

Date: May 28, 2024

To all members/customers/consumers of Saratoga Water District (SWD):

Based on revised rules from the US EPA and WA Department of Health (DOH): All community water systems must develop an initial inventory of service lines that meets the Lead and Copper Rule Revision (LCRR) requirements for both the public and private portions of every service line and **submit the lead service line inventory to the state by October 16, 2024**.

As noted by DOH, “replacing lead service lines is the best way to reduce the risk of exposure to lead in drinking water across a community”. In 1986, Congress amended the Safe Drinking Water Act (SDWA) to require the use of “lead free” pipes, solder or flux in public water systems.

Service lines for homes constructed after 1986 in Washington should be made of materials other than lead. Water systems developing their lead service line inventories may designate homes built after 1986 as not having a lead service line.

While the District understands that all district-owned main and service lines were replaced in the 1990’s and are therefore considered non-lead, the customer portion of each service line (from meter to the residence) for homes built after 1986 need to be inventoried.

The SWD Board reviewed the Island County Assessor’s data base for information on the year homes in the District were built. If your home was noted as built after 1986 it will be identified as “non-lead”.

However, we are asking each homeowner to check your own records and **if your home was built in 1986 or earlier**, please follow the guidance below for the inventory of your service line.

The lead service line inventory must include data on the private-side portion of the service line (from the meter to the building inlet). Internal premise plumbing is not required to be inventoried.

Customers may self-report the material of the customer-owned portion of the service line by using their records or performing a visual inspection (e.g., by using scratch or magnet tests or lead paint test kits) to identify the material. Below are DOE and DOH’s instructions to create a written record and photograph it for verification if needed.

Visual Inspection of Service Line by Customers: Many utilities enlisted the public’s help to identify the material of the customer-owned portion of the service line. The service line may be visible where it comes into the building, such as in the basement, where it connects to the water meter and/or premise plumbing. Note incoming service lines may have different configurations, which can make it difficult to locate the service line entering the home.

Visual Inspection of Service Line Material: The material composition of a service line can be identified through visual inspection. Exhibit below provides a comparison of common service line materials:

- Plastic is a smooth pipe of various colors (*e.g.*, white, blue, black, and green).
- Lead is a soft metal that is a dull, silver-gray color. It is easily scratched with a coin or key, and the scratched areas will be shiny. It is non-magnetic, meaning a magnet will not stick to it. Lead pipe is commonly attached to other pipe with a “wiped” joint (see photo).
- Copper is the color of a penny (new or old).
- Galvanized is a dull, silver-gray color that is difficult to scratch. It is magnetic, meaning a magnet will stick to it.



Example of Wiped Lead Joint

Pipe diameter can be used to determine if a pipe is non-lead. Most lead pipes and lead goosenecks are two inches in diameter or less. DOH considers any pipe larger than two inches in diameter as non-lead.

In addition to the scratch and magnet test, lead paint test kits can be used to test the pipe for lead. Surface swab kits approved by EPA for lead paint will change color after coming in contact with a lead surface. A list of approved test kits is available on EPA's website (<https://www.epa.gov/lead/lead-test-kits>). Care should be taken in interpreting results as the kits can react to lead paint if the pipe is painted.

Please respond with the following information about your service line no later than August 1, 2024:

- Property physical address, pipe material type and method used to identify

Without a response your service line will be identified in the Inventory as "Lead status Unknown".

Email the information to Commissioner William Poss at: poss@whidbey.com Include "lead inventory" in the email subject line. For questions contact Commissioner Poss at email above or 360 632-0261

For more information about this Inventory and Lead and Copper in general see the following link: <https://doh.wa.gov/community-and-environment/drinking-water/contaminants/lead/lead-and-copper-rule-revisions> or the QR Code below:

