CITY OF LE ROY

Illinois EPA Identification Number: IL1130750

Lead Service Line Replacement Plan

Why have we created this Lead Service Line Replacement Plan?

Drinking water can be a source of lead exposure. Service pipes (lines) that contain lead can corrode, causing lead to enter drinking water. However, the presence of a lead service line does not always mean a home has a lead issue. Nonetheless, lead in drinking water can be a problem. The U.S. Environmental Protection Agency (EPA) estimates that drinking water contaminated with lead can contribute up to 20 percent or more of a person's total exposure to lead. Infants who consume mostly mixed formula can receive 40 percent to 60 percent of their total exposure to lead from drinking water.

Public Act 102-0613 (PA) requires the owners and operators of community water supplies to develop, implement, and maintain a comprehensive water service line material inventory and comprehensive lead service line replacement plan, provide notice to occupants of potential affected buildings before any construction or repair work on water mains or lead service lines, and request access to potentially affected buildings before replacing lead service lines. The PA also prohibits partial lead service line replacement.

How large a problem does City Of Le Roy have with water service lines that contain lead?

Over the past several years, water supply officials have been evaluating water service line materials and, as a result, have complied with 415 ILCS 5/17.12. This statute requires community water systems to provide a comprehensive water service line material inventory to the Illinois EPA by April 15, 2024. (To further comply with PA 102-0613, water supply officials have requested that the Illinois EPA post this information to their website.)

Because not all is known about the actual service line connections to our water mains, the city has been using a combination of meter changeout information, previous repair work, maps, two city surveys one in 2003 and another in 2024, predictive modeling, potholing, new construction and service line replacement records to obtain a representation of how many water service lines might need to be replaced across our community. All of these efforts have been somewhat successful even though water mains are constructed below the streets. Since removing a portion of the street was beyond the scope of the project, actually viewing the connection between the service line and the City's water distribution system was not possible. Since this project was not as successful as hoped (although it did provide needed information on the plumbing materials used throughout the community), water supply officials must draw upon their historical knowledge of the system including where repairs have been made, the age of the water supply distribution system, etc.

In summary, the water system supplies water to 3512 customers. Of these customers, The City has confirmed the presence of 49 service lines that must be replaced (service lines that are wholly or partially lead) (those that are or have ever contained lead plumbing materials) and suspects that an additional 10 will also need to be replaced (based upon the information indicated above). Finally, since 2020 water supply officials have proactively replaced 8 lead service lines connected to the distribution system of our community water supply.

Note: The attached map illustrates the areas of the at-risk water services within our community. (In the future, this map will be revised as service lines are replaced or material identification indicates a revision to the material inventory.)

Distribution System Map



Current estimates place the cost of replacing at-risk service lines averaging \$5,700 to \$21,000 each. The net cost to taxpayers could be as much as \$1,000,000.

If this is so costly, do we have to replace our service lines?

Pursuant to Public Act (PA) 102-0613, the Illinois Environmental Protection Agency (EPA) is charged with compiling information necessary to demonstrate that our water supply (and all community water systems in the state) has evaluated its water service connection for the presence of lead and has developed this lead service line replacement plan.

By enlarge and based upon our institutional knowledge, our community water supply does not have wholly lead service lines. But we do have lead connections to our water mains. Generally, these lead service lines transition to galvanized pipes that transmits water to home plumbing systems. Unfortunately, U.S. EPA studies have documented that these galvanized pipes (once downstream of lead) provide much the same health risk as wholly lead pipes. These studies have shown that galvanized pipes that are, or have been downstream, of lead pipe must be removed to protect public health. Again, PA 102-0613 requires the entire service line to be replaced if any portion of it was lead followed by galvanized pipe.

How soon will we replace our at-risk water service lines?

Beginning as soon as possible and pursuant to Public Act (PA) 102-0613, we must replace a minimum of 7% of our at-risk service lines per year for the next 15 years.

The city of Le Roy will be taking a more aggressive replacement schedule to hopefully remove all effected service lines within ten years.

Specifically, how much is this going to cost the city and taxpayers?

The following is a detailed accounting of costs associated with replacing lead service lines and galvanized lines requiring replacement.

Each job will be comprised of

Labor 54% of project costs Equipment 14% of project costs Materials 32% of project costs

How are we going to pay for this effort?

The following is an analysis of costs and financing options for replacing at-risk service lines connected to the community water supply's distribution system.

The city will initially be funding all portions of the service line replacements, the city does not anticipate this to change. The city will explore all funding sources to recoup these costs. Nothing will be left of the table in exploring funding options as the city is not in the position to fund this project for its completion at this time. Any changes made to the funding analysis will be updated on a yearly basis or sooner as information becomes available.

Note: Our community is an equal opportunity employer. The community itself is made up of a very diverse population and every opportunity will be taken to ensure the contractual services of a diverse workforce as specified in Public Act 102-0613.

How will we get started?

Throughout this next year the council will meet at regular times and days with the topic to discuss this plan and priorities for at-risk service line replacement. At those times, city officials will discuss consideration of different scenarios for payment and financing service line replacement over time. The City will make this and future plans available through the City website. Finally, printed copies of this (and future revised plans) will be made available upon request.

As noted previously, water supply officials hope to receive funding assistance through state and federal "grant" opportunities. With this said, we must prepare ourselves in the event that these funding options are not fruitful.

How will the City actually go about replacing at-risk service lines?

Procedure for conducting full lead service line replacement.

Full-service line replacements will be initiated using a geographic approach to minimize contractor deployment costs. Water supply officials will deviate from this approach in the event that a high-risk location is identified. When the City is notified or discovers the presence of these locations, their water service line replacement will be given the highest priority.

In compliance with Illinois law, water supply officials will continue to inform customers before a lead service line replacement is scheduled. At this time and following the replacement, the City will provide technical assistance documents regarding the health effects of lead in drinking water, flushing instructions following the water supply disturbance and other facts that may reduce consumer water quality concerns.