



Non-Lead Written Statement

Irvine Ranch Water District (IRWD) completed its initial lead service line inventory required by U.S. EPA's Lead and Copper Rule Revisions (LCRR) on September 16, 2024, prior to the October 16, 2024 deadline established by the U.S. EPA.

The inventory confirmed that IRWD has no lead or galvanized requiring replacement (GRR) service lines in its distribution system.

Service Line Inventory Methodology:

IRWD determined it has no lead or GRR service lines in its distribution system by completing a thorough review of historical records and thorough field investigations. The District's review included an examination of service lines owned by IRWD and privately-owned or customer-owned service lines.

IRWD began its review by looking at all applicable sources of information, including:

- All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials;
- All water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures;
- All inspections and records of the distribution system that indicate service line material, including inspections conducted during the course of normal operations (e.g., checking service line materials when reading water meters or performing maintenance activities); and
- All previous service line or meter replacement records.

A preliminary inventory of service line materials was established using the information summarized above to establish the material composition of those service lines for which a material could be identified.

IRWD then implemented a work plan to identify the material composition of those remaining service lines whose material could not affirmatively be identified following the primary inventory. These service lines are called "service line of unknown material" under the LCRR.

The workplan used field verification sites, combined with stratified random sampling, statistical analysis and predictive modeling to classify unknown service lines. It was

approved by the State Water Resources Control Board Division of Drinking Water (DDW) on January 18, 2024. Stratified random sampling involves physically verifying a subset of randomly selected service lines in the distribution system. That subset is stratified or divided into groups based on certain characteristics (e.g., years the service lines were installed).

Stratification allows for a statistically significant sample or subset of service lines to be more representative of the service lines in the distribution system. After investigating the statistically significant subset of service lines, if no lead or GRR service lines are discovered, the remaining service lines are assumed to be non-lead with a certain level of confidence.

As per the DDW-approved workplan, IRWD established field verification targets for representative groupings of service lines with unknown material. These service lines were grouped together or binned based on the service line installation date or associated parcel legal start date (unknown, pre-1900, 1900-1949, 1950-1985). The District then used field verification of service lines to determine the material they were made of in tandem with predictive modeling through a phased approach. Service lines within each bin were randomly selected for the field verification to create a statistically significant sample within each bin, and the initial results were used to further refine the sample size based on predictive modeling.

Overall, IRWD conducted a field verification for 1,085 service lines throughout its service area. All of the service lines verified were found to be made of materials other than lead. The material of the service lines verified included 593 copper service lines, 461 plastic service lines, 19 galvanized service lines (not requiring replacement), and 12 non-lead service lines of other materials.

Conclusion of the Service Line Inventory:

After looking at historical records and conducting the field investigations, IRWD found no lead or galvanized requiring replacement service lines within its service area. Because no lead or GRR service lines were found, IRWD has determined, consistent with DDW's direction and approved workplan, that it has no lead or GRR service lines in its distribution system. This includes any privately-owned or customer-owned service lines.