tool, and provide contact information for where they can go for questions. Again, resources are found on the project website at sdwaterpipes.com. Also, check this site regularly for updates to the Frequently Asked Questions (note, there will be a FAQ specific to water customers and a separate one located under the "Systems Log In" tab specific to water systems).

PHASE 3: STATEWIDE DATA COMPILATION AND COST ESTIMATES. Using the data that water systems and customers upload, our team will use predictive modeling to estimate the material composition of the service lines identified as unknown. This information will be used to develop a more accurate estimate of statewide costs for service line replacements. The statewide cost estimate will provide DANR with needed information to develop an effective strategy to leverage the various funding opportunities available and prioritize use of funds.

It is imperative that as much information as possible is entered into the database before utilizing predictive modeling. Further investigative field work will be required in areas that lack enough detail to ensure the modeling is accurate. Since system records can be incomplete and not all homeowners will respond to the survey or be supportive of the data collection, systems are allowed to submit an inventory with

“unknown” service line status identification. However, the more information collected, the closer we will be to a completed inventory. This not only helps the project move forward, but is also helpful in the event that your system hits a Lead and Copper Rule (LCR) action level. The more information you are able to provide by the October 16, 2024 deadline means the fewer service lines you will be required to replace as part of the 40 CFR 141.84 requirements since service lines identified as unknowns are included as lead service lines for this calculation. The DANR would rather see systems implementing a steady and consistent replacement plan that works within your planning and budget than be forced into a project larger than you can handle due to excessive unknowns in the inventory.

**You. In the basement.
With the survey.**



Get a clue to your property's water pipe material.

the prepared messaging communication tools and begin engaging your customers by **June 30, 2023**. The goal is to complete the bulk of your inventory by the end of **August 2023**. The prepared public education resources available

to you consist of one-page fliers explaining the nationwide lead service line initiative to your customers, an infographic, and various images and videos. The latter includes a 90-second video for your customers, explaining the importance of the project and completing the survey. This media directs your customers to the electronic survey for them to complete their service line identification.

In the second one-page flier, systems are given the opportunity to offer an incentive to their customers for completing the customer

PHASE 4: FINAL INVENTORIES AND REPLACEMENT PLANS. Systems will have time between the Phase 2 Initial Inventory Service Line Campaign and October 16, 2024 to collect additional information regarding unknown service lines, allowing systems to submit the most complete final inventory possible. In addition to the inventory, a replacement plan is required to be submitted to the inventory database. The DANR will manage the inventory following the October 16, 2024 deadline, and systems will be required to submit updates to the inventories annually as improvements are made to public and private service lines statewide.

survey. While this incentive is optional and will be resourced (either funded or donated) through your system, keep in mind that the more customers successfully completing the survey leads to less time and effort you are spending quite literally digging up this information. This can be beneficial and cost-effective for your system. 💧

QUESTIONS CAN BE DIRECTED TO:
Erin Fagnan, SDDANR, erin.fagnan@state.sd.us, 605.910.4953
Erin Steever, Bartlett & West, erin.steever@bartwest.com, 605.373.5915

We are entering the final stages of Phase 1 and are asking all water systems to visit **sdwaterpipes.com** to view and utilize

You can also reach out to your favorite South Dakota Association of Rural Water Systems contact (see page 9 for contact information)



Lead Service Line Inventory

What you (and your customers) need to know

To encourage your customers to complete the lead service line inventory, you'll need to understand the project and how to communicate about it. Luckily, there are messaging and communication tools already available for you.

Lead Service Line Requirements

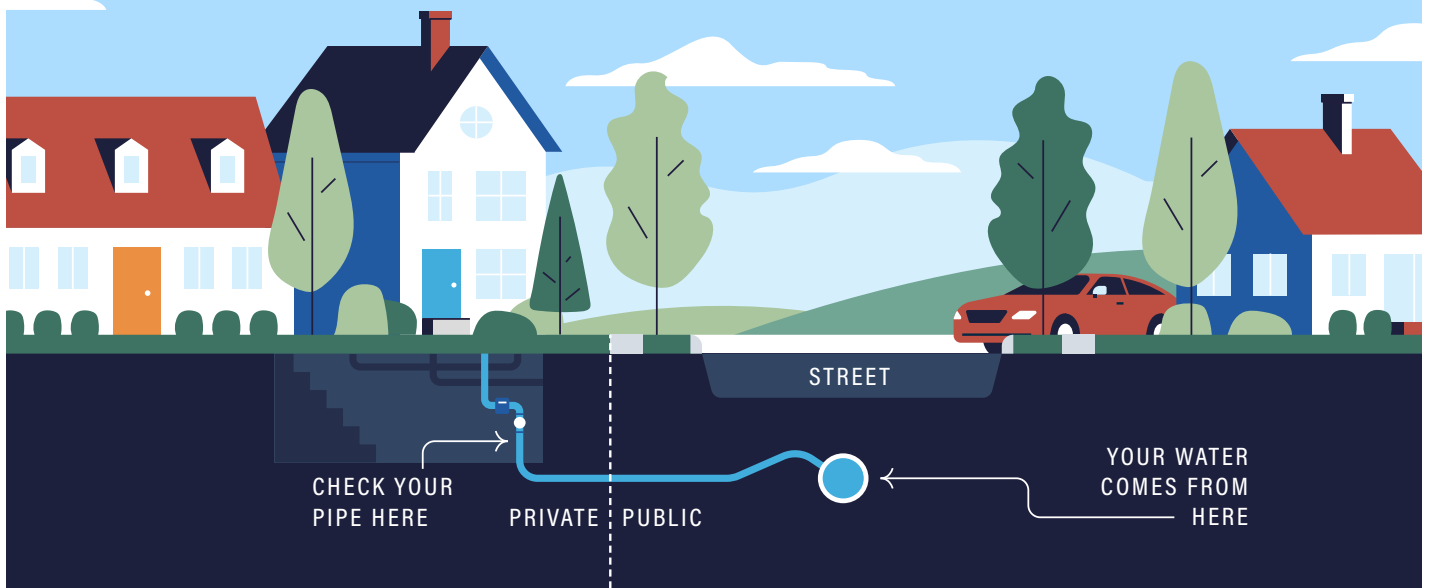
The more "unknown" service lines you have, the more you'll have to replace, according to the Lead and Copper Rule.

Systems with lead service lines with compliance sampling results over **15 micrograms/liter** after corrosion control treatment installation must replace **7%** or more of the lead service lines in their distribution system per year—including lines marked as "unknown."

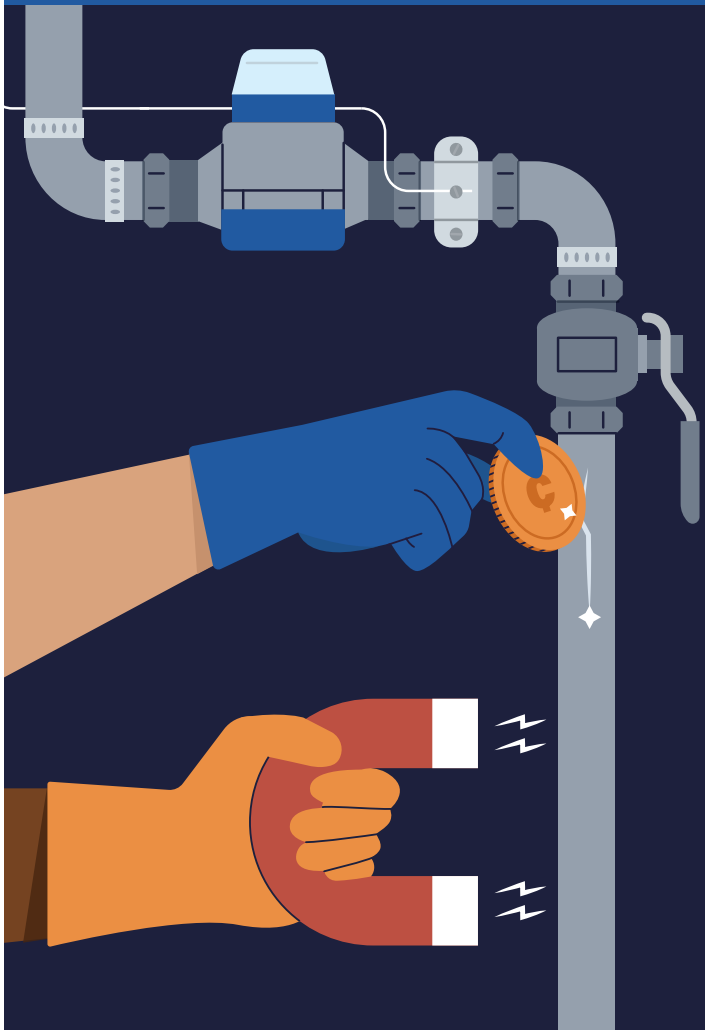


Spread the word to complete the survey

Visit sdwaterpipes.com to learn more about the project and access important resources to help with your customer communication.



Initial inventory deadline: October 16, 2024



Requirements after the deadline: EPA

- Update every year or every three years based on the lead tap sampling frequency
- Systems that demonstrated absence of lead service lines by October 16, 2024, don't need to provide an update

Requirements after the deadline: Customer follow-up

Provide notification to the persons served at the water connection with a LSL, GRR, or "lead status unknown" service line

- 30 days after completing the initial inventory; repeated annually until only non-lead service lines remain
- At time-of-service installation for new customers

Here are some suggestions you can consider communicating with your customers:

Your customer's service line has been identified to contain lead. What now?

- 1 We will be noting it in our inventory and designating it to be replaced in the near future.
- 2 In the interim, because your line has lead, you can flush your line. Use a NSF/ANSI 53 certified pitcher filter to protect yourself until the line is replaced.
- 3 Consider offering to collect a water quality sample from their service.

Visit sdwaterpipes.com to learn more, access resources for the project, and start sharing information with your customers.