



Non-Lead Service Lines Statement

[Liberty Utilities \(Apple Valley\) Corp.](#) has completed the initial lead service line inventory required by U.S. EPA's Lead and Copper Rule Revisions. The deadline for the initial inventories is October 16, 2024.

Through completing a historical records review and field investigations, [Liberty Utilities \(Apple Valley\) Corp.](#) has determined that its distribution system has no lead or galvanized service lines requiring replacement. This includes any privately-owned or customer-owned service lines.

[Liberty Utilities \(Apple Valley\) Corp.](#) reviewed all applicable sources of information, including:

- All construction and plumbing codes, permits, and existing records or other documentation that 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 lines or meter replacements were conducted.

In addition to reviewing the above sources of information, [Liberty Utilities \(Apple Valley\) Corp.](#) 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.

[Liberty Utilities \(Apple Valley\) Corp.](#) 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. Liberty verified 50% more than the minimum number required. [Liberty Utilities \(Apple Valley\) Corp.](#) verified **590** service lines, and the

service lines were verified non-lead ([copper, plastic, or galvanized](#)). No lead or galvanized requiring replacement service lines were identified. Liberty randomly selected service lines to be physically inspected. The selection was uniformly random and not based on any specific criteria, which could introduce bias.

[Liberty Utilities \(Apple Valley\) Corp.](#) 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.

A copy of the approved verification plan can be found here:

<https://libertyutilities.com/av/verification/>