

March, 2017

Ohio EPA Southwest District Office
401 E. Fifth St.
Dayton, OH 45402

Lead Mapping Narrative

In response to the House Bill 512 requirements, Trenton Public Works has been very active in collecting needed data to comply with these new mandates. Upon being notified of these requirements on January 10, 2017 several meetings have been held involving different departments within the City of Trenton including administration, IT, street, distribution, and water supply. Those involved in these meetings have had many years of hands on experience dealing directly with the Trenton distribution system. Their experience includes water main breaks, distribution improvement/replacement, service line repairs, service line locating, meter reading, and meter repair/replacement.

Based the years of experience, knowledge, and thorough research completed on the City of Trenton distribution system, it is our conclusion that there are no known lead service lines on the City owned side of the distribution system. In all of the combined years of experience no one has found a lead service line during a repair job or meter replacement which was last conducted in the early 2000's. We do acknowledge, although unlikely, it may be possible for lead service lines to exist, especially on the privately owned side of the line, because of the lack of precise documentation of the line makeup and/or materials used during any repairs.

In an effort to ID all service line material, Public Works has been using photos, notes, and GIS system mapping when there is a service line repair made on the City owned side of the service line. During water meter repairs documentation is now being taken of the service line material before and after meter sites. With this new form of documentation any future discovery of lead service lines will be noted, updated, and resubmitted in the lead mapping of the Trenton distribution system to the OEPA and other required parties every 5 years as required by House Bill 512.

The Trenton distribution system does contain a small number of lead packed mains not identified on the lead map. The streets verified having lead packed mains are W State St, N First St, N Second St, and North St. These mains are located in the older sections of the down town area and are likely not isolated to these streets. It is presumed that most downtown streets are likely to contain lead packing. This will continually be updated to the Trenton GIS system as maintenance and repairs are in this area of the system.

The Butler County GIS department, several other surrounding municipal water systems, and the OEPA were also consulted to clarify what data format was appropriate for this mapping project and attempt to make a semi-uniform response for our district. Since the Trenton distribution system has no lead service lines, parcels were shaded according to the year the building was constructed. These shaded areas represent different levels of risk, again based on construction age. Yellow represents all construction before 1998 and is the highest risk of lead contributing to drinking water. Gray represents construction between 1998 and 2014 and may contain a smaller amount of lead contaminating piping and fixtures. Green represents construction after 2014 and is the lowest risk of lead contributing to drinking water.

Much effort, work, and collaboration went into this lead mapping project in a very short period of time. Please accept the contents of this report which include the detailed lead map, a list of sample locations (previously submitted on 1-13-17), the Verification from for Community Public Water Systems Claiming No Lead Service Lines, and this written narrative with added details the map didn't cover or contain.

Thank You,

David J. Combs
Operator in Charge
City of Trenton
513-464-1335


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):

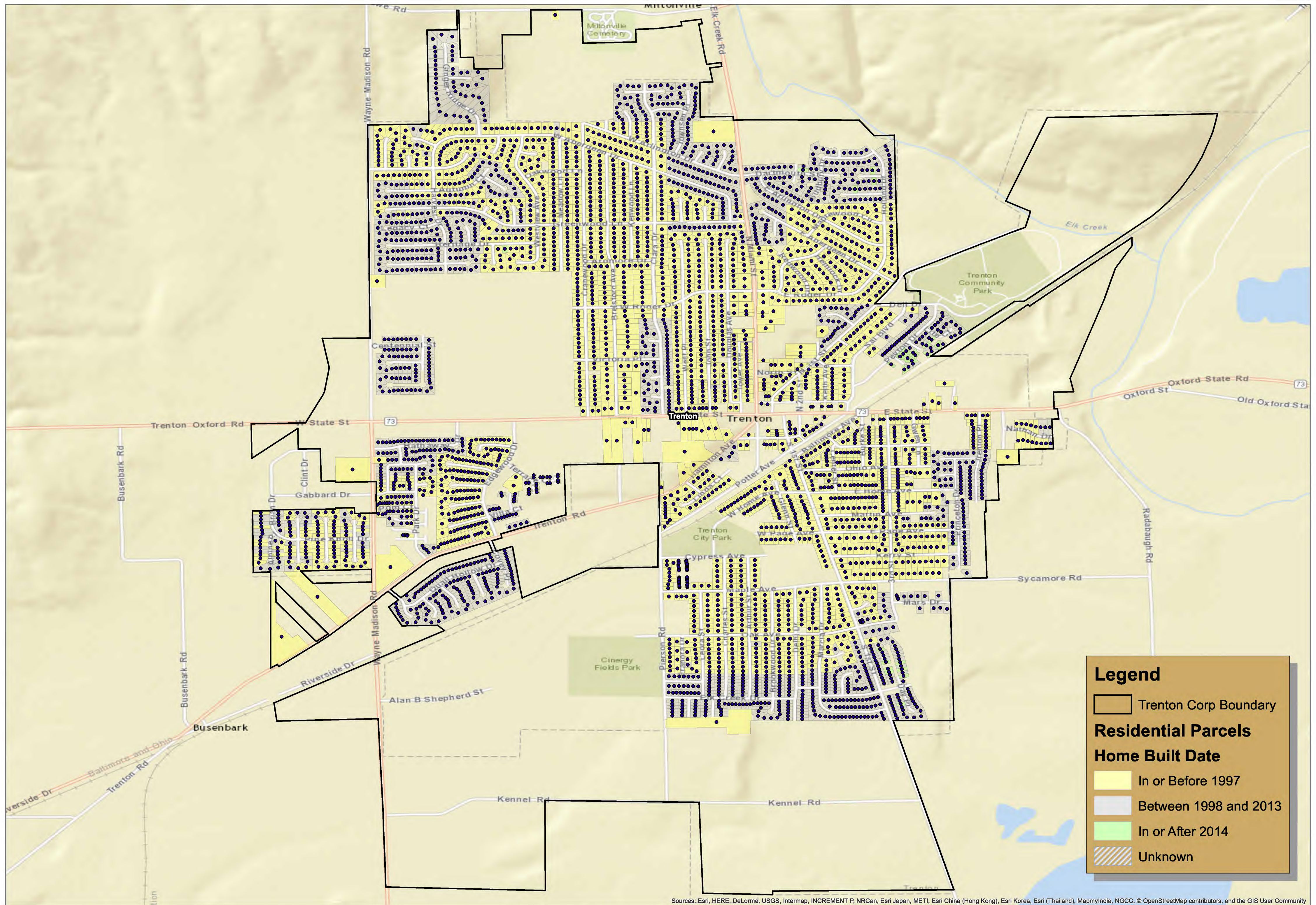
LEAD SERVICE LINE VERIFICATION
<p>This PWS states they have no lead service lines and has reviewed the following information (select one or more of the following):</p> <ul style="list-style-type: none"><input type="checkbox"/> Historical permit records and/or local ordinances<input checked="" type="checkbox"/> Distribution maintenance records (i.e. meter replacement, waterline break repairs)<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)

 WS3-1109606-10 3-7-2017
Signature of Responsible Person Date
David J Combs Operator in Charge
Printed Name and Title of Responsible Person

PWS NAME: Trenton City PWS
PWS ID: OH 0903012
COUNTY: Butler

For Ohio EPA use only:

Date Verification Rec'd: _____



1 inch = 1,000 feet

Trenton, Ohio EPA Lead Mapping

Date: 3/5/2017

