



LEAD SERVICE LINE AND FIXTURE MAPPING PROJECT

City of West Carrollton
300 E. Central Ave.
West Carrollton, Ohio 45449

March 6, 2017

Find enclosed a copy of the revised Lead Mapping, verification form and sample sites used for Lead sampling. Also enclosed is a copy of the Lead and Copper Monitoring Report from 1992 indicating that there were no known lead service lines.

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cc: Ohio EPA, Southwest District Office
Ohio Dept. of Health, Lead Program
Ohio Dept. of Job and Family Services

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LEAD SERVICE LINE AND FIXTURE MAPPING PROJECT - NARRATIVE

City of West Carrollton Water Department

March 2017

300 E. Central Ave.

West Carrollton, OH 45449

PWSID: OH5702812

HB512 enacting section 6109.121 of the Ohio Revised Code (ORC) requires the City of West Carrollton to complete a Lead Mapping Project in the distribution system. To complete this task the City of West Carrollton has followed the OEPA document titled, "Guidelines for the Lead Mapping in Distribution Systems" dated January 6, 2017, hereafter referred to as, "The Guideline".

Lead service lines should have stopped being installed sometime during the 1950 – 1960s and as of 2014 all new installations would require the use of no lead components. No lead meaning 0.25% or less by weight instead of the previous 8% as was allowed by law. This time frame corresponds to the time frame given in The Guideline.

The City of West Carrollton has no record of any lead lines that were seen during maintenance activities, this goes back to personnel who were working here at the start of the Lead and Copper Monitoring in 1992 (see attached "Drinking Water Lead and Copper Monitoring Report" 1992). The City of West Carrollton has not previously recorded a log of maintenance issues over the years, should this be deemed necessary the City will start a system of tracking maintenance activities.

Due to time constraints, no public interaction could be utilized as is described in the Customer Self-Reporting section of The Guideline. In the future, this avenue may be explored to update the City's records. However, recent experience has shown that a customer can call a copper service line a lead line. This of course would be an erroneous record, which would not be helpful in determining areas with lead service lines.

To complete the map, since no actual records exist to determine which services may have lead on the City's side or the customers side, the City of West Carrollton had to turn to other information, when the houses were constructed. The green colored area of the map indicates that the houses were built before 1998, the red color area on the map indicates that the houses were built between 1998 and 2014.

The Guideline states, "Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacture of 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”.

The City of West Carrollton does not know of any lead service lines as far as can be determined by city personnel.

Since 1992 the City of West Carrollton has been monitoring lead and copper in the water. The original survey sampled 60 sites, presently the City is monitoring 30 sites. Neither the results for lead or copper have ever been above the Action Level during the past 17 years. Sampling occurred in the following years: 1992, 1993, 1994, 1995, 1996, 1997, 1998, 2000, 2003, 2006, 2009, 2012, 2015.

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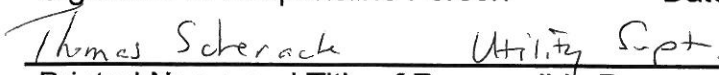
VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS ^{at District} CLAIMING NO LEAD SERVICE LINES

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.

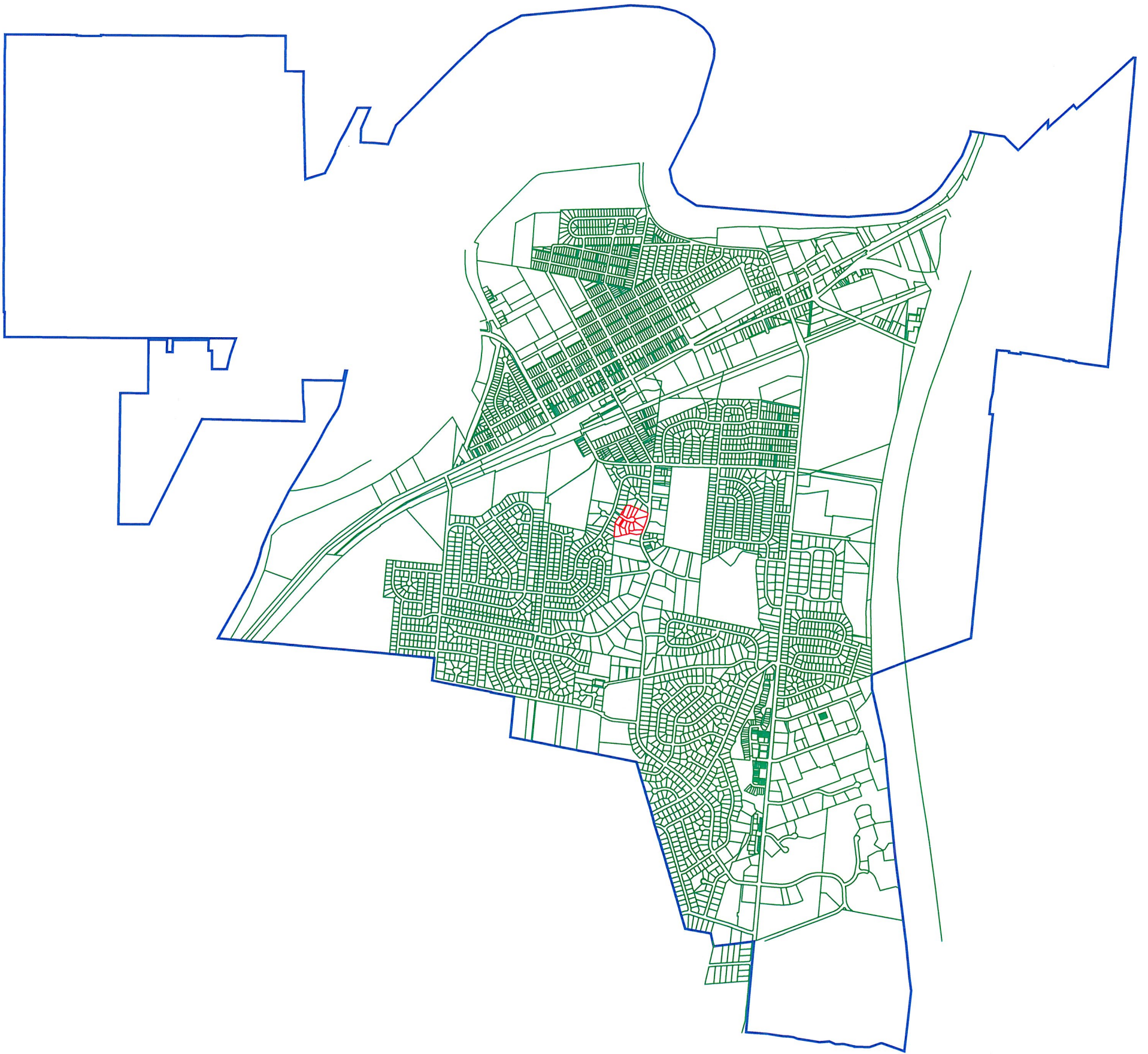
I HEREBY CERTIFY THAT THE FOLLOWING METHOD(S) WERE USED TO DETERMINE NO LEAD SERVICE LINES EXIST IN THIS WATER SYSTEM'S DISTRIBUTION SYSTEM, AS REQUIRED BY ORC 6109.121(F):

LEAD SERVICE LINE VERIFICATION
<p>This PWS states they have no lead service lines and has reviewed the following information (select one or more of the following):</p> <ul style="list-style-type: none"><input type="checkbox"/> Historical permit records and/or local ordinances<input checked="" type="checkbox"/> Distribution maintenance records (i.e. meter replacement, waterline break repairs) <i>The city does not know of any Pb lines at this time!</i><input type="checkbox"/> Information pertaining to installation dates for all service lines (i.e. after 1986 when lead services lines were banned)<input type="checkbox"/> Service line material of all service lines is known (i.e. all service lines are known to be PVC)


Signature of Responsible Person 3.2.17
Date

Printed Name and Title of Responsible Person

City of West Carrollton
PWS NAME: 5702812
PWS ID: OH 5702812
COUNTY: Montgomery

<p><u>For Ohio EPA use only:</u></p> <p>Date Verification Rec'd: _____</p>



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CITY OF WEST CARROLLTON, OHIO
PWS ID: OH5702812

LEAD MAPPING IN DISTRIBUTION SYSTEM
DATE: MARCH 3, 2017

LEGEND

LIKELY TO HAVE LEAD SOLDER BUT NO LEAD SERVICE LINE

LIKELY TO HAVE NO LEAD SOLDER AND NO LEAD SERVICE LINE

DISCLAIMER:

Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacturer 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 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.