



Subject: Leaks Exceed 10% Limit

Thank you for submitting your 2012 Annual Water Use Efficiency (WUE) Report. Based on the information you submitted, your three-year average leakage rate is greater than the 10% standard. As you may be aware, this is out of compliance with WAC 246-290-820 unless you have developed and implemented a water loss control action plan.

WAC 246-290-820(4): If the average distribution system leakage for the last three years does not meet the standard..., the municipal water supplier shall develop and implement a water loss control action plan.

This letter provides technical assistance to help you get into compliance by completing a water loss control action plan aimed to reduce leaks below 10%.

Background

Many water systems report average water loss greater than 10% to the Department of Health (department). Commonly, much of this “lost water” isn’t a real leak at all, but apparent losses that are difficult to find, such as meter inaccuracies, theft, authorized uses that are not being accounted for, and/or mistakes in collecting and reporting data.

Leaks do occur, even if they don’t surface. Most water systems are already taking actions to reduce both real and apparent losses. In order to be in compliance, you will want to document these efforts within the action plan.

Completing a water loss control action plan

If you have already developed and are implementing your action plan, you are in compliance and no further action is necessary. If not, here is how you do it.

At a minimum, include the following in your water loss control action plan:

- 1. Water loss control methods you will implement to strive for the 10% standard.**
 - Such as leak detection, meter replacement, attending water loss management educational courses, or performing a [water audit](#).
- 2. An estimate of how long it will take you to achieve the standard.**
 - In addition to your customer reduction WUE goal, you may want to establish a leak-reduction goal to identify a benchmark.

3. **A budget that demonstrates how you will pay for controlling leakage.**
 - Consider a rate increase, apply for loans/grants, [get paid to save energy by taking advantage of incentives aimed at funding leak detection and repair projects](#), or any other means to pay for infrastructure improvements.

4. **Any technical or economic concerns that prevent you from complying with the standard.**
 - If you determine that you cannot meet the 10% standard, you must explain what factors are keeping you from reaching 10%.
 - Water systems with 500 or fewer connections may submit a request for the department's consideration to increase the leakage standard to 20%.
 - In either case above, a strong case will need to be made in order to be credible.

If you are submitting a planning document to the department for approval, your water loss control action plan must be included. The WUE rule also allows us to request that you submit your action plan at any time.

What You Need to Do Next

The department **isn't** requiring you to submit the action plan at this time. However, you should complete the action plan and summarize within the annual WUE report. **Before you submit your WUE report next year, we expect you to either:**

1. Complete the action plan;
- or
2. Achieve a level of water loss below 10%, based on the last three-years of data.

Depending on your level of water loss, the efforts you will need to undertake are based on the severity of water loss. If your average water loss is:

Greater than 10 and less than 20%, you must:

1. Assess data accuracy.
2. Assess data collection methods and errors.

Between 20-29%, within 12 months you must:

3. Complete 1 and 2 above, and;
4. Implement field activities to reduce leakage.

30% or greater, within 6 months you must:

5. Complete steps 1, 2, and 4 above, and;
6. Implement additional water loss control methods to reduce leakage.

Much more information can be found online from the department's [new water loss control website](#). Chapter 6 of the [Water Use Efficiency Guidebook](#) also has more guidance about meeting the state's 10% leakage standard, including examples for how to complete a [water loss control action plan](#).

Thank you for your help in meeting this important requirement. If you have any questions, please contact me at (360) 236-3154 or e-mail michael.dexel@doh.wa.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Dexel", written in a cursive style.

Mike Dexel
Water Use Efficiency Program Manager
Washington State Department of Health
Office of Drinking Water, Policy and Constituent Services Section
Olympia, WA 98504-7822

[WUE website](#)