



**ERIE COUNTY WATER AUTHORITY
INTEROFFICE MEMORANDUM**

July 10, 2019

To: Jerome D. Schad, Chair
Mark S. Carney, Vice Chair
E. Thomas Jones, Treasurer

Cc: Terrence D. McCracken, Secretary of the Authority
Karen A. Prendergast, Chief Financial Officer
Margaret A. Murphy, Attorney
Russell J. Stoll, Executive Engineer
Steven D'Amico, Business Office Manager
Jeffrey Schlierf, Acting Manager of Information Technology

From: Sabrina Figler, Director of Water Quality

Subject: 2019 Lead and Copper Study Update

On June 13, 2019, I presented the Board of Commissioners with an update of the progress set forth for the 2019 Lead and Copper Study. Since this time, considerable advancement has been made:

1. I was invited to sit with Ms. April Kellerhouse of the NYSDOH and Ms. Jennifer Delaney of the ECDOH to discuss EPA's Lead and Copper Rule and to review the most important aspects and details of the study. I was also given the opportunity to ask questions regarding the rule and review requirements of the ECWA.
2. One of the most important areas of discussion was "Tier Criteria": Required of ECWA for the study ~ Tier One Single Family Residences (SFR) and Multi-Family Residences (MFR) which include a minimum 25 homes with a Lead Service Line (LSL) and a minimum 25 homes with Copper with Lead Solder (CLS) built 1984-1985 **OR** a 50/50 representation of residences with LSL to residences with CLS. What this means is, if we choose to sample **60** homes with CLS built between 1984-1985 (the number of homes we currently have committed), we need to find and sample 60 homes with LSL's. We currently have only **24** residences with LSL's committed to the study.

3. Ms. Kellerhouse expanded the definition of Multi-Family Residences (MFR's): If a home was built as a single-family home, but now used as a multi-family home or business with a **SINGLE LSL**, it is considered a **Tier One Site**. This has opened up our sample field. Of the MFR we visited and verified lead, I can now use 5 of the 6.
4. Ms. Jennifer Delaney noted to expect about a 50% response to the first round of sample kits delivered. She stated it typically takes several attempts to get the customer to complete the sampling and it may not always be done correctly.
5. We also reviewed (a) Criteria that may invalidate a sample, (b) forms, letters, reporting deadlines, and (c) water quality parameter testing.
6. Ms. Jennifer Delaney said they are quite impressed by what they have seen "coming out of ECWA" to find participants who qualify. She stated they were impressed by the social media postings, email outreach and website information. She said it's the most effort she's seen by a utility.
7. The week of June 17, I sent out letters to all the residents who agreed to participate in the study. Letters detailed a review of the study objectives and a date as to when to expect sample kits to be delivered.
8. The week of June 24, Water Quality began dropping off and picking up sample kits. Addendums were attached to the sample kit's directions, stating when residents' samples were due for pick-up. Homeowners were given 48 hours to complete the sampling.
9. As of July 3, we received 20 samples from homes with Lead Service Lines and 26 samples from Copper with Lead Solder homes date of build 1984-1985. All samples met the sampling criteria.
10. On July 8, all 46 samples were shipped to Microbac Laboratories for analysis.
11. We continue to search for several more homes with LSL's.
12. After acquiring the Town of Aurora July 1, I identified homes potentially eligible to participate in the study. Customer service had no success with customers responding nor willing to participate.
13. July 9, 2019, I identified 25 more homes on our GIS that may have LSL's. These addresses were forwarded to Karen Prendergrast and Steve D'Amico.

14. As of this date, the meter shop has gone to 150 homes. There are 5 outstanding L-orders, meaning 5 homes to visit and verify service line material type.
15. As part of the study we are required to sample 2 sets of 10 samples during the study period from DOH approved sites within our distribution system. These samples are analyzed for “Water Quality Parameters” designated by the EPA. These parameters include but are not limited to alkalinity, ph, calcium hardness, and conductivity. The first set was collected by Water Quality June 27 and testing completed July 3 in-house. The next set is scheduled for September 2019.

Once test results are received, letters will be sent to the participating residents with their individual results. Also, to be included is educational material explaining how to reduce one’s exposure to lead and copper. The ECDOH will also be provided with test results.

As the Lead and Copper Rule states, we are required to sample an equal number of homes for each category (LSL and CLS homes). Ms. April Kellerhouse made it clear to me that any home whose samples are analyzed during the study, their data must be included in the reporting. At the time this study commenced, I did not suspect locating homes with lead service lines would be so difficult. My goal was to obtain 60 homes within each category. Because I only have 24 homes with lead, we are only allowed to test approximately 25 homes with copper with lead solder. Therefore, there are an additional 35 CLS residents remaining who agreed to participate in the study. ECWA will maintain our commitment to them and will sample and test the water after the conclusion of this study. I will send letters to these customers with the new scheduled sample kit drop-offs and testing dates.

We are well in advance of the end of the timeline, September 30, 2019 to have all testing completed and results reported

If you have any questions, please do not hesitate to contact me prior to the meeting. Otherwise, I will present at the July 18th meeting to answer any questions.