(IL0313300) Village of Wilmette

Draft Lead Service Line Replacement Plan

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LIST OF DEFINITIONS & ABBREVIATIONS

Action Level (AL): The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a CWS must follow. The current Action Level for lead is 15 parts per billion, in accordance with the Lead and Copper Rule.²

Community Water System/Supply (CWS): A public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.²

Corrosion Control Treatment (CCT): A treatment that utilizes a corrosion inhibitor which is a substance that can reduce the corrosivity of water toward metal plumbing materials, especially lead and copper, by forming a protective film on the interior surface of those materials.³

Emergency Repair: Any unscheduled water main, water service, or water valve repair or replacement that results from failure or accident.¹

Full Lead Service Line Replacement (LSLR): Replacement of a lead service line (or galvanized service lines requiring replacement) that results in the entire length of the water service line, regardless of ownership, being free of lead.² A full lead service line replacement could leave a lead service line in place in the ground but out of service if using a new non-lead service line.³

Galvanized Requiring Replacement (GRR): A galvanized service line that is or ever was downstream of a lead service line or is currently downstream of a lead status unknown service line.³

Note: Galvanized water service lines have a rough interior surface. If the galvanized service line is or has been in contact with lead, then it likely has lead particulate that has settled on the interior surface.

Galvanized Service Line: A water service line that is made out of iron or steel piping zinc-dipped to prevent corrosion and rusting.³

Illinois Lead Service Line Replacement and Notification Act (ILSLRNA): Illinois law requiring CWS to create a water service line material inventory, create a LSLR Plan, provide notice to potentially affected building occupants, prohibit partial LSLR, and disconnect LSLs from the drinking water supply.¹

Lead: A naturally occurring element found in small amounts in the earth's crust; while it has some beneficial uses, it can be toxic to humans and animals, causing health effects.²

Lead and Copper Rule (LCR): Federal law established by USEPA to protect public health and reduce exposure to lead and copper in drinking water.²

Lead Service Line (LSL): A water service line made of lead or water service line connected to a lead pigtail, lead gooseneck, or other lead fitting.¹

Lead Status Unknown Service Line: A water service line that a CWS has yet to identify as lead, galvanized requiring replacement, or non-lead material. The service line material may also be designated as Unknown.³



Non-Lead Service Line: A water service line that a CWS has determined through an evidence-based record, method, or technique is non lead or galvanized requiring replacement. The service line material may also be designated using its actual material of construction (e.g., plastic, copper, ductile iron, etc.).³

Safe Drinking Water Act (SDWA): A federal law that regulates the nation's public drinking water supply to protect public health. The Act has been revised multiple times since its enactment in 1974, the last revision occurring in 2018. In 1986, Congress amended the SDWA to ban the use of lead pipe, flux, and solder. There was a two-year implementation period after Congress banned the use of lead pipe. For the purpose of the LSLR Plan, 1988 will be used as the year lead pipe was banned.

Solder: A type of metal that is used to join metal parts such as sections of pipe, without melting the existing metal in the parts to be joined.²

Suspected Lead Service Line: A water service line that a CWS finds more likely than not to be made of lead than not.¹

Trigger Level (TL): The concentration of lead which, if exceeded, triggers notification, water quality sampling and replacement requirements which a CWS must follow. Effective October 16, 2024, the Trigger Level for lead is 10 parts per billion, in accordance with the Lead and Copper Rule Revisions.²

Unknown Not Lead Service Line: A water service line that a CWS has been unable to determine the material of, however has determined the building/property was developed after Congress banned the use of lead pipe in 1988 and/or the service line diameter is greater than 2-inch and therefore can safely assume the service line is not made of lead.

Water Main: A pipe that conveys water to a connector or customer's water service line. In residential areas, it is usually located underground.²

Water Service Line: Piping, tubing, and necessary appurtenances acting as a conduit from the water main or source of potable water supply to the building plumbing at the first shut-off valve or 18 inches inside the building, whichever is shorter.¹

Water Service Line Material Inventory: A water service line inventory developed by a community water supply under this Act that identifies the material of each water service line.¹

Water Service Line Ownership: Lead service line ownership is shared between the CWS and the property owner. The CWS maintains the service line from the water main up to the b-box (exterior shut-off valve); from the b-box into the home is the homeowner's responsibility. Note, for service lines not requiring replacement, refer to the Village's ordinance (Article V. Sec. 26–110 and 26-111) regarding service line ownership.¹

References:

- 1. Defined in accordance with the Illinois Lead Service Line Replacement and Notification Act
- 2. Defined in accordance with the U.S. Environmental Protection Agency (USEPA)
- 3. Defined in accordance with the General Assembly's Illinois Administrative Code



EXECUTIVE SUMMARY Page 5

EXECUTIVE SUMMARY

Under the Illinois Lead Service Line Replacement and Notification Act (ILSLRNA) and the Lead and Copper Rule Revisions (LCRR), the Village of Wilmette is tasked with facilitating the replacement of all lead and galvanized requiring replacement (GRR) water service lines connected to its drinking water supply. The purpose of a Lead Service Line Replacement (LSLR) Plan is to identify and locate lead and GRR water service lines, develop strategies to facilitate the replacement of such water service lines, identify funding mechanisms for replacements, and develop design and construction criteria for executing replacements. This LSLR Plan is the Village's first draft and will be revised annually.

As of March 26, 2024 the Village has 8,875 water service lines within its corporate limits and is actively working to identify the material of each water service line. At this time, the Village has identified 1,790 lead and GRR water service lines. The table below highlights the inventory efforts of the Village since 2020, including remaining unknowns, identified, and replaced lead and GRR water service lines.

Water Service Lines Requiring Replacement and Replaced to Date

Year	Total Water Service Lines	Unknown Material	Leads & GRRs	Replaced Lead & GRRs
2020	9,000	5,635	764	0
2021	9,044	4,993	982	0
2022	9,044	3,498	1,120	40
2023	8,875	363	1,790	13

At this time, the Village is estimating that it will have approximately 2,200 lead and GRR water service lines. Under ILSLRNA, the Village intends to replace all lead and GRR water service lines by 2044, with replacements scheduled to begin in 2027. At a required replacement rate of 6% per year, the Village is required to facilitate the replacement of 132 lead or GRR water service lines annually. The replacement schedule as shown in the table below, includes a one-year, 5 year, 10, year and 15 year goal year, which accumulate the total replacements to be completed by that designated year.

Service Line Replacement Schedule

Completion	Known	Cumulative Required	Non-	Total Service
Year	Lead	Replacements	Lead	Lines
2026	2,200	0	6,750	8,875
2027	2,068	132	6,882	8,875
2031	1,540	660	7,410	8,875
2036	880	1,320	8,070	8,875
2041	220	1,980	8,730	8,875
2042	88	2,112	8,862	8,875
2043	0	2,200	8,875	8,875
	Year 2026 2027 2031 2036 2041 2042	Year Lead 2026 2,200 2027 2,068 2031 1,540 2036 880 2041 220 2042 88	Year Lead Replacements 2026 2,200 0 2027 2,068 132 2031 1,540 660 2036 880 1,320 2041 220 1,980 2042 88 2,112	Year Lead Replacements Lead 2026 2,200 0 6,750 2027 2,068 132 6,882 2031 1,540 660 7,410 2036 880 1,320 8,070 2041 220 1,980 8,730 2042 88 2,112 8,862





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Note: Non-lead water service lines have been identified as copper, plastic, galvanized, cast iron, ductile iron or transite.

At this time, the Village is estimating that the total cost to replace all 2,200 lead and GRR water services lines will be \$68.5 million, with an annual estimated cost of \$5 million beginning in 2027. At this time, the Village of Wilmette is assessing what funding programs and local revenue sources will minimize the debt service and overall financial impact on the Village and its consumers. The Village is currently applying for funds through Illinois State Revolving Fund's Public Water Supply Loan Program.

The Village of Wilmette will post this Draft Lead Service Line Replacement Plan online at wilmettelead.info the time of their first draft LSLR Plan submittal to Illinois Environmental Protection Agency (IEPA) by April 15, 2024. The Village will provide opportunity for public comment before the final LSLR Plan is due on April 15, 2027.

This draft LSLR Plan is pursuant to the ILSLRNA and U.S. Environmental Protect Agency's (US EPA) Lead and Copper Rule Revisions (LCRR). While US EPA has released the proposed Lead & Copper Rule Improvements (LCRI), the LCRI is not yet final and is not considered as a part of this draft LSLR Plan. The LCRI is anticipated to be finalized by October 2024, and the Village will update future draft LSLR Plans as required by the ILSLRNA, LCRR and LCRI.



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1. INTRODUCTION

In accordance with the Illinois Lead Service Line Replacement and Notification Act (ILSLRNA), Public Act 102-0613 (415 ILCS 5/17.12), every Community Water System (CWS) with known lead, suspected lead, galvanized requiring replacement (GRR), or lead status unknown water service lines must create a Lead Service Line Replacement (LSLR) Plan. The purpose of the LSLR Plan is to identify and locate lead and galvanized requiring replacement service lines, develop strategies to facilitate the replacement of such water service lines, identify funding mechanisms for replacements, and develop design and construction criteria for executing replacements.

As of March 26, 2024, the Village of Wilmette has 8,875 water service lines connected to the Village's water distribution system. Of those, the Village has identified 1,790 lead and GRR water service lines. The Village must submit their first draft LSLR Plan to the Illinois Environmental Protection Agency (IEPA) by April 15, 2024. After which, IEPA will review and provide comments back to the Village. After subsequent draft submissions to IEPA, the Village will submit their final LSLR Plan by April 15, 2027.

Since 2020, the Village has been working to identify the material of water service lines and has been reporting materials to IEPA annually. Table 1 below provides a breakdown of total water service lines, including unknown, known lead and GRR, and replaced lead and GRR water service lines within the Village since 2020.

TABLE 1

<u>Water Service Lines Requiring Replacement and Replaced to Date</u>
As of March 26, 2024

Year	Total Water Service Lines	Unknown Material	Lead & GRRs	Replaced Lead & GRRs
2020	9,000	5,635	764	0
2021	9,044	4,993	982	0
2022	9,044	3,498	1,120	40
2023	8,875	363	1,790	13

Note: Service lines classified as GRRs are considered lead service lines for the purpose of this plan.

This draft LSLR Plan is pursuant to the ILSLRNA and U.S. Environmental Protect Agency's (US EPA) Lead and Copper Rule Revisions (LCRR). While US EPA has released the proposed Lead & Copper Rule Improvements (LCRI), the LCRI is not yet final and is not considered as a part of this draft LSLR Plan. The LCRI is anticipated to be finalized by October 2024, and the Village will update future draft LSLR Plans as required by the ILSLRNA, LCRR and LCRI.



2. SYSTEM OVERVIEW

2.1 Location & Customer Base

The Village of Wilmette is located in New Trier Township, Cook County and is approximately 14 miles north of Chicago, Illinois. According to the 2020 Census, the Village covers 5.40 square miles and serves 27,087 customers. Figure 1 below shows the Village's municipal boundary.



Figure 1: Village of Wilmette Municipal Boundary

The Village of Wilmette provides water service to customers within the municipal boundary of the Village. Additionally, Wilmette sells treated water to the Village of Glenview, Village of Golf, Village of Kenilworth and portions of Prospect Heights and unincorporated Maine Township. This draft LSLR Plan will pertain only to water service lines within the municipal limits of the Village.

Understanding the demographics and characteristics of Wilmette's customer base assists the Village with the planning of future replacements and public engagement needs. Approximately 17% of the Village is non-English speaking, with the most common languages spoken other than English being Spanish, Russian, Polish, Korean, and Chinese.

Additionally, IEPA has identified eight criteria to compare and score lead service line replacement projects submitted to the Illinois State Revolving Fund's Public Water Supply Loan Program for



funding assistance. Within the Village of Wilmette, there are seven Census designated geographic areas, known as census tracts. See Appendix A for a map of Wilmette's census tracts and how many points IEPA would award projects in each tract. Projects are awarded points based on which census tract the project is located within.

2.2 Water System Overview

The Village of Wilmette owns and operates a public water treatment and distribution system that includes the Carbon P. Dubbs Water Treatment Plant, a standpipe, a reservoir, and a booster station. The Village's water system is supplied by surface water from Lake Michigan that is primarily treated with gravity filtration and chemical disinfection. Additionally, for the past 25 years, the Village has had a Corrosion Control Treatment (CCT) program. To prevent lead and copper from leaching into drinking water, the Village adds ortho-polyphosphate to the water at the treatment plant. Orthopolyphosphate prevents corrosion by forming a protective coating inside the pipes throughout the distribution system.

Treated water is then distributed to customers through 112 miles of water main, mostly comprised of cast iron and ductile iron pipes. The Village is aware of water main with lead joints in their distribution system. However, it is important to note that lead from lead jointed water mains does not come into direct contact with the water supply. The Village's water distribution system can be seen in Figure 2.

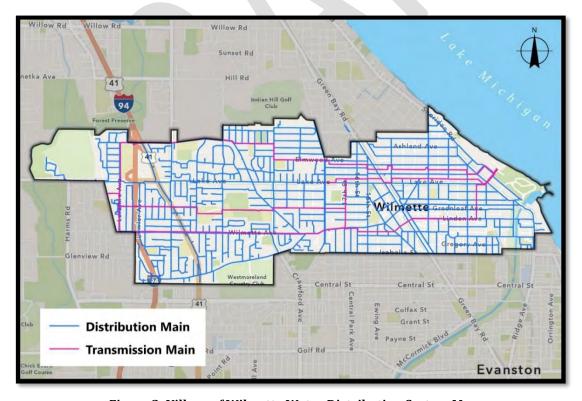


Figure 2: Village of Wilmette Water Distribution System Map

Additionally, the Village performs regular testing for lead throughout the distribution system. Currently, the Village samples for lead at approximately 30 sites on a triennial basis. Results from the last three rounds of testing are shown below in Table 2. The Village of Wilmette is in full compliance with IEPA and USEPA, which requires a community to be below an Action Level of 15 parts per billion at the 90th percentile. For reference, if a community were to sample at 10 locations and order the sample results from these locations from least to greatest, the 90th percentile would be the 9th highest sample result.

TABLE 2
Lead Sampling Results By Year

	No. of Sites	Action Level (AL) (parts per billion)	90 th Percentile (parts per billion)	No. of Sites over AL
2021	31	15	4.9	0
2018	30	15	5	0
2015	30	15	6.4	0

The Village also publishes their annual water quality report (also known as a Consumer Confidence Report) on the Village's website by July of each year. This report provides additional information on the Village's source water, any contaminants found in the water and ways residents may get involved to protect drinking water.

2.3 Water Usage

Consumers are billed on a quarterly basis based on the amount of water that is used. The Village uses a volumetric rate of \$2.75 per 100 cubic feet (roughly 748 gallons of water) plus a flat rate fee based upon the size of a property's water meter. Table 3 below shows the quarterly flat rate fee for each water meter size.

TABLE 3
Water Meter Flat Fee

Meter Size	Quarterly Flat Rate Fee
5/8"	\$0.67
3/4"	\$1.08
1"	\$1.33
1.5"	\$5.41
2.0"	\$19.16
3.0"	\$43.45
4.0"	\$63.33



Water service connections are broken down by account type, including residential and commercial. Of the water accounts in the Village, 8,694 are residential and 361 are commercial. Based on Census data, the owner-occupied housing unit rate is 87.3 % for 2018-2022. It is estimated that 7,590 of the residential connections are occupied by the property owner (primary residence) and the remaining 1,104 connections are assumed to be occupied by tenants. Table 5 below provides a breakdown of the number of residential and commercial accounts and the total volume of water billed by account type in 2023.

TABLE 4
Water Account Data

Account Type	Number of Accounts	Water Billed in 2023 (gallons)	Average Billed Monthly (gallons)
Residential	8,694	736,414,228	61,367,852
Commercial	361	110,839,388	9,236,616
Total	9,055	847,253,616	70,604,468

2.1 Future Service Area

At this time, the Village of Wilmette does not anticipate any annexations or planned future expansion. As such, the Village is not anticipating any significant changes to the number of water service lines in town.



3. <u>LEAD SERVICE LINE REPLACEMENTS</u>

Under the ILSLRNA and the federal LCRR, the Village is required to facilitate the full replacement of lead and GRR water service lines. The ILSLRNA requires lead and GRR water service lines be replaced if they are disturbed (repaired) or, beginning 2027, at a designated rate of replacement each year until all lead and GRR water service lines are completely removed. Effective October 2024, the LCRR requires lead and GRR water service lines be replaced at a designated rate based upon the sample results of a CWS's lead sampling.

3.1 Water Service Line Material Inventory

A comprehensive water service line material inventory includes compiling a list of each active water service line, the locations within the Village, and identifying the material type for both the public side (from the watermain to the b-box/exterior shut-off valve), and the private side (from the b-box to into the building/interior shut-off valve). The water piping inside of the building after the interior shut-off valve is deemed internal plumbing. Internal plumbing is the full responsibility of the property owner and falls under the jurisdiction of the Illinois Department of Public Health and local plumbing codes. Figure 3 illustrates the shared responsibility of a water service line in the Village of Wilmette.

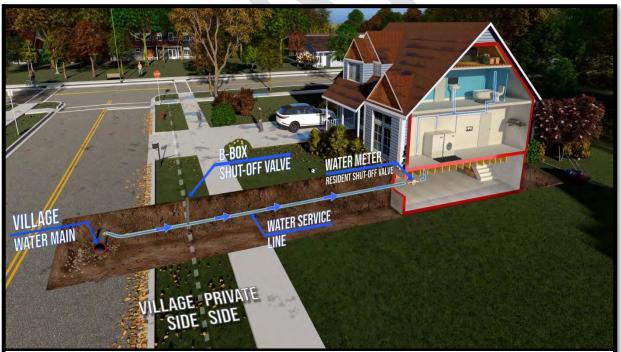


Figure 3: Water Service Line Ownership

At this time, the Village of Wilmette has identified the material of 8,512 water service lines within their distribution system. Table 5 provides a breakdown of identified materials for both the Village side (Village owned and maintained) and the private side (property owner owned and maintained).



TABLE 5
Service Line Material Inventory
As of March 26, 2024

Service Line Material	Village Side	Private Side
Lead	1,637	1,784
Unknown Material	369	358
Galvanized Steel	261	272
Unknown, but NOT Lead	1	1
Copper	6,542	6,365
Cast/Ductile Iron or Transite	61	91

Note: Service lines classified as GRRs are considered lead service lines for the purpose of this plan.

The Village is continuing to identify the material of water service lines and at this time is estimating that the total number of lead and GRR water service lines will be approximately 2,200.

3.1.1 Material Inventory Methodology and Continuing Efforts

When completing the water service line material inventory, a CWS is to utilize, at minimum, the following methods to complete the identification of pipe material types:

- Review of historical documentation, such as as-builts, permits information, construction records, or subdivision plans
- Visual inspection during distribution system maintenance
- Utilize known installation time periods for when lead was or was not installed
- Discuss with staff, contractors, or local plumbers who have worked on service lines connected to the distribution system

Note that under the ILSLRNA and LCRR, the Village is not required to excavate water service lines to determine their material. However, certain circumstances may warrant the Village to complete more invasive methods, such as excavation, on a case-by-case basis.

In addition to the above methods, the Village conducted a resident information survey and performed in-home inspections. Both the resident information survey and in-home inspections utilized visual inspection of the water service line as it enters the building to confirm the material type. The resident information survey requests customers self-report the material type of the water service line where it enters the building. As a part of the survey, customers were asked to provide a photo of the water service line, allowing the Village to review and confirm the information provided. When necessary, the Village followed up with customers and performed in-home inspections to verify submitted information.

To date, there remain 363 water service lines within the Village with an undetermined material type. The Village is continuing to use the resident information survey and in-home inspections to identify the remaining unknowns.

(IL0313300) Village of Wilmette



3.2 Replacement Schedule

The Village has identified 1,790 lead and GRR water service lines to date but anticipates this number will increase as the materials of remaining unknowns are identified. At this time, the Village is estimating that it will have approximately 2,200 lead and GRR water service lines. The estimate of 2,200 lead service lines is based on the assumption that the unknown service lines have the same proportion of lead as the service line materials already identified.

Although required replacements will not begin until 2027, the Village is considering faciliting the replacement lead and GRR water service lines that are within the limits of upcoming Capital Improvement Projects.

Water service lines that have been identified as lead or galvanized to date are shown below in Figure 4. Note that the galvanized service lines identified below do not automatically require replacement. Additional investigation may be required by the Village to determine if a galvanized service line requires replacement. Appendix B shows all service line material types throughout the Village.

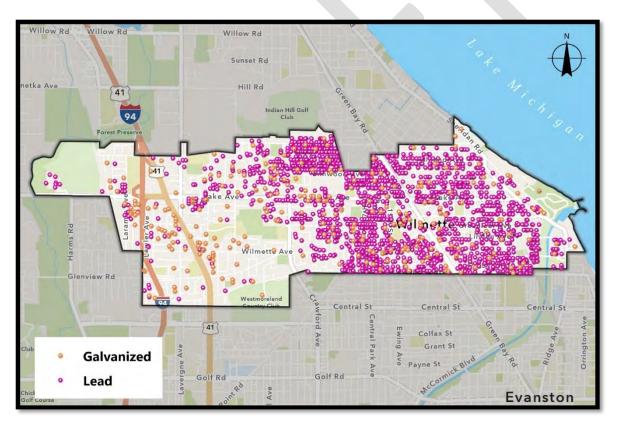


Figure 4: Village of Wilmette Identified Lead Service Line Locations

The Village expects to continue to identify lead water service lines throughout the Village. However, as seen above in Figure 4, the Village anticipates the majority of newly identified lead water service lines to be located in the eastern portion of town where the highest concentration of lead service lines has already been identified.



3.2.1 Federal Replacement Schedule (Effective October 2024)

Per the LCRR, the Village must initiate lead and GRR water service line replacements based upon the results of the water sampling conducted throughout the distribution system at specified locations/properties approved by the state's primacy agency (agency responsible to ensure that a CWS meets all national drinking water regulations). The Village is required to respond under the LCRR if the following occurs:

• Exceedance of Trigger Level: In the event that the Village has an exceedance of 10 parts per billion at the 90th percentile, the Village must recommend a goal replacement rate. The Village will aim to replace 3% of lead and GRR water service lines annually, until the Village no longer exceeds the Trigger Level.

Note that a replacement goal rate is only for CWS's that serve more than 10,000 people.

• **Exceedance of Action Level:** In the event that the Village has an exceedance of 15 parts per billion at the 90th percentile, the Village must begin annual lead and GRR water service line replacements at a rate of 3% per year.

The above requirements become effective October 2024, however, are superseded by Illinois required rate of lead and GRR water service line replacements starting in 2027, as described in Section 3.2.2 Illinois Replacement Schedule. Additionally, the LCRR requirements are subject to change with the proposed LCRI requirements. For the purposes of this draft LSLR Plan, only the LCRR has been considered.

3.2.2 Illinois Replacement Schedule

Per the ILSLRNA, the State of Illinois has set annual replacement rates based on the number of lead and GRR water service lines a community has identified. Table 6 below shows the tiered rate of replacement per the LSLRNA.

TABLE 6

Lead Service Line Replacement Rate Requirements
Per Public Act 102-0613

Total Lead and GRR Service Lines	Annual Replacement Rate	Timeline (years)	Completion Year
0-1,200	7%	15	2042
1,201-4,999	6%	17	2044
5,000-9,999	5%	20	2047
10,000-99,999	3%	34	2061
100,000+	2%	50	2077

Based on the number of lead and GRR water service lines identified, the Village will be required to meet a 6% annual rate of replacement starting in 2027. Under the ILSLRNA, the Village will work to



maintain this replacement rate and verify, in set goal years, that completed replacements are on schedule. Table 7 indicates the anticipated replacements schedule based on the estimated 2,200 lead service lines.

TABLE 7

Mandatory Lead Service Line Replacement

Year	Known	Annual Required <u> </u>	Replacements ¹		_ Non-Lead	Total Service
End	LSL	Replacements	CIP	LSL		Lines
2027	2,200	132	15	117	6,807	8,875
2028	2,068	132	94	38	6,939	8,875
2029	1,936	132	62	68	7,071	8,875
2030	1,804	132		132	7,203	8,875
2031	1672	132		132	7,335	8,875
2032	1,540	132		132	7,467	8,875
2033	1,408	132		132	7,599	8,875
2034	1,276	132		132	7,731	8,875
2035	1,144	132		132	7,863	8,875
2036	1012	132		132	7,995	8,875
2037	880	132		132	8,127	8,875
2038	748	132		132	8,259	8,875
2039	616	132		132	8,391	8,875
2040	484	132		132	8,523	8,875
2041	352	132		132	8,655	8,875
2042	220	132		132	8,787	8,875
2043	88	88		132	8,875	8,875

Notes:

1. The Village will continue to update replacements occurring as a part of upcoming Capital Improvement Plan (CIP) programs versus a separate Lead Service Line Replacement Program.

At this time, the Village will need to replace a minimum of 132 water service lines each year to meet the required rate of replacement. To achieve this, the Village is considering replacing lead and GRR water service lines within the CIP project limits in addition to a separate program specifically for lead and GRR water service line replacements.

3.3 Prioritization of Lead Service Lines

The Village first intends to prioritize the replacement of lead and GRR water service lines at facilities that serve populations most sensitive to the effects of lead. Facilities that have a higher likelihood to serve children and/or pregnant women have been identified in Section 3.3.1 High-Risk Facility Replacements below, in accordance with the ILSLRNA and LCRR. Additionally, the Village has



reviewed other CIP programs to assist with the prioritization of the remainder of replacements, as identified in <u>Section 3.3.2 Future Replacement Planning</u>.

3.3.1 High-Risk Facility Replacements

High-risk facilities, as described by the ILSLRNA, are facilities such as preschools, day care centers, day care homes, parks and playgrounds, hospitals, and clinics. The Village has identified 83 high-risk facilities, with one (1) of the high-risk facilities having a lead service line. Table 8 below shows the number and type of high-risk facilities identified in the Village.

TABLE 8

Lead Service Lines by High-Risk Facility Type
Updated March 2024

High Risk Facilities	No. of Facilities	Reported Lead or GRR	Unknown Material
Preschool/Day Care Facility	8	0	1
Elementary School (K – 5 th Grade)	8	0	0
Secondary School (6 th – 12 th Grade)	4	0	0
Women, Infants and Children (WIC) and Head Start programs	0	0	0
Medical Facility	30	1	0
Local welfare agencies (shelters)	0	0	0
Community Centers	1		0
Places of worship	16	0	0
Parks and playgrounds	16	0	0

Note:

1. For the purpose of this Plan, hospitals, emergency care, clinics, pediatricians, obstetricians-gynecologists, and midwives were considered medical facilities.

In addition to the single lead service line found at a high risk facility, there is one (1) facility that has an unknown water service line material. The Village will continue to work with these facilities to determine the material of the service line and any next steps. At the high risk facility with a lead service line and in the event additional lead or GRR water service lines are identified at a high-risk facility, the Village will work with the facility to execute the replacement of the water service line by 2029. Figure 5 shows the relative location of the high-risk facilities that still have an unknown water service line material.



Figure 5: High-Risk Facilities with a Lead, GRR, or Unknown Service Line Material

3.3.2 Future Replacement Planning

In an effort to minimize inconvenience to residents and reduce overall construction costs, the Village's Capital Improvement Plan (CIP) projects were reviewed to assist with the prioritization of future replacements. The Village is considering scheduling replacements either during planned underground infrastructure improvements, such as watermain or sewer replacement project, or to schedule replacements in advance of planned roadway resurfacing or sidewalk improvements.

At this time, the Village's upcoming 2025 Watermain Improvement Project and the Village's 2024 through 2029 road improvement programs have been reviewed as a part of this draft LSLR Plan. As part of the Village's 2025 Watermain Improvement Project, the Village will be required to faciulitate the replacement of any lead or GRR water service lines that are disturbed. For scheduled road improvements, the Village is considering incorporating replacements in advance of the road programs to reduce the need to patch a newly resurfaced road in the following years. Figure 6 shows the limits of the CIP projects by program year and project type through 2029.

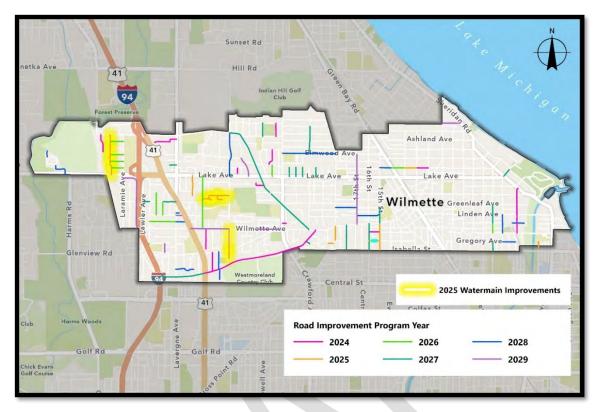


Figure 6: Village 2024 - 2029 Capital Improvement Project Areas

At this time, there are a total of 258 known lead and GRR water service lines identified within the limits of the 2025 Watermain Improvement Project and the 2024 through 2029 road improvement programs. Table 9 shows the total number of known and unknown service line materials within each of the CIP project's limits.

TABLE 9
Lead and Unknown Water Services within CIP Limits

Project Year	Known Lead & GRR	Unknown Material					
Watermain Improvement Projects							
2024	3	1					
Road Improvement Projects							
2024	35	3					
2025	26	6					
2026	15	13					
2027	94	26					
2028	62	4					
2029	23	9					
Total within Project Limits:	258	74					



Prior to the start of a CIP project, the Village will prioritize identifying remaining unknown water service lines within the project limits. Not only will this assist the Village with construction but will also allow the Village to communicate to any affected property owners in advance of required replacements.

Beginning 2027, the Village will be required to replace an estimated 132 water service lines each year. The Village is considering the following ways to prioritize lead and GRR water service lines replacements outside of planned Capital Improvement Projects:

- **Census Tracts** In an effort to prioritize disadvantaged costumers, the Village is considering prioritizing areas of town based upon census tract information.
- **Presence of Children** Children under the age of six and pregnant women are the most susceptible to the health effects from lead exposure. The Village is considering prioritizing areas of town where the Village anticipates higher concentrations of children, such as near elementary schools or parks/playgrounds.
- Lead and GRR Water Service Line Locations In an effort to reduce the mobilization costs
 related to moving construction efforts throughout a community, the Village will work to
 minimize the limits of each year's replacement project by focusing on areas of town with
 higher concentrations of lead and GRR water service lines.
- **Future CIP Projects** The Village will continue to plan other CIP projects based on community needs. As CIP projects are developed, the Village will coordinate lead and GRR water service line replacements within the limits of these projects.



4. FINANCING LEAD SERVICE LINE REPLACEMENTS

The ILSLRNA and the LCRR do not require a CWS to finance the full replacement of a lead or GRR water service line. As described under <u>Section 3.1 Water Service Line Material Inventory</u>, maintaining a water service line is a shared responsibility between the Village and the property owner. The Village is currently assessing what funding options are available for both the Village and property owners. Different funding sources have different requirements associated with utilizing those funds and impact the Village and their consumers in different ways.

4.1 Water Service Line Replacement Cost Analysis

In recent years, the water industry has seen an increase in replacement costs for lead and GRR water service lines, mostly due to an increase in material costs and contractor availability. Additionally, each water service line requiring replacement is unique and dependent on the constraints of an individual property. Interior and exterior restoration efforts may vary from property to property, even within the same area of the Village. Due to this, an average construction cost ranging from \$20,000 to \$25,000 for a full water service line replacement (from watermain to inside the property to the first interior shut-off valve or 18-inches, whichever is shorter) was used for the purpose of this draft LSLR Plan. This cost range is based on replacements completed within the Village during 2022 and 2023.

Table 10 provides a cost estimate range to replace all lead and GRR water service lines in their entirety throughout the Village. Note that at this time, the Village is estimating 2,200 lead and GRR water service lines, but this number is subject to change as the Village continues their effort to identify the material of remaining unknown water service lines.

TABLE 10

Estimated Cost Range to Replace All Lead and GRR Water Service Lines

Updated February 2024

Full Comigo Lino Donlo comento	R	eplacement Cost I	Estim	ate (2024 Dollars)
Full Service Line Replacements		Low Range		High Range
2,200 Estimated Lead Service Lines	\$	44,000,000	\$	55,000,000
Design Engineering (5%)	\$	2,200,000	\$	2,800,000
Construction Engineering (8%)	\$	3,600,000	\$	4,400,000
Engineering & Construction Sub Total:	\$	49,800,000	\$	62,200,000
Contingency (10%)	\$	5,000,000	\$	6,300,000
Replacement Total:	\$	54,800,000	\$	68,500,000
Estimated Annual Replacement Cost	\$	4,000,000	\$	5,000,000



For budgetary purposes, design engineering, construction engineering, and a contingency were included in the cost estimate. Design and construction engineering efforts will vary significantly, depending on if the Village is using Village staff or a consultant and whether a water service line is being replaced as a part of an existing CIP project or a stand-alone lead water service line replacement program. At this time, the Village is estimating that the total cost to replace all 2,200 lead and GRR water services lines will be \$68.5 million, with an annual estimated cost of \$5 million beginning in 2027.

4.1.1 Upcoming Replacement Costs Within CIP Project Limits

The Village has identified lead and GRR water service lines within the limits of upcoming CIP projects, including the Village's 2025 Watermain Improvement Project and the Village's 2024 through 2029 road improvement programs. As required by the ILSLRNA, the Village will be required to facilitate the replacement of any lead and GRR water service line disturbed as a part of the watermain project.

Table 11 provides a breakdown of the additional water service line replacement construction cost anticipated for each of the Village's CIP projects. For budgetary purposes, a cost of \$25,000 per water service line replacement was used. The table only includes water services that have been identified as lead or GRR and does not account for water service lines that are unknown. There is the possibility that a portion of the unknown water service lines will be identified as lead or GRR and need to be replaced, adding to the total replacement cost. Table 11 does not indicate that water services lines within the limits of a CIP project will be replaced as a part of the CIP project but is for budgetary planning purposes.

TABLE 11
Estimated Replacement Costs for Upcoming CIP Projects

Project Year	Known Lead & GRR	Constr	uction Replacement Cost
Watermain Improvement Projects			
2025	3	\$	75,000
Road Improvement Programs			
2024	35	\$	875,000
2025	26	\$	650,000
2026	15	\$	375,000
2027	94	\$	2,350,000
2028	62	\$	1,550,000
2029	23	\$	575,000
Total within Project Limits:	271	\$	6,450,000



4.2 Funding Mechanisms

Understanding the various funding mechanisms available is crucial for the Village to begin planning future replacements and sequencing replacement work with other infrastructure projects. Funding sources may include, but are not limited to:

- Federal loan and grant programs
- State loan and grant programs
- County grant programs
- Local revenue sources, such as water and sewer rates

The Village's eligibility to obtain funds from any of the above sources will be dependent on the requirements of that funding source.

4.2.1 State and Federal Funding Sources

State and federal funding sources for lead and GRR replacements are still relatively inconsistent in availability and most require a community to be considered disadvantaged (which is usually based on the median household income) to be eligible to apply. However, two funding sources the Village may consider supplementing the cost of lead service line replacements include the following:

- <u>U.S. Congressional Directed Spending</u>: Senators can advocate for programs critical to the nation, constituents, and their states that promote economic growth, education, and health care initiatives. Funds are allocated each fiscal year by the U.S. Senate Committee on Appropriations.
- <u>Public Water Supply Loan Program (PWSLP)</u>: A low interest loan program funded through Illinois State Revolving Fund, to provide financial assistance to eligible public water systems for projects that maintain compliance with the requirements of the Safe Drinking Water Act and Illinois regulations. IEPA has announced that lead service line replacement projects are eligible for a 0% interest loan for up to 30 years with additional financial assistance, including principal forgiveness and a 40-year loan, for disadvantaged communities.

In addition, Cook County is offering free lead service line replacements to childcare providers licensed by the Illinois Department of Children & Family Services that are located within suburban Cook County through their LeadCare program. Although this program does not directly assist the Village in funding replacements, it would allow the Village to direct any eligible childcare facility with a lead or GRR water service line to the program. At this time, the Village has no known lead or GRR water service lines at home-based childcare providers.

4.2.2 Local Revenue Funding Sources

If the Village is utilizing local revenue sources, such as water and sewer rates, issuing bonds, or implementing special levies focused on infrastructure improvements, to execute LSLRs, then a cost-share program with property owners may be considered. There are a variety of different cost-share



programs that area communities have been implementing. The below list is not exhaustive and identifies various types of cost-share programs that have been seen throughout the Chicagoland area.

- A CWS pays for the public side and the CWS pays for a set percentage of the private portion
 up to a designed capped amount. The property owner is responsible for the remainder of
 the replacement cost.
 - o Examples of Chicagoland community's private side payment options are as follows:
 - CWS pays for 50% up to \$5,000 of private side
 - CWS pays for 50% up to \$6,000 of private side
 - CWS pays for 66% up to \$10,000 of private side
- A CWS pays for a set percentage of the entire service line up to a designed capped amount. The property owner is responsible for the remainder of the replacement cost.
 - Examples of Chicagoland community's entire service line payment options are as follows:
 - CWS pays 50% up to \$10,000 of full replacement
 - CWS pays for 50% up to \$5,000 of full replacement

For any cost-share program, consideration needs to be given to how funds will be obtained from the property owner. The following is a list of options, but is by no means all inclusive:

- Request property owner to pay at or before replacement occurs.
- Rebate property owner after replacement occurs.
- Provide a payback period for the property owner utilizing water billing or other method.
- Provide a differed loan to property owner, until the property is refinanced or sold.

4.3 Current Funding Considerations

At this time, the Village of Wilmette is assessing what funding programs and local revenue sources will minimize the debt service and overall financial impact on the Village and its consumers.

The Village is going through the Public Water Supply Loan Program application process at this time. This process requires the Village to develop a Project Plan, which will communicate to the IEPA proposed water system improvement projects, including lead and GRR replacements, for up to five years. The Project Plan will be submitted to IEPA the summer of 2024, with the goal to have it approved prior to March 31st of 2025. Upon approval, the Village will compete with other CWS's for available funds. If allocated funds, the Village plans to use the funds on future lead and GRR water service line replacement projects.



5. REPLACEMENT PROCEDURES

Under the ILSLRNA, partial lead and GRR water service line replacement is prohibited, except in the event a property owner has denied access. As described under <u>Section 3.1 Water Service Line Material Inventory</u>, maintaining a water service line is a shared responsibility between the Village and the property owner. To facilitate and complete the replacement of the entire water service line, from the water main to the first interior shut-off valve or 18-inches within the property, work is completed both within the Village right-of-way as well as on private property.

A lead or GRR water service line replacement shall be completed in accordance with the ILSLRNA, LCRR, Illinois Plumbing Code and Village ordinances. Requirements vary depending on if the Village or the property owner initiates replacements.

5.1 Community Initiated Replacement Procedure

When the Village initiates the replacement of a lead service line, whether planned or during emergency maintenance efforts, the Village must follow specific procedures during the bidding process, resident notification process and at time of construction. Below identifies the various replacement scenarios. These procedures are based on current state and federal regulations.

5.1.1 Minorities, Women, and Persons with Disabilities Act

Per the ILSLRNA, the Village is to make a good faith effort to use contractors and vendors owned by minority persons, women, and persons with a disability for not less than 20% of the total contracts, as defined in Section 2 of the Business Enterprise for Minorities, Women, and Persons with Disabilities Act.

- 1. Contracts representing at least 11% of the total projects shall be awarded to minority-owned businesses.
- 2. Contracts representing at least 7% of the total projects shall be awarded to women-owned businesses.
- 3. Contracts representing at least 2% of the total projects shall be awarded to businesses owned by persons with a disability.

In order to meet the above standards, the Village requires that bidders acknowledge they have sought contractors and vendors owned by minority persons, women, and persons with a disability.

5.1.2 Scheduled Water Service Line Replacements

A scheduled replacement is when the Village has an upcoming project, such as a watermain replacement project, sewer replacement project, or a lead and GRR water service line replacement project, where lead or GRR water service lines are known or suspected and will be physically disturbed, requiring full replacement of the service line. Under these circumstances, the Village will complete the following:



1. At least 45 days prior to replacement, the Village or the Village's representative shall contact the property owner by written notice of the potentially affected service line to request access and permission to replace the lead or GRR water service line.

- a. If the property owner does not respond within 15 days, the Village shall post the request on the building entrance.
 - i. If private side replacement is denied due to the property owner not granting access to the property, the Village will request that the property owner should sign the Illinois Department of Public Health's (IDPH) <u>Waiver of Complete Lead Service Line Replacement</u>. The Village may continue with the replacement of the public side and continue with steps 2 through 5.
 - If a property owner of a nonresidential building or residence operating as a rental property denies a complete water service line replacement, the property owner is responsible for installing and maintaining point-of-use filters at all fixtures intended to supply water for the purpose of drinking, food preparation or making baby formula. The filters must meet NSF/ANSI 53 and NSF/ANSI 42 for the reduction of lead.
 - ii. If the property owner fails to respond, the Village shall notify IDPH within 30 days by filling out the <u>Partial Lead Service Line Replacement IDPH Notification Form</u>. The Village may continue with the replacement of the public side and continue with steps 2 through 5.
- 2. At least 14 days prior to replacement, by mail/posted at entrance/electronically, the Village or the Village's representative shall notify the owner and occupants of the upcoming replacement. The notice will include the following information:
 - a. The replacement of the lead or GRR water service line may result in a temporary increase in lead levels.
 - b. Information on best practices to reduce lead in drinking water.
 - c. Information regarding health dangers to young children and pregnant women.
- 3. The standard method of conducting full lead service line replacement shall be directional drilling, which will minimize the area disturbed by construction and reduce restoration costs. However, site conditions will vary and may require other construction methods, such as pulling a new water service line or performing open-cut replacement.
 - a. When using directional drilling or the pulling construction method, a water service line may be replaced at or in close proximity to the same location of the existing lead or GRR water service line, even if water-sewer service separation requirements are not met, so long as the water service line is either encased or Type K Copper is used, and there is no observed leak on the sewer service per IDPH's Sewer/Water Service Separation Variance. In the event of open-cut replacement, if the water-sewer service separation requirements are not met, the water service will require encasement.
- 4. At the time of replacement, the Village shall provide the property owner with a Point-Of-Use Filter or Pitcher Filter meeting NSF/ANSI 53 and NSF/ANSI 42 requirements and provides up to 6-months of filtration.



REPLACEMENT PROCEDURES Page 27

5. Within 24 hours of replacement, the Village shall notify the owner and occupants of the executed replacement, including:

- a. The replacement of the lead or GRR water service line may result in a temporary increase in lead levels for the next six months.
- b. Information on best practices to reduce lead in drinking water, including the flushing procedures described in <u>Section 5.3 Flushing Procedure After Lead Service Line Replacement</u>.
- c. Information regarding health dangers to young children and pregnant women.
- d. (Starting October 2024) Offer to have the property's water sampled for lead in the next 3 to 6 months by the Village or Village representative.

5.1.3 Emergency Water Service Line Repair and Replacements

An emergency replacement is when the Village disturbs a lead or GRR water service line during unplanned maintenance, such as a water main break or water service line leak. The Village may temporarily repair the lead service line and maintain water service, however by disturbing a lead service line, full replacement will then be required.

- 1. At the time work is initiated, by mail/posted at entrance/electronically, the Village shall notify the owner and occupants of the lead service line and provide a Point-Of-Use Filter or Pitcher Filter meeting NSF/ANSI 53 and NSF/ANSI 42 requirements until such time that the remaining portions service line have been replaced or replacement is waived. The notification shall include:
 - a. The replacement of the lead or GRR water service line may result in a temporary increase in lead levels.
 - b. Information on best practices to reduce lead in drinking water.
 - c. Information regarding health dangers to young children and pregnant women.
 - d. Information on how to use the provided water filter (pitcher or point-of-use).
 - e. Information on the upcoming full water service line replacement and required coordination efforts.
- 2. From the time of the repair, the Village has 30 days, or 120 days in the event of weather or other circumstances beyond reasonable control that prohibits construction, to facilitate the full replacement of the lead or GRR water service line.
 - If replacement is denied due to the property owner not granting access to the property, the Village will request that the property owner should sign the Illinois Department of Public Health's (IDPH) <u>Waiver of Complete Lead</u> <u>Service Line Replacement</u>.
 - 1. If a property owner of a nonresidential building or residence operating as a rental property denies a complete water service line replacement, the property owner is responsible for installing and maintaining point-of-use filters at all fixtures intended to supply water for the purpose of drinking, food preparation or making baby



formula. The filters must meet NSF/ANSI 53 and NSF/ANSI 42 for the reduction of lead.

- ii. If the property owner fails to respond, the Village shall notify IDPH within 30 days by filling out the <u>Partial Lead Service Line Replacement IDPH Notification Form.</u>
- 3. The remaining replacement procedures will follow steps 2 through 5 in <u>Section 5.1.2.</u> <u>Scheduled Water Service Line Replacement</u>.

5.2 Property Owner Initiated Replacement Procedure

When the property owner initiates the replacement of a lead service line, whether planned or during emergency maintenance efforts, the property owner and Village must follow specific procedures during prior to and at time of replacement. These procedures are based on current state and federal regulations.

5.2.1 Scheduled Water Service Line Replacement

A scheduled replacement is when the property owner is planning to replace their lead or GRR water service line. This may be due to wanting to remove the lead or GRR water service line, or may be due to other property improvements requiring an increase in size of their water service line. Under these circumstances, the property owner will complete the following:

- 1. The property owner must notify the Village at least 45 days before commencing work to replace the lead or GRR water service line.
- 2. The Village of Wilmette requires property owners to obtain a permit for water service line replacements, which can be initiated by contacting the Village's Community Development Department.
 - a. The Village will provide the following information to a property owner intending to replace their lead or GRR water service line.
 - i. The replacement of the lead or GRR water service line may result in a temporary increase in lead levels for the next six months.
 - ii. Information on best practices to reduce lead in drinking water, including the flushing procedures described in <u>Section 5.3 Flushing Procedure After Lead Service Line Replacement</u>.
 - iii. Information regarding health dangers to young children and pregnant women.

5.2.2 Emergency Water Service Line Repair and Replacement

An emergency replacement is when property owner disturbs their lead or GRR water service line during unplanned maintenance, such as water service line leak. The property owner may temporarily repair the lead or GRR water service line and maintain water service, however by disturbing the service line, full replacement will then be required. Under these circumstances, the property owner will complete the following:



1. The property owner must provide filters in each kitchen area. The filters must meet NSF/ANSI 53 and NSF/ANSI 42 requirements for the reduction of lead and particulate.

- 2. If the property owner notifies the Village of the completion of the emergency repair, the Village has 30 days, or 120 days in the event of weather or other circumstances beyond reasonable control that prohibits construction, to complete the replacement of the public portion of the lead or GRR water service line.
 - a. At the time of the public side replacement, the Village will provide a Point-Of-Use Filter or Pitcher Filter meeting NSF/ANSI 53 and NSF/ANSI 42 requirements and provides up to 6-months of filtration. Additionally, the Village will provide notice to the property owner and occupants of the completed lead or GRR water service line replacement. The notice will include:
 - i. The replacement of the lead or GRR water service line may result in a temporary increase in lead levels for the next six months.
 - ii. Information on best practices to reduce lead in drinking water, including the flushing procedures described in <u>Section 5.3 Flushing Procedure After Lead Service Line Replacement</u>.
 - iii. Information regarding health dangers to young children and pregnant women.
 - iv. (Starting after October 2024) Offer to have the property's water sampled for lead in the next 3 to 6 months by the Village or Village representative.

5.3 Flushing Procedure After Water Service Line Replacements

At the time of a lead or GRR water service line replacement, lead particles can migrate into a property's plumbing during the construction effort. Due to this, it is strongly recommended that consumers flush all plumbing within the property.

The following flushing instructions are in accordance with ANSI/AWWA C810-17 (First Edition) Replacement and Flushing of Lead Service Lines Section 4.4.2 "Flushing by the customer after lead service replacement". Consumers should follow the below flushing instruction the day of replacement or before water is used following a lead or GRR water service line replacement to reduce particulate lead. The steps below should be followed every two weeks for three months following replacement. Hot water should not be used until initial flushing is complete.

- 1. Locate all faucets in the building, including laundry tubs, hose-bibs, bathtubs, and showers.
- 2. Remove aerators and screens from faucets where possible, including showerheads.
- 3. Open faucets in the basement or lowest floor in the building. Using cold water, leave faucets running at the highest rate possible.
- 4. Open faucets on the next highest floor in the building, going from lowest level to the highest level in the building, until all faucets are open on all floors in the building.
- 5. Once all faucets are open, leave the water running for at least 30 minutes.
- 6. After 30 minutes, turn off faucets in the order they were opened.
- 7. Clean aerators or screens at each faucet.



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APPENDIX A

Village of Wilmette Census Tracks



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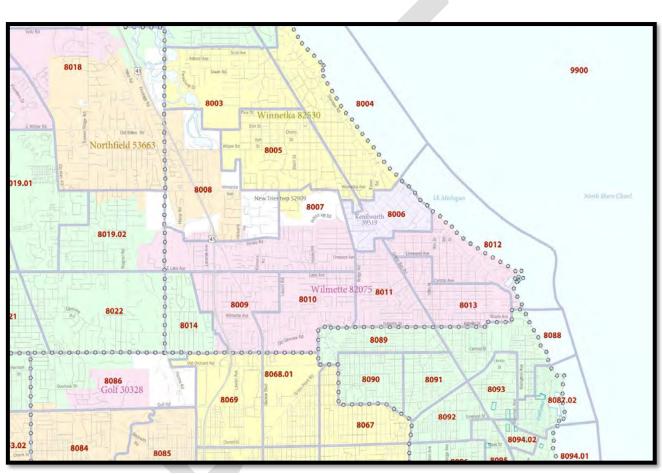


Figure: Village of Wilmette Census Tracks by Geographic Location

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Lead Service Line Replacement Funding Census Metric Data and Percentile Ranks Data from 2021 5-year American Community Survey

	Mediar	Median Household Income		So	Social Security Income	ncome		Poverty		Supplen	Supplemental Security Income	ty Income
		Table B19013			Table B19055	55		Table S1701			Table B19056	9
				% of	Percentile		% of	Percentile		% of	Percentile	
Census Tract	Dollars	Percentile Rank	Points	Population	Rank	Points	Population	Rank	Points	Population	Rank	Points
Census Tract 8007, Cook County, Illinois	\$ 230,972	99.629	0	31.36	51.744	25	1.3	3.163	0	1.28	15.786	5
Census Tract 8009, Cook County, Illinois	\$ 117,208	87.206	0	35.81	70.074	35	1.8	4.852	0	0.67	8.384	0
Census Tract 8010, Cook County, Illinois	\$ 138,897	93.294	0	40.50	84.656	40	3.2	10.902	5	1.85	24.109	10
Census Tract 8011, Cook County, Illinois	\$ 215,694	99.32	0	22.06	18.469	5	2.6	8.2	0	1.44	17.874	5
Census Tract 8012, Cook County, Illinois	\$ 236,250	99.66	0	46.33	95.464	45	1.3	3.163	0	1.59	20.147	10
Census Tract 8013, Cook County, Illinois	\$ 131,848	91.347	0	24.80	26.727	10	9.9	31.541	15	2.19	28.746	10
Census Tract 8019.02, Cook County, Illinois	\$ 173,844	577.75	0	20.15	13.52	5	0.5	0.798	0	0.00	0	0

	Hous	Houses Built pre-1990	066	Child	Children Under 6		n	Unemployment		Lead Service Line Burden	ne Burden
	_	Table B25034		Tables B(Tables B09001 & B01003	03		Table S2301			
	% of	Percentile			Percentile		€ 0 %	Percentile		% Lead of	
Census Tract	Houses	Rank	Points	% of Population	Rank	Points	Population	Rank	Points	Total	Points
Census Tract 8007, Cook County, Illinois	88.06	63.513	30	9.58	83.972	70	3	20.939	10	20.2%	0
Census Tract 8009, Cook County, Illinois	93.03	76.658	35	6.24	42.585	30	4.1	34.909	15	20.2%	0
Census Tract 8010, Cook County, Illinois	82.32	50.46	25	99.8	75.683	09	9.5	52.717	25	20.2%	0
Census Tract 8011, Cook County, Illinois	77.89	41.492	20	7.65	64.261	20	4	33.497	15	20.2%	0
Census Tract 8012, Cook County, Illinois	91.24	71.713	35	3.94	13.325	5	1.7	6.877	0	20.2%	0
Census Tract 8013, Cook County, Illinois	81.57	48.802	20	6.84	52.348	40	1.7	69.481	30	20.2%	0
Census Tract 8019.02, Cook County, Illinois	80.11	46.283	20	9.25	81.7	20	6.0	0.921	0	20.2%	0

Note: Points shown for the various census track metrics are based upon IEPA's Part 663 Public Water Supply Loan Program rules and are subject to change. The maximum amount of points for a given census track is 400 points.

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APPENDIX B

Village of Wilmette Water Service Line Material Map

<u>As of March 26, 2024</u>



Appendix B - Water Service Line Material Inventory

