

BEST ADVICE:



The popular shoe company has been using the slogan to move products for years, “Just Do It”. It is good advice for water systems faced with the requirement to complete an inventory of ALL service lines, both what the system owns AND what the customer owns. And I’m here to tell you, it’s not going to get easier.

During the last week of September, I attended the annual WaterPro Conference in Aurora, Colorado along with KRWA Director Bill Shroyer and eight (8) KRWA staff members. The Conference was attended by around 2,000 people from all across the country, including officials from USDA and the EPA. Officials from the EPA presented a “Regulatory Outlook” where I learned of the new regulations being discussed in Washington D.C., including the Stage 3 Disinfection Byproducts (DBP) Rule. There are not a lot of details yet on the proposed Stage 3 DBP Rule, but it doesn’t appear that EPA plans to simplify any rules. The National Rural Water Association (NRWA) has a Regulatory Committee comprised of staff and board members of the various State Rural Water Associations who are actively representing our interests during the rule-making process. NRWA also has staff who work in

Washington D.C. to make sure the elected officials there remember the rural communities they represent.

Unfortunately, the regulations water and wastewater systems must work within are not going to get simpler. It doesn’t pay to worry about new rules far off into the future. Especially when the new Lead and Copper Rule is staring all of us in the face. Hopefully, by the time this article is in print, the Lead and Copper Rule Improvements will be released. Whether or not the LSLI has been released, all indications are that the Lead Service Line Inventory (LSLI) requirements will not change. The EPA is requiring all public water systems to inventory ALL service lines in the distribution system, including the privately owned portion of the service line. There have been countless discussions, advertisements, training sessions and round tables devoted to obtaining the information required.

The main takeaway from all of the talk about the inventory is: “Just do it!” Regardless of personal feelings about the

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inventory, it will not go away. In fact, KDHE says they will require an updated version of the inventory spreadsheet every time a water system performs lead and copper testing in the future. Whether or not the inventory is complete on the due date, the water system will be required to submit whatever is completed. Water systems MUST begin to work on the inventory spreadsheet. Whether the system has 150 meters or 15,000, this will not be an easy task.

A very popular method is sending a survey to customers with the hope they will provide the needed information. Many water systems are employing surveys to varying degrees of success. These systems are getting (at least some of) the required information and beginning to complete the massive inventory spreadsheet. KRWA has an example (Lead Service Line Customer Survey) available on our

website at www.krwa.net/downloads. The survey is available as a fillable pdf file or as an editable spreadsheet so water systems can customize details and the appearance.

The best advice I've heard during all of this chatter about the Lead and Copper Rule Revisions and Lead Service Line Inventory and Lead and Copper Rule Improvements, etc., is to just knuckle down and do it. At least start doing it. Don't wait for the government to come help because I don't know that the help is coming. Don't fret (yet) over replacing any customer's plumbing and how that's going to work. Start with the survey and work on filling in all of the information the system already knows. Talk to retired employees and see what they know about the service line materials. Go through the old file cabinet at City Hall or the rural water district office and look for anything that indicates what the water system materials are. Look for low-hanging fruit, so to speak, to start with. Then, use the momentum to continue gathering data. The one consistent thing we all heard from EPA is that this thing is not going to go away and we will have to complete it, one way or another. So, maybe the best advice is: Just Start Doing It.

Scott Robertson started work with the city of Bishop, CA in 1987 working there for five years before taking the Public Works Supervisor Position with the city of Phillipsburg, Kan. In 2011, he relocated to Hesston, Kan. where he was Superintendent of Public Works until his recent retirement. First elected to KRWA's Board of Directors in 2016, he holds Class II operator



certification in water and wastewater.

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