



New EPA and state requirements affecting the Quillen's Point water system

What owners need to know

Presented at the October 7, 2023 QPHA Community meeting

This presentation is based on official information provided by the State of Delaware's Office of Drinking Water and by the Delaware Rural Water Association, based on federal rules established by the Environmental Protection Agency.

The new EPA and state requirements are not “optional”

- QPHA is, officially, a “public water system” accountable to state and federal regulations
- These rules affect all water systems in the country, not just Delaware
- The state government's Office of Drinking Water supervises water systems in Delaware, including the Quillen's Point Water System
- First deadline is one year away: October, 2024



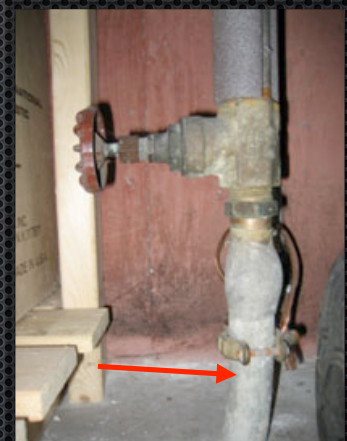
Quillen's Point's water is excellent and already meets all standards

- You can always see our water testing results at quillenspoint.org/water
- The new rules govern the materials used in water pipes in systems like ours
- Intended to eliminate the existence of any lead pipes or fittings which might affect the water supply
- Even though our water already meets all standards...
- **We are required to inventory the materials used in our water system's pipes**



Why are lead pipes & fittings a problem?

- Lead is considered a serious contaminant in public water systems (but remember, our water meets or exceeds all standards)
- Lead (and copper) rules are already enacted into law at the federal and state levels (since 1991)
- **So... what's new?**
 - There are new requirements for compliance we'll outline here today



Lead pipe example

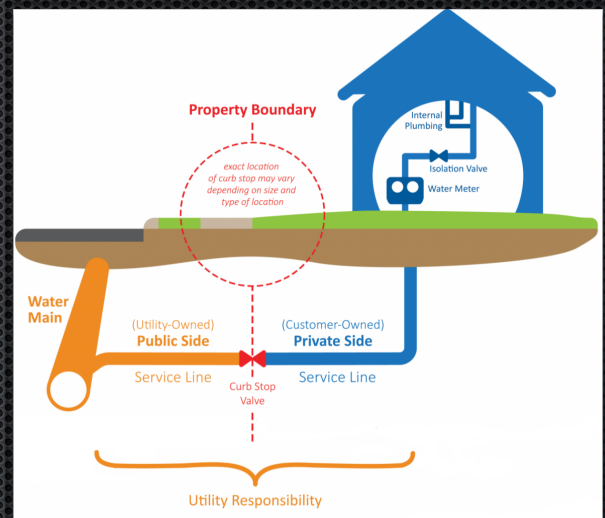
QPHA water service inventory requirements

- Between now and October, 2024...
- All water systems (including ours) must complete and submit two different things:
 1. A **detailed inventory** revealing whether our water system contains any lead pipes or fittings
 2. A **detailed plan** for **removing all lead** pipes and fittings from our water system
(Not “removal,” but a “plan” for removal)



QPHA water service inventory requirements

- The “inventory” must include:
 - All distribution pipes and fixtures carrying water to each home
 - Including the junction (called a “curb stop”) between the QP water mains and the pipes leading to every house
 - Including the pipe entering each home



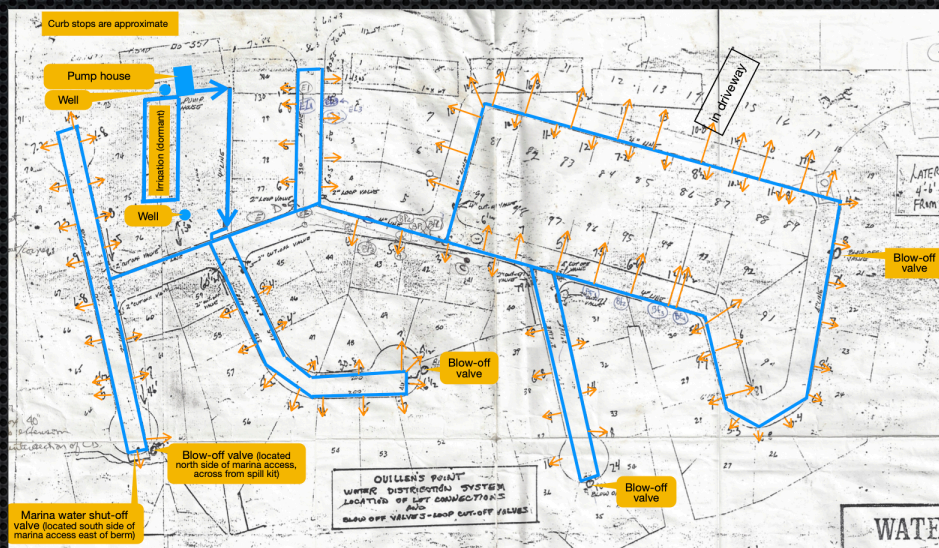
There are some “twists”

- Lead was outlawed in the mid-1980s for use in water systems.
- So, systems and homes built after a specific date to be announced soon by the state... will be assumed to have no lead pipes or fixtures.
- *The Quillen's Point water plant and distribution system were built in the early 1980s, before lead was outlawed.*
- *Many QP homes were built before lead was outlawed.*



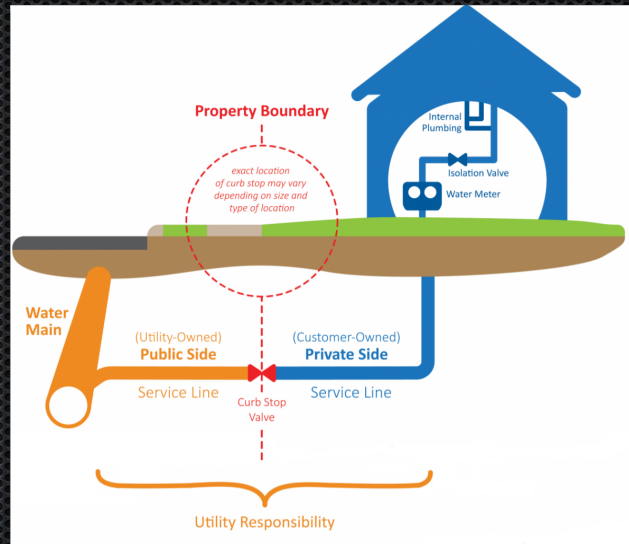
What's in the inventory?

We must inventory most pipes and fixtures in the QP water system for lead



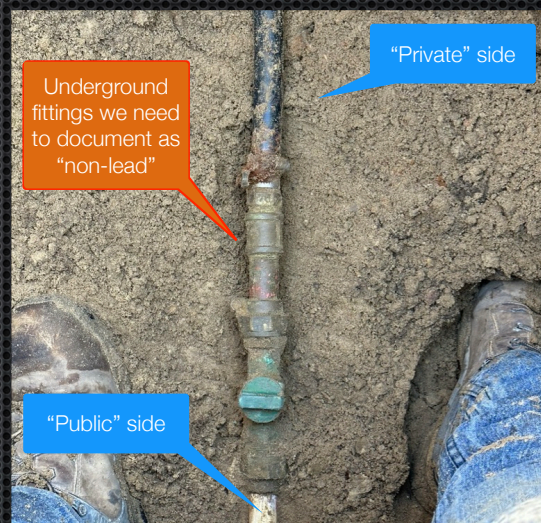
What does the “inventory” involve?

- Physical inspections and documentation are required. (Not merely “best guesses”)



What does the “inventory” involve?

- We are confident we can properly “document”...
- ... the non-lead makeup of the QP water plant and distribution system...



What does the “inventory” involve?

- Documenting the “curb stops” at some lots may be more difficult (and costly)
- Physical digging might be necessary, *within the QPHA common area right-of-way*



“Curb stop”

What does the “inventory” involve?

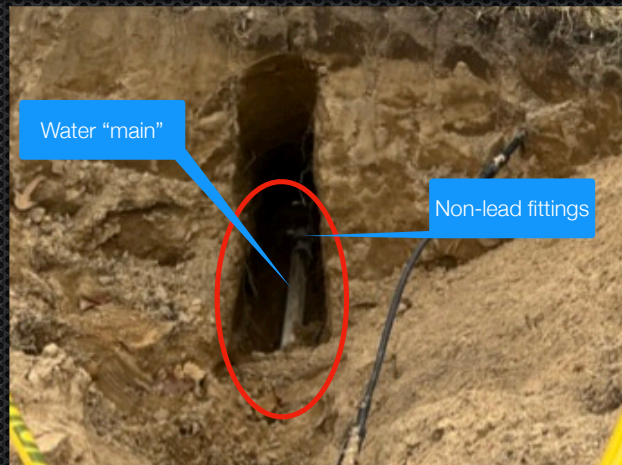
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“Curb stop”

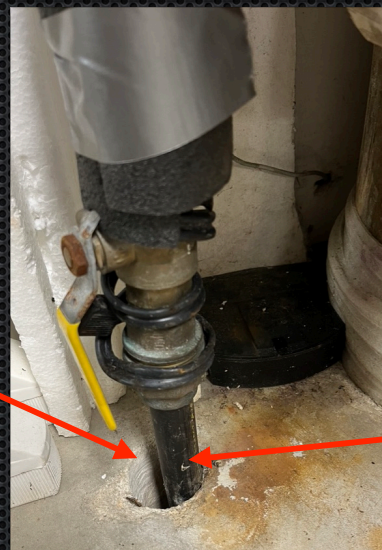
What does the “inventory” involve?

- Images like this will help make our case to the authorities...
- ... that our system contains no lead pipes or fittings



What does the “inventory” involve?

- We may ask owners of some homes to help document your own water pipes...
- ...with photos...
- ...of the place where your water supply enters your house
- ... and possibly with test kits which will be supplied by QPHA



Plastic pipe?
Lead pipe?

What about water meters?

- Some... but definitely not all... QP homes have water meters.
- They are not used. Here's why:
 - Water systems with meters are subject to more intense levels and varieties of state regulation.
 - QPHA has historically chosen not to incur the additional effort and cost of greater regulation.
 - So QPHA has never required installation of water meters.



Who will do the QP inventory?

- QPHA (as a “public water system”) is legally responsible for producing our own inventory and reporting it to the state.
- We have assistance from...
 - The Delaware Rural Water Association
 - Artesian, our water plant manager
 - our contractors
 - the Sussex County Planning and Zoning Division
 - and very **importantly, you, our community of owners** here at Quillen's Point.



The clock is ticking

The new rule takes effect next year



- We hope to document by October 2024 that Quillen's Point has zero lead components in our water system.
 - Owner cooperation is essential.
 - If we're successful, we will never be required to do another inventory.
 - If we cannot document "no lead," we will be required to repeat this process every year until we show "zero lead."