COUNCIL MEMBERS
Chris Betz – President
Ed Child – Vice President
Allyson Goodin
Mike George
Stephen Spor
Rebecca Spor
Amanda Hahn

TRUMBAUERSVILLE
BOROUGH

OTHER MEMBERS
James Black – Mayor
Dani McClanahan – Secretary
Borough Manager
Zoning Officer
Craig Wilhelm – EMC –
Fire Marshall-CEO
Solicitor- Colby Grim, Peter Nelson
Cowan Assoc – Water Engineer
Wynn Assoc – Borough Engineer
Ken Fulford – Water Operator

One Evergreen Drive, PO Box 100, Trumbauersville, PA 18970
Tel: 215-536-1761 Fax: 215-536-1339
info@trumbauersvilleboro.org

AGENDA
June 5, 2025

Call to Order:
Pledge of Allegiance:

Special Presentation (P. G.)
Eagle Scout Project Approval
President's Remarks:

Public Comment on Agenda Items:

Motion on 05/01/2025Minutes:

Check Register: attached

QAPC Report: Pending
New Business:

- Cowan Associates Well #2 Upgrades and Alternatives Evaluation (tabled 5/1/2025)
  - ACTION:

- Cowan Associates: EPA Lead and Copper Rule Improvements Action Items (report attached)
  - ACTION: Authorize CAI to proceed with SLI action items as defined in the attached report, with a cost not to exceed $5950.

- Pittsburg Tank & Tower Group: Estimate for inspection and maintenance of water tower and installation of PSI Pressure Gauge.
  - ACTION: Authorize work not to exceed $9105.

- Wild Goose Landscaping: Clean up leaves and weeds around the borough building, mulch trees, and around the building
  - ACTION: Authorize work not to exceed $1670.

- BCPC Act 167 Stormwater Update –
  - Field /Work Site Visits are expected to be wrapped up this week.
  - Meeting to review and discuss findings is yet to be determined

- Interconnect Completion: Passerini & Sons has completed the final items on the punch list; the engineer has recommended releasing the remaining $2.936.38.
  - ACTION: Authorization to release the balance of funds.

- Well #3 Project: Payment Request #4 for $99,250 has been reviewed by the engineer and approved for payment.
  - ACTION: Authorization to process Payment Request #4

- Well #2 VFD replacement: Two estimates are attached. The engineer recommends the unit from ACS, which is an all-inclusive price with a shorter lead time. The insurance claim has been approved, and the funds will be dispersed, minus the $500 deductible.

  Allied Control Services Inc. Turnkey design and build $11,855.
  Sigma Controls, Inc:
  System Total: $11,646
  Pressure Transmitter: $300
  On-site startup $1200/day
  Minimum Total: $13,146

  - ACTION: Authorize purchase of VFD from ACS for $11,855 complete.

REPORT OF BOARDS AND COMMISSIONS:

Planning Commission: Report attached.

- Recommendations regarding the LI district
  - ACTION:

Public Services Committee: (C. Betz – Chair, S. Spor, M. George) – Technical report attached.

Budget & Finance Committee: (E. Child – Chair, R. Spor, C. Betz) – no meeting

Park/Recreation Committee: (A. Goodin – Chair, S. Spor)- Community Day June 7th

Ordinance Committee: (– Chair, E. Child, C. Betz, R. Spor) – no meeting

Personnel/Administrative Committee: (E. Child – Chair, C. Betz, R Spor) – no meeting

Zoning – No permits were issued during May.

CEO/Fire Marshall –Reports attached

Fire Police Requests –

- Milford Twp. Volunteer Fire Company Annual Carnival Tuesday, June 24th through Saturday, June 28th. Tuesday, Wednesday, Thursday, and Saturday from 5:30 pm – 10 pm, and Friday 5:30 pm – 11 pm.
- Milford Twp Annual Ag-Daze event on Saturday, September 13, 2025, 10 am – 4 pm.
- Quakertown Borough requests Fire Police assistance on July 4th, reporting to the Command Post no later than 1945 hours.

ANNOUNCEMENTS:

Public Comment on Non-Agenda Items

Motion to Adjourn

REPORTS

The Trumbauersville Planning Commission met on May 22, 2025. The only agenda item was the proposed Light Industrial zoning district.
The PC reviewed comments from the Bucks County Planning Commission, the borough Water Engineer, and the Borough Solicitor. The meeting was then opened up to public comment. Comments were plenty, but respectful.
After public comments, the PC voted to recommend to the Borough Council a moratorium on any new development that requires additional public water hook-ups and new public sewer EDUs.

Ed Child
Chair

The borough Code Enforcement Officer performed the following activities during May 2025:

May 9, 2025: Checked borough for code violations
May 14, 2025: Checked for code violations-found two high grass violations
May 15, 2025: Prepared two letters for high grass violations
18 N. Main St.
41 N. Main St.
May 22, 2025: Conducted rental property 10 N. Main St.-3 units
May 28, 2025: Prepared letter, report and certificates for rental property inspection-10 N. Main St.-3 units
Checked borough for code violations, found high grass
23 N. Main St.
May 29, 2025: Prepared letter-23 N. Main St.-high grass
May 30, 2025: Conducted rental property inspection-219 E. Broad St. one unit

Craig Wilhelm
CEO
Borough of Trumbauersville

The following activities were performed by the borough Fire Marshal during May 2025:

May 5, 2025: Prepared Fireworks Permit for Community Day and mailed to Fireworks Company
Prepared letter, report, and Certificate for Fire Inspection MoldGenix, E. Broad St.
May 14, 2025: Performed fire inspection at Bracalente
May 15, 2025: Prepared letter, report, and Certificate for fire inspection at Bracalente
May 22, 2025: Conducted annual rental property inspection at 10 N. Main St. three units
May 23, 2025: Checked out complaint of open burning- 125 Woodview Drive
Met with the property owner
May 27, 2025: Prepared letter to the property owner of 125 Woodview Drive concerning open burning
May 28, 2025: Prepared letter, certificate, and report for rental property inspection-10 N. Main St.-3 units
May 30, 2025: Conducted rental property inspection 2 E. Broad St. one unit

Craig Wilhelm
Fire Marshal
Borough of Trumbauersville

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Richard S. Cowan, PE (1910-1997)
James R. Leister, PE/PLS (1936-2006)
William D. Kee, PE *(Retired)*
Johann F. Szautner, PE/PLS *(Retired)*
Todd R. Myers, PLS *(Semiretired)*
Scott P. McMackin, PE
Charles R. Tomko, PE
Michael R. Smith, PE
Wayne V. Doyle, PE

VIA EMAIL: info@trumbauersville.org

May 15, 2025

Ms. Dani McCalanahan
Trumbauersville Borough
1 Evergreen Drive
Trumbauersville, PA 18970

Subject: EPA's Revisions to the Lead and Copper Rule Improvements
2025-2026 Water Service Line Inventory Action Items
CAI 00907.31

Dear Dani,

The initial water service line inventory submitted in October 2024 was the first step in the process of ensuring all public water system service lines are lead free nationwide. Following submission of the initial inventories, Environmental Protection Agency (EPA) published updated requirements under the Lead and Copper Rule Improvements, which became effective December 30, 2024. The Lead and Copper Rule Improvements expanded service line inventory requirements and established compliance criteria for replacement of all lead service lines by 2037. Annual updates to service line inventories are required until all water service lines are identified as non-lead.

To assist water systems, the EPA has published several Fact Sheets providing information on various aspects of the Lead and Copper Rule Improvements. CAI has also compiled a summary of significant dates, compliance requirements and procedures which we feel are particularly pertinent to our clients. This information is being provided to support the development of an action plan.

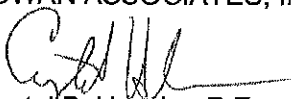
Below is a summary of CAI's recommendations for 2025-2026:

1. Target lead status unknown service lines and portions of service lines from the initial inventory.
    a. CAI has identified an opportunity to create a statistical model to confirm private side service line materials for buildings which connected to the water system when it was constructed in 1938. Borough historical documentation includes a plan depicting the buildings which were connected to the system at that time. This group represents a potential statistical approach as all connections would have been constructed at or approximately the same time and are likely to have used the same materials. For statistical groups of less the 1500, 20% of the pool can be verified using visual inspection at two locations, and if uniform information is obtained, it can be applied to the entire statistical group. CAI understands the original system included 138 buildings, requiring verification at 37 locations.

2. Plan and budget for excavations and/or soft-digs for 2026 to perform visual inspections necessary for validation and to identify materials of lead status unknown services.
    a. Begin to plan for visual inspections of publicly owned water service lines which are currently classified as lead-status unknown. Soft digs performed at curb boxes are valuable for identification of public and private sides of service lines.
    b. Compile a list of soft-dig locations needed to collect additional information for identification of private sides of service laterals.
    c. Explore available resources with access to soft-dig equipment, determine if a contractor will be hired to complete the work. Verify if public bidding will be necessary.
3. Expand public outreach programs to help the community understand the scope of work required of the Water System and the importance of the work.
    a. CAI will provide a list of property owners who have not yet provided responses to the 2024 Customer Survey mailed by the Borough and whose service line materials are unknown in the initial inventory. The Borough may wish to send out targeted mailings to these property owners. Or, alternately, the Borough may wish to seek permission to have a plumber or other Borough representative conduct a visual inspection.
    b. We recommend the Borough keep the community informed regarding plans to perform soft-digs and efforts to compile additional visual inspection data.
4. Continue to document service line materials observed during water meter replacements, curb stop repairs, curb box replacements or other water related repairs. Non-water related excavations within the Borough, which may expose water service lines, may also provide opportunities to document service line materials. The Borough may wish to consider coordinating with these projects to perform visual inspections where possible.

CAI's service line inventory team stands ready to support your water system. We understand that the work required for compliance with the EPA's Lead and Copper Rule is a large undertaking. We feel the knowledge gained holds great value to confidently ensure safe drinking water for your community.

Sincerely,
COWAN ASSOCIATES, INC.



Crystal B. Hessler, P.E.

CBH:aew

Enclosures: CAI Summary
EPA Fact Sheet Final LCRI
CAI Proposal for Services 2025 SLI Update

Compliance Date Summary

October 16, 2024 – Initial Service Line Inventory Completed and Submitted

- DEP has been performing spot checks of the submitted inventories
- There is no approval process, submission of the initial inventory satisfied current regulatory obligations.

October 30, 2024 – EPA's Lead and Copper Rule Improvements (LCRI) - final rule published

December 30, 2024 – EPA's Lead and Copper Rule Improvements became effective

October (?) 2025 – Annual Update of Initial Service Line Inventory due to State

- Currently there is no data on an exact submittal due date for annual updates
- All systems with lead, galvanized requiring replacement or unknown materials must complete and submit an annual update.
- Annual update should document any service line replacements during the year, and additional efforts to identify/verify services unknown service line materials.

October (?) 2026 – Annual Update of Initial Service Line Inventory due to State

November 1, 2027 – Baseline Service Line Inventory and Lead Service Line Replacement Plans are due

- Baseline Service Line Inventory – the total count of lead, GRR and lead-status unknown service lines in this baseline inventory become the basis of the annual service line replacement rate for the water system
- Lead Service Line Replacement Plan – the LCRI requires water system to replace all service lines identified as lead, GRR or lead-status unknown in the baseline inventory into the replacement pool.
    - The minimum annual replacement rate is 10%. However, annual replacement rate will be higher in systems with a larger replacement pool.
    - Annual updates to the replacement plan are also required.

January 30, 2035 –Non-Lead Service Line Validation due to State

- A validation process is required for non-lead service lines which were constructed prior to a regulatory lead ban (1991 PA lead ban or earlier municipal ordinance)

November 2037 – Lead Service Line Replacements are required to be complete.

- Water systems are required to have all lead and GRR service lines replaced by this date.
- Water system are required to have all service line materials identified by this date.

- States are delegated authority to shorten the replacement period. If PaDEP chooses to exercise this authority, it would likely impact systems with a small number of required replacements in order to expedite the replacement process.

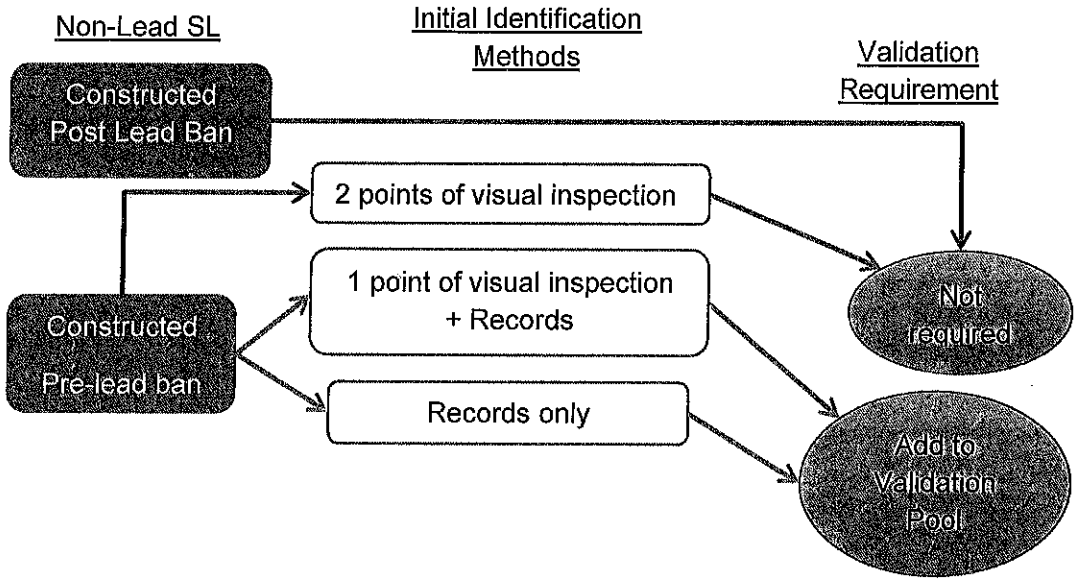
Lead and Copper Rule Improvements (LCRI), effective December 30, 2024

1. Expanded requirements for the base line service line inventory to include an inventory of connector materials.
    a. Connectors are defined as a short section of pipe between the water main and service line, which may not be a continuation of the service line pipe in some installations. Particularly, in instances where service lines are constructed of rigid pipe materials, especially lead and galvanized pipes.
    b. Copper, PVC and PEX piping typically do not utilize a connector.
2. Established additional compliance dates.
3. Introduced the non-lead service line validation requirement.
4. Requires Water Systems to conduct full replacement, meaning privately and publicly owned portions, of service lines in the replacement pool.
    a. The rule includes specific requirements for the water system to make an effort to obtain permission from property owners to install the private replacement.
    b. The rule does not appear to suggest costs associated with the required replacement must be the water system's responsibility.
5. Revised sampling protocols, exceedance action levels, treatment requirements, public outreach and education requirements. These changes are heavily focused on water systems where lead levels exceed action level.

Non-Lead Service Line Validation Requirement

The LCRI introduced the requirement for Water Systems to Validate the data used to determine service lines in their initial survey are constructed of non-lead materials. The rule requires water systems complete validation efforts by 12/31/2034 and submit them to the State by 1/30/2035.

The validation pool will contain non-lead service lines and portions of service lines (public/private) which were constructed prior to a regulatory lead ban (PA 1991 or earlier local ordinance).



For validation pools containing less than 1,500 service lines, 20% of the pool must be validated

- Validation sites are randomly selected from the pool
- Selected validation sites must be verified through 2-point visual inspection.
- Where 1 visual point was previously obtained, a second must be obtained for validation
    - Where ownership is shared, the water system must conduct at least one visual inspection on each portion of the service line.
    - Where ownership is shared and only one portion of the service line is included in the validation pool, systems must conduct at least one point of visual inspection on the unconfirmed portion of the service line.
- If permission to visually inspect a selected validation site cannot be obtained, the Water System should select an alternate site where permission can be obtained.
- Documentation of the validation process must be submitted to the State. The contents of this submission are not currently available.

Non-lead services identified by record review are not anticipated to change after the initial inventory. Once the baseline inventory has been established, reclassification of service lines will be based on 2-point visual inspections only.

Recommendations for 2025

1. Identify the Water System's validation pool

a. Review non-lead service lines identified in the 2024 initial SLI. Identify which non-lead SL are required to be included in the validation pool.

2. Set a goal for additional service line and connector identification in 2025.
    a. Consider what methods can be utilized to obtain additional verification data.
    b. Document any service line repairs and/or replacements.
    c. Document service line materials during meter readings and replacements.
    d. Continue to coordinate with your community. Request property owners notify the water system if their private service line is being repaired or replaced.
    e. Target the Unknowns. Recall that lead status unknown services in the 2027 Baseline Inventory will be included in the replacement pool and could influence the required annual replacement rate.
    f. Look for opportunities to create statistically significant sub-groups within the water system. Subgroups can be created where there is evidence a group of services would have been constructed with the same materials – such as a planned development. The use of valid statistic groups can reduce the number of excavations required to obtain 2 visual points of identification.
3. Plan for excavations to be performed in 2026 and through Q1 & Q2 2027. Budget for excavations which may be necessary to identify unknowns and validate non-lead lines identified by records.
    a. Excavations and/or soft digs will be necessary for most water systems.
4. Start preparing the Service Line Replacement Plan
    a. Will replacements be performed by water system staff or will a contractor be needed?
    b. How will the Water System engage property owners to obtain permission to construct replacements?

EPA FACT SHEET

EPA's Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements

October 2024

This fact sheet provides an overview of the final Lead and Copper Rule Improvements (LCRI) requirements for the (1) service line inventory, (2) service line replacement plan, (3) mandatory service line replacement, and (4) notification and risk mitigation measures. Throughout this fact sheet, links are provided to other EPA fact sheets for more detail. Table 1 provides some important service line-related definitions and descriptions.

Table 1: Service Line-Related Definitions/Descriptions

Term	Definition/Description
Service line	A portion of pipe that connects the water main (or other conduit for distributing water to individual consumers or groups of consumers) to the building inlet. Where a building is not present, the service line connects the water main (or other conduit for distributing water to individual consumers or groups of consumers) to the outlet.
Lead service line	A service line that is made of lead or where a portion of the service line is made of lead. A lead-lined galvanized service line is defined as a lead service line.
Galvanized service line	A service line that is made of iron or steel that has been dipped in zinc to prevent corrosion and rusting.
Galvanized requiring replacement (GRR) Service Line	A galvanized service line that currently is or ever was downstream of a lead service line; or is currently downstream of a lead status unknown service line. For this definition, downstream means in the direction of flow through the service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it is a GRR service line.
Non-lead service line	A service line that is determined through an evidence-based record, method, or technique to not be a lead or GRR service line.
Lead status unknown service line (Unknown service line)	A service line whose pipe material has not been demonstrated to be a lead, GRR, or a non-lead service line.
Connector	Also referred to as a gooseneck or pigtail, a short segment of piping not exceeding 3 feet that can be bent and is used for connections between service piping, typically connecting the service line to the water main.
Partial service line replacement	Replacement of any portion of a lead or GRR service lines that leaves in service any length of lead or GRR service line upon completion of the work.
Cumulative average annual replacement rate	Systems must meet a cumulative average annual replacement rate of 10 percent that is first assessed in program year 3 and is assessed annually thereafter. For more details on how to comply with the replacement rate, see EPA's Fact Sheet: Calculating Service Line Replacements.
Program year	The first program year runs from November 1, 2027 to the end of the next calendar year (December 31, 2028). Every program year thereafter is a calendar year (January 1 to December 31). For example, program year 2 is January 1, 2029, to December 31, 2029.

1. Service Line Inventory Requirements under the LCRI

The service line inventory provides a foundation for water systems to address a significant source of lead in drinking water, lead and galvanized requiring replacement (GRR) service lines. Table 2 provides a summary of the service line inventory-related requirements under the LCRI.

Table 2: LCRI Service Line Inventory Requirements

Requirement	Description
2021 LCRR Initial inventory	• The LCRI retains the requirements from the 2021 Lead and Copper Rule Revisions (LCRR) to develop and submit an **initial inventory by October 16, 2024.** • This inventory must include all service lines, regardless of ownership status. • Service lines must be categorized as lead, non-lead, GRR, or unknown.
Baseline inventory	• The **baseline inventory** builds on the initial inventory and is due by November 1, 2027. It must include information identified on connectors as well as any updated or new information on service line materials and locations. • Systems must review specified sources of information for connector materials and categorize them as "Lead", "Non-lead", "Unknown", or "No connector present" where there is no connector at the location.
Updated inventory	• The inventory is a ***living dataset*** that should be continually revised over time as systems replace lead and GRR service lines and identify the material of unknown service lines. • After the end of the program year 1 (by January 30, 2029), and every January 30th thereafter, water systems must submit an inventory update and post it online, including total counts for each service line material, total counts for known lead connectors and connectors of unknown material, and total number of full and partial replacements that occurred in the past year. • Systems with all non-lead service lines are not required to submit or post inventory updates (unless lead or GRR service lines are discovered during the inventory validation process).
Identification of unknown service lines	• Water systems must identify the material of all unknown service lines in their inventory by their mandatory service line replacement deadline.
Validation of non-lead service lines	• To assess inventory accuracy, water systems must validate a subset of their non-lead service lines no later than December 31, 2034, or on a schedule specified by the State. • Water systems that completed validation efforts before November 1, 2027 that are at least as stringent as the LCRI requirements can request a waiver from the State. See the LCRI validation fact sheet for more information.

Keep In Mind:

- Water systems must make the service line inventory ***publicly accessible.***
  - Systems serving more than 50,000 people must post it online.
  - All other water systems can elect to post it online or use another method to make it accessible to the public (e.g., by mail, available at the water system's office).
- Starting with the Baseline Inventory, the publicly accessible inventory must include the ***street address*** of each service line and identified connector. Where a street address is not available, a unique locational identifier (e.g., block, GPS coordinates, intersection, or landmark) may be used.
- Water systems with no lead, GRR, or unknown service lines, no known lead connectors, and no connectors of unknown material:
  - Must complete the inventory validation process described above and in the LCRI validation fact sheet.
  - May provide (1) a written statement that their system has no lead, GRR, or unknown service lines, no known lead connectors, and no connectors of unknown material and (2) a general description of the methods used to make this determination.
  - Are not required to submit annual updates; however, if they later discover a lead or GRR service line or lead connector, they must notify the State within 60 days, comply with any additional actions required by the State, and prepare an updated inventory.

2. Service Line Replacement Plan Requirements under the LCRI

What information must be included in the Service Line Replacement Plan?

A service line replacement plan is required for any water systems with at least one lead, GRR, or unknown service line. This plan can help the water system implement their service line replacement program effectively. It is due to the State by November 1, 2027 and must include:

① A description of a strategy to identify the material composition of all unknown service lines in the inventory.

② A standard operating procedure for conducting full service line replacement.

③ A communication strategy for informing consumers and customers before a full or partial lead or GRR service line replacement.

④ A procedure for consumers and customers to flush service lines and premise plumbing of particulate lead following a disturbance of a lead, GRR, or unknown service lines or following full or partial replacement.

⑤ A strategy to prioritize service line replacement based on factors such as known lead and GRR service lines and community-specific factors.

⑥ A funding strategy for conducting service line replacement that includes ways to accommodate customers that are unable to pay to replace the portion of the service line they own.

⑦ A communication strategy to inform both consumers and customers served by the water system about the replacement plan and program.

⑧ Identification of any laws, regulations, and/or water tariff agreements that affect the water system's ability to gain access to conduct full replacement.

⑨ For water systems that identify any lead-lined galvanized service lines in the inventory, a strategy to determine the extent of their use in the distribution system.

What additional information must be included in the plan related to Deferred Deadlines?

The final LCRI includes a deferred deadline option for systems with a high proportion of lead and GRR service lines compared to the number of total service connections. Systems that are using a deferred deadline must include additional elements in their service line replacement plan, as summarized in Table 3.

Table 3: Additional Service Line Replacement Plan Elements for a Deferred Deadline

	Description
Initial Replacement Rate and Deferred Deadline	The following elements are required as part of the initial service line replacement plan that is due by November 1, 2027: • Documentation to support the system's determination that it is eligible for a deferred deadline by showing that 10 percent of the total number of known lead and GRR service lines in the replacement pool exceeds 39 annual replacements per 1,000 service connections. Systems may not include unknown service lines in this determination. • Identification of the deferred deadline and the associated cumulative average annual replacement rate[1] that the system considers to be the fastest feasible, but no slower than a deadline and replacement rate corresponding to 39 annual replacements per 1,000 service connections. • The annual number of replacements required, the length of time (in years and months), and the date of completion for the deadline and rate. • Information supporting the system's determination that replacing lead and GRR service lines at a rate faster than 39 replacements per 1,000 service connections is not feasible.
Continued Evaluation of Replacement Rate and Deferred Deadline	Every three years after the initial submission of the plan, the system must provide updated information to support the State's evaluation of why it continues to need the deferred deadline.

[1] See EPA's fact sheets on deferred deadline and on calculating the service line replacement rate for additional information.

Keep In Mind:

- Water systems must make their plan ***publicly accessible,*** and those serving more than 50,000 people must post their plan online.

3. Mandatory Service Line Replacement

The LCRI requires all community water systems (CWSs) and non-transient non-community water systems (NTNCWSs) to fully replace all lead and GRR service lines under their *control* ***within 10 years***, unless the system is eligible for a deferred deadline or the State sets a shortened deadline. The LCRI service line replacement requirements are summarized in Table 4.

A service line is under the control of the water system wherever the system has access (e.g., legal access, physical access) to conduct full service line replacement.

Table 4: LCRI Service Line Replacement Requirements

Requirement	Description
Replace all lead and GRR service lines	Water systems must fully replace all lead and GRR service lines under their **control** within 10 years, unless they are required by the State to replace them sooner or have a deferred deadline.
Cumulative average annual replacement rate	Water systems must assess the cumulative average annual replacement rate of 10 percent beginning at the end of program year 3 (December 31, 2030) and annually thereafter. See EPA's Calculating Service Line Replacements Fact Sheet for detailed requirements and guidance. • A lead or GRR service line counts as fully replaced only when the entire length of the service line (both customer side and system side) is non-lead.
Obtaining property owner consent (if required)	• Where a water system has legal access to conduct full service line replacement only if property owner consent is obtained, water systems must make a "reasonable effort" to obtain consent. • Under the LCRI a "reasonable effort" is at least 4 attempts to engage the property owner using at least 2 different communication methods (e.g., in-person conversation, phone call, text message, email, written letter, postcard, or door hanger). • The water system must continue annual notification of service lines known or potentially containing lead regardless of whether access is obtained after making a "reasonable effort" as described above.
Change in ownership	• Within 6 months of a change in property ownership, water systems must offer full service line replacement to the new property owner. • Within one year of any change in ownership of the property, the system must make a "reasonable effort" to obtain the property owner's consent.
Partial replacements	• Partial replacements are prohibited unless conducted as part of an emergency repair or in coordination with planned infrastructure work that impacts the service line (e.g., water main replacement, meter replacement). Infrastructure work does not include projects solely to replace lead and GRR service lines as part of a service line replacement program. Additional requirements to mitigate the impact of a partial replacement are required following partial service line replacement. • During partial replacements, systems must install a dielectric coupling separating the remaining portion of the service line and the replaced portion of the service line (i.e., newly installed line) to prevent galvanic corrosion, unless the replaced service line is made of plastic. • Partial replacements do not count towards the system's mandatory replacement rate.
Replacing lead connectors	Water systems must replace lead connectors under their control when encountered during planned or unplanned water system infrastructure work. Replacing lead connectors does not count towards the mandatory replacement rate.

4. Notification and Risk Mitigation Requirements

Lead service line replacement activities can break apart corrosion scales and cause temporary increases in lead in drinking water. To protect public health, the LCRI requires water systems to conduct notification and risk mitigation measures following full and partial lead and GRR service line replacements. Specifically, water systems must provide consumers with the following:

- Notification that explains that the consumer may experience a temporary increase of lead levels in their drinking water due to the replacement and contact information for the water system;
- Written information about a procedure for the consumer to flush service lines and premise plumbing of particulate lead following replacement; and
- A pitcher filter or point-of-use device that is certified by an American National Standards Institute (ANSI) accredited certifier to reduce lead along with six months' worth of replacement cartridges and instructions for use.

For any service line replacement, notification and risk mitigation measures must occur before the affected line is returned to service. Additionally, the water system must offer to collect a follow-up tap sample between three months and six months after the completion of the replacement and test for lead.

Disclaimer: This document is being provided for informational purposes only to assist members of the public, States, Tribes, and/or public water systems in understanding the Lead and Copper Rule Improvements (LCRI). It includes descriptions of regulatory requirements. In the event that there are any differences, conflicts, or errors between this document and the LCRI, States, Tribes, and/or public water systems should refer to the LCRI. This document does not impose any legally binding requirements on the EPA, States, Tribes, or the regulated community. Further, this document does not confer legal rights or impose legal obligations on any member of the public. In the event of a conflict between the discussion in this fact sheet and any statute or promulgated regulation, the statute and any promulgated regulations are controlling.

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Johann F. Szautner, PE/PLS *(Retired)*
Todd R. Myers, PLS *(Semiretired)*
Scott P. McMackin, PE
Charles R. Tomko, PE
Michael R. Smith, PE
Wayne V. Doyle, PE

Engineer's Report
Trumbauersville Borough
Council Meeting June 5, 2025

Questions regarding technical aspects of the ongoing work on the public water system will only be answered by the licensed water operator and the water department engineers. All questions should be submitted to the Borough Administrator, who will forward them to the appropriate licensed party. All questions and responses will be presented at the next Borough Council meeting.

1. Trumbauersville Road Water Interconnection (CAI 00907.29)
   a. The project is ready for closeout. CAI recommends approval of the final application for payment in the amount of $2,936.38.
   b. CAI's recommendation for approval of the application for final payment is provided under separate cover.

2. Well #2 (CAI 00907.17)
   a. CAI has been working with Borough and Operation staff regarding well control replacement. Quotations were provided by Allied Control Systems and Sigma Controls for replacement.

3. Well #3 Upgrades (CAI 00907.29)
   a. Permit number 0924511 for construction of the Well #3 Upgrades was issued by DEP on June 3, 2024. The COA requires completion of this construction by September 12, 2025.
   b. Construction is proceeding on schedule. The contractor has installed filter vessels, process plumbing and sanitary sewer lateral. The project is anticipated to be ready for start-up in June 2025.
   c. The contractor submitted Application for Payment No. 4 in the amount of $99,250.00. CAI's recommendation for approval is provided under separate cover.

4. Consent Order and Agreement (COA) (CAI 00907.29)
   a. The Borough has met compliance dates in the COA.

5. Service Line Inventory (SLI) PWSID 190091 (CAI 00907.31)
   a. CAI met with Borough manager to discuss goals for 2025 updates to the Service Line Inventory. A summary of the recommended 2025 goals and budgetary proposal are provided under separate cover.
   b. Memo included a draft coordination meeting agenda for the execution of pre-flushing, flushing and post flushing tasks. CAI suggests the coordination meeting be held after Well #3 has returned to operation.

6. Future Projects
   a. CAI attended the April 17 Borough Council meeting to discuss the 2025 Project Overview and Summary presented to Council in our February engineer's report. CAI provided a budgetary proposal for a Feasibility Evaluation of Well #2 future treatment needs for the Council's consideration.