

## Statement of Non-Lead Initial Service Line Inventory

California American Water has completed the initial lead service line inventory required by U.S. EPA's Lead and Copper Rule Revisions for its Larkfield water system. The deadline for the initial inventories is October 16, 2024.

Through completing a historical records review and field investigations, California American Water has determined it has no lead or galvanized requiring replacement service lines in its distribution system. This includes any privately-owned or customer-owned service lines.

California American Water reviewed all applicable sources of information, including

- County parcel year-built data. Properties built after January 1, 1986, were determined to have no lead service lines because the State of California had banned the use of lead as of that date;
- 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
- Previous service line or meter replacements records.

In addition to reviewing the above sources of information, California American Water used an alternative method to develop the inventory that was approved by the State Water Resources Control Board Division of Drinking Water on a case-by-case basis.

California American Water used stratified random sampling to develop the initial inventory. 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 sample or subset of service lines to be more representative of the service lines in the distribution system.

After investigating the subset of service lines, if no lead or galvanized requiring replacement service lines are discovered, the remaining service lines may be assumed non-lead with a certain level of confidence. California American Water verified 264 service lines in its Larkfield water system. The service lines were verified non-lead, consisting of copper, plastic, or galvanized. No lead or galvanized requiring replacement service lines were identified. Parcels predating 1900 or dating from 1940 to 1949, if any, were prioritized because of the higher likelihood of lead presence.

California American Water continues to document service line material information obtained from normal operations, such as service line maintenance or water meter readings, after October 2024 and will update the initial inventory accordingly.