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Seal Rock Water District

General Manager's Report:
Board Meeting – April 11, 2024

This report serves as an executive summary for the Board meeting agenda. It provides recommendations for actions to be taken if necessary. Detailed information, staff reports, and supporting materials can be found in the full agenda packet.

PHASE-IV BEAVER CREEK SOURCE WATER PROJECT:

Water Treatment Plant (WTP) Operators continue working with Jacobs Engineers and the membrane filter skid provider, WesTech to improve operational performance at the water treatment plant. Filter skids are using much less power and chemicals during the clean in place (CIP) process and operators are recognizing much longer run times between CIP's.

Recently water treatment plant operators began phasing in remote operation of the water treatment plant. Implementation of remote operation allows operators to monitor functions at the water treatment plant through a human machine interface (HMI) program. While this phase in the process is relatively new for the district, it is standard throughout the industry and while recently implemented we are recognizing promising results.

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Operators are able to allow the WTP to operate after hours with successful starts and stops, to include automated routine maintenance cleans during production. The result to the district is less overall cost to produce water and an increased overall level of stored water in the drinking water system. Operators continue to monitor conditions as they work collaboratively with engineers and WesTech technicians to build greater optimization as continued monitoring is performed.

SRWD COMPLIANCE WITH LEAD AND COPPER SERVICE LINE INVENTORY:

Seal Rock Water District distribution operators began the task of field verifying 284 random water services to meet compliance with the Lead and Copper Rule Revision (LCRR). On January 15, 2021, the US EPA issued revisions to the federal LCR. US EPA's new Lead and Copper Rule Revisions (LCRR) aim to strengthen the LCR to better protect communities and children in elementary schools and childcare facilities from the impacts of lead exposure. On January 20, 2021, under federal Executive Order 13990, the LCRR was identified as an agency action requiring review. Consequently, US EPA delayed the effective and compliance dates established in the LCRR to December 16, 2021, and October 16, 2024, respectively, while engaging with local communities, states, local governments, utilities, and stakeholders for input on any changes that should be made to the LCRR.

On December 17, 2021, following US EPA engagement activities, US EPA published Docket No. EPA-HQ-OW-2021-0255 in the federal register. Within the Docket, the US EPA committed to propose and revise the LCRR by October 2024 with the Lead and Copper Rule Improvements (LCRI). The LCRI is expected to delay the implementation of portions of the LCRR beyond the October 16, 2024 compliance date, however, **US EPA maintains the October 16, 2024 compliance date for the lead service line inventories.** Water systems are to keep their current tap sampling plans until the LCRR comes into effect on October 16, 2024.

The statistical approach provides a method to complete a service line inventory without inspecting every unknown service line. This approach will demonstrate a minimum 95 percent level of statistical confidence. A key factor in the success of this strategy is the use of a randomly generated list of unknown service lines to be physically inspected. If ANY service line is found to be a lead service line (either through the initial records review or the verification process) then this framework will not be able to be used and an alternate process will be discussed with the state. If NO service line is found to be lead through the records review and verification process then the remaining unknown service lines will be classified as non-lead and the submitted inventory will be final (e.g. contain all non-lead service lines).

Known service lines are defined as a service line where the pipe materials are classified using records (Previous Materials Evaluation, Construction and Plumbing Codes and Records, Water System Records, Distribution System Inspections and Records, and other required or related records) or other state approved verification methods and the water system has high confidence in the material classification. Records showing that service lines were installed after the state lead ban.
Unknown service lines are defined as a service line of unknown material with no/low-confidence documented material history.

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The statistical method includes the following steps:

Step 1: Identification of all service lines of unknown material.

Step 2: Identification of the number of service lines to be physically inspected.

Step 3: Random selection of service lines for physical inspection.

Step 4: Physical inspection of the service lines.

Step 5: Record of the physical inspection process.

Step 6: Results input of unknown service lines into the inventory.

Step 7: Retention of identification records.

Step 1: Identify known and unknown service lines.

Table 1 shows the total number of service connections in Seal Rock, OR (OR4100798).

Public Water System Name	Total Service Line Count
Seal Rock, OR (OR4100798)	2,676

Table 2 shows the classification of service connections in Seal Rock, OR (OR4100798).

Public Water System Name	Lead Status Known Count	Lead Status Unknown Count
Seal Rock, OR (OR4100798)	1,506 Non-Lead	1,170

Step 2: Identify how many unknown service lines must be verified.

Table 1 shows the total of unknown service connections in Seal Rock, OR (OR4100798).

Public Water System Name	Lead Status Unknown Count
Seal Rock, OR (OR4100798)	1,170

Type of Service Line Verification Method:

Public Side Service Line Verification Methods Used:
- Visual - Excavation

Private Side Service Line Verification Methods Used:
- Visual - Excavation

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Step 3: Determine approach for verification of lead status unknown.

Stratified Random Sampling - At this time, the only statistical verification and minimum sample size calculation accepted is the 95% confidence level (with +/-5% margin of error and 50% sample proportion) approach. Examples are Oregon and Michigan.

The statistical approach provides a method to complete a service line inventory without inspecting every unknown service line. This approach will demonstrate a minimum 95 percent level of statistical confidence. A key factor in the success of this strategy is the use of a randomly generated list of unknown service lines to be physically inspected; however, this list of randomly selected locations will be randomized per the categorized decade of installation records. If installation records don't exist the location will still be included in the decade of highest risk**.** If ANY service line is found to be a lead service line (either through the initial records review or the verification process) then this framework will not be able to be used and an alternate process will be discussed with the state. If NO service line is found to be lead through the records review and verification process, then the remaining unknown service lines will be classified as non-lead and the submitted inventory will be final (e.g. contain all non-lead service lines). If, in the future, an LSL is found then the water system will contact the state within 30 days to discuss a path forward.

Known service lines are defined as a service line where the pipe materials are classified using records (Previous Materials Evaluation, Construction and Plumbing Codes and Records, Water System Records, Distribution System Inspections and Records, and other required or related records) or other state approved verification methods and the water system has high confidence in the material classification. Records showing that service lines were installed after the state lead ban (or local ordinance with an earlier lead ban) and service lines >2 inches (diameter allowance depends on state) will be considered known and classified as non-lead.

Unknown service lines are defined as a service line of unknown material with no/low-confidence documented material history.

Step 4: Randomly select service lines for verification.

The generation of a uniformly random set of service lines for inspection using the direction as provided below:

1. In the first column of a spreadsheet, list every unique service line of unknown material.

2. In the second column, generate uniformly random numbers, so that each service line is associated with a randomly generated number.

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Follow these steps:

a. Enter the formula =RAND() into the second column next to each location and press Enter. This generates a number between 0 and 1 for each service line.

b. Select the second column (the column with the random values) and copy it, using the spreadsheet's Copy feature.

c. With the second column still selected, use the Paste Special option to Paste Values Only into that same column. This will ensure your random numbers remain static.

d. Use the Sort feature to list the randomly generated numbers from lowest to highest. If the Sort Warning appears, select Expand the Selection, then Sort.

e. Select only the top N service lines, where N is the number requiring inspection. For example, if you need to inspect 20 service lines, select the first 20 service lines on the list. These are the 20 uniformly random service lines to be inspected.

f. In addition to the number of locations requiring inspection, use the same process outlined above to generate 50 additional locations as a buffer if any issues arise with residents not being willing to comply with inspection.

Step 5: Conduct service line verifications.

Type of Service Line Verification Method

At least one point of verification is required for each portion of the unknown service line. If the service line is jointly owned, each portion that is unknown (utility and/or customer) must be verified. Verification methods include approved verification methods. If one or more of the original randomly selected sites cannot be verified, the next available location from the random number generation will be used. Example: If a system has 2,000 unknowns and has to verify 322 SLs but was only able to verify 312 SLs, then the next 10 SLs will be taken from the original random number list (e.g. 323 to 333).

Public Side Service Line Verification Methods used:
- Visual at the Meter Pit - Excavation

Private Side Service Line Verification Methods used:
- Visual at the Meter Pit - Excavation

Inventory Approach	Public Water System Name	Lead Status Unknown Count	Number of Service Lines to Verify (min)
Stratified Random Sampling	Seal Rock, OR (OR4100798)	1,170	284

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Other notable activities for the month include:

- Attended the Mid Coast Water Conservation Consortium Meeting.
- Attended SDAO/SDIS Joint meeting in government camp on April 3rd and 4th.
- Attended the OWRD Place-Based Planning Coordinating Committee Meeting, on March 19th.
- Met with GSI Water Solutions to review progress on MC-WPP, the Water Management and Conservation Plan, and Beaver Creek streamflow and temperature monitoring scope of services.
- Attended the Monthly Oregon Water Utility Council (OWUC) meeting, on March 21st.
- Staff attended the quarterly IT and Cybersecurity Briefing with OrchoTech on March 15th.
- Staff are working to complete the Annual SRWD 2024/2025 Budget Packets.
- Staff worked with Jacobs Engineering to satisfy the request for production of documents related to arbitration.
- Met with consultants developing Lead and Copper Rule Revision service line inventory report.

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