Lead Service Line Inventory & Replacement Project

Historically in Greeley, lead piping was occasionally used for water service lines that connect individual properties to the water main. This means older homes in Greeley may still have service lines that contain lead. In December 2021, the Environmental Protection Agency released the Lead and Copper Rule Revision (LCRR), that strengthens the regulatory framework governing lead in drinking water. One of the key elements of the LCRR is the requirement for water systems to develop and maintain a service line inventory, including material information for both the public and privately owned portions of the system. The LCRR also requires that any lead or galvanized steel lines downstream of historical lead lines must also be removed.

The Lead Service Line Inventory & Replacement Project will help the City of Greeley provide the best possible water to our customers, and to stay ahead of the regulatory framework. The project will identify the service line material of homes by potholing and physical verification of service line material. Where lead or galvanized steel downstream of historical lead service lines are identified, the City will replace such lines at no cost to the customer.

This project is critical for the City of Greeley as we meet changing regulations and continue our mission to provide high quality, safe, and reliable drinking water to customers.

1. **Alternatives Considered:**
   (a) Leaving lead service lines in-place is not a viable option and will leave the City at risk for future water quality violations and potential lead exceedances in drinking water provided to homes.
   (b) Leaving lead service in-place and increasing anti-corrosion treatment for treated water is a cost prohibitive solution. The likely treatment would be orthophosphate which in addition to increasing treatment costs for the City's water, would also increase wastewater treatment costs. Wastewater effluent requirements limit the amount of phosphate which can be in our discharged, again this would be an expensive ongoing and cost-prohibitive solution..

   Both alternatives (a) and (b) are considered less than ideal from a public health perspective and the Colorado Department of Public Health and the Environment (CDPHE) is encouraging water providers to identify and replace lead service lines in their water distribution systems.

2. **Preferred Alternative:** The preferred alternative is to identify and replace water service lines that contain lead or galvanized steel downstream of historical or

suspected lead. While this is an expensive capital project, it is a one-time expense that with each lead or Galvanized Requiring Replacement (GRR) identification and replacement, improves the water quality for the City's water distribution system. Total cost of the project is $22,805,240.

3. **Any projected rate increases:** Each year the department models the future 10 years of capital and operating expenses and plans out the necessary rate and other revenue needed to meet the costs. This project is included in that model, and the impact of the project will not affect that forecast and planned service rates. Receiving funding through the SRF loan, and the potential for loan forgiveness will reduce the cost of the capital funding allocated to this Project and ease the demand on revenue arising from it.
4. Construction for a water service line replacement occurs in previously disturbed and developed areas and following a replacement all landscaping is returned to pre-existing conditions. The size of each construction disturbance is less than the environmental impact is negligible.