



ERIE COUNTY WATER AUTHORITY INTEROFFICE MEMORANDUM

March 15, 2023

TO: Terrance McCracken, Secretary to the Authority

FROM: Sabrina A. Figler, Director of Water Quality

SUBJECT: Request for Service Line Inspection Incentive for the EPA LCR
and LCRR

On February 9, 2023, the New York State Department of Health returned ECWA to Standard Monitoring under the current EPA Lead and Copper Rule (LCR), effective January 1, 2023. LCR Standard Monitoring requires the sampling of 100 Tier One sites, or single family residences, every 6 months. Fifty of these 100 sites are required to be homes with a lead service line. In an effort to recruit these 100 Tier One sites, the Board approved a \$50 bill credit incentive for each 6-month monitoring period. The result of this incentive was very successful in that 71 of the 100 2022 LCR study participants and 12 new participants committed to participating in the two 6-month monitoring periods of 2023.

To complete our sampling pool, we need an additional 15-20 homes with lead service lines. Obtaining a home with a LSL requires reaching out to customers whom we suspect have a lead service line and perform an in-home inspection to confirm material type at the meter and obtain a commitment. This effort has been met with some resistance as customers have declined access to their homes. I feel the best means to achieve access to the home is to incentivize with a \$25 bill credit. I have developed a list of 64 homes with potential lead service lines based on previous year's lead service line replacements and construction projects.

In addition, under MP-91 Lead and Copper Rule Revisions Management contract with Arcadis, to build the lead service line inventory (LSLI) required by the upcoming rule, a predictive model has been developed. This model has generated 200-250 homes requiring field verifications, or in-home inspection at the meter. The information obtained from these field verifications is fed back into subsequent model runs to further refine ECWA's inventory. This project would also benefit from the \$25 bill credit incentive.

The credit for both projects is planned not to exceed 350 homes. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sabrina A. Figler".

Sabrina A. Figler