



LCRI Proposal

From a Water System Perspective

US Conference of Mayors
Jan 17, 2024



American Water Works
Association

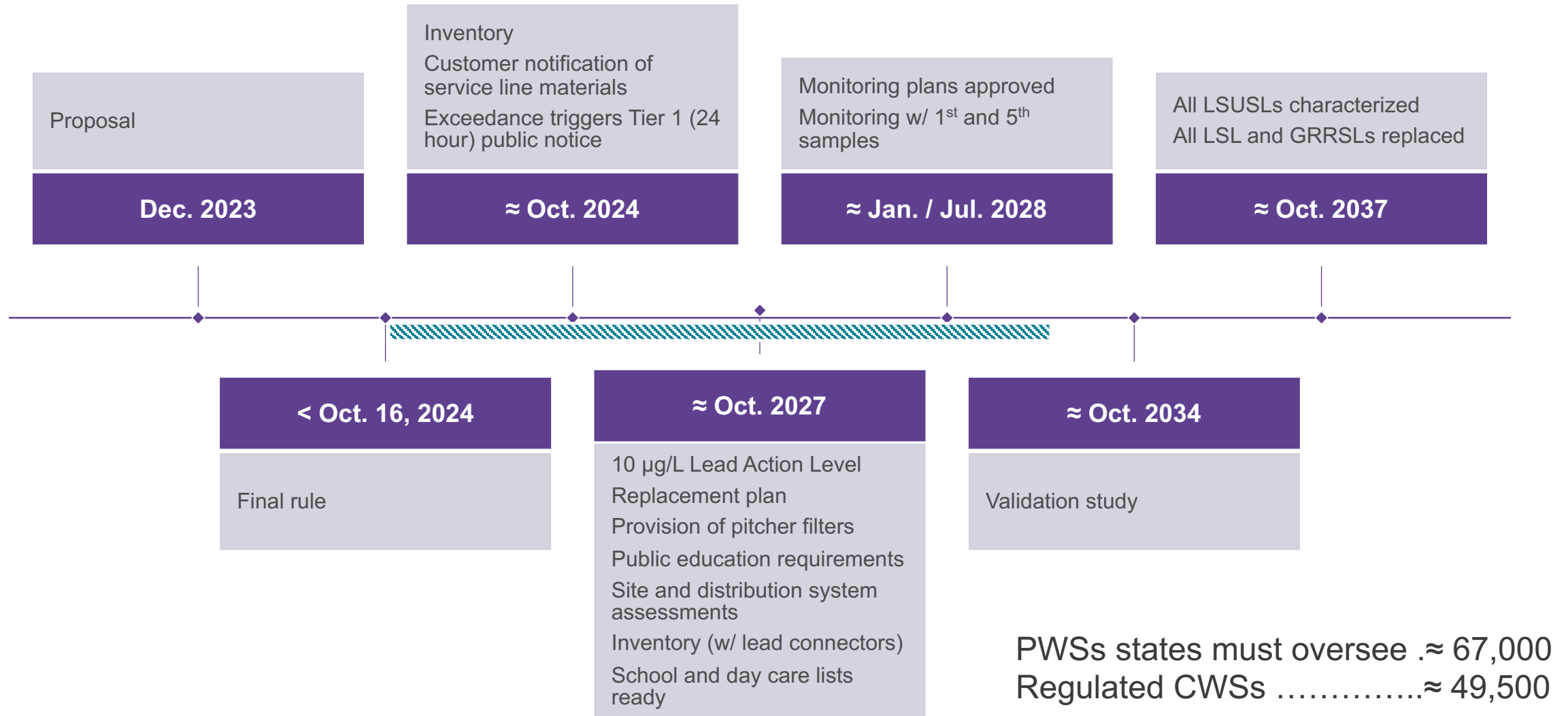
Important Positive Developments

- 💧 EPA retains treatment technique and affirms importance of corrosion control
- 💧 Final LCRI will almost wholly replace LCRR and complying with both will not be required
- 💧 Separates service line replacement from trigger for evaluation of corrosion control practice
- 💧 Comports with SDWA expectation for compliance beginning 3 years after promulgation



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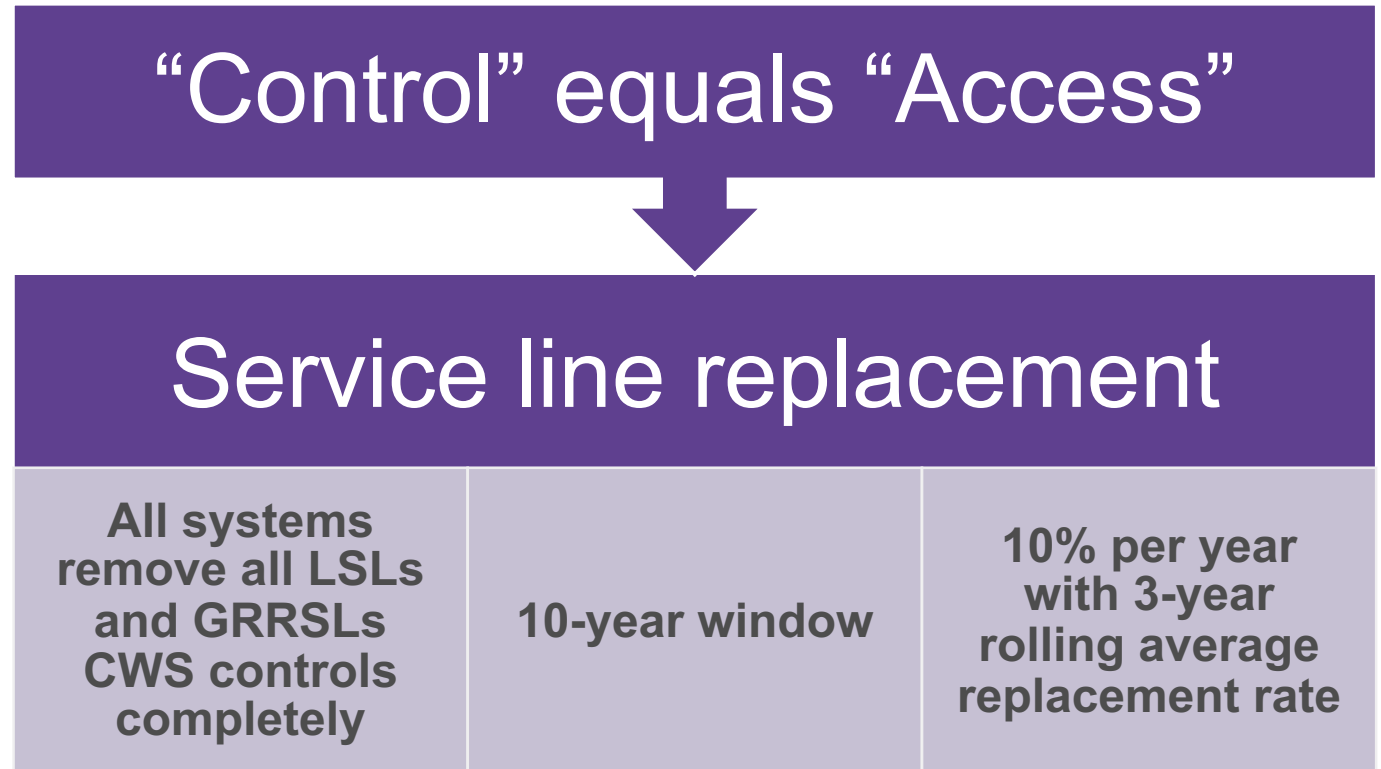
Schedule (assuming rulemaking proceeds on schedule)



Key Issue for Service Line Replacement

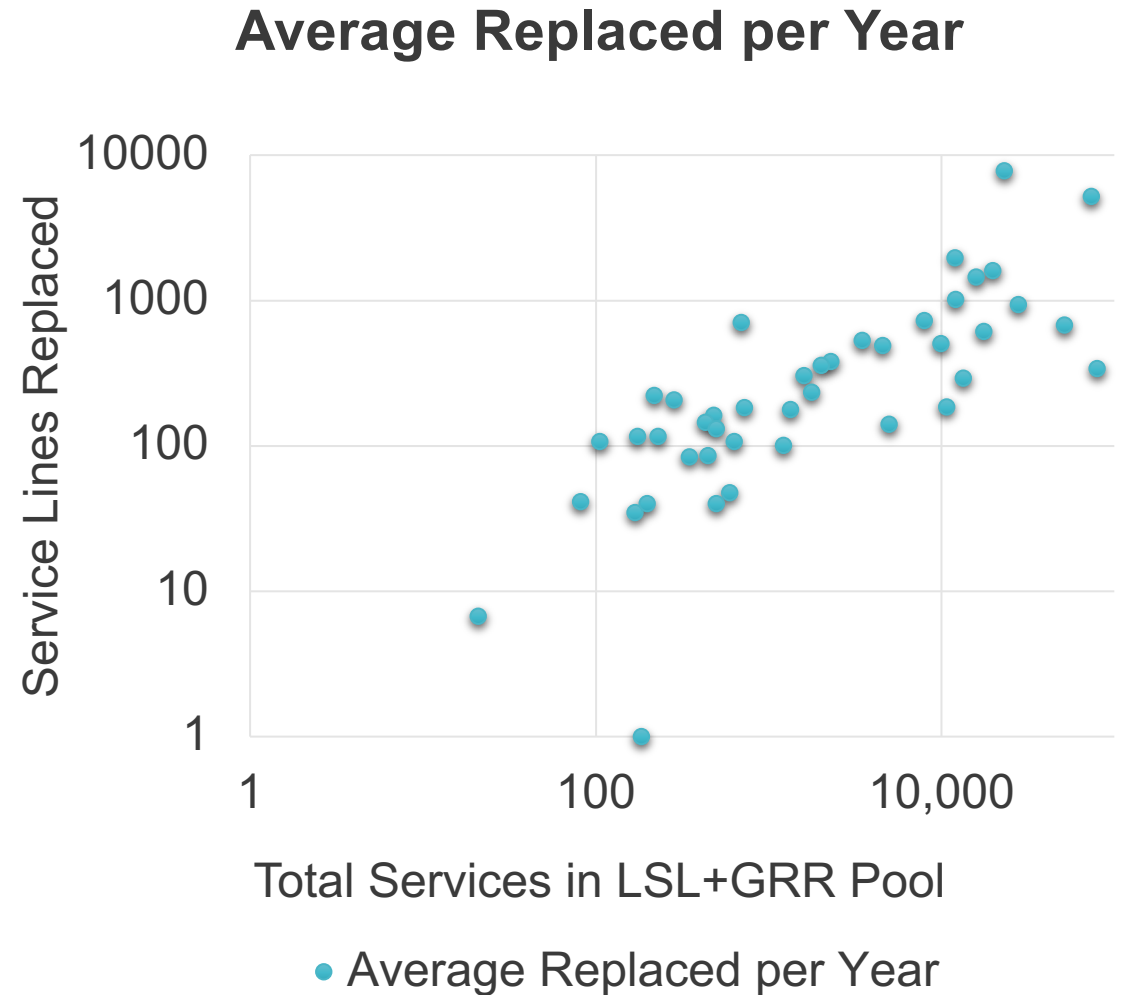
“Identification of any laws, regulations, and/or water tariff agreements that affect the water system’s **ability to gain access** to conduct full lead and galvanized requiring replacement service line replacement, including the citation to the specific laws, regulations, or water tariff agreement provisions. This includes identification of any laws, regulations, and/or water tariff agreements that require customer consent and/or require or authorize customer cost-sharing.”

-- § 141.84(b)(2)(viii)



Service Line Replacement

- 💧 EPA estimated annual replacement program cost at \$2.8 – 3.5 B
- 💧 Full Replacement Cost (2022\$)
 - 💧 EPA analysis - \$6,507 - \$8,519
 - 💧 CDM Smith - \$7,600 - \$37,800
 - 💧 Recent 2023 prices are higher
- 💧 10 – 13 year program annualized over 35 years
- 💧 10 year / 10% annual replacement rate
- 💧 8,000 – 10,000 service lines per year is not feasible



Logistics of Implementation

- 💧 All regulated systems are on the same compliance schedule
- 💧 No clear sideboards for primacy agency oversight of corrosion control
- 💧 Lack of clear technical documentation leaves standard of care uncertain
- 💧 Paperwork burden will lead to high violation rates



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Questions?

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