



**Work Session Meeting Agenda**  
**2 Park Drive South, Great Falls, MT**  
**Gibson Room, Civic Center**  
**September 20, 2022**  
**5:30 PM**

The agenda packet material is available on the City’s website: <https://greatfallsmt.net/meetings>. The Public may view and listen to the meeting on government access channel City-190, cable channel 190; or online at <https://greatfallsmt.net/livestream>.

Public participation is welcome in the following ways:

- Attend in person.
- Provide public comments in writing by 12:00 PM the day of the meeting: Mail to City Clerk, PO Box 5021, Great Falls, MT 59403, or via email to: [commission@greatfallsmt.net](mailto:commission@greatfallsmt.net). Include the agenda item or agenda item number in the subject line, and include the name of the commenter and either an address or whether the commenter is a city resident. Written communication received by that time will be shared with the City Commission and appropriate City staff for consideration during the agenda item, and, will be so noted in the official record of the meeting.

**CALL TO ORDER**

**PUBLIC COMMENT**

*(Public comment on agenda items or any matter that is within the jurisdiction of the City Commission. Please keep your remarks to a maximum of five (5) minutes. Speak into the microphone, and state your name and either your address or whether you are a city resident for the record.)*

**WORK SESSION ITEMS**

1. Update on EPA's Lead and Copper Rule Revisions - Mark Juras.
2. Semi-Annual Litigation Update - Jeff Hindoiien/David Dennis
  - A. Public Entity Litigation – Cascade County / Board of Health “Governing Body” Matter
  - B. Private Party Litigation – *Legal counsel has recommended that this portion of the meeting be closed to the public pursuant to § 2-3-203(4), MCA to discuss strategies to be taken with respect to pending litigation matters because an open meeting would have a detrimental effect on the City’s litigating position in those matters.*

The meeting will be re-opened at the conclusion of the litigation strategy discussion.

**DISCUSSION POTENTIAL UPCOMING WORK SESSION TOPICS**

**ADJOURNMENT**

*City Commission Work Sessions are televised on cable channel 190 and streamed live at <https://greatfallsmt.net>. Work Session meetings are re-aired on cable channel 190 the following Thursday morning at 10 a.m. and the following Tuesday evening at 5:30 p.m.*

*Wi-Fi is available during the meetings for viewing of the online meeting documents.*

## **UPCOMING MEETING SCHEDULE**

Work Session -- Tuesday, October 4, 2022 5:30 p.m.

Commission Meeting -- Tuesday, October 4, 2022 7:00 p.m.

# CITY OF GREAT FALLS UPDATE ON EPA'S LEAD AND COPPER RULE REVISION

September 20, 2022

## EPA's Lead & Copper Rule Revision Big Picture

City Progress Update on:

- 1) Lead Service Line Inventory
- 2) Tap Sampling Plan
- 3) Lead Service Line Replacement Plan

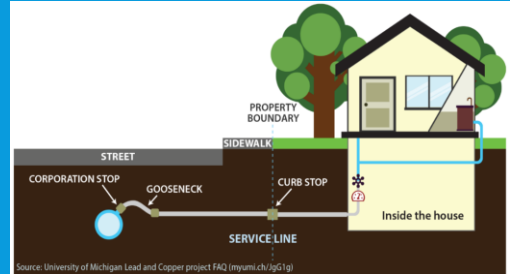


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# Lead Service Line Inventory

## City Obligations under the LCRR

- The City must create and maintain an inventory of all service lines including: addresses, material classification, information sources, and public accessibility
- Service lines must be classified as lead, galvanized requiring replacement, non-lead (or the actual material), or lead status unknown (or unknown)
- Non-lead service lines must be determined through an evidence based record, method, or technique
- Submitted to MT DEQ by October 16<sup>th</sup>, 2024



# Lead Service Line Inventory

## Additional Obligations

- Record or track service material type during normal operations
- Perform a comprehensive historical records review

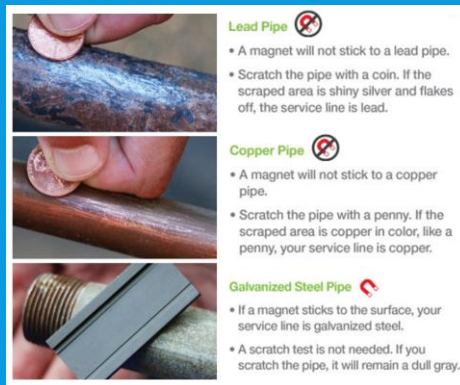
The table is a handwritten ledger titled "Taping Record" with the subtitle "Dwornick, Knost & Children". It contains the following columns: Date, No., Meter, and Measurement. The entries include:

Date	No.	Meter	Measurement
NOV 2 1892	100	Donald W. Reynolds 3625 - 9 Ave South	7" Galv. 30' from curb
NOV 3 1892	101	Ed. Berglund - 481 - 7 Ave South	4" Galv. 30' from curb
NOV 4 1892	102	Ed. Berglund - 3643 - 9 Ave South	3" W. 25' B.
NOV 4 1892	103	Arthur Beckman - 2635 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 4 1892	104	Arthur Beckman - 2637 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 4 1892	105	Ed. Berglund - 3645 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	106	Ed. Berglund - 3647 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	107	Ed. Berglund - 3649 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	108	Ed. Berglund - 3651 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	109	Ed. Berglund - 3653 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	110	Ed. Berglund - 3655 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	111	Ed. Berglund - 3657 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	112	Ed. Berglund - 3659 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	113	Ed. Berglund - 3661 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	114	Ed. Berglund - 3663 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	115	Ed. Berglund - 3665 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	116	Ed. Berglund - 3667 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	117	Ed. Berglund - 3669 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	118	Ed. Berglund - 3671 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	119	Ed. Berglund - 3673 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	120	Ed. Berglund - 3675 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	121	Ed. Berglund - 3677 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	122	Ed. Berglund - 3679 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	123	Ed. Berglund - 3681 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	124	Ed. Berglund - 3683 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	125	Ed. Berglund - 3685 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	126	Ed. Berglund - 3687 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	127	Ed. Berglund - 3689 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	128	Ed. Berglund - 3691 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	129	Ed. Berglund - 3693 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	130	Ed. Berglund - 3695 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	131	Ed. Berglund - 3697 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	132	Ed. Berglund - 3699 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	133	Ed. Berglund - 3701 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	134	Ed. Berglund - 3703 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	135	Ed. Berglund - 3705 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	136	Ed. Berglund - 3707 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	137	Ed. Berglund - 3709 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	138	Ed. Berglund - 3711 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	139	Ed. Berglund - 3713 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	140	Ed. Berglund - 3715 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	141	Ed. Berglund - 3717 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	142	Ed. Berglund - 3719 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	143	Ed. Berglund - 3721 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	144	Ed. Berglund - 3723 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	145	Ed. Berglund - 3725 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	146	Ed. Berglund - 3727 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	147	Ed. Berglund - 3729 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	148	Ed. Berglund - 3731 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	149	Ed. Berglund - 3733 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	150	Ed. Berglund - 3735 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	151	Ed. Berglund - 3737 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	152	Ed. Berglund - 3739 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	153	Ed. Berglund - 3741 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	154	Ed. Berglund - 3743 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	155	Ed. Berglund - 3745 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	156	Ed. Berglund - 3747 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	157	Ed. Berglund - 3749 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	158	Ed. Berglund - 3751 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	159	Ed. Berglund - 3753 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	160	Ed. Berglund - 3755 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	161	Ed. Berglund - 3757 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	162	Ed. Berglund - 3759 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	163	Ed. Berglund - 3761 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	164	Ed. Berglund - 3763 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	165	Ed. Berglund - 3765 - 9 Ave South	4" Galv. 48' W. 27' from curb
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NOV 5 1892	171	Ed. Berglund - 3777 - 9 Ave South	4" Galv. 48' W. 27' from curb
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NOV 5 1892	175	Ed. Berglund - 3785 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	176	Ed. Berglund - 3787 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	177	Ed. Berglund - 3789 - 9 Ave South	4" Galv. 48' W. 27' from curb
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NOV 5 1892	179	Ed. Berglund - 3793 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	180	Ed. Berglund - 3795 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	181	Ed. Berglund - 3797 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	182	Ed. Berglund - 3799 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	183	Ed. Berglund - 3801 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	184	Ed. Berglund - 3803 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	185	Ed. Berglund - 3805 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	186	Ed. Berglund - 3807 - 9 Ave South	4" Galv. 48' W. 27' from curb
NOV 5 1892	187	Ed. Berglund - 3809 - 9 Ave South	4" Galv. 48' W. 27' from curb
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## Lead Service Line Inventory

### Additional Obligations

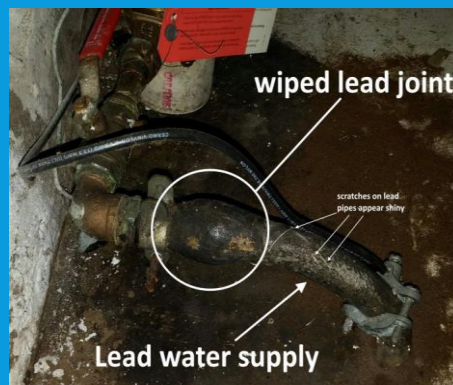
- Utilize identification methods approved by the State and the LCRR including:
  - Visual inspection
  - Water quality sampling
  - Excavation
  - Predictive modeling



## Lead Service Line Inventory

### Additional Obligations

- Promote public education on lead in drinking water
- Deliver mailed letters to lead service line owners annually
- Provide online public access to the location of lead, galvanized, and unknown lines
- Each line must include a location identifier such as a street address, block, intersection, or landmark



# City Progress Update

## Service Line Inventory

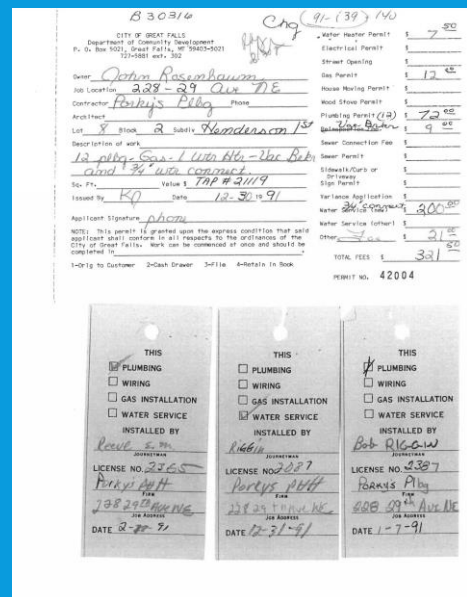
- Digitize a list of every service line in City jurisdiction using Cartegraph and Meter Data
- Includes service/meter address, customer information, diameter, installation date, material type, and source of material information

Approximate Totals as of September 2022	
• Non-Lead –	12,800 (58.3%)
• Lead –	110 (0.5%)
• Galvanized	250 (1.1%)
• Unknown -	8,800 (40.1%)
• Total –	21,960

# City Progress Update

## Historical Records Review

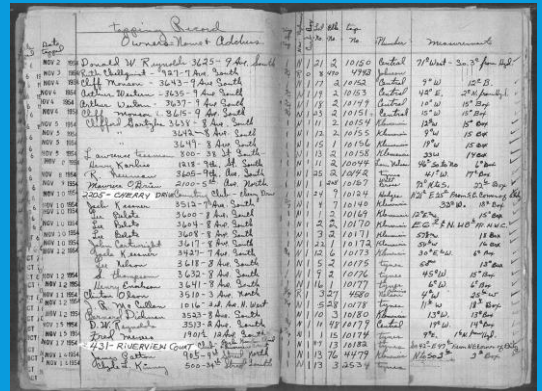
- Construction and Plumbing Codes and Records
  - Ordinance 1558 (Feb 1967) copper only for 2" and smaller services
  - Ordinance 1913 (March 1976) repairs made to service lines required full replacement with copper if found to be non-copper and repairs exceeded 1/4 of the total service length
  - Old Water Service Permits – do not provide material type



# City Progress Update

## Historical Records Review Continued

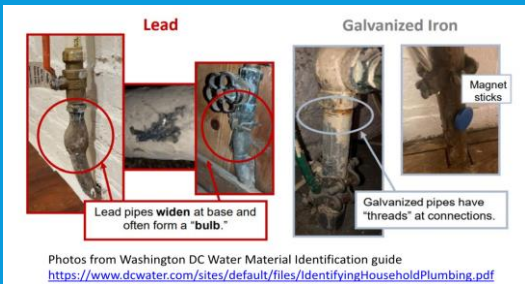
- Water System Records
  - Tap Books – provide service installation date and address since July of 1937, but no material type
  - Water record drawings generally do not indicate service material type
  - Water main replacement projects – identifies non-copper services since ~1980
  - Other – previous surveys



# City Progress Update

## Historical Records Review Continued

- Distribution System Inspections and Records
  - Continuing to research inspection records, permits, and other potential sources of information for pre 1980 projects.
- State Requirements
  - State of MT lead ban 1986-88
  - Currently, MT DEQ is not requesting additional records research beyond what the EPA requires.



# City Progress Update

## Public Engagement

- Based on City ordinances 1558 & 1913, there are about ~10,000 services with potential to be non-copper
- Mailed ~10,000 letters with instruction to complete a visual identification "scratch test" and return the information to the City.
- Non-responder to mailer will be contacted for visual inspection by City staff.
- As of September 2022, have received ~1,500 mailers back

**TEST FORM**

Please read the entire form and the test instructions and example carefully before filling out this form. This form may be completed and returned to the City in one of two ways, please select one of the following methods:

- 1) Fill out this hard copy of the form and mail it to: Attention – PW Engineering, City of Great Falls, PO BOX 5021, Great Falls, MT 59403
- 2) E-mail the information to [waterserviceline@greatfallsmt.net](mailto:waterserviceline@greatfallsmt.net) –attachment size limited to 5 MB

Your contact info is only required if you wish to schedule an inspection or would like to have City staff contact you. If you have more than one water service line entering the building, please complete the test for each water service line.

**Please provide the following information:**

- 1) Your Street Address: \_\_\_\_\_
- 2) What is the color of the scraped pipe on the upstream/street side of the water meter? (shiny silver, dull-silver, copper, brass, gray, or described other color) \_\_\_\_\_
- 3) Does a magnet stick to the pipe? (yes, no, slightly) \_\_\_\_\_
- 4) What is the material of the pipe? (lead, galvanized, copper, plastic, brass, or unknown) \_\_\_\_\_
- 5) If you are uncertain of your water service line material, please take a photo of the exposed and scratched service line where it enters the building and return it with this form.

**The following information is optional:**  
If you would like to schedule an inspection or be contacted by the City, please provide your preferred method of contact info, or you may call the City's Water Service Line Inventory Hotline at (406) 455-8401, we expect a high volume of calls so please be patient as we respond.

Name: \_\_\_\_\_

Mailing Address (If different from above): \_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

# City Progress Update

## Public Engagement Continued

- Test form and instructions:
  - <https://greatfallsmt.net/publicworks/water-service-line-inventory>
  - Water Service Hotline: 406-455-8401
  - Email: [waterserviceline@greatfallsmt.net](mailto:waterserviceline@greatfallsmt.net)

## Additional investigation TBD:

- Door to door inspections
- Water quality sampling
- Excavation
- Predictive modeling

**TEST INSTRUCTION AND EXAMPLE**

**Items Needed:**

1. Flathead screwdriver, copper penny, or similar metal tool (not included)
2. Magnet (included)


First, locate the water service line coming into the building. You will typically find it located in the basement, mechanical room, or in a wall panel. A water meter is installed on the water service line pipe after the point of entry into the building, see the example pictures below for additional information.

Identify a test area on the pipe on the **upstream or street side of the meter, which is between the point where it comes into your building and the water meter**. If the pipe is covered or wrapped, peel back the cover to expose a small area of the pipe, about 6-inches, to clearly see the color of the pipe.


Using the edge of a screwdriver, penny, or other similar tool, scratch or scrape through any corrosion that may have built up on the outside of the pipe so that the color of the pipe can clearly be seen. Then, use the magnet and the color of the pipe to identify the material of the water service line from the following criteria:

- If the scratched area is shiny and silver-gray, your service line is lead. A strong magnet will not stick to a lead pipe.
- If the scratched area remains a dull silver-gray, and a strong magnet sticks to the surface, your service line is galvanized.
- If the scratched area is copper in color, like a penny, your service line is copper. A strong magnet will not stick to copper.
- The service pipe may be plastic and plastic pipes may vary in color. Plastic pipes are rigid, non-metallic, and may have information regarding the characteristics of the plastic printed on the side of the pipe.
- If the scratched area is brass in color, or dark reddish brown to a light silvery yellow in color, your service line is brass. A strong magnet will not stick to brass.

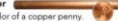
If you are uncertain, please 1) take a photo of the water service line coming into the building and return it with the test form or 2) indicate that you would like to schedule an inspection with a representative from the Public Works Department.




**Lead**  
A dull, silver-gray color that is easily scratched with a coin. Use a magnet - strong magnets will not cling to lead pipes.




**Galvanized**  
A dull, silver-gray color. Use a magnet - strong magnets will typically cling to galvanized pipes.



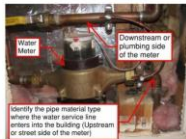
**Copper**  
The color of a copper penny.




**Plastic**  
White, rigid pipe.



**Brass**  
Dark reddish brown to a light silvery yellow color.



Identify the pipe material type where the water service line enters into the building (Upstream or street side of the meter)



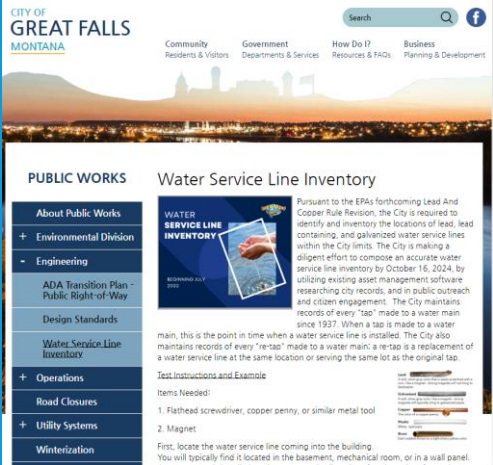
Downstream side of the meter  
Water Meter  
Identify the pipe material type where the water service line enters into the building (Upstream or street side of the meter)



# City Progress Update

## Public Outreach Goals

- Promote education on lead in drinking water
- Publicize requirements of EPA's Lead & Copper Rule Revision
- Encourage participation in lead service line inventory
- Utilize local meetings, social media, the City's website, and the press to get the word out
- <https://greatfallsmt.net/publicworks/water-service-line-inventory>



# City Progress Update

## Tap sampling Plan

- Sample at known lead service lines starting Oct 2024
- 5<sup>th</sup> liter draw
- Sampling results obtained in late 2024 or early 2025, will dictate City's required response

<p><b>ACTION LEVEL – 90<sup>TH</sup> PERCENTILE @ 15 PPB</b></p> <ul style="list-style-type: none"> <li>• Lead Service Lines – full replacement, 3% per Year</li> <li>• Tap Sampling – standard monitoring every 6 months</li> <li>• Corrosion Control Treatment – Implement or re-optimize</li> </ul>
<p><b>TRIGGER LEVEL – 90<sup>TH</sup> PERCENTILE @ 10 PPB</b></p> <ul style="list-style-type: none"> <li>• Lead Service Lines - Full replacement at defined goal rate (set by state and system)</li> <li>• Tap Sampling – standard monitoring every year</li> <li>• Corrosion Control Treatment– conduct study (if CCT not installed) or re-optimize CCT if installed</li> </ul>
<p><b>0-10 PPB</b></p> <ul style="list-style-type: none"> <li>• Lead Service Lines – voluntary replacement</li> <li>• Tap Sampling – reduced monitoring every 3 years</li> <li>• Continue corrosion control treatment and Water Quality Parameter Monitoring</li> </ul>

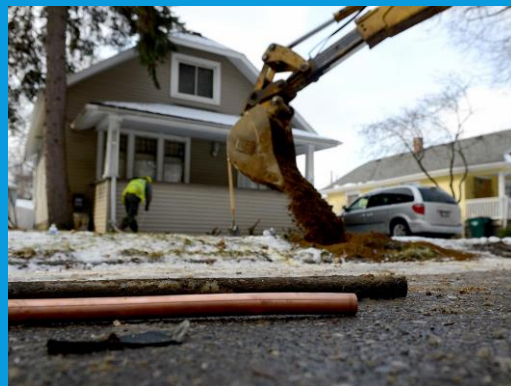
It is anticipated that updated tap sampling protocols will result in increased lead concentrations, which may result in required lead, galvanized, and unknown service line replacement. The City will know with certainty in late 2024 or early 2025. The City is focusing its efforts on composing an accurate lead service line inventory.

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## City Progress Update

### Lead Service Line Replacement (LSLR) Plan

- If sampling results trigger replacement, the LCRR requires full service line replacement of lead, galvanized, and unknown lines
- LSL owners to be notified annually by mail until line is replaced



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## City Policy & LSLR Funding

OCCGF 13.6.010 "All the expense of laying and maintaining the service pipes from the mains to the consumer's premises must be borne by the consumer."

### Bi-Partisan Infrastructure Law

- Allocates \$15 B for LSLR efforts
- MT to receive ~\$140 M
- ~\$28 M per year for 5 years
- Dispersed via SRF loans
- State provides final guidance



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## Common Questions & Answers

Where can I find more information? Where can I learn more about the EPA's Lead and Copper Rule Revision and/or the City's compliance?

Monitor the City's Facebook page and engineering website, as information will be released when it is available. Additional information on EPA's Lead and Copper Rule Revision can be found on their website:

<https://www.epa.gov/dwreginfo/lead-and-copper-rule>

<https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>

How does lead get into drinking water?

Lead enters drinking water primarily through plumbing materials.

What are the common health concerns with lead in drinking water?

Please refer to the EPA's webpage which discusses potential lead related health concerns:

[www.epa.gov/lead/what-are-some-health-effects-lead](http://www.epa.gov/lead/what-are-some-health-effects-lead)

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## Common Questions & Answers

How can I test my drinking water for lead?

The City of Great Falls is not able to perform lead tests for individual consumers. To test for lead, contact the Department of Health Services Lab in Helena, (406) 444-3444, or visit their website:

<https://dphhs.mt.gov/publichealth/laboratoryservices/EnvironmentalLaboratory/>

The cost is approximately \$60 and they will direct you to the necessary size of the sample, the sample container, and a sample pick up location.

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How can I check if my water service line is lead or lead containing?

Lead and galvanized water service lines can be identified by performing a "Scratch Test" on the water service line where it enters the building. The scratch test is essentially a visual test that can be completed with basic tools and in a short timeframe. First, locate the water service line coming into the building. It is typically found in the basement, crawl space, mechanical room, or in a wall panel. A water meter is installed on the water service line pipe after the point of entry into the building. Identify a test area on the pipe on the upstream or street side of the meter, which is between the point where it comes into the building and the water meter. If the pipe is covered or wrapped, peel back the cover to expose a small area of the pipe, about 6-inches, to clearly see the color of the pipe. Using the edge of a screwdriver or penny, scratch or scrape through any corrosion that may have built up on the outside of the pipe so that the color of the pipe can clearly be seen. Also, grab a strong magnet. Using the color of the scratched surface and the magnet, identify the pipe from the following criteria:

- Lead – scratches are shiny and silver-gray – a strong magnet will not stick to a lead pipe
- Galvanized – scratches are dull silver-gray – a strong magnet will stick to galvanized pipe, pipe fittings are also threaded on galvanized pipe
- Copper – scratches are copper – a strong magnet will not stick to copper
- Plastic – plastic pipes are rigid, non-metallic, and may vary in color – magnets do not stick

Residents can download a test form with instructions to perform the scratch test and return the results to the City at [greatfallsmt.net/publicworks/engineering](http://greatfallsmt.net/publicworks/engineering). The test form is under the Supporting Documents at the bottom of the webpage. Residents can also contact the City of Great Falls water service Inventory Hotline at 406-455-8401. Please keep questions pertinent to identifying the material type of the water service line, and please be patient with us as we respond to calls as we expect a large volume of calls. Residents can also take a picture of the water service line where it enters the building, indicate the physical address of the building, and send that information in an e-mail to [waterserviceline@greatfallsmt.net](mailto:waterserviceline@greatfallsmt.net). Residents with non-copper water service lines are encouraged to communicate their water service line material type and address to the City so that the City can incorporate that data into the water service line inventory.

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Why did I receive a mailer and not someone else?

Mailers were delivered to every residence or building which had a water service line installed prior to 1970 or replaced prior to 1980. The mailer included instructions to perform a scratch test and return the results to the City. About 10,000 mailers were delivered.

I have a lead, lead containing, or galvanized water service line, what now?

Let the City know as instructed on the test form available under the supporting documents heading at the bottom of the following webpage: [greatfallsmt.net/publicworks/engineering](http://greatfallsmt.net/publicworks/engineering). The City will add the information to the water service line inventory. As of July 2022, the Federal government is not requiring line replacement, and the next phase of the LCRR is tap sampling. The Federal Government may require water service line replacement in the future as dictated by the results of the LCRR Tap Sampling Plan.

Who will pay for replacement of a lead, lead containing, galvanized, or unknown water service line?

The City's Code states that all the expense of laying and maintaining the service pipes from the mains to the consumer's premises must be borne by the consumer.

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## Common Questions & Answers

What is the estimated cost for a lead or lead containing water service line replacement?

As of July of 2022, the City does not know with certainty whether or not lead service line replacement is required. The cost may vary greatly from residence to residence. Local qualified water utility contractors should be contacted to obtain individual quotes.

Will the State or Federal government provide funding for lead or lead containing water service line replacement?

The Bipartisan Infrastructure Law allocates \$15 Billion for LSLR efforts. Montana is to receive ~\$140 Million: \$28 Million per year over 5 years. Money will be dispersed through the State Revolving Fund process, a low interest loan program. Formal guidance on fund allocations will be provided by the State.

What if the plumbing inside my building is lead, lead containing, or galvanized?

Lead plumbing components inside the building are another potential source of lead contamination. As of July of 2022, the LCRR does not require replacement of interior plumbing, just lead, lead containing, unknown, or galvanized water service lines.

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