



# Water Service Line Survey Outreach

Jill Hoyenga, Regulatory Compliance Manager  
City of The Dalles, OR

## The Rule

- **§ 141.84 Lead service line replacement requirements.**
- **(a) *Lead service line inventory.*** All water systems must develop an inventory to identify the materials of service lines connected to the public water distribution system. The inventory must meet the following requirements:
  - **(1)** All water systems must develop an initial inventory by October 16, 2024, and submit it to the primacy agency in accordance with § 141.90(e).
  - **(2)** The inventory must include all service lines connected to the public water distribution system regardless of ownership status (e.g., where service line ownership is shared, the inventory would include both the portion of the service line owned by the water system and the customer-owned portion of the service line).

## Service Area Size Matters

- City of The Dalles serves about 12,500 people.
- A different water utility serves about 1/3 of the properties within The Dalles City Limits.
- Water systems must make the inventory publicly accessible, including a location identifier for each LSL and GRR. The LCRR requires water systems that serve more than 50,000 people to provide their inventory online (40 CFR §141.84(a)(8)).
  - Publicly available inventory requirement does not apply to the City of The Dalles.

## The State of Oregon

- In the mid-1980's the State of Oregon required all water utilities to removed lead pipe and appurtenances.
- The City of The Dalles conducted an extensive lead removal program throughout the system and considers the system to be lead-free.
- But those records were not retained. Therefore, we do not know of the location of any lead services or pigtails that were removed.

## Required Sampling

- The City of The Dalles has conducted lead testing in accordance with the previous version of the Lead and Copper Rule since 1994.
- All in-home lead sampling conducted since 1994 indicates that lead levels in drinking water are below regulated limits.
- The City expects that the test results will continue to show lead levels below the trigger level set in the Lead Copper Rule Revision.

## Outreach Goals

- The goals of the Water Service Line Inventory Campaign are consistent with The Dalles Public Works Communication Plan and the Oregon Health Authority Requirements.
- **City Goal:** Provide City-wide infrastructure to support safe and well maintained streets and reliable utility systems for the citizens of The Dalles.
  - **Public Role:** The call to action should emphasize tasks that any citizen can do to help our community maintain safe passage and reliable utility service.

## Outreach Goals

- **Public Works Goal:** Monitor Federal and State regulation changes and make necessary adjustments and/or improvements required to maintain compliance.
  - **Public Role:** The call to action should emphasize tasks that any citizen can do to help our community maintain compliance with regulations. Messaging should help citizens understand that regulation is generally in place to protect public health or the environment.
- **Project Goal:** Each customer is motivated to report the type of service line plumbing materials present on their property.
  - **Public Role:** The call to action should be easy to do. Examples include, QR code to jump to form, a simple online form, a how-to video, etc.

## Outreach Strategy

- The Water Service Line Inventory Campaign communication plan strategy is to prioritize messaging to properties and populations that have the greatest potential to have lead plumbing materials.
- However, the Oregon Health Authority requires the water utility to identify all service line materials unless the utility has qualified to use the statistical method (more about that later).



## Outreach Strategy

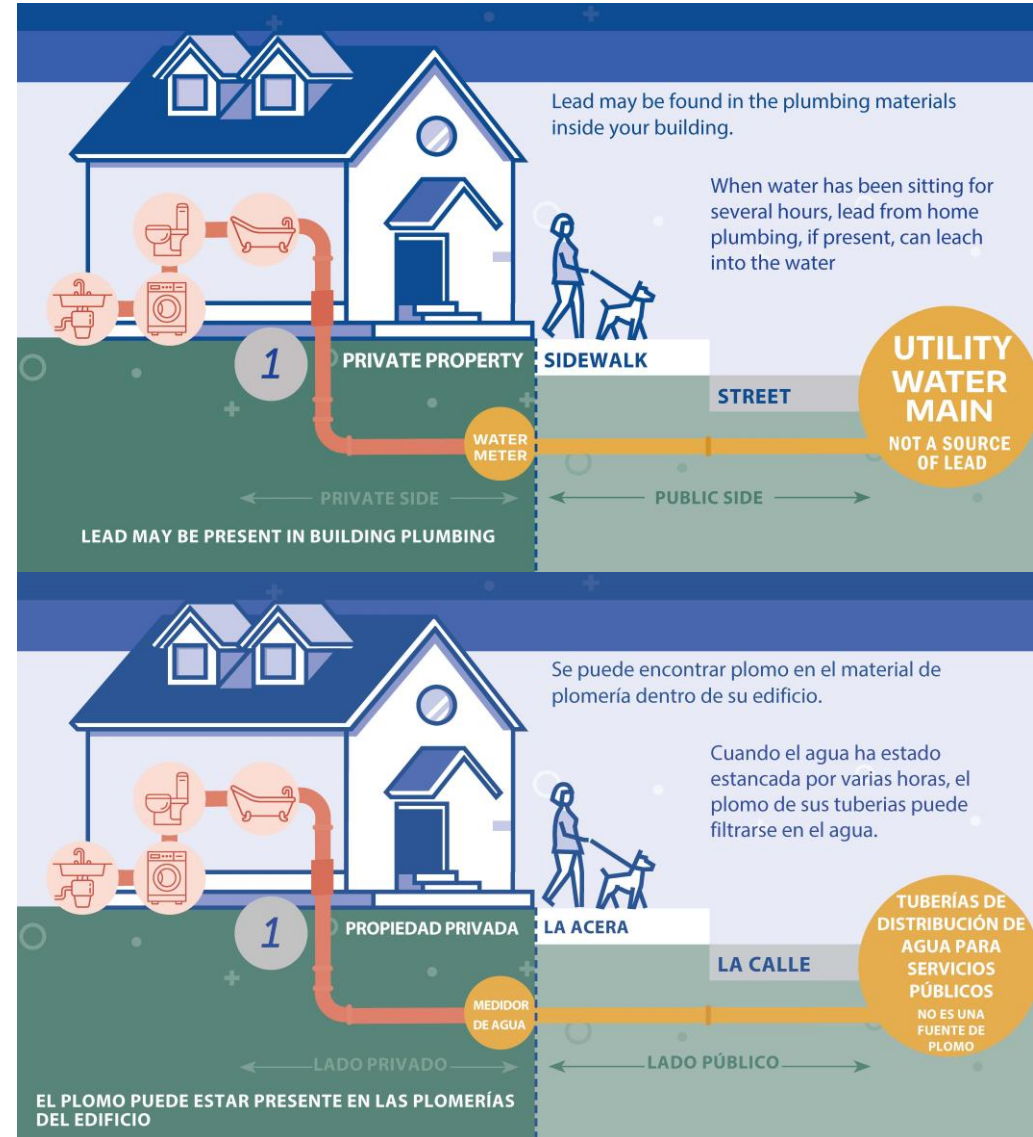
- The City has a long history of messaging about the potential for lead in drinking water via the US EPA required consumer confidence report. The Water Service Line Inventory Campaign look, feel and messaging will be aligned with the annual Water Quality Report whenever possible.



## Outreach Channels

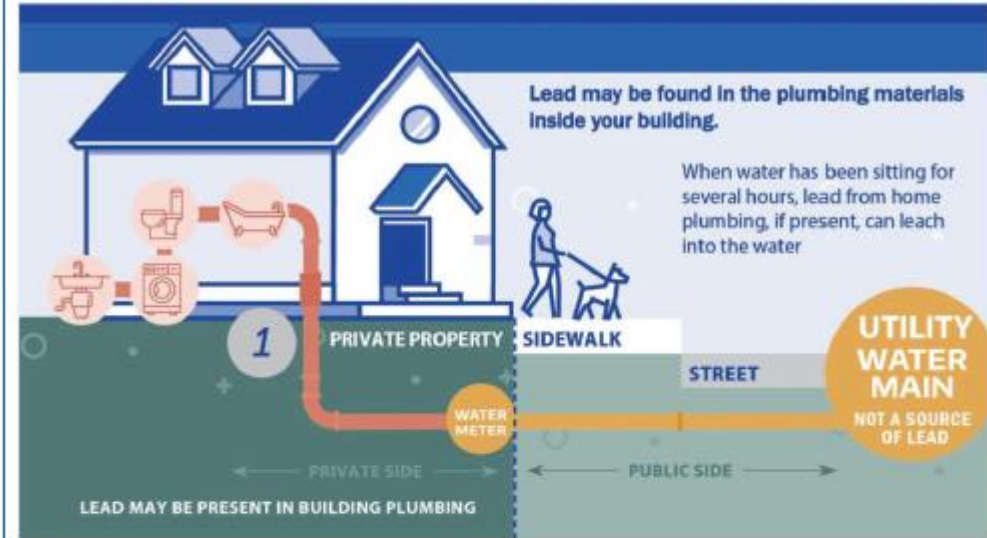
- Direct mail
- Website
- Facebook posts
- Contact service providers and regulators who serve vulnerable populations

# 120 Water assisted with direct mailer



Get the lead out  
of the project  
title

The City of The Dalles is conducting a water service line survey.

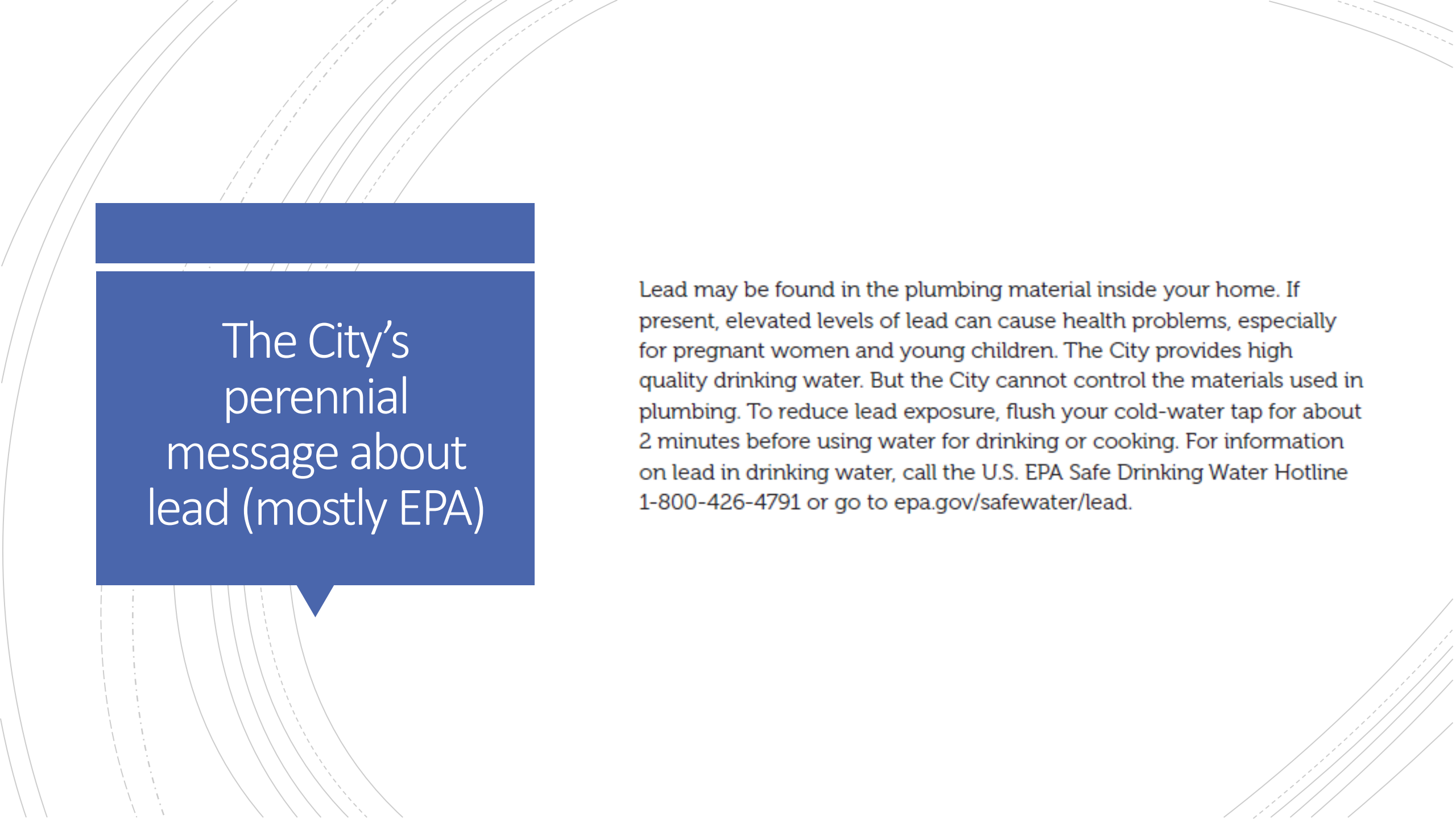


The City of The Dalles has no known lead service lines in our system. However, to comply with the Federal Lead and Copper Rule Revised, the City must record an inventory of all materials in our system from the water main to where the service line connects to your building.

You can help! Send us a picture of your scratch test.

For more information go to [thedalles.org/waterservicelinesurvey](http://thedalles.org/waterservicelinesurvey)



The background features several sets of concentric, curved lines in shades of gray, some solid and some dashed, creating a sense of motion and depth. A dark blue rectangular box with a white border and a small white triangle pointing downwards at the bottom center contains the text.

## The City's perennial message about lead (mostly EPA)

Lead may be found in the plumbing material inside your home. If present, elevated levels of lead can cause health problems, especially for pregnant women and young children. The City provides high quality drinking water. But the City cannot control the materials used in plumbing. To reduce lead exposure, flush your cold-water tap for about 2 minutes before using water for drinking or cooking. For information on lead in drinking water, call the U.S. EPA Safe Drinking Water Hotline 1-800-426-4791 or go to [epa.gov/safewater/lead](https://epa.gov/safewater/lead).

# Call to Action: Simple 1,2,3

You can help!  
Send us a picture of your scratch test.

- ① Do the scratch test where the service line enters the building.
- ② Jot notes below.
- ③ Enter notes and upload picture online at [thedalles.org/waterservicelinesurvey](http://thedalles.org/waterservicelinesurvey) or [thedalles.org/encuestasobrelineasdeserviciodeagua](http://thedalles.org/encuestasobrelineasdeserviciodeagua)

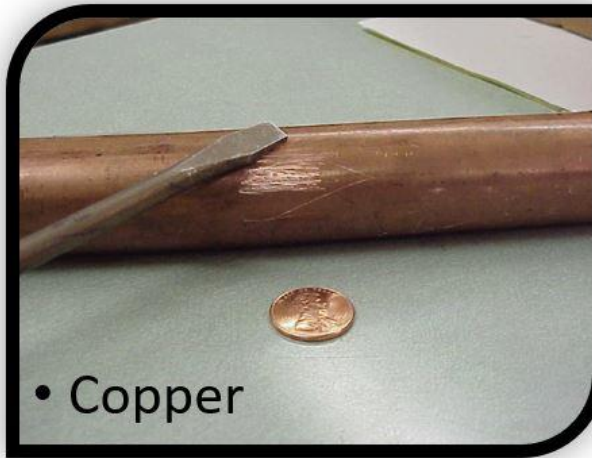


Address of building: \_\_\_\_\_

Pipe material: \_\_\_\_\_

Contact email: \_\_\_\_\_

A picture is  
worth 1000  
words



• Copper



• Galvanized Steel



• Lead



• Plastic

A few slides from the video posted on our website.



# Find your water service line



- Find your water meter
- The water service line usually goes directly from the water meter to the building.
- Call Public Works if you can't find your water meter (541)296-5401








# Copper

- Introduced in the 1930's
- Commonly used today
- Scratched area will be shiny like a penny
- Magnet will not stick

A photograph showing a person using a magnetic screwdriver to test a copper pipe. The screwdriver is held against the pipe, and a blue arrow points to it with the text "Magnetic screwdriver does not stick". Another blue arrow points to a scratch on the pipe with the text "Scratch is shiny like a penny".

Magnetic screwdriver does not stick

Scratch is shiny like a penny

Your service line might come up through your concrete slab



# Galvanized Steel



Your service line might enter your crawl space

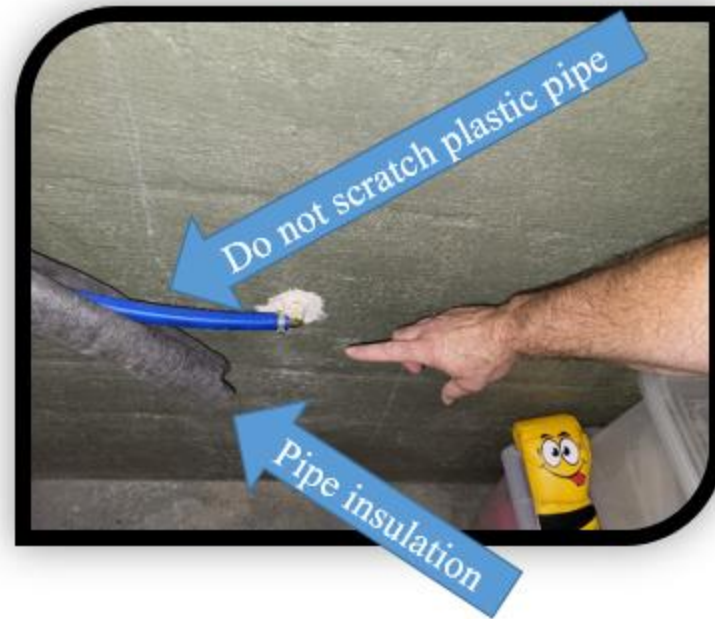
- Commonly used from the 1950's through 1980's
- May appear rusty or grey
- Scratched area will remain a dull grey
- Magnet will stick





# Plastic

- Used since the 1970's
- Commonly used today
- **Do not scratch plastic pipe**
- Magnet will not stick
- Any type of pipe may be insulated



Your service line might enter your basement wall





# Lead



- Phased out of use in the 1930's
- Prohibited in Oregon since 1986
- Scratched area will be shiny silver
- No rust
- Magnet will not stick



The background features several sets of concentric, curved lines in shades of gray, some solid and some dashed, creating a sense of motion and depth. A dark blue rectangular box with a white border and a small white triangle pointing downwards at the bottom center is positioned on the left side of the slide.

Customer  
picture is worth  
10,000 words

- Have they taken a picture of the service line entering the building or exiting the meter box?
- Have they correctly identified the type of pipe?

The background features several sets of concentric, curved lines in shades of gray, some solid and some dashed, creating a sense of motion or a circular path. A dark blue rectangular box with a white border and a small white triangle pointing downwards at the bottom center is positioned on the left side of the slide.

# An underwhelming response

- Mailed 4,477 in October 2023
- Less than 100 responses in March 2024

What is a  
utility to do?

- October 2023 Frequently Asked Questions About EPA's Proposed Lead and Copper Rule Revisions Service Line Inventory Requirements:
- What methodologies are acceptable to categorize service lines?
  - Records search.
  - Installation date. Any services installed after 1/1/1986.
  - Service line size. Any service line 2-inches or greater.
  - Customer data. Specifies photo documentation.
  - Statistical analysis.

Statistical  
Method? Tell  
me more.

- March 2023 Oregon Health Authority Guidance for Evaluating Unknown Service Lines:
  - Identify all service lines of unknown material.
  - Identify how many service lines must be physically inspected.
  - Randomly select service lines for physical inspection.
    - Specific instructions.
  - Utility conducts one point inspection (more than one if needed).



## City of The Dalles Statistical Method

- ~4099 unknown services.
- Must physically inspect 354 service lines from randomized list.
  - Cannot use any previously submitted service line surveys.
- New outreach will be based on previous messaging.



Thank you for your time

Jill Hoyenga, Regulatory Compliance Manager  
jhoyenga(at)ci(dot)the(dash)dalles(dot)or(dot)us