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October 17, 2024

Town of Middleburg, VA c/o Mr. Danny Davis, Town Manager

RE: Service Line Materials Inventory

Mr. Davis,

Inboden Environmental Services, Inc. (IES) is pleased to inform the Town of Middleburg that your service line materials inventory has been completed and submitted to VDH-ODW for processing (previously submitted to the Town). Our investigations revealed that there were 559 service lines in your distribution system, and our findings indicated that 100% of those lines could be classified as "non-lead" on both the public- and private-side of the meter. These findings were arrived at using three primary methods:

- 1. A federal ban on using lead in plumbing materials (e.g., pipe, solder, fittings, etc.) was passed in 1986. As a precaution, the State assumed a two-year buffer to realize full compliance with the "lead ban". As compliance was assumed to occur in 1988, all service lines installed after 1988 (i.e., 1990 and later) can be classified as non-lead. The Town of Middleburg has 181 properties that are identified in the county tax records as having construction dates of 1990 and later.
- 2. The second method of classification was a visual inspection at the meter pit. IES staff opened meter crocks at approximately 255 properties and assessed the pipe material on both the public and private side of the meter (510 observations). Two (0.4%) of the lines were identified as plastic; the remaining 508 lines (99.6%) were identified as copper.
- 3. VDH-ODW allows for statistical sampling of properties that share common attributes (e.g., built in the same subdivision in the same decade, etc.). If 20% of the properties in any such subset are determined to be 100% "non-lead", then the remaining properties in that subset can also be classified as "non-lead". This process requires a proposal to VDH to define the subsets based on common attributes, and the process of randomizing the selection of the 20% of the properties. Once the data is collected, VDH then requires a report on the findings of the statistical sampling. IES submitted a proposal that increased the minimum sampling rate to 50% and subsequently reported on the findings (the proposal and report were previously submitted to the Town). As such, the remaining (approximately 125) properties were classified as "non-lead"

Please let me know if you have any questions or concerns. We would be pleased to discuss our findings at your convenience.

Respectfully submitted,

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