



August 15, 2024

Mayor Diezel DePew
City of Edgewater
PO Box 100, Edgewater, FL 32132

Re: Water Service Line Inventory Reveals No Lead Pipe Throughout Edgewater

Mr. Mayor,

Please accept this report as the result of extensive effort by the Environmental Services Department, the City Clerk's Office, and the City's GIS Division to **definitively conclude there are no lead pipes within the City of Edgewater water main network nor in water service lines up to any customer's home or business.**

Completing this Lead Service Line Inventory (LSLI) is a requirement by the US Environmental Protection Agency (USEPA) of every Public Water System (PWS) throughout the country, with a due date of October 16, 2024. The initial rule was issued by USEPA in 2021, however USEPA continued revising the rule through November 2023. Finally, the Florida Department of Environmental Protection (FDEP) and Florida Department of Health (FDOH) jointly released guidance documents in early February 2024 clarifying the requirements for all PWS in the State to conduct and file their LSLI Inventory.

Per the FDEP guidance, a Statewide ban on lead pipe went into effect on January 18, 1989. The City of Edgewater's GIS Division used City and Volusia County building structure and parcel data to determine that approximately 50% of our water services were constructed before or during 1989, specifically a total of 6,634 services. To complete the LSLI Inventory, each water service constructed prior to the lead-ban date must be investigated through one of two ways: 1) a thorough review of available records pertaining to the materials of construction of the water service; and/or 2) visual / physical inspection via excavation of two points of the pipe material by documenting the City-owned pipe coming into the water meter and the customer-owned pipe exiting the water meter. By default, all services built prior to the lead-ban date would be listed as "Unknown

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Material” and subject to public notification and regulatory reporting equal to a presumption of containing lead material.

Environmental Services Director Randy Coslow, P.E. and Deputy Director Jeff Thurman recognized that widespread confusion and negative public perception would result from issuing notices of “Unknown Material” to our customers and instead sought to provide the greatest degree of assurance and transparency possible regarding lead water pipe. Mr. Coslow and Mr. Thurman developed a protocol to fully comply with the requirements and intent of the LSLI rule by dedicating approximately forty (40) ES Department staff on consecutive Fridays to manually dig and physically verify the pipe material in each water service constructed before the lead-ban date. As the ES Department was preparing to begin the field work, the City Clerk’s Office diligently searched their records to determine whether a local lead-ban was enacted earlier than the State ban and to find building permits for the subject properties which might indicate whether the water service material contained lead pipe. Ultimately, no building permits were found with sufficient information and all of the water system construction plans did not provide enough certainty regarding the customer-side pipe material. Thus, all services required physical verification.

ES Department Staff from all nine (9) divisions participated in training on March 22, 2024. Also on March 22, the City mailed a letter to all 6,634 accounts notifying of the upcoming investigation in and around the water meter boxes. Field work began on the following Friday, March 29. Within six (6) weeks, ES Staff dug up and documented 2,725 water services.

In early May 2024, the City Clerk’s Office located Ordinance #941 enacted November 24, 1975 which adopted a plumbing code that excluded lead pipe and fittings from use in new water service and water supply lines (namely Southern Standard Plumbing Code 1975 edition, Section 1206.1). In less than one week, ES Director Coslow, Deputy Director Thurman and GIS Coordinator Frank Vignati quickly revised the maps to reflect this much earlier local lead-ban date of only those water services constructed before or during 1976. This date was chosen to include any building permits issued in 1975 before the local plumbing code was updated. The new local lead-ban date reduced the number of total services to be excavated to 1,926 of which 619 had already been investigated. (It is important to note that the City’s 1975 plumbing code did not prohibit the use of lead materials inside the building; these items were prohibited by the Statewide lead ban effective 1/18/1989.)

As of June 7, 2024, ES Staff had visited all water services constructed prior to the local lead-ban date and had excavated over 4,000 services total. Only 99 services were reported with “Unknown Material”, which Staff from the Field Operations division subsequently excavated and confirmed the material types. Thus, we can say with very high confidence that 100% of all possible services were inspected and found that no lead pipe exists within the City of Edgewater water supply

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network or water service lines. All of this work was completed with budgeted funds using on-duty personnel.

I would like to personally and sincerely congratulate the members of the Environmental Services Department, the City Clerk's Office, and the GIS Division for their diligent and expeditious work to ensure all of our residents have the safest and most reliable drinking water.

Sincerely.

Randy J. Coslow, P.E.
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CC: Gigi Bennington, Vice Mayor / District 2 Councilwoman
Charlotte Gillis, District 1 Councilwoman
Debbie Dolbow, District 3 Councilwoman
Jonah Power, District 4 Councilman
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