

	City of South St. Paul ENGINEERING POLICIES AND PROCEDURES	City Administrator Approval: SPK
		City Council Approval: 07/18/2018
		Issue Date: 07/18/2018 Revised Date:
SUBJECT: LEAD SERVICE LINE REPLACEMENT POLICY		

I. OVERVIEW

Based on the ages of water main construction in the community, staff estimates that we have approximately 800 lead service lines still in existence at the time of this policy creation. Lead most frequently gets into drinking water by leaching from plumbing materials and fixtures as water moves through the distribution system. The City has a comprehensive water testing process that is completed in accordance with the Minnesota Department of Health (MDH) and Environmental Protection Agency (EPA) rules that comply with the Safe Drinking Water Act (SDWA) to monitor lead levels at spot locations throughout the City as well as within school properties. The water monitoring results have consistently shown that the City is not above the thresholds by the MDH and EPA for when lead becomes a concern.

However, staff anticipates that the MDH and the EPA will eventually require all communities to chlorinate City water supplies and these agencies are continually lowering acceptable levels of contaminant thresholds within the distribution system. Staff is concerned that in the future the City may face issues of changing water chemistry, which may increase lead solubility and corrosion within the aging water distribution system. While there are ways to mitigate this during the chlorination process, the most cost effective and responsible approach would be to encourage property owners to replace lead service lines on their own. At this time, there are no requirements from the MDH or EPA to require private property owners to remove lead service lines.

II. POLICY

Based on requests from property owners for lead service line replacement assistance, the City Engineer will execute an assessment agreement with the property owner for up to \$5,000 for lead service line replacements at an interest rate of 1 percent plus the current bond rate with the following repayment schedules:

- Less than or equal to \$2,500 is payable over 3 years.
- Greater than \$2,500 up to \$5,000 is payable over 5 years.

Based on Sec. 50-21 of the City's Code of Ordinances, property owners are allowed to request a deferred assessment if they meet certain age or hardship requirements. If the City Council approves deferment of payment of special assessments, the City Engineer will execute a deferred assessment agreement with the property for up to \$5,000 for lead service line replacements at an interest rate of 1 percent plus the current bond rate.

If the total requests for lead service line replacements exceed the total overall budgeted amount for the program, the City Engineer will not authorize any additional lead service line replacements without City Council authorization.

PROCEDURE

- Staff will note lead service lines during the inspection for the “Time of Sale Reports” or “Rental Housing Reports”, during street reconstruction projects, or water main repairs. A notification will be sent to the property owners with supplemental information to contact the Engineering Department if the property owner would like to replace the water service line.
- The property owner and City shall fully execute the assessment agreement or deferred assessment agreement prior to construction and installation activities for the lead water service line replacement.
- The property owner hires a licensed and qualified contractor to complete the work and files the appropriate permit with the City.
- At the time of construction for the new water service line, the property owner shall notify the City Utilities Department to ensure that the lead service was replaced properly. Staff will provide information on procedures to flush the water line to remove any loose particles left in the service line after the work is completed along with one filter pitcher for use by the property owner at their discretion.
- The property owner submits receipts for the work completed to the City along with a withholding tax form, the City processes a claim voucher and then assesses property owners payable starting the following year for the terms set in the assessment agreement.

III. AUTHORITY FOR IMPLEMENTATION AND ENFORCEMENT

The City Engineer or their representative is responsible for administering the program. The policy may be modified over time for procedural changes or to provide clarity as long as no substantive changes are made without City Council authorization.