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**To:** Utilities Committee  
**From:** Luke Vandenberg, Engineer  
Peter Neuberger, P.E. City Engineer  
Danielle Block, P.E. Director of Public Works  
**Date:** March 6, 2024  
**Re:** Lead and Galvanized Service Line Update - 2024

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### LSL Replacement Program – By the Numbers Update As of January 30, 2024

#### **Background Information:**

The City of Appleton takes the issues of lead in drinking water very seriously and because property owners in Appleton own a portion of their water service lines (see illustration below), there is a shared responsibility to manage lead exposure. Effective January 19, 2022, the City of Appleton enacted new ordinance, Section 20-44: Lead and Galvanized Water Service Line Replacement, which requires all property owners to replace their lead or galvanized service line within one (1) year of written notification from the City. <https://www.appleton.org/government/public-works/lead-service-program>

#### **Lead Service Line (LSL):**

A portion of pipe that is made of lead, which connects the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner, or both. For the purposes of this subpart, a galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material. If the only lead piping serving the home is a lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, the service line is not a lead service line (40 CFR §141.2).

\*Since we do not have the historical records of the downstream material the city is required to classify all galvanized downstream of unknown material, which then classifies the service line as an LSL.

#### **Galvanized Requiring Replacement (GRR):**

If the galvanized service line is or ever was at any time downstream of an LSL or is currently downstream of a lead status unknown service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL (40 CFR §141.84(a)(4)(ii)).

\*Again, we must presume there was an upstream LSL since we cannot demonstrate if the line was ever downstream of an LSL. Then technically speaking, this GRR line is now classified as an LSL as defined above.

#### **Non-Compliance:**

LSLs are identified as non-compliant when they have been invited to participate in the city replacement

program and did not participate. Three letters are sent to property owners. First, initial invite to program. Second (typically 30 days after first), extended invite to program. Third (typically 30 days after second), non-compliance letter issued to have service line replaced within one year of non-compliance date. If pipe is not replaced within one year timeframe, official non-compliance orders are created, and additional notifications are sent following non-compliance procedures and policies.

**Historical Numbers:**

2022

123 LSLs Replaced – 79 LSL / 44 GRR

TOTAL COST= \$497,312.13 (100% Funded by WDNR principal forgiveness funds)

Avg. cost per property = \$4,043.19

2023

154 LSLs Replaced - 83 LSL / 71 GRR

TOTAL COST= \$475,103.13 (100% Funded by ARPA set aside funds)

Avg. cost per property = \$3,082.00

**Future Program Numbers:**

2024

276 LSLs scheduled – 9 LSL / 267 GRR

To be completed under two City Department of Public Works (DPW) Projects

- Y24 - 100% funded by remaining ARPA set aside funds (\$524,896.87 to be awarded)
- U24 – 100% funded by WDNR principal forgiveness funds (\$611,302.00 to be awarded)

*\*Non-Compliance (4 LSL / 2 GRR) ordinance requires replacement in 2024 by property owner.*

2025 - 2029

903 LSLs to be scheduled - 0 LSL / 903 GRR

Future funding strategies currently being defined between DPW, Finance, and Utilities.