

SOUTH CENTRAL CONNECTICUT REGIONAL WATER AUTHORITY

ENVIRONMENTAL, HEALTH & SAFETY COMMITTEE

NOVEMBER 21, 2024

MEETING TRANSCRIPTION

[ENVIRONMENTAL, HEALTH & SAFETY COMMITTEE MEETING BEGINS AT 12:31 P.M.]

Mario:

Okay, thank you very much. First item is the approval of the minutes of August 22nd, 2024.

Suzanne:

So moved.

Mario:

Any second?

Kevin:

Second.

Mario:

Any discussion? All those in favor say aye.

Committee members:

Aye.

Mario:

Thank you very much. Thank you Jennifer for putting them together [inaudible 00:04:09]. Before we get into the, just kind of an overview. There were two memorandums, one on HazWaste Central, one on Lake Whitney Dam, which we'll ask if there's any questions on those.

Catherine:

[inaudible 00:04:36].

Mario:

Which one?

Catherine:

I can't see.

Mario:

I repeat [inaudible 00:04:36].

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Sunny:

We'll make the memos longer, Mario.

Mario:

We should have thrown the other one in.

Sunny:

Yeah, I know. Water supply.

Catherine:

Oh, is there a reason why? Oh, I'm sorry. I actually have questions on both.

Mario:

That's okay. So, you want to do HazWaste first?

Catherine:

Yes.

Mario:

Okay.

Catherine:

So, is there a reason why there was an increase in the number of households? Is it just outreach or is there an increased utilization?

Mario:

It's not really that dramatic like last year.

Catherine:

Well, what I thought was interesting is that there was a significant drop, there was a spike right around the pandemic, which makes sense.

Mario:

Everybody had time to clean up.

Catherine:

Right.

Mario:

Yep.

Catherine:

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But well, there was a small increase, I'm just wondering if we've been doing some outreach that's all.

Mario:

There has been some advertising.

Sunny:

Right. We have been reaching out, not exactly sure on social media but I think we have been reaching out a little bit more and some other towns have participated so-

Mario:

Yeah, going to the other towns, you see there's a huge increase in Orange?

Catherine:

I like that.

Sunny:

Right.

Mario:

That's where another 100 people in Fairfield.

Catherine:

My other question is are there funding sources in your state or general that can pay for some of this, the cost, because it's right now it's coming out of the capital reserve fund.

Mario:

So, the towns-

Catherine:

Go ahead.

Mario:

This one I know. So, each town participates has a representative on this group. The towns then get charged for the usage by the number of residents from the town, the CESQGs, additionally because I'm a small quantity generator, so they're like a paint store, not long [inaudible 00:06:32] or a painter who might have [inaudible 00:06:36]. They are allowed to make money so they pay for disposal there so that's an income constraint that we did have one, we originally started it and so as each town pays their share, part of that goes into this capital funding.

Catherine:

Understood.

Mario:

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Now there are some costs of overhead that RWA absorbs, but it's not like payment for the whole program.

Sunny:

Correct.

Catherine:

Got it.

Sunny:

We get reimbursed pretty much.

Mario:

Yeah, I've used it a few times it's pretty good.

David:

Yeah, [inaudible 00:07:15] drive through?

Mario:

Mm-hmm.

Sunny:

And the capital reserve fund too we actually get monies from the towns to replenish it and that's where we are going to use those monies to do the repairs to the tank and the roof so it's not coming out of our [inaudible 00:07:34].

Mario:

That's why we haven't approved any projects for it.

Catherine:

Okay.

Mario:

[inaudible 00:07:44]?

Catherine:

Not on the HazWaste.

David:

Can I ask a question?

Mario:

Go ahead, David.

David:

I noticed that you're looking ahead, one of the considerations is to expand it to prescription drugs. I'm not against that, but each municipality, their police station accepts them as well and that might be a cost avoidance that we could have if it's going to be a significant cost. If it's not going to be a significant cost, then I'm fine. But if it's going to be a significant cost, maybe we don't want to tack that onto the charge each of the municipalities pay because some of them complain a little bit about the cost, but then it is not more expensive than anything else that they can use.

Mario:

Well, one of the things they've asked forward is the five-year, which is the initial memo just had one. So, we have to look at it because historically, especially the small accounts always are looking at, "Well, are we getting any benefit anymore?" One of the questions I've had for year is we have outlawed a number of the items that used to be big and your one-day collections because everyone had them, which is common, you no longer can buy a lot of those things. Now, I think that the number of items that are considered household hazardous waste has narrowed and paints may go to a paint store. So, the question always is, have we outlived our usefulness as a permanent site? That does not seem to be the case, we're still good numbers coming in, but I think in each town when they meet as a committee votes can, that's one of the things they need to discuss.

Suzanne:

Whether they want to continue to participate or not?

Mario:

Well, whether the whole program should continue. Satellite collections are good things if they don't have a lot of costs. They're not just open to, Guilford isn't just open to Guilford residents but it's advertised mostly in Guilford.

Other questions on HazWaste? Lake Whitney?

Catherine:

So, the last paragraph you talked about there's been meetings with the City of New Haven officials. Just curious which departments kind of gauging what's going to happen with that back in December?

Sunny:

It's both with the city engineer's office and the big works and you know the people, Catherine.

Catherine:

My clients.

Sunny:

Yeah, they've been pretty helpful. We have the City of Alders to for the other projects.

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Mario:

Item is Eastman [inaudible 00:10:50] I think, that's with the Parks Department.

Catherine:

It's another that costs.

Mario:

Yeah.

Sunny:

I mean, all of them pretty much we have.

Catherine:

Yeah, well you're involved.

Mario:

We always want to stay in your personal-

Catherine:

Yeah, but I have to recuse myself so I have to figure out who's going to manage that, but that's okay, I'll handle.

Mario:

Anything else on Lake Whitney Dam?

David:

We're at 90%, so it's supposed to be more and more like it's about a \$60 million project.

Sunny:

Correct.

David:

That's what that updated number, that's the same number for a while, right? So, that's in the 10-year model and that's in the capital budget above that.

Sunny:

Correct.

David:

Okay. Can we see whatever next? Not now.

Sunny:

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Absolutely.

David:

Can we see maybe in the next meeting or whatever?

Sunny:

Sure.

David:

Just the plans. It doesn't have to be a full agenda item just to see them and get a sense of the scope of it.

Sunny:

Yeah.

David:

But Joe was asking me a lot of questions about that today when I was talking about him.

Sunny:

Absolutely.

David:

The engineer ever the engineer.

Mario:

I think it'll be interesting to see how the contractor involvement, their suggestions steered the final design compared to what we saw originally, which was, "Oh, do we put the dam downstream, do we put the dam upstream? If we shut the water off here, do we ..." So, there were a lot of options and so if we can talk about doing something like that.

Sunny:

Yeah, absolutely. Only one follow-up question, Dave. Do you want it as a separate item, or do you want it as the next EH&S item?

David:

No, just as a-

Sunny:

Regular item? Yeah.

David:

Report, yeah, just as under business updates or something?

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Sunny:

Yeah. Okay.

David:

If you don't mind, Mario.

Mario:

No, no. Yeah, I don't intend us to spend a lot of time on just business.

Sunny:

Yeah, sure.

Mario:

Just to keep you thinking, coming up with your questions.

Catherine:

It's more of a comment.

Mario:

Yes.

Catherine:

In that report because there's been so much interest from the surrounding community, it would be nice for us to understand what outreach there would be for the community 'cause it just keeps popping up.

Mario:

Right.

Catherine:

So, I think we're doing a good job in terms of keeping the neighbors informed of what's going on 'cause I get asked.

Mario:

That's an involvement.

Sunny:

No exception, yeah. We had two meetings even this fall, one in person and one virtual, it was pretty well attended, we answered most of the questions. We plan to do more of those as well as now we are at the 90%, we can actually kind of in a concrete fashion address some of those questions and what the impacts are. And we've been talking to the fisheries and deep and dam safety and all that so there is a lot more input from the regulatory agencies as well, which can be shared.

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Catherine:

Thanks.

Mario:

Yes?

David:

No, I just had-

Mario:

Another dam?

David:

I just had one more. Are we far enough away from the time of the application that we could give a preview of this to the RPV in terms of how it looks? Because really what you could say is, "Here's your last application and how we spent the \$5 million for the design," as opposed to prejudicing the outcome.

Sunny:

We can do that, yeah.

David:

I just think that it's a large project that it might be good to get that in on this sooner rather than later.

Sunny:

Certainly, I think we are pretty far enough.

David:

Yeah.

Mario:

Before we get into the regulatory update on PFAS and service lines, which is a presentation, a quick presentation.

Sunny:

Quick presentation.

Mario:

We've been told you'll be seeing a memo on the trends of water supply consumption coming soon, probably before the next meeting. And also an update on the legislative agenda and what the thought for the next legislative session since that starts in January. We're trying not to jam too much into one meeting, but obviously high on the list we'll be stopping any efforts to adhere or to take over regulation

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of non-lead foreign utilities. It will fit to the March Environmental Health and Safety Committee; I'm going to be remote for that one. It's not a problem but I just tell people. I can't do all the meetings and the traveling at the same time, it's just [inaudible 00:15:33].

Suzanne:

Can I ask you about, what was the first thing you said? You said there were three things?

Mario:

The trends on the water supply and consumption.

Suzanne:

Yes. In terms of just general, the report that we get which shows how many gallons are used and all that kind of stuff, is that what you're talking about?

Mario:

This is a broader look at it. So, we've been talking about 1% decline each year, what does it look like, as I saw the graph and the memos, what does it look like as far as what are the trends nationally and then locally, how does that affect us and what are the projections going forward?

Suzanne:

Mm-hmm. And do the trends nationally have any bearing on what's going on in Connecticut and our district?

Mario:

It's just an interest point.

Suzanne:

Okay, just another data point? Okay. Because I guess all the efficiencies created with the appliances and all that kind of stuff is a big national thing, but-

Mario:

It's a national and also you've got the data collection is more broad national scale so we try to [inaudible 00:16:09].

Suzanne:

Okay.

Mario:

We're seeing the same thing.

Suzanne:

Okay, very good. Thank you.

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Mario:

We don't [inaudible 00:16:09] not anymore. So, with that, no more questions?

David:

The AWA, the AWWA will do that stuff.

Mario:

They do that all the time.

David:

Yeah.

Mario:

The research [inaudible 00:16:09].

David:

I'll turn it over to Sunny?

Sunny:

Yes.

David:

If that's okay.

Sunny:

Well, I'll take everybody to the initial introduction and then Tom is supposed to join because he couldn't join on Teams so I think he should be here at any moment.

David:

Okay.

Sunny:

But we are going to give you a quick update on where we are on the Lead and Copper Rule because we also had an update, a new LCRI, which is lead and copper regulatory kind of a, another improvement that happened on October 10th, which was EPA finally kind of blessed it. So, there have been some changes based on the original LCRR deadlines. We filed the inventory as of October 16th, 2024 with the DPH based on the Excel sheet they had given us. We made substantial progress in the last, I would say eight months where we were able to do almost 3,000 plus vacuum excavations across 15 towns and we were able to finalize the artificial intelligence machine learning input, which kind of spit out some of the graphs you will see as we go further. With that, I'll just wait for Tom I think he's right here. He can go into a little bit more details, but anytime you feel like asking questions, just stop us because ... Yep, go ahead. Suzanne is already putting the hand.

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Suzanne:

[inaudible 00:18:22] a time for you to talk about what our-

Sunny:

No, you're right.

Suzanne:

So, that's not going to help us a lot.

Sunny:

Right. I mean, just a follow-up on that. We took the original service records and tab cards and all that, we put them on an Excel sheet and then we fed the data into the GIS and then there is a Lightcast platform which is provided by the vendor. We updated that. But now what we are doing is for the second phase, we are actually going to digitize those records because we can do the character recognition and then start running through it. So, that's the second phase. I think it's a good question. So, we are actually improving our systems as we kind of do this. Two reasons is one, it gets to catch up with the latest technology, second is, we will actually get paid at least 75% through grant funding to do all of this under the inventory assessment itself. Yeah. Tom?

Tom:

Good afternoon.

Sunny:

Good afternoon.

Tom:

How's everyone?

Group:

Good.

Tom:

You already got started, Sunny on the-

Sunny:

Yeah, I gave a little brief and then you can go tell as you usually do.

Tom:

Oh, all right, well I'm going to try to keep it briefer than that 'cause I know you're on a timeline. We can talk about this all afternoon but we're not going to-

David:

No, not quite that way.

Tom:

But we'll talk. So, let's just start at the top and please I'll entertain questions as we go unless your preference is to wait but sometimes we can address them as we go because it's more appropriate. So, Lead and Copper Rule improvements. So, this is the latest iteration in the long line of Lead and Copper Rule regulatory oversight by the EPA. So, what we're looking at is now finally the LCRI has been approved by the Environmental Protection Agency, you can see it's published at the end of October. It replaces the LCRR so the LCRR made a brief appearance so now it's gone and been replaced. We currently are still operating out of the original 1991 LCR. While the LCRI has been approved, its effective date is October of this year, its compliance date is October of 2027. That means by October of 2027 we have to have all of our ducks in a row and we must be compliant on that date.

So, we have 36 months on the ramp to get there. So, we're well on our way because we've started this process years ago so we will get there. It's going to be a continual challenge but away we go. So, we did also, I want to make mention of the fact we did submit our initial lead service line inventory on time by the 16th of October so we're good there, we're compliant there. That's taught us a lot about our system and we'll continue to build on that information. From that inventory we did have 30 days then to mail out just about 8,000 notification letters to customers that either were defined as having a lead service, a galvanized required replacement service or a service we didn't have any information on, about 5800 of those specifically.

We did get those letters issued in three waves in that 30-day time period. We're now just receiving some callbacks from customers that have received those notifications and have some follow-up questions. So, we're using especially the unknown letters as an opportunity to fill in blanks in data gaps that we have. So, we're using that as not a challenge but an opportunity. So, we're getting that information back in and again, building on that in a variety of different ways that we don't need to get into the details this point. Next slide please, Jim.

Suzanne:

Can I ask two quick questions?

Tom:

Absolutely.

Suzanne:

The timeframe for 36 months, has that changed through the iterations of this whole thing?

Tom:

No. I mean, if you recall when the LCRR came in, there was also a 36-month ramp up until its, but that's standard in EPA. They typically have an on-ramp of 36 months and exception is PFAS but we don't need to get into that.

Suzanne:

Right. And so, you don't anticipate that to change for them?

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Tom:

That's correct, I do not anticipate that to change.

Suzanne:

Okay. And you mentioned that 5800 homes or businesses?

Tom:

Yeah, businesses, yeah.

Suzanne:

Okay. And so, the rest of it is known and what's the total?

Tom:

So, we had the 8,000 letters that went out. So, out of those 8,000, the breakdown was 17 lead based on our data. We have about 2200 galvanized requiring replacements, that'll be further refined over time. And then, 5800 were those unknowns.

Suzanne:

So, more than half now then?

Tom:

Of that 8,000, correct.

Suzanne:

Right.

Tom:

The balance is we have 125,000 services, the balance was 117,000. We know those are non-lead services.

Suzanne:

Thank you.

Tom:

Now, there are sub-baskets in that non-lead categorization, Suzanne but we don't need to get into that conversation right now. It's something we'll be keeping track of internally, but even a regulator state federal aren't necessarily at this time subdividing the non-leads, we would be.

Suzanne:

So, now with all this known information, isn't that, I might be jumping ahead, our cost associated with this changing at all?

Rochelle:

Yeah. We actually already need the first update, significant update in the 10-year model so it went down from our 196 million down 127 million. The key part now of that 127 million is actually the goosenecks, which are now, and correct me if I'm wrong, but goosenecks more than, is it 10 inches now, two feet are considered lead lines?

Tom:

They've refined that and they've gone from no lines of demarcation separating connectors from service lines to a 24-inch line separating and now it's at 36. So, there's been movement on how goosenecks now called connectors are categorized and that plays in directly to the economics.

Suzanne:

Thank you.

Tom:

You're welcome. So, what we're really focusing on now, so now that we've got the inventory in, we've gotten our letters out, is we're focusing on those 17 lead service lines. Six of those 17 are on the utility side balance around the customer side. Five of those we're already familiar with and the customers are familiar with what they have as we've educated them on that, so there's at least six. We're trying to get a hold of six customers right now. We've made a number of outreach attempts. We have not, interestingly, have not heard back from those six people so I'm not sure whether they're, they don't care or what have you, but I think we may end up going knocking on six doors, we're trying to get people's attention.

But our focus will be to verify that our historic record data is correct and if so, we'll be focusing on removing those lead services and we will be following the LCRI protocols that's necessary to do that. Well, we're trying to incidentally, I mean we're trying to take as many of these changes in our EPGs that are necessary, trying to implement those as soon as possible because again, when we get to 2027, that's not the beginning of the learning period, that's the end of the learning period. So, we want to be able to implement as many of these improvements as we can as promptly as possible. A, so it becomes part of our normal everyday activity and focus and we can work out some of the wrinkles that are typically inherent and need change. So, if you don't work you'd be on that. We're going to further classify the galvanized requiring replacement, we just touched on that a little bit.

There seems to be, well there has been a change in demarcation separating what qualifies as a connector which can stay in place does not need to be proactively removed under federal law from those that exceed 36 inches that are categorized as lead service lines and do need to be proactively removed as part of your replacement requirement. So, we need to get a better feel for those. We do feel that the majority of goosenecks in our system are less than 36 inches based on anecdotal information from construction staff over the years. So, we anticipate most of those would be on the connector side and that becomes a question as to whether we proactively go after those because it's the right thing to do versus leaving them in place and replacing upon discovery, which has been our practice since the mid-1960s. Just continuing that overview so we continue to move along.

Kevin:

The connectors themselves then are not part of the program.

Tom:

They're a part of the program from the perspective of how you categorize them, right? They're [inaudible 00:28:00], you do have to remove them.

Kevin:

Okay.

Tom:

Whether you have to go at them proactively and they become part of your replacement plan. In the mind of the EPA, it's a 37-inch-long connector is the same as a 50-foot-long piece of lead. They don't differentiate. If it's 35 inches, well then it can stay in there. And you can remove it upon discovery during normal utility business opportunities, whether you're upsizing a water main, whether you're repairing a leak, what have you.

Mario:

That's a huge improvement to the water utilities because trying to find those, it's very difficult to do.

Tom:

We have some guidance from Don Jackson from the late 1980s, but there's exceptions to every rule. I mean, within his document that covered 75 years where the history of the authority, the rules governing that changed five times and then there were exceptions to each of those. So yes, it becomes difficult to figure all of that out with any confidence.

Catherine:

Right now we have put in an estimate to about 127 million, it does include to the best of our knowledge how many goosenecks are still left.

Sunny:

Just to elaborate on that. At this point we have identified close to 17,000 goosenecks. Based on conversations in-house we are expecting that number to go down significantly, given that a lot of those seem to be in Ansonia and Derby, at least 25% of those, and Birmingham is what we understand never used lead connectors. We have to verify that, which means your three, 4,000 could come just right out of it, which means about say 80, 90 million could get reduced to that extent. At this point, the estimates, we are also going to do a very similar exercise on the AI machine learning for goosenecks, see how that works out actually. And interestingly, yesterday we had another meeting where we are trying to see whether there are other technology options to identify the goosenecks without being invasive. Those are things that we're trying to do to see whether using satellite data, we can actually use conductivity to see whether the metallurgy and all that will work.

So, yesterday I had this very interesting conversation about leak detection but the same company uses satellite data for mining purposes because they can identify gold, lithium and all that. If we can actually kind of use whatever I would say trimming of the frequency wavelengths to target these lines, at this point very high level conversations, not sure where we end up but yesterday it was a very interesting conversation I had. And they have this mining arm which can actually look at the satellite kind of test data and they use low or high, low frequency, whatever it is to identify metals underneath. Can it come

in handy? Maybe it can, we don't know. Or it could be a billion dollar opportunity we could be giving ideas to some other company too so all of it is under the radar. So, it's interesting I would say we learned so much.

Mario:

You don't have to replace it until we find them.

Sunny:

Correct.

Suzanne:

It's always been in case.

Sunny:

And one other aspect, Mario is it ties to the funding too, which Rochelle can elaborate because if it is less than 36 as Tom said, does it qualify for funding because it is up to the utility? If it's more than that, if it's classified as a service line, then in that case if we replace the residential side of it, then we might get qualified. So, there is so much of that goes in and each day pretty much our conversations are guided by DPH and the DWSRF. Tom, sorry.

Tom:

Yeah, no, no, no, it's all good. So, the third item here, again, we're still talking about those notification letters, but the third set of those was really going to folks that we don't know what their service line material is for any number of reasons. I mean, we were not part of the installation of a curved house, falling that was between the homeowner and the plumber of their choice back in the day. And if you go back far enough, their plumbing licenses didn't exist. That was a plumber 'cause my father was a plumber type of thing and you don't have the same level of scrutiny, you didn't have an international plumbing code to follow, right? So, you don't really know what's out there.

And there was a lot of opportunities, in turn of the 20th century, it could have been iron, brass, lead, if there was any number of opportunities and I think part of what was put in was maybe what the plumber fellow who did the work was most comfortable working with the material that they were comfortable with. So, there's a real smorgasbord, if you will, of opportunities for different things out there. But what we want to be able to do with those unknowns is convert those to knowns. So, if you look at the guidance, whether it's state or federal, there's really four buckets of options, right? There's a lead bucket, there's a galvanized bucket, there's an unknown bucket and there's a non-lead bucket. Ultimately, you want to get everybody in the non-lead bucket. That's the goal.

But first, we got to figure out how to re-categorize the unknowns, put them in the right bucket and then you can work with them, whether it's a replacement, no need to replace, whatever the case be. So, that's really a focus. It's getting information on the unknowns to convert them to knowns so we can work with them. And we've been using that self-assessment QR code for the better part of the year now. If somebody goes into our website or any of the communication specific to lead, we're including a QR code. Use your smartphone, go in here, answer a few questions, take a snapshot, upload that. We can then build that information into our inventory, and we can provide some comfort, assurance with that information.

We're going to be doing some neighborhood canvassing in early December with CDM, our contractor focusing. So, a lot of people that are calling in they're, "Gee, I got a letter, it says I have an unknown, I don't know what to do. Can you help me?" We're making appointments with those customers. We're going to be able to go out and CDM has been assisting that and we go out into the home and we can do the assessment ourselves. We get the information we need, the customer's reassured. We're still offering some sampling support if folks are really concerned about whether they have lead exposure. Again, it provides reassurance and also provides us with some meaningful data that we can use a little further down the line when we're talking about corrosion control, treatment changes and other facet of the LCRI. So, it provides us with good information today that we'll be able to use.

Suzanne:

Are you saying we test their water?

Tom:

Yes.

Suzanne:

So, what if you find out it's lead?

Tom:

We're looking for lead, we're looking for copper, we also look for some other metals that help us with that inventory. And then, we can re-categorize them, put them in the proper bucket, put them into the replacement plan and act accordingly. So, we're sharing the information and prioritizing.

Suzanne:

And the lead detection? I'm just wondering if you find something that's hazardous to their health immediately.

Tom:

Well, I think then we have to take that as a one-off basis. So I mean, what we've been doing so far, for example, during the, I'm going to back up just for a second. When we were doing the vacuum excavation work, we were offering the same sampling protocol. We got in about 130 samples, either lead or galvanized. 129 of those had no lead detections at all, one sample and it was under the limit. Something we're okay, we're confident that we're not going to suddenly see something different.

Suzanne:

Okay.

Tom:

We know that our corrosion control technologies that we've been employing since 1978 work as evidenced by non-detects on high-risk service lines. We're anticipating that will be continued information that we're getting, but it's good information for both the customer to have and for us to have.

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Suzanne:

Thank you.

Tom:

Because if there's going to be an issue, we want to know about it so we can act on them.

Suzanne:

Thank you.

Tom:

You're welcome. So, we'll be going out with CDM, we're going to be doing some neighborhood work specifically on folks that are asking. We're also going to try to, while we're in the neighborhood and while we're addressing that customer, we're going to go to some other customers in the neighborhood as time allows, knock on some doors and see if we can gather some additional information while we're there. It gives us an opportunity to provide the education as well.

We're notifying the City of New Haven because the majority of that work will be in New Haven, but we're notifying municipal partners and their health agencies to let them know that we're doing this work so they can partner with us. If they suggest that we need to reach out to certain ethnic associations or faith-based associations that have credibility and history in these geographic areas, we're going to take that opportunity and so as well. Sometimes the message is important, the messenger is equally important. So, I think that's something we'll continue to do.

Suzanne:

That's interesting.

Tom:

Field service department, this is instead of the in-home service identification assistance that's continuing. We're developing that to also include CDM staff because that's going to help take maybe some of the pressure off of our staff that's doing their normal everyday field service metering-related business. We don't want this initiative to overwhelm the baseline utility responsibility so we're building some redundancy and expansion of effort. And then, we're continuing to collect day-to-day information through the cross connections group, our metering group and through constructions activities. So, we're building our inventory on a daily basis utilizing staff that's already out in the field through their normal activity, that's working all fine.

Catherine:

When you are working, particularly, I know that New Haven has some blood abatement programs, when you're giving that education to people, are you providing information about available resources for paying for some of this or are you even aware of the programs?

Tom:

We've talked to the lead folks in New Haven, historically those lead paint programs, we've asked them to determine whether some of the funding that's available through the traditional lead paint funding

programs can also be extended and utilized in this context. I think the New Haven folks are still exploring.

Suzanne:

It's lead abatement so it's not just the paint.

Tom:

Yeah, I mean I'm not privy to the language of how that all works. I think that we around the table agreed with you that there should be a provision to utilize that in the lead environment, if you will. But I don't know whether there's anything specific to the language that would [inaudible 00:39:03].

Suzanne:

Okay.

Sunny:

Just one follow-up is we are trying to have a meeting with the mayor in the next three to four weeks because the next slide it'll go into this, we are targeting New Haven and Milford first. So, New Haven having the, amongst the 8,000, there is a significant proportion of that 8,000 falls in New Haven so we want to attack New Haven first. So, Kevin is trying to arrange a meeting with the mayor, and as part of the consumer affairs, we also let Naomi know that we will kind of knock on doors both on the community engagement as well as working with the mayor's office. Yeah.

Catherine:

When you meet with the mayor, will you also have people from the health department?

Sunny:

We have been, Tom has been meeting with Ms. Bond and I have actually met with Maritza Bond so I think that is an ongoing cadence that he has almost on a three-month or six-month basis.

Tom:

Yeah. It's a quarterly basis that I have with the eight health departments and districts that we interact with. So, they've been privy to this information, we've been invited to the lead task force in the past. We want to be a regular partner of the city. It is our expectation that the New Haven Health Department will be part of the mayor's meeting as well the building department. There's a number of opportunities for us to partner with the City of New Haven and we want to be able to discuss those. I hope that that answered-

Suzanne:

I'm aware of quite a bit of money that's available for homeowners to address challenges with respect to lead paint, not just paint, but just lead in there that is hazardous to children. So, I hope that those resources are being [inaudible 00:40:53].

Tom:

I agree with you. I mean, that's how we became affiliated with the accelerator program that the EPA initiated is simply because New Haven had the highest pediatric blood lead concentrations in the state. So, that's how we got involved in that opportunity, take that opportunity to promote our programs.

Mario:

Those funds would end up being directed towards improvements within the house itself.

Catherine:

Yes, that's what they're for, that's specifically what they're for.

Mario:

Yes, I think they'd be working here. Yes. Yeah, it's for the private consumer [inaudible 00:41:29], things like that.

Tom:

Yeah, anybody who's welcome because I think the EPA is starting to kind of pull back a little bit of the more traditional BIL-related funding in the water context.

Suzanne:

Okay, thanks.

Tom:

You're welcome. Next slide please, Jim.

So, here's what Sunny was mentioning, our focus areas are going to be on New Haven and Milford primarily because New Haven is our biggest community, has some of the oldest plumbing, some of the data gaps exist in the city of New Haven and Kevin simply including Milford here because on the lead list of the 17 properties, 12 of them are in Milford. So, we want to be able to make sure that we have a good understanding of what's happening in Milford. It may have been many years ago the Milford Water Department back in the day may have had a preference to lead, I mean that's a possibility, but we do want to get our runs firmly around what's going on in Milford so that we can address it appropriately. Schools and day cares are a large part of the LCRI focal points there. Many of you may be aware, we've done, historically, we've tested all the schools in the district.

Any specific issues around lead in the schools were addressed by the appropriate boards of education at the time. Day cares are currently monitored for lead through their licensing procedures, so I don't anticipate we're going to run into any problems with elevated lead concentrations in day cares in the district. What we are taking a look at daycares and smooth specifically again, is lead service line, do they exist? Do we have some old galvanized? Do we have any concerns around some old plumbing? I think you can all appreciate a lot of the day cares are repurposed properties, right? They may have been homes, they may have been business storefronts at one point in time, so we want to make sure that some of the historical utilization of plumbing conveyance can be identified and prioritized since that's a gathering place of the youngest amongst.

Municipal buildings and Yale just briefly there. We've reached out to all of the municipal partners that we have. Municipalities own a lot of buildings, right? Whether they're school buildings, libraries, schools, and so on and so on. We've asked them to say, "Within your organizations as a municipality, can

you provide us with service line information on properties you want to maintain?" So, far the response has been mixed, but there has been some communities that have really embraced this in providing us with information. We've done the same at Yale University, they own 350 buildings in our district. We've asked them to assist us, again it's easier for them to get in their own buildings as they do every day, "Can you build this identification into your normal work projects and provide that information to us?"

So, Yale has agreed through their environmental, whether in school or environmental health and safety office that's going to be assisting us. So, that information is coming in slowly but surely. We're going to expand our own service line identification efforts at Yale. Appreciate we have a lot of work at Yale around cross connection control, they have almost a thousand backflow valves that we have to account for. So, while we're there, we're going to take a little bit of extra time to kind of snoop around and see what's going on with their service line connections. Most of their larger buildings won't be of concern, we have to document it, right? Any at all. But a lot of those are iron lines just because simply of the diameters, it only comes in iron.

So, while we will document that it's not overly concerning. The Yale properties of concern are the repurposed properties that may have been homes at one point in time that are now used for various offices and smaller dormitories, education centers and so on. So, we're trying to build those partnerships because it's easier for them to get into their own properties than it is for us, so whatever we can do there. We've made some, just as a side note, some of the information that's come back in from the folks that got the unknown letters, sometimes those inquiries are coming back from large landlords, sometimes those inquiries are coming back from property management companies.

We're taking those opportunities to partner with those groups and say, "Oh gee, you may have a question about this property, but we understand you own a lot of properties. Let's work out a schedule so we can get into all of the property." And that so far has been running pretty well. Most folks have been agreeable to that. Sure, all landlords are going to have that take that posture, but at least the larger ones that we're dealing with, the ones you're able to talk to I've been recently.

Catherine:

You said that your outreach in municipal municipalities has been, what was the word you used? I can't remember. Mixed?

Tom:

Yeah.

Catherine:

Are there particular municipalities that are uncooperative?

Tom:

I wouldn't say they're uncooperative, maybe they're slower to respond. And I'm reaching out to, typically it's the city clerk. They typically are the clearinghouse for when requests come in as to where they should go. So, I'm going to city clerks and I'm going to the municipal building departments. And that's where I'm touching first. We've done that, I've gone sent out the formal request, but also then I waited about four or five months and sent out a reminder and that's just what we sent to the [inaudible 00:47:32].

Mario:

I would add just a little bit to that that there was one municipality that was being difficult, not giving us permission to even go into the testing in the towns. And so, Larry and I went and had lunch with that mayor and we said, "What's going on? Well, we want to make sure that if you find it, that you take care of it right away." That isn't the program to take care of it right away, it's in finding it. But because that is one of the distressed municipalities, we were able to promise we could do it while no lead was found in that town so that promise didn't have to be fulfilled too much. So, it took that to get it to happen. And then, right away the next day he signed off and told her whoever was policing us to sign off that we have permission to go in or public works. So, there is some of that. They're holding it over to get what they think is a perceived benefit.

Suzanne:

Well, if you need some assistance in New Haven, because the departments but probably not the city town clerk, but engineering and then board of education to get into those buildings, we can give you the assistance.

Tom:

I appreciate that. We have a good relationship through our cross connections group with the building inspector. But you're right, I mean sometimes it's the right person and an opportunity to explain why that helps, I appreciate that. Thank you.

Mario:

Also not wait four months to send them [inaudible 00:48:57].

Tom:

Yeah, yeah, true enough.

Mario:

Because it's completely lost. You see it after a month you're like, "Oh yeah, I really need to get there."

Tom:

Oh, you're right, absolutely.

Mario:

And just in the interest of time of-

David:

No, no, no, no, no.

Tom:

Yeah.

David:

Questions are more than welcome.

Tom:

[inaudible 00:49:18]. So, here's the goosenecks. So, we kind of talked about this a little bit, it just identifies that 36-inch line of demarcation so we can move on.

I think Sunny touched on this a little bit. I mean, this is part of CDM's Trinnex software where you get your existing information, you put that into the software, there's some capability of the software to do some predictive analysis, we're taking advantage of that. It's giving us some heads-up as to where we need to spend a little bit more time. So, this is working out quite well and it really helped to define the information that we did share with the state as part of our inventory space. So, it has been a good effort so far. It just keeps, and as the last second bullet there, the more information you put into the system, the smarter that machine learning aspect gets and it just continues to promote better results. Next slide please, Jennifer.

Sunny, if you want to expand the box just a little bit.

Sunny:

Yeah, I mean, this would be the interesting one, right? So, what did I would say the AI machine learning give us? So, if you see this is less than 10%, almost 19,000 lines, the probability of lead or galvanized is very little compared to the 26,000 originally, we started off with. So, what we are trying to do in the second phase, which Tom was referring to is, see there's only 1178 that says it could be in 90 to 100% lead or galvanized. But we want to move either this way or this way. So, the numbers in between either we completely know they're lead, or they are non-lead. So, the second phase is going to tell us which way we want to move these buckets actually.

So, you can see 55, 89, 237, all of these on different probabilities of them being lead or non-lead. So, the next six months will tell us, we want to move these guys one way or the other, and then start working on the galvanized requiring replacements. Where does it happen? Is it on the customer side? Is there a site? Whatever it is. So, that's the next exercise which you're going to do. So, going back to the earlier slide, now this kind of is a pictorial representation of what the output was when it came to spitting out. And this is the information we used to fill the inventory and send it to the DPH.

Tom:

Yeah. And this will become the basic document too for what will be defined as our replacement plan. That's the plan that we'll have to submit in 2027.

David:

But how did the 8,000 letters you've sent out tie in with this? Because that's 4500, not counting but almost 19,000 or they don't or they're not meant to. It's just what I'm trying to-

Tom:

Well, I think the 8,000 letters too is going to be predicated on data that we have based on historic configuration. So, I think some of those 8,000 letters we're going to determine probably didn't need to be sent because the 100-year-old tab card says they may have lead, well you know what they don't. Or that galvanized going to have to be further refined. Some of those galvanized lines are not going to be

required to be replaced because the configuration is such that they don't follow through. We sent those out carrying in the side.

David:

Okay.

Tom:

We may be able to retract some of those numbers based on evidence as it becomes more available.

David:

Okay.

Sunny:

I mean, to your point question, I mean a good question because ideally we would just send it to these guys.

David:

Right. But you added a few more in?

Sunny:

I added a few more because we just wanted to cover a lot more folks. And the reason is, going back to Tom's earlier point, the more you train this model with more information like say 8,000, we get 7500 back, the machine becomes much smarter to identify which ones are lead and not lead. So, if we can get those 8,000 lines and customers to say, "Come and inspect the basement," we are actually getting better and better at this.

Tom:

Confidence becomes much higher.

So, here's just to kind of give you an idea of some of the challenges that we've identified as we move along. So, validation of accuracy of machine learning service. Part of what's required in the rule is if you're going to rely on machine learning and predictive analysis, even as smart as those systems can get, regulator wants you to be able to go out to those specific addresses and field verify the accuracy of the data that the computer software is providing you. So, that's going to be a big challenge moving forward. It's something like 20% of the total machine learned values have to be field verified, now you're back in people's basements again. Question now coming up that we haven't gotten an answer from the regulator is can we revisit folks we've already seen? Do we need to go to new-

Sunny:

20%.

Tom:

Or do we have to take a fresh 20% slice of pie? That's going to be challenging because it's interesting about these regulations, it continues to evolve. Access and control, there's some significant

considerations or objections that the industry has to the LCRI. One of those is the whole issue of access control. I know at a national level; this is being discussed a little bit further for some potential action at the national level. If you read again, not to Ariel's point, I don't want to go too far down a sidebar here, but if you read the regulation as it exists, if you go up to a home that's got a service line under the lawn, in the eyes of the EPA you have access to that because it's just a wall. And if you have access, then you control it, you can bring a machine in, you can pick it up. Of course, the problem with that is you don't own it. EPA doesn't seem to recognize ownership as a reason why.

So yes, so people are saying, we may want to think about clarifying what we're talking about here. So, that's a serious consideration, that may be a challenge if it's not resolved. Some folks have already expressed an issue of getting all of the service replacements done within a 10-year timeframe, there are waivers and exceptions in the rule. However, AWWA feels that there is no provision for the unanticipated issues that may come up. There should be a mechanism for utility to say, "This has happened or that has happened, it's going to seriously impair my ability to meet that timeline." That's simply what that's all about. And then, the other thing, and I don't know how much of a challenge this is going to be, but the reduction in the action level has been reduced from 15 parts per billion down to 10.

We've been running based on our existing sampling protocol at two parts per billion for decades. But keep in mind that our sampling, which is the next section of this slide, is sampling compliance protocols that are also done completely renovated and completely different. Again, looking at that 130 sample set, what we did as part of vacuum excavation, 129 samples with no lead, that gives me a greater level of comfort that we're not going to have compliance problems with the canister. So, it'd be good there. Because this is a complete reset button issue, initially starting in 2028 in January, we'll be looking at sampling every six months for a period of two years. Then you have opportunities to reduce the frequency based on the results.

And historically, we've met those frequency reduction milestones without any challenge. We intend that that'll be the case, but you got to go back to the beginning and work yourself back into that demonstration of confidence. And then just finally, again the last bullet, this is a huge, very complex regulation. There's a lot of communication requirements in here. Kevin is familiar with those; he's already initiating those with following the communication requirements. There's just, for instance, notification to customers has been reduced from 30-day window to a three-day window. So, it's now a lot of new communication and a lot of tightened communication.

Mario:

Treatment control, corrosion control. What do we currently use as a primary corrosion control?

Tom:

Zinc polyphosphate.

Mario:

They haven't tied the zinc polyphosphate to being an issue.

Tom:

Not yet, polyphosphate traditionally is a sequestering agent as opposed to the corrosion control chemistry but with association into orthophosphates protecting us. So goes to theory. I think we're going to be okay as long as we maintain good chemistry results. I think if you start to ramp up your

numbers and your chemistry becomes a little dicey, now you're moving over to an orthophosphate blend model in a stepped fashion based on pipe growth evaluations of where the best chemistry is so that's a lot more involved.

Mario:

Yeah, that's not [inaudible 00:59:37] what works.

Tom:

And that's why we're trying to gather the information while we can now so we can start to build some of what the bigger peek around the corner a little bit, see how we're going to be doing it. Customer interactions, again, looking at, and I mentioned this earlier, additional service involving CDM staff. It eases the impact on the normal day-to-day RWA staff baseline activities and also maximizes to Sunny's point earlier, DWSRF funding opportunities. So, if we can utilize CDM who's already an approved contractor under the DWSRF protocols, we can then be reimbursed for their work because it's all part of the inventory development, which is clearly covered. Kevin and communications is using a multimedia approach in trying to reach the maximum number of customers and we can for them to help us develop our own inventory. If they can do it, that saves us a trip to the house.

So, I think it provides them with a little bit of buy-in to our efforts and I think that helps the education process. We're prioritizing replacements for those service lines and qualifying thin lead, galvanized requirement replacement and so you have this galvanized [inaudible 01:01:00] the details, we're looking to really focus on New Haven just because of the way the numbers are falling out and then taking what we learn and expanding to the other communities. And then, I know Rochelle and her group is constantly looking at funding opportunities because the financial impact, \$127 million is still a lot of money out there. So, whatever we can do to reduce the burden on our ratepayers, it's something that Richard's been doing obviously. And that's a continual process as evolution continues, refinement of the BIL funding seems to be continuing.

Any other questions? I think that was the last.

Sunny:

On lead service lines, right?

Mario:

Yeah.

Tom:

Yeah, so for lead service lines quickly, this is-

Suzanne:

I've heard up to this point, our whole effort has been opportunistic. If we find lead, we replace it and we do our corrosion to the source, preventatives to the source water and then people have their homes tested and that kind of thing. But right now it's been opportunistic until this whole thing started, correct?

Tom:

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Yes and no. Earlier versions of the Lead and Copper Rule had their own replacement requirements but they were driven a little bit different. This is the one that really disconnects the chemistry from the replacement requirements. One always was predicated on the other that's been separated at this level.

Suzanne:

Thank you.

Tom:

You're welcome. So, one slide, promise only one slide on PFAS. So, the update is we completed the sampling in June of this year for the Unregulated Contaminant Monitoring Rule iteration. Again, really the data that developed out of that years' worth of effort didn't show us anything differently than we have seen on our own since 2018 so there were no surprises there. I'm mimicking the compliance cadence that we're going to have to follow in 2029.

Sunny:

Yes.

Tom:

Yeah, so we're doing quarterly monitoring, we're going to have that on our website for transparency purposes. And it provides you with data that counts toward your compliance as we ramp up to 2029, it gives us a heads-up. We're comfortable with what our field activities involve, we're smoothing out the wrinkles. So, we're doing that. We're piloting treatment options currently at the Lake Whitney Plant, looking at what are options for us to control areas where we may see elevated use, what's going to work?

Suzanne:

Why are you running Lake Whitney?

Tom:

I think Lake Whitney is a spot that you have enough real estate to set up treatment options and pilot test those. You just need some square footage to be able to do that. I think we had that square footage at that location.

Suzanne:

And once you learned from the pilot, then you will expand it to other treatment sites?

Tom:

As necessary, yes. Yeah, we have to take a look at each one of those independently but yes, that is the plan moving forward. We're continuing to participate in the class action lawsuit with the provision of information as the attorney is requesting that, that's going on very well. In the laboratory I know is working on an additional certification for PFAS, there's two that are recognized currently at the federal level, we have one of them. We've had one of them for a while, we're working on that second one. So, Richard's staff there in the laboratories has that similar to the required items and then once we have

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them, we'll be good for the full compliment that right now with the 29 compounds that UCMR 5 had identified. Further information [inaudible 01:05:11].

Catherine:

That's a real opportunity for a value add for our customers and potential revenue stream for the AWA.

Sunny:

Catherine, we are looking at it because that's one of the reasons why we are going for the second certification because at this point of time, maybe we will be the only second lab in Connecticut to have it. And PFAS is a significant source of revenue commercial site for us. And by getting this, I think we just are getting new equipment as well. It kind of hastens the process so timeline to go from collection to analysis to giving the results out gets crunched up with this as well as we can actually test a lot more of the PFAS compounds. So, it's helping out in many ways, but certainly one of the major drivers for us to get this is the commercial aspect.

David:

With regard to the fact that you're able to do some of this testing and new ways of doing things at plants where we have the robot at Lake Whitney, I thought some of the PFAS was in wells so we don't have a lot of space and they do minimal treatment at the wells. So, does that mean eventually we're going to have to build some kind of a treatment plant at the wells or take the wells offline?

Tom:

Potentially, yes.

David:

That's where the big bucks are as well because it's not, it's there.

Tom:

Yeah, and I think we're very limited in terms of what we're looking at now with respect to the existing data that we're looking at for PFAS, there's one well here that we have to pay attention to in particular, the other ones, not so much and all of our surface plants.

Sunny:

Correct.

Tom:

So, it's out of the 11 finished water sources, there's one that we have to pay attention to with respect. So, the work that we're doing at Lake Whitney with powdered activated carbon, we're learning about the chemistry, we're learning how it works and then that knowledge could be applied to a different resource.

David:

Okay.

Tom:

But the background chemistry is going to be important and that's where the tweaks are going to be necessary. Relative to what some of our peers are dealing with, I'm happy with where we're at.

David:

Right. Well, that's good to know as well.

Sunny:

We also have the monies built in for one of those wellfields.

David:

Right, \$20 million or something.

Sunny:

Yeah.

David:

Yeah. Hopefully the pilot testing can be shifted over, we'll work on [inaudible 01:07:44].

Tom:

Yeah. Thankfully the one resource that we're keeping an eye on the numbers we're seeing are not crazy, they're a scooch above that four parts per trillion in technical term.

David:

It's just a lot less [inaudible 01:08:01]. Yeah.

Tom:

Exactly. We really just need to drop it below that threshold of the MCL and that's not a big reaction.

David:

Just one more. Is that factoring into your decisions of accelerating the redundancy or expansion of redundancy in areas that you're looking at? Well, for instance, South Cheshire well I think is the one that had the issue. And you were talking about over the years you're going to put another pipe all the way to the north end-

Tom:

Well, right.

David:

Just finish back.

Tom:

Yeah.

David:

So, is that accelerating your discussions of doing that and maybe that will, what you would've had to spend on the well will cover what some of what's going to cost to do what you want to do anyway.

Sunny:

Right Dave, I think that kind of factors into the business case evaluations of whether we want to do the treatment at the wellfield or move water from the south. And I think that's one of the things that we will certainly look at actually, it's a very valid point. Absolutely.

And just to add to the pilot, recently I think in the last couple of weeks there was a referral from AdvanceCT, they had reached out to Larry. Larry I would say sent it over to me to pursue that. There is a company which is based in Connecticut, which is again using powdered activated carbon who wants to put a pilot plant in one of the wellfields on their own and want to see how it works. It's kind of a hybrid filter with very microscopic filters with nano filtration with powdered activated carbon.

They're supposed to send a scope of work for us to participate with them, which can actually be leveraged. If they put a pilot there it might actually save our cost going into the business case itself. As well as one of the things that I would say throughout there was what's the benefit? Not only I would say putting the pilot will benefit us, but what's the commercial benefit to us in terms of if we participate with them? How do we leverage that if it becomes a commercially viable product? So, there are many things on the hopper that we could exploit. More to follow.

Tom:

Questions?

Joe:

I just want to know what's the class action suit's all about?

David:

We can't talk about that right here.

Yeah, there's a couple of manufacturers that are involved in that and then we've had special meetings and regular meetings to discuss our participation in that and our involvement.

Joe:

Okay.

David:

So, we're looking out very much for what's best for the organization and our people.

Suzanne:

I think David telling the point it's not [inaudible 01:10:40] which is we're not the subject.

David:

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No. Okay, yes, no. Okay, that's a good point. We're not the subject, there's some other privately-owned water companies that are the subject of lawsuit, we are not the subject of a lawsuit for this.

Joe:

I feel better.

David:

I'm glad you are-

Joe:

Who's the plaintiff?

Sunny:

We are the plaintiff.

David:

Yes, yeah.

Suzanne:

Yeah, thank you for your passion and your attention to detail.

David:

That's great, thanks so much.

Tom:

Appreciate the opportunity, yeah absolutely.

David:

It's actually better that you were here instead of online, so I appreciate you coming down. It was great.
[inaudible 01:11:44].

Tom:

Good to see you.

David:

Good to see you, thank you.

Any other questions?

Mario:

Is there a motion to adjourn as the Environmental, Health & Safety Committee?

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Catherine:
So moved.

Kevin:
I second.

Mario:
And second? All in favor?

Committee members:
Aye.

Mario:
Opposed? Thank you.

[ENVIRONMENTAL, HEALTH & SAFETY COMMITTEE MEETING ADJOURNS AT 1:39 P.M.]