



COMMUNICATION CHALLENGES

for the LCRR


TAWWA Webinar - September 7, 2023

Public Outreach

- Inventory
- Compliance Sampling
- Public Notification
- AL Exceedence
- LSL Replacements/Disturbances
- Trigger Level Exceedence
- School & Daycare Sampling
- Corrosion Control
- Health Departments



Our Challenges

- Developing all the notifications/outreach materials
 - Developing and maintaining various stakeholder lists
 - Communicating with stakeholders
 - Communicating with schools and daycares
 - Communicating internally
- 

Inventory

Data Availability

- Info in CCR on how to access
- Post on website (>50,000 served)

10

Notify

- Customers with lead, galvanized requiring replacement or unknown
 - Within 30 days of completing inventory
 - Annually until no longer in any of these categories
 - New customers at service initiation
 - Notification language varies



Individual Test Results

- 30 days if $<15 \mu\text{g/L}$ (ppb)
- 3 days if $\geq 15 \mu\text{g/L}$ (ppb)
- Communicating with occupants of building where tap was sampled



Overall results

- Annual outreach to state and local health departments
- Publicly available within 60 days



Compliance Sampling

Action Level Exceedance

**Public notice
within 24-hours
(Tier 1 Violation)**



**Must deliver
materials to all
bill paying
customers &
many other
groups**



**Offer free tap
sampling to all
customers & discuss
lead in plumbing
components**

**Mandatory full LSL replacement
of 3% percent of annually**

Action Level Exceedance

Initially

- PN to entire system within 24 hours
- Printed materials to every bill paying customer
- Phone or in-person notice to public health agencies
- Any organization lists provided by health departments
- Notices in or on water bill (quarterly, specific language)

Initially

- Notices to 7 categories of organizations and encourage them to distribute
- 3 activities from one or more of 10 specified categories
- News release
- Post on website if serve >100,000

10

Action Level Exceedance

Ongoing

- Monthly notices in or on water bill (specific language)
- Posting on website (>100,000)
- News release (2X)

0

Ongoing

Every 12 months:

- Printed materials to every bill paying customer
- Phone or in-person notice to public health agencies
- Any organization lists provided by health departments
- Notices to 7 categories of organizations and encourage them to distribute
- 3 activities from one or more of 10 specified categories

Trigger Level Exceedance
(>10,000 served)
Goal-based LSR replacements

**Failure to meet
replacement goal
in 1st year**



**Must do one
outreach activity
(5 options)**



**More outreach
required each
successive year fail
to meet goal
(1 of 5 plus 2 of 4)**

Corrosion Control



**America's Water
Infrastructure
Act of 2018**



Annual
Water Quality
Report



Information on
corrosion control efforts

Schools and daycares



Elementary Schools and daycares



Health risks



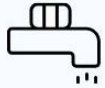
Requirement to sample; proposed schedule



Instructions and 3Ts document



Results and remediation options



Secondary Schools



Health risks



info on how to request sampling



Results and remediation options

4





2+

State & Local Health Departments



Find & Fix

- Location of sites exceeding action level
- Result of initial tap sample
- Result of follow-up tap sample
- Result of water quality parameter monitoring
- Distribution system management actions
- Corrosion control treatment adjustments made



Schools and Daycare Results



AL Exceedance

- by phone or in person



Plannned water line replacements



Unplannned water line repairs



Disturbances



Customer initiated replacements

3

Outreach: LSL Replacements

By the numbers

8

Annually
(without trigger or
action level
exceedances)

17

Printed
materials
(by Oct. 16, 2024)

11

Outreach
Requirements
for AL Exceedance

??

Time & effort
to implement

Internal communication challenges

- How will CS know the service line material when a customer initiates service?
- How will field staff know the service line material when there is a disruption or disturbance?
- How will you know when a customer replaces their service line?
- How will field staff know the service line material when there is a disruption or disturbance?
- How will field staff know the service line material when there is a disruption or disturbance?
- How will the lab know to offer follow-up sampling in three to six-months?

Collaborate

Within Utility

Meter Services

Field Operations

Customer
Service

Public
Engagement

Capital Delivery

Water IT

Laboratory

Other City Departments

Code
Compliance
Consumer
Health

Neighborhood
Services

Development

Transportation/
Public Works

State Agencies

TCEQ

TEA

THHS

Local

County Health
Departments

Schools
(ISDs, parochial,
private, charter)

Licensed child
care

Other

Plumbers

Realtors

Social Service
Organizations

Builders and
Developers

Equity Issues



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Thank You