

LSLI Review and Q&A

WRITTEN FOR:
LEDYARD WPCA

PRESENTED BY: GU
LSLI TEAM

02/11/2026

LCRR/I Regulatory Timeline



Start of Initiative

- Records review
- Developing SLI
- Extensive GIS updates
- Public outreach
- In-house training with GU staff



LCRI Compliance Date: November 1, 2027



2024

- Baseline Inventory due
- Begin DSSA, Schools and Childcare Sampling, Disturbances
- Lowered AL to 10 ppb
- LSLR Plan Due
- Begin LSLR

2028

School and Childcare Sampling Program

Must offer/complete sampling at all licensed childcares and elementary schools in 5 years

2034

LSLR Replacement Deadline

- December 31, 2037
- All lead and GRR SLs Replaced
- No unknowns left in inventory

2021

LCRR Compliance Date: October 2024

- Initial inventory due
- Inventory notifications
- Tier 1 notification
- Final LCRI (Effective Dec 30, 2024)

2027

Tap Sampling

January 1, 2028 begin standard monitoring

2032

Inventory Validation

Must validate non-lead service lines by December 31, 2034

2037

Groton Utilities System Overview and Service Line Ownership

1 Gales Ferry System

2 Ledyard Center System

Additional Water Service Areas

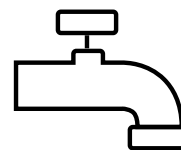
3 Southeastern Connecticut Water Authority (SCWA)

4 Mashantucket Pequot



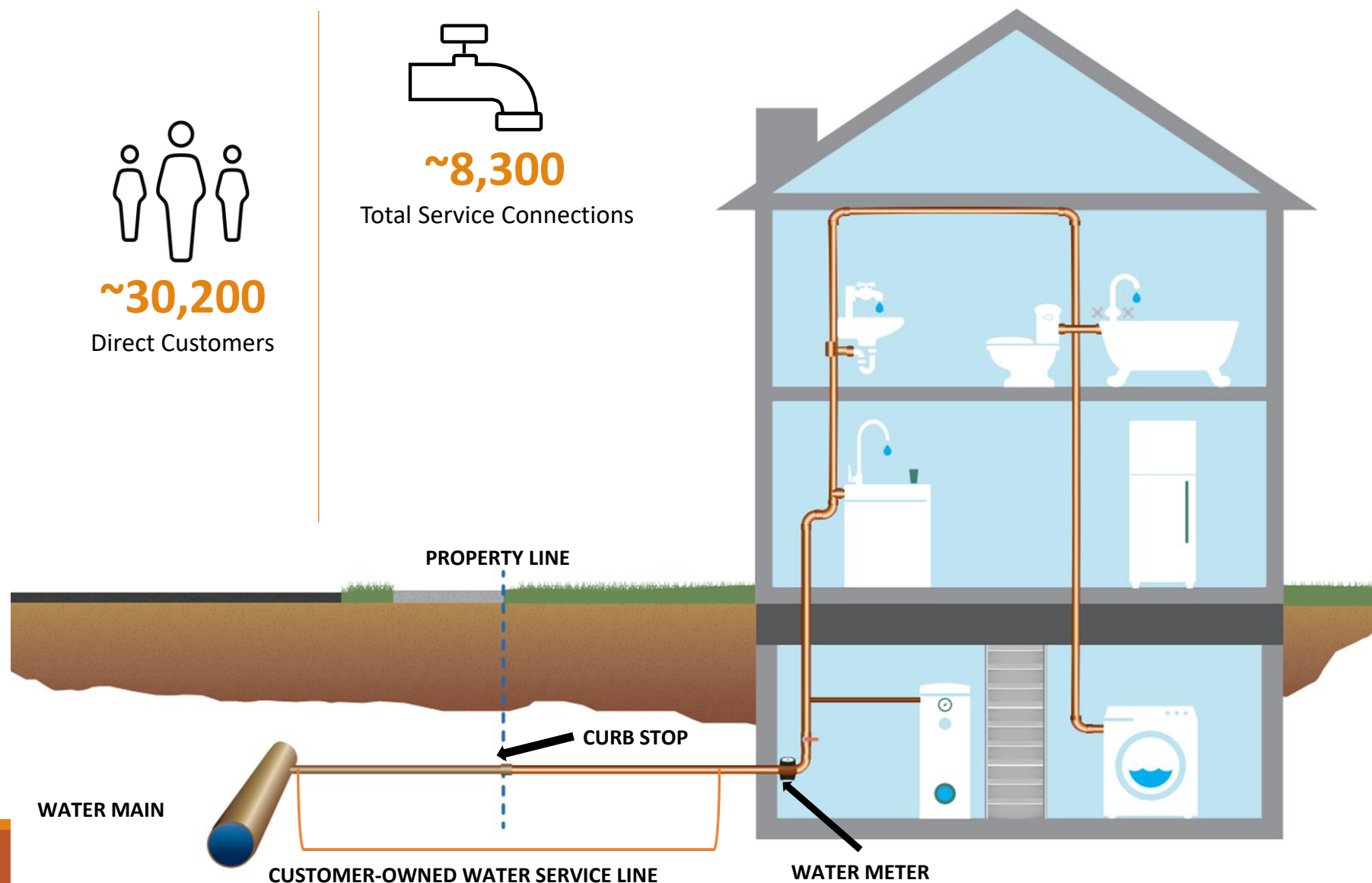
~30,200

Direct Customers



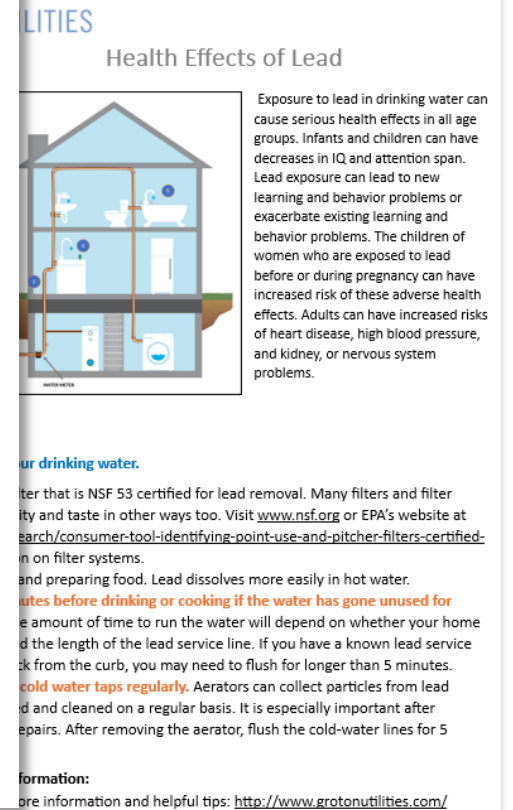
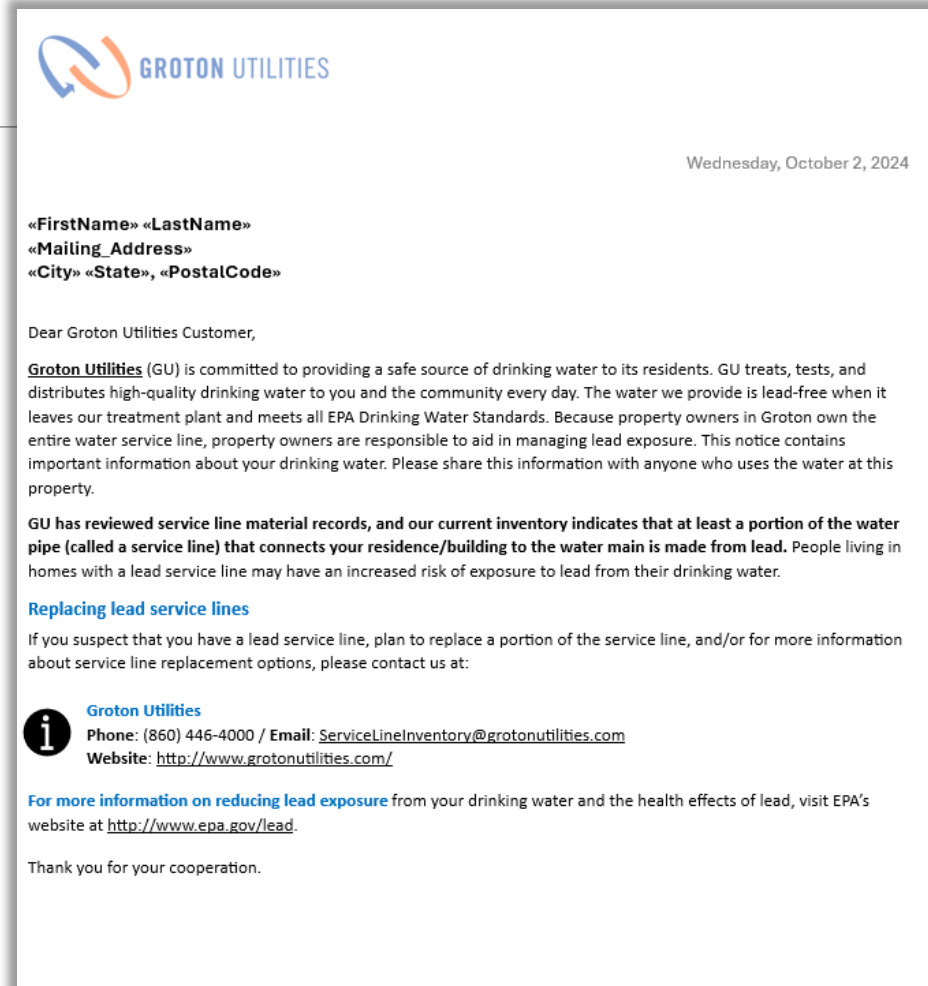
~8,300

Total Service Connections



Work Completed – SLI Notification Letters

- Sent 776 SLI Notification Letters to Customers by 11/15/2024
 - Ledyard – 463
 - GU - 313
- Customers received a letter if the SL on **either or both** side(s) of the curb stop is:
 - Unknown
 - Lead
 - Galvanized Requiring Replacement
- Health informational sheet required to be provided with notice



- Connecticut Department of Public Health information on lead: <https://portal.ct.gov/DPH/Drinking-Water/DWS/Lead-and-Copper-Rule>
- Resources to understand and reduce lead exposure from the United States Environmental Protection Agency: epa.gov/lead
- Lead Hotline – Contact the National Lead Information Center's Hotline at 1 (800) 424-LEAD [5323]

Options for Identifying Unknowns

Continuing Work – Field Verifications

- Customers self-reporting (*forms*)
- Data collection during:
 - Meter repair/replacements
 - Meter installation
 - SL repair/replacements
- Additional records review
- Test pits at curb stop
- In-home basement inspections
 - Utility staff
 - Third-party staff (consultants, subcontractors, etc.)

Important Things to Note:

- Annual notification letters continue to the GRR, Lead and Unknown SLs (annually prior to Dec 31st)
- Finish verifying the remaining unknown SLs
- Required to identify the material of all service lines by 2037
- Additional Field verification methods (cameras) have proven to be difficult and non-producing.

LCRI Requires All Systems to Validate the Accuracy of 'Non-lead' Service Lines by Oct 31, 2034

1. Determine validation pool
2. **Randomly select** a group of remaining non-lead
3. Visually inspect **at 2 points** (public and private side if split ownership). Where ownership is shared and only one portion is in validation pool only 1 point of verification on that side
4. Replace properties that cannot be accessed using the random selection process



New LCRI Revision:



Systems can now apply for a **waiver** if they have conducted validation at least as stringent as the LCRI requirements

Must submit waiver application to State by **Nov 1, 2027**



Size of Validation Pool	Number of Validations Required
<1,500	20 percent of validation pool
1,500 to 2,000	322
2,001 to 3,000	341
3,001 to 4,000	351
4,001 to 6,000	361
6,001 to 10,000	371
10,001 to 50,000	381
>50,000	384

This requirement **INCLUDES** systems with **all non-lead service lines**

What Non-Lead Service Lines Need to be Validated per LCRI?

EXCLUDED from Validation Pool

- Installed post-lead ban or June 19, 1988 (whichever is earlier)
- Identified through visual inspections of **the pipe exterior** at minimum of **two points**
- Previously replaced lead or GRR

INCLUDED in Validation Pool

- Records (e.g., tap cards, as-builts, previous materials evaluation)
- Water System Records (e.g., CIPs, SOPs)
- Predictive Modeling and Statistical Approaches
- Institutional Knowledge

Primacy Agency - Dependent

- “Historical” visual inspections (i.e., those that inspected the exterior of the pipe before the initial inventory)

What Should I Do in the Next 3 Years?

- ✓ **Initial inventory** (was due on October 16, 2024)
- ✓ Send **annual inventory notifications** to lead, GRR, and unknowns (by Nov 15, 2024)
- ✓ Use revised **health effects language** (use 2021 LCRR until LCRI compliance date)

☐ **Tier 1 Public Notice** if AL exceedance

☐ Prepare Items Due by **November 1, 2027**:

- ☐ Develop **baseline inventory**
- ☐ Develop **LSLR Plan** (if at least one lead, GRR, or unknown SL)
- ☐ Create **list of the schools and licensed childcare facilities**
- ☐ Submit a written request to the State for an **inventory validation waiver**, if desired, by the LCRI compliance date.

***NOTE: Validation must be conducted at least as stringent as LCRI (2 points of verification – “Customer side and system side”). All services must be known.**



Must update LSLR Plan annually until system is non-lead

LSLR Plan Requirements Under the LCRI

All systems with LSLs, GRR, or unknown service lines must develop a full LSLR plan that includes:

Strategy for determining composition of lead status unknown service lines

Standard Operating Procedure to conduct full LSLRs (e.g., techniques to replace service lines)

Strategy for notifying customers (i.e., persons served at the connection) prior to full or partial LSLRs

Procedures for customers to flush service line and premise plumbing

LSLR prioritization strategy (based on known LSLs & GRRs, community-specific factors)

Funding strategy (incl. assistance options for those unable to pay if charging customers)

Strategy to inform customers and consumers about the plan and program

Identify laws, regulations or agreements that affect access for LSLR

Submit to the State on or before **November 1, 2027**

Make it **publicly available** (online for systems serving > 50,000)



Additional sections required for systems with lead-lined galvanized or deferred replacement deadline

Financial Highlights



Groton System

- Groton LSLI WO – **2024-Current “Phase 1” and some “Phase 2”**
 - Included: **\$100,000.00** worth of record work, including submittal of initial inventory, mailers to customers, website interfacing and information, GIS, and inspections.
- Groton Potholing – **2025-Current “Phase 2”**
 - \$59,000.00 spent to date, with a projected spend in the remainder of FY26 and FY27, being an additional **\$200,000.00**.
- **Gross Financial Projection Estimate through 2027: \$450k**

Ledyard System

- Ledyard LSLI – **2023-Current “Phase 1” and limited “Phase 2”**
 - Included: GU has conducted **\$33,000.00** worth of record work, including submittal of initial inventory, mailers to customers, website interfacing and information, GIS, and limited basement inspections.
 - Of note: Ledyard has not been charged for any overhead that has lead program management, legislative updates, training costs, nor meetings (6 staff members part time labor – varying from 25% to 5% by time). Nor has GU cost shared regulation oversight conducted by Arcadis (\$20k). Ledyard was advised post Oct. 2024 submittal that Phase 2 of baseline inventory was due by Oct. 2027, Ledyard began DWSRF consideration. GU ceased management awaiting guidance from Ledyard.
- Arcadis Proposes: **\$234,200.00 “Phase 1 – alternate”**
 - Scope Includes: Program Management & Meetings, CTDPH DWSRF financial oversight and management, regulation oversight, review of GU submission of initial inventory and associated records, coordination with GU, coordination with CT DPH, preparation and submission of 2027 baseline inventory submission, non-lead certification plan, and public education and outreach.
 - Exclusions: **“Phase 2”** Any potholing, inspections of service lines via potholing, or any other form of field verification.
- **Gross Financial Projection through 2027: TDB**

Moving Forward

Groton Utilities (for GU)

- Will continue Potholing, with goal of 3 points of verification for Oct. 2027 submission to the CT DPH.
 - Will develop our LSLR Plan as required by CT DPH if needed.
 - Create lists of schools and childcare facilities for service territory.
 - Send Annual Letters to customer base before Dec. 31st annually.
 - Certify Annual Letters by Jul 1st annually.
 - Etc.
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- Does Ledyard wish to have GU enter Meter Cards on LSLI WO (equivalent to basement inspections)? And if so, are these performed on GU OT – we are at resource capacity.
 - GU will need Mayor to sign Certification Letter from Letters sent in Nov. 2025. We will send certification to the State.

Ledyard - TBD

- GU Advises Ledyard to negotiate cost of program management and proposal with Arcadis (or another vendor). Request T&M instead of Lump Sum billing.
- GU will not manage any financials associated with CT DPH DWSRF.
- GU currently does not have resource capacity to internally devise a field verification plan and conduct potholing, or inspections, in Ledyard within 18 months. Presented Meter Cards are only 1 point of verification.
- GU seeks guidance on narrative for when GU employees are conducting work in Ledyard and questions are received by our operational staff regarding LSLI.
- GU & Ledyard will need to discuss responsibility of mailers (vendor or GU).
- GU & Ledyard will need to discuss responsibility of lists of schools and childcare facilities (vendor or GU).
- GU & Ledyard will need to discuss responsibility of basement inspections as customers request them (vendor or GU).
- GU & Ledyard will need to discuss hosting domain for website information and responsible party (vendor or GU).
- GU & Ledyard will need to discuss file transfers for GIS data entering our Unity enterprise. GU requests frequent alignment with any vendor doing GIS for Ledyard.
- GU & Ledyard will need to discuss responsibility of any potholing inspections (vendor or GU).

Implications

What if we do nothing?

- Potential for Fines for non-compliance if no submittal. Increased monitoring requirements.
- Any Unknown, GRR, or lead service left on the October 2027 baseline submission is subject to additional sampling requirements. GU is Ledyard's sampling manager, and the sampling would be displaced on GU. Financial and resource capacity strain impacts are predicted.
- Waiver is a potential – but at current requires 2 points of verification on defined validation pool. Submitting a waiver outside these guidelines should be advised by a consultant and notified to GU.
- ***Legislation on this initiative has been variable. Decisions should be made based on current the EPA LCRI's that were released on October 30, 2024, and approved on December 30, 2024. GU continues to maintain awareness on EPA and CT DPH changes and discusses any new disclosures at our monthly LSLI meeting.***