EPA Flint Technical Support Team (formerly Safe Drinking Water Task Force) Recommendations Regarding the City of Flint's FAST Start Program and Lead Service Line Replacement Procedures

Recently, EPA received a copy of the new American Water Works Association (AWWA) Standard (ANSI/AWWA C810-17: Replacement and Flushing of Lead Service Lines), which became effective on November 1, 2017 (see https://www.awwa.org/resources-tools/public-affairs/press-room/press-release/articleid/4839/awwas-new-standard-assists-communities-in-removing-lead-service-lines.aspx).

This is an important standard that all utilities with lead service lines (LSLs) should be aware of, especially those that are in the process of removing LSLs as the City of Flint is doing under the Flint Action and Sustainability Team (FAST) Start Program.

Among other things, this new standard prevents home plumbing from becoming contaminated by particulate lead in dislodged scale and sediment released into the water by LSL disturbances from excavation and LSL removal activities.

Once particulate lead enters the home plumbing, especially if the home plumbing contains galvanized iron pipe, it is difficult to fully flush all of the particulate lead out of the home plumbing and random release of particulate lead into the water can continue long after the LSL and all associated galvanized iron pipe are fully removed.

Therefore, **EPA's Technical Support Team recommends** that the City of Flint and its contractors review this new AWWA standard for the "Replacement and Flushing of Lead Service Lines" and incorporate the following into its current and future requests for proposals for the FAST Start Program LSL replacement work. Specifically, Section 4.1.2.4 of the new standard, which discusses water shutoff and service line isolation, states that the water supply to both the service line and customer should be shut off prior to beginning the replacement work to prevent the release of particulate lead into the customer's premise plumbing due to the disturbances caused by the excavation activities.

In addition, given the potential for very high lead release due to physical disturbances, **EPA's Technical Support Team** also recommends that LSL removal crews coordinate with entities distributing filters to ensure that residents have working point-of-use filters that are certified under NSF 42 and NSF 53 prior to commencement of LSL verification and LSL replacement activities.