

***Little Hocking Water Association, Inc.***

***Lead Mapping***

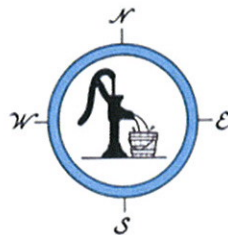
***March 2017***

*Submitted to:*

*Ohio Environmental Protection Agency  
Southeast District Office  
2195 Front Street  
Logan, Ohio 43138*

*By:*

*Little Hocking Water Association, Inc.  
3998 State Route 124  
Little Hocking, Ohio 45742*



*Data and Report Compiled by:  
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## **RELIABILITY OF REPORT - DISCLAIMER**

Conclusions reached in this report are based upon the objective data available to the CONSULTANTS at the time of forming their opinions and as presented in the report. The accuracy of the report depends upon the accuracy of these data. Every effort is made to evaluate the information by the methods that generally are recognized to constitute the state of the art at the time of rendering the report and conclusions, and the conclusions reached herein represent our opinions.

The CONSULTANTS are not responsible for actual conditions proved to be materially at variance with the data that were available to them and upon which they relied, as presented in the report.

The opinions, conclusions and recommendations shown in the report are put forth for a specific and proposed purpose and for the specific site discussed. The CONSULTANTS are not responsible for any other application, whether of purpose or location, of our opinions, conclusions and recommendations other than as specifically indicated in the report.

## **INTRODUCTION**

Substitute H.B. 512 of the 131<sup>st</sup> General Assembly that enacted Section 6109.121 of the Ohio Revised Code (ORC), effective September 9, 2016. Division (F) of ORC Section 6109.121 stipulates that not later than six months after the effective date of the law (i.e., March 9, 2017), the owner or operator of a community public water system shall identify and map areas of the distribution system that are known or likely to contain lead service lines and identify the characteristics of buildings serviced by the system that may contain lead piping, solder, or fixtures.

Subsequent to the passage of H.B. 512 and the enactment of ORC Section 6109.121, the Ohio EPA issued a January 6, 2017 guidance document, number PWS-04-001 titled, Guidelines for Lead Mapping in Distribution Systems. This document outlines the Agency's position on how to map a distribution system to identify areas that are known to contain or likely to contain lead service lines, and identify characteristics of buildings served by community water systems that may contain lead piping, solder, or fixtures. Further, the guidance document establishes mapping requirements and recommendations relative to format, scale, land base features (including parcels and buildings served by the system), color schemes and naming conventions for water service lines on both the public and private side of the meter, and the use of coloring or other mapping tools to highlight areas on the water distribution map that are known or likely to have lead services lines, lead piping, solder, or fixtures. Submittal requirements for the map, together with a narrative description of buildings served by the water system likely to contain lead solder, plumbing, or fixtures as well as the list of sampling locations that are Tier 1 sites used to collect samples, as required by rules adopted under ORC Section 6109.121, are also outlined in the guidance document. The attached map and this narrative report were produced in compliance with Ohio EPA guidance.

## **LITTLE HOCKING WATER ASSOCIATION**

The Little Hocking Water Association, Inc. (LHWA) serves over 4,000 customers in Washington and Athens counties in southern Ohio. LHWA began collecting the data necessary to develop a GIS-based (Geographic Information System) information system in 2016. This data was used as the basis of the mapping required by H.B. 512.

## **ANALYSIS OF PIPING AT THE LITTLE HOCKING WATER ASSOCIATION**

During the development of the GIS system for LHWA, data was collected on the type of piping that had been installed in the system. This data was compiled from as-built drawings that were scanned into the GIS system and used as reference when digitizing the piping network. In addition, each time a leak is repaired or a pipe is exposed for repair, LHWA personnel note the material of each pipe. Little Hocking personnel also note the pipe material each time a line locate is performed. This data is stored in the GIS system and used to verify the pipe material. Personnel from LHWA and the data in the GIS system provide data that LHWA does not have any lead distribution lines in their distribution system.

The Responsible Person for LHWA has signed the Verification Form for Community Public Water Systems Claiming no Lead Service Lines (attached). All distribution piping shown on the attached map are, therefore, known to not be lead lines and all piping on the public side of the meter is known to be made of a material other than lead.

LHWA is not responsible for installation of service lines from the meter into the house, or piping and fixtures within the house (this is typically owned by the property owner). However, for the purposes of this mapping (as required by H.B. 512), analysis has been performed to tentatively identify the probable piping within each house served by LHWA.

### **PIPING WITHIN BUILDINGS SERVED BY THE LITTLE HOCKING WATER ASSOCIATION**

Few water providers keep records on the piping used on the private side of the meter. Even fewer water utilities have any records or direct knowledge of the type of interior plumbing materials used in the buildings served by the system. Nevertheless, enactment of division (F) of ORC Section 6109.121 now requires water utilities to identify and map areas of their distribution system that are known or are likely to contain lead service lines and identify characteristics of buildings served by the system that may contain lead piping, solder, or fixtures.

Ohio EPA "Guidelines for Lead Mapping in Distribution Systems" outlined the Agency's recommendations about identifying characteristics of buildings served by community water systems that are known to contain, or likely to contain, lead piping, solder or fixtures. According to Ohio EPA, *"Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacture or installation date is the primary indicator of the lead content. Therefore, the characteristics of buildings and piping solder or fixtures would be buildings in Ohio built prior to 1998 or that use plumbing material or solder manufactured before 1998 may have materials with greater than 8% lead and are at a higher risk of contributing lead to the drinking water than materials manufactured after 1998. In addition, buildings built and plumbing materials manufactured after 2014 were required to have less than 0.25% lead by weight and have the lowest risk for contributing lead to the drinking water. It should be noted however that, although prohibited, some use of leaded solder or leaded components may have occurred after the prohibitions became effective."*

To comply with Ohio EPA guidelines, LHWA has identified (to the best of its ability given the data available) building served that were constructed before 1998. These buildings are assumed to contain plumbing materials containing higher percentages of lead than those constructed after 1998. Pipes in buildings constructed before 1998 are, therefore, assumed to have a higher risk of contributing lead to the drinking water than pipes in buildings constructed after 1998.

To compile data on the year that each building served by LHWA was constructed, data was obtained from the Athens County Auditor and Washington County Auditor. The year that a building was constructed is not typically included in the data download available from a county auditor's website. It was, therefore, necessary to obtain the CAMA file (or equivalent) from

## VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS CLAIMING NO LEAD SERVICE LINES

The owner or operator of all community public water systems must identify and map areas of their distribution system that are known or are likely to contain lead service lines. Systems must submit a copy of the applicable map to the Ohio Department of Health and the Ohio Department of Job and Family Services. Systems must also submit a report to the director containing at least both of the following: (1) The applicable map with narrative, and (2) A list of sampling locations used to collect samples as required by Ohio Revised Code (ORC) Section 6109.121 and any rules adopted thereunder, including contact information for the owner and occupant of each sampling site.

Should a water system determine no lead service lines exist in their distribution system, they must provide information stating they reviewed, at the minimum, historical permit records and local ordinances, distribution maintenance records and information pertaining to installation dates or materials for all services lines. This information must be verified below.

I HEREBY CERTIFY THAT THE FOLLOWING METHOD(S) WERE USED TO DETERMINE NO LEAD SERVICE LINES EXIST IN THIS WATER SYSTEM'S DISTRIBUTION SYSTEM, AS REQUIRED BY ORC 6109.121(F):

LEAD SERVICE LINE VERIFICATION
<p><b>This PWS states they have no lead service lines and has reviewed the following information (select one or more of the following):</b></p> <ul style="list-style-type: none"><li><input type="checkbox"/> Historical permit records and/or local ordinances</li><li><input type="checkbox"/> Distribution maintenance records (i.e. meter replacement, waterline break repairs)</li><li><input type="checkbox"/> Information pertaining to installation dates for all service lines (i.e. after 1986 when lead services lines were banned)</li><li><input checked="" type="checkbox"/> Service line material of all service lines is known (i.e. all service lines are known to be PVC)</li></ul>

Jon T. Hanning Feb. 28, 2017  
Signature of Responsible Person Date  
Jon T. Hanning General Manager  
Printed Name and Title of Responsible Person

PWS NAME: Little Hocking Water Assoc. Inc.  
PWS ID: OH 8400212  
COUNTY: Washington

### **For Ohio EPA use only:**

Date Verification Rec'd: \_\_\_\_\_



each county auditor. Each auditor's office provided this data in slightly different database formats. This data was then standardized before it could be used in geospatial analysis.




Using ESRI ArcMap software, meters were linked to parcels on a county-by-county basis. The parcel ID number was then used to link meters to parcel information from the county auditor's office. When available, data on the year buildings were constructed was linked to the meter and used to develop the dataset on the attached map.

Note that this mapping is subject to limitation imposed by the datasets available from the county auditor's site. These limitations include the following:

1. The "year built" reported by the county auditor is accurate.
2. Not every building is identified with a "year built". In these cases, buildings were identified as "unknown" in the attached map.
3. Manufactured homes in some counties are not identified as having a "year built". In these counties, manufactured homes were identified as unknown.
4. When no "year built" was identified on the auditor's site, parcel IDs and/or addresses were searched individually to check whether the land was vacant (included in the "post-1998" classification), or whether a building was on the property (included in the "unknown" classification).
5. Some county auditor's sites contained information on the year a property was remodeled. It was assumed that this remodel did not include replacement of all indoor pipes, and the "year built" was retained for the purposes of this analysis.

In addition to the data from the auditor's offices, LHWA has conducted a survey of customers in the service area in 1992. This survey was conducted as part of the lead and copper sampling regulations that took effect in 1992. In preparation for selection of lead and copper sampling locations, LHWA asked customers to provide information on the type of interior pipes and plumbing fixtures in buildings. This data had previously been housed on the original postcard surveys. During this analysis of buildings within the service area supplied with water by LHWA, this data was entered into a spreadsheet. This data was used to supplement data available from the auditor's offices. When customers identified their plumbing as being entirely plastic during this survey, these customers were reclassified as "Post-1998" to identify that these homes (according to the home owner in 1992) are not at a higher risk of lead contamination.

Each dot on the attached map represents a LHWA customer. The color of the dot represents the most likely date range during which the private-side service line and indoor piping was installed:

-  Pre-1998
-  Post-1998
-  Unknown/No Information

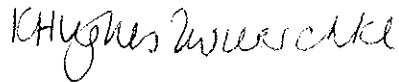
## LEAD AND COPPER SAMPLING LOCATIONS

As required, attached is a list of Tier I sites used to collect lead and copper samples. The attached table contains contact information for the owner/occupant of each sampling site.

## INTENDED USE OF THIS DATA

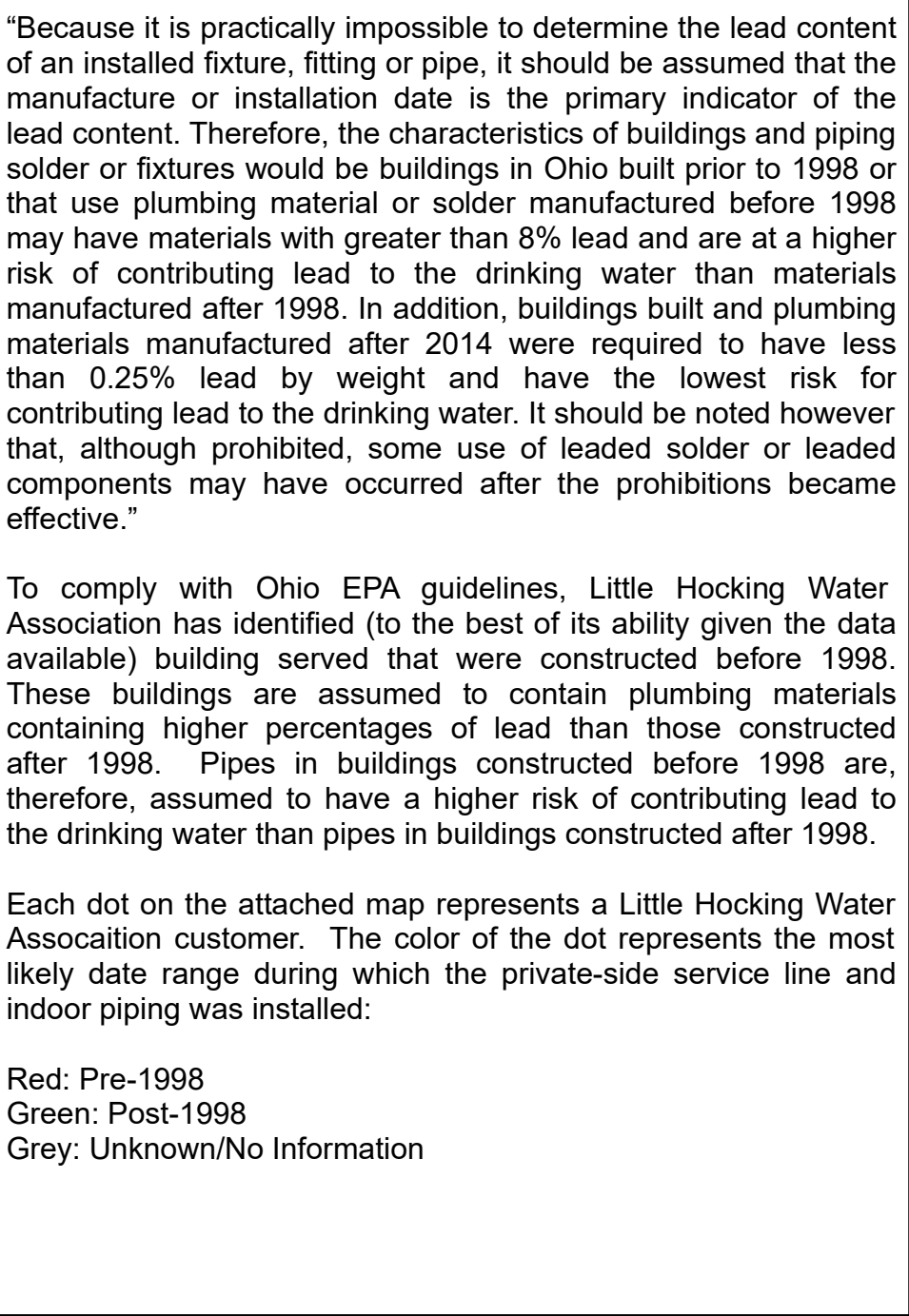
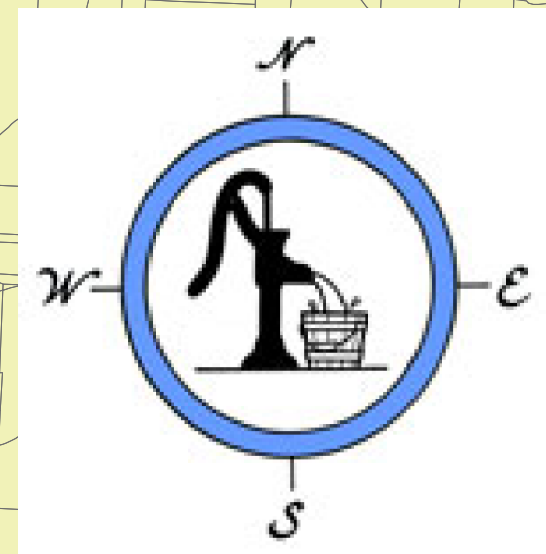
Data in the attached map has been compiled to facilitate notification in case of a system-wide exceedance in the lead action level. The required notifications are defined in ORC 6109.121(C). Specifically, within 5 business days of receipt of laboratory results showing the system has exceeded the lead action level, the community water system must notify "*all consumers known or likely to have lead service lines, lead pipes or lead solder as identified in the map required to be completed under division (F) of this section.*" In the event of a system-wide exceedance of the lead action level, there are also additional notifications that are required to be made to the entire system, regardless of classification on the attached map.

Respectfully submitted,  
BENNETT & WILLIAMS  
ENVIRONMENTAL CONSULTANTS, INC.



Kerry H. Zwierschke, P.E., Ph.D.  
Principal Engineer





# Little Hocking Water Association - Lead Mapping 2017