OIG NEW ORLEANS OFFICE OF INSPECTOR GENERAL

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Inspector General

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RE: Follow-Up on OIG recommendations made in the 2017 *Lead Exposure and Infrastructure Reconstruction* Report

Dear Mr. Hayman, Council President Morrell, Ms. Tymrak, and Mr. Giarrusso,

The Office of Inspector General (OIG) is authorized to comment on rules, regulations, policies, procedures, and transactions for the purpose of preventing and detecting fraud, waste, and abuse, and to monitor the implementation of recommendations made by the Office of Inspector General.[1] In 2017, the OIG conducted an evaluation of Sewerage & Water Board of New Orleans (S&WB) policies and procedures regarding infrastructure work that may involve partial replacement or disturbance of lead service lines (LSL). On July 19, 2017, the OIG released a Report entitled *Lead Exposure and Infrastructure Reconstruction* (2017 Report).[2] The report included findings and recommendations to reduce the potential risk to the public of lead exposure in drinking water resulting from infrastructure reconstruction work in the City of New Orleans (City). This follow-up letter addresses the status of actions taken by the S&WB to implement the OIG's recommendations.

In 2026, the Louisiana Legislature enacted Act No. 938 which gave the City authority to prescribe rules and regulations governing the appointment, terms, and service of board members of the S&WB and regulatory and oversight of the S&WB, including regulation and approval of rates,

[1] City Charter Sec. 9-401(2); City Code Sec. 2-1120(2) and (10)(f).
[2] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017. https://nolaoig.gov/wp-content/uploads/2023/03/OIG-Lead-Exposure-and-Infrastructure-Reconstruction-Final-Report-170719-r.pdf

budgets, policies, contracts, election of the executive director, and the hiring of board employees, thereby ending the independent operation of the S&WB. Pursuant to this authority, the New Orleans City Council adopted Ordinance No. 35,521 M.C.S. in August 2026 to take direct control over S&WB billing policies and procedures, rates, incurrence of debts, budgets, policies, professional service agreements, and confirmation and approval of the executive director and general superintendent and any employment agreements with those executives. Because of this new role of the City Council, this letter is also addressed directly to the Council. The OIG is issuing this follow-up public letter to reaffirm the importance of implementing the recommendations presented in the 2017 Report in order to prevent lead exposure risks associated with infrastructure reconstruction. The 2017 Report warned that disturbing aging LSLs during construction can heighten the risk of lead entering household drinking water, highlighting the need for the S&WB to adopt stronger safeguards and communicate more clearly with the public. Because these issues directly affect public health and trust in the City's infrastructure work, it is important to outline how S&WB has responded to the OIG's recommendations since the release of the 2017 Report. The sections that follow describe the S&WB's actions taken to address the OIG's 2017 recommendations, note areas where progress has been made, and identify where continued attention is needed to ensure the public remains protected as infrastructure reconstruction projects continue throughout the City.

Finding 1 Follow-Up: Resident Notification and Lead-Risk Communication

At the time of the OIG's 2017 evaluation, the City and the S&WB had embarked on $2.4 billion of infrastructure reconstruction projects, known as the Joint Infrastructure Recovery Request (JIRR) Program. Using a combination of federal and local funds, the JIRR Program aimed to fund more than 200 construction projects covering over 400 miles of roads and infrastructure. Many of these projects involved repairing and/or replacing components of the water supply system, including service lines. Finding 1 of the 2017 Report addressed that an unknown number of the City's service lines were LSLs, and the S&WB did not have complete or accurate records of where those LSLs were located. The OIG concluded the S&WB's lack of LSL quantity and location data posed an imminent risk to public health as infrastructure reconstruction projects commenced, stating "the practice of conducting partial LSL replacements and disturbing LSLs exposes residents to risk if they are unaware of the likelihood of increased exposure to lead in their drinking water."[3]

[3] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017, 25.

2017 Finding 1: The City and the S&WB have not alerted residents to or provided them with information to reduce the risk of increased exposure to lead in water caused by the partial replacement or disturbance of lead service lines.[4]

To resolve Finding 1, the OIG recommended, "the City and the S&WB should develop and implement a strategic public health initiative that reduces the risk of exposure to lead in water caused by the partial replacement or disturbance of lead service lines."[5] The OIG's recommendation urged S&WB to take immediate steps to educate the public and mitigate the ongoing risk of elevated lead exposure that should include the following at a minimum:

- A thorough and persuasive public education plan that includes risk communication strategies to educate the public about the risks associated with LSLs.
- Advance notification of impending infrastructure work that may disturb LSLs.
- Detailed instructions for flushing service lines to reduce exposure to lead after a partial LSL replacement has been performed or LSLs may have been disturbed.
- Distribution of water filter kits and refills certified to remove lead to residents affected by partial LSL replacements or LSL disturbances.
- Water quality testing post-LSL replacement or LSL disturbances to provide residents with assurance that elevated lead levels have subsided.

In its 2017 response to the OIG's recommendations, S&WB management acknowledged the risk of elevated lead levels following partial LSL replacement or disturbance. S&WB gave several examples of measures they had already begun implementing to improve communication with customers, including the following:

> "developing a map of LSLs across New Orleans; public communication about the partial replacement of LSLs and steps homeowners can take to reduce the risk of lead exposure; encouraging homeowners to replace privately owned lead lines; and incorporating notices of partial LSL replacement into the communications plan for the CIP [Capital Improvement Program]."[6]

The OIG's follow-up determined the S&WB partially implemented the 2017 Report's recommended steps to develop and implement a strategic public health initiative to reduce exposure to lead in water from LSLs as detailed below: [7]

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[4] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017, 25.
[5] Ibid., 29.
[6] Ibid., 61.
[7] The OIG's verification relied on interviews with S&WB executives and examination of documents supplied by S&WB. The OIG did not conduct independent testing to determine whether S&WB personnel or contractors were following the protocols as recommended.

Public Education and Communications Strategies – Partially Implemented

Since the release of the 2017 Report, S&WB has taken several actions intended to improve resident notification and reduce the risk of lead exposure during construction activities that may disturb LSLs. S&WB has added lead awareness information to its website to educate customers about the dangers of LSLs in New Orleans, and offers options for them to request lead testing kits and water filter pitchers, as well as check the status of the service lines to their homes.[8] S&WB leadership reported that it communicates lead awareness information to customers through mailed notices and door-hangers. The OIG verified S&WB hangtags and mail notifications to customers contained lead awareness information.

S&WB leadership acknowledged it had not developed a standalone strategic public health initiative specific to lead exposure during construction. S&WB leadership emphasized that they do not consider themselves public health experts and therefore rely on state and federal agencies for lead awareness content. S&WB relies on best practice guidance from the U.S. Environmental Protection Agency (EPA) and the Louisiana Department of Health (LDH). S&WB leadership asserted it coordinates with the LDH on lead awareness information that it communicates to customers through mailers, hangtags, letters, its Annual Update and Consumer Confidence Report on Water Quality (Annual Water Quality Report), public presentations, and its website. While these efforts meet basic notification requirements, they do not constitute a fully developed, strategic, and persuasive public education plan recommended in the 2017 Report. As a result, this recommendation remains only partially fulfilled.

Advance Notification of Impending LSL Repairs – Implemented

The OIG recommended that S&WB provide advance notice to the public prior to any repair work that may disturb LSLs. The OIG verified S&WB designed and implemented protocols to train both staff and contractors to provide advance notification to customers of impending LSL replacement. The OIG reviewed a 2024 draft copy of the S&WB's Lead Service Line Replacement Plan (LSL Replacement Plan) provided by S&WB leadership and verified S&WB documented those notification protocols.[9] S&WB stated that the timing of advance notifications to customers varied by project type, but a City ordinance required S&WB to notify customers no later than five days prior to a scheduled repair.[10] The OIG verified that the advance notifications S&WB provided to customers included information on the type of service line present, steps customers can take to protect themselves, explanations of potential lead sources, and links to additional information on the S&WB website. For scheduled service line replacements, the notices also included the planned date and time window for the work, a statement that flushing is required afterward, and step-by-step flushing

[8] https://www.swbno.org/Projects/LeadAwareness.
[9] Sewerage and Water Board of New Orleans. *SWBNO Lead Service Line Replacement Plan* (Draft, November 2024).
[10] City Code Sec. 159-3(j).

instructions. S&WB reported that these materials were available in English, Spanish, and Vietnamese. Based upon these steps and processes, S&WB has implemented the OIG's recommendation to provide advance notice to its customers before any work that may disturb LSLs.

Since the release of the 2017 Report, S&WB has also implemented new notification protocols for when an LSL is identified during service line replacements, which both S&WB workers and contractors follow. As documented in the City's JIRR Program Standard Operating Procedures (JIRR Program SOP), which S&WB leadership stated were followed by S&WB employees and contractors, the identification of an LSL triggered several required notifications to construction managers, the City's Office of Strategic Engagement and Special Projects, and the engineer of record and/or the inspector.[11,12] The JIRR Program SOP also required S&WB employees and contractors to notify customers when an LSL was identified, as well as after the LSL had been replaced. In alignment with the JIRR Program SOP, S&WB leadership reported that when an LSL was identified, S&WB and its contractors distributed hangtags and flyers to affected customers explaining the actions they could take to reduce their exposure to lead in the drinking water. Once S&WB has replaced the LSL on the public-service side, they distributed notifications to the affected customers that the service line replacement was complete. The OIG verified S&WB's LSL notifications included information alerting customers that the service line between the meter and the customer's home may also be an LSL, instructions on how to flush their system, and the availability of lead testing. The OIG verified that these procedures were included in the JIRR Program SOP. The OIG concluded S&WB's customer notification procedures aligned with the emphasis of the OIG's recommendation on reducing the risk of exposing customers to lead in water during the partial replacement or disturbance of LSLs.

Detailed Instructions for Flushing Service Lines - Implemented

The OIG recommended that S&WB provide customers with clear flushing instructions whenever LSLs are disturbed. Since the 2017 Report's release, S&WB began providing flushing instructions on hangtags left at affected properties, along with additional recommendations to reduce lead exposure. S&WB leadership stated it supplied the hangtag notifications to contractors for distribution to customers in advance of any work that may disturb LSLs, as required by the JIRR Program SOP.[13] The S&WB website provided information on flushing service lines as a recommended step to help reduce lead exposure. The OIG concluded S&WB appeared to have fully implemented the recommendation to provide the public with detailed instructions for flushing service lines.

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[11] City of New Orleans Department of Public Works. *Standard Operating Procedures: FEMA JIRR Project Management.* Revised December 19, 2025. Effective December 21, 2025.

[12] The City's Office of Strategic Engagement and Special Projects (OSE) provides public information about the comprehensive infrastructure repair program at https://ose.nola.gov/home/.

[13] City of New Orleans Department of Public Works. *Standard Operating Procedures: FEMA JIRR Project Management.* Revised December 19, 2025. Effective December 21, 2025.

Distribution of Water Filter Kits and Refills - Partially Implemented

The OIG recommended that S&WB distribute water filters and refills certified to remove lead to customers affected by partial LSL replacements or disturbances. The auditors verified that S&WB now provided free water filter pitchers to customers upon request.[14] However, S&WB did not proactively distribute the filters to all affected households and distribution of the filters was dependent on customer requests. Therefore, the OIG's recommendation is only partially implemented.

Water Quality Testing Post-LSL Replacement or Disturbance – Partially Implemented

The OIG recommended that S&WB conduct water quality testing after LSL replacements and disturbances and communicate the results to impacted customers. S&WB leadership stated that customers may request a free water testing kit online and that S&WB workers and contractors leave door hangtags informing customers of this service.[15] As of March 2026, S&WB leadership reported conducting 2,552 tests since 2017 and providing written results to customers. The OIG verified that the results received by a customer indicated if lead was detected in their drinking water. The results also described potential health impacts associated with lead exposure and provided recommended practices for reducing lead in drinking water. However, S&WB's water quality testing was customer-initiated rather than performed after each LSL replacement or disturbance. While S&WB's water quality testing service was available to all customers and widely used, the OIG recommendation called for proactive testing. Therefore, S&WB had only partially implemented the OIG's recommendation to provide customers with assurance that elevated lead levels have subsided post-LSL replacement or LSL disturbance.

Finding 2 Follow-up: Coordination, Testing, and Lead-Service Line Management

Finding 2 of the 2017 Report addressed S&WB's lack of a long-term strategy for lead reduction, including full LSL replacement.

2017 Finding 2: The City and the S&WB have not developed a long-term lead reduction strategy that includes encouraging and providing support for property owners to replace privately-owned portions of LSLs.[16]

[14] S&WB customers can request a water filter pitcher online at https://www.swbno.org/Form/FilterPitcherRequest.
[15] https://www.swbno.org/Form/LeadTestingKitRequest. The water filter pitcher provided by S&WB meets NSF Standard 53, which is certified for lead reduction below the EPA's action level.
[16] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017, 40.

The OIG recommended,

> The City and the S&WB should persuade residents of the advantages of full LSL replacement and encourage property owners to replace privately-owned LSLs by offering options that ease the financial burden [such as] deferred payment programs, customer reimbursements, low-interest or interest-free loans, and rebates.[17]

In its 2017 response to the OIG's recommendations to resolve Finding 2, S&WB management acknowledged the importance of full LSL replacement as a long-term solution. S&WB agreed that encouraging private-side replacement was beneficial, but they emphasized the legal and financial constraints. Specifically, the Louisiana constitution's prohibition of the donation of public funds prohibited S&WB from using public funds to repair service lines on private property.[18] Additionally, S&WB asserted that many homeowners cannot afford private-side replacement and S&WB could not require its customers to replace the private-side portion of known LSLs.

The S&WB's LSL Replacement Plan outlined how the S&WB will identify and remove all LSLs in its system.[19] The OIG's review of the LSL Replacement Plan determined that it served as the long-term strategy for lead reduction recommended in the 2017 Report. However, the OIG concluded the S&WB has not fully addressed the 2017 recommendation. While the draft LSL Replacement Plan included broad public education and outreach related to lead risk, it did not include a sufficient strategy to educate the public about the advantages of full LSL replacement or offer options to reduce the financial burden for customers to replace the private portions of LSLs. Therefore, the S&WB cannot yet meet the 2017 recommendation's goal of promoting full LSL replacement as the standard, as discussed below:

Public Education of the Benefits of Full LSL Replacement - Partially Implemented

Since the release of the 2017 Report, the S&WB has taken initial steps to inform and encourage residents about the benefits of full LSL replacement. S&WB leadership stated that when the S&WB identified an LSL, customers received a notification that the private portion of the LSL is the customer's responsibility to replace. S&WB leadership stated the S&WB also discussed the benefits of full LSL replacement with residents when they hosted community meetings. The OIG verified that S&WB's service line notification mailers, Annual Water Quality Report, and its website included information to customers stating that it was the property owner's responsibility to replace the private portion of the LSL in order to reduce lead exposure.[20] However, S&WB has not conducted dedicated outreach specifically aimed at explaining the benefits of full LSL replacement or encouraging the public to replace the private portion. S&WB leadership stated that it was in the

[17] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017, 43.
[18] Louisiana Constitution, art. VII, § 14(A).
[19] Sewerage and Water Board of New Orleans. *SWBNO Lead Service Line Replacement Plan* (Draft, November 2024).
[20] https://www.swbno.org/Projects/LeadAwareness.

process of finalizing a formal communications plan for its LSL replacement program. S&WB leadership anticipates mailing notices to customers before service line inspections are performed to explain the program and the benefits of full LSL replacement. However, the full communications strategy was not finalized or fully executed. As a result of the limited communications dedicated to persuading residents of the full advantages of LSL replacement, the OIG concluded the recommendation was partially implemented.

Funding of Full LSL Replacement – Partially Implemented (Pending Voter Approval)

Since the release of the 2017 Report, the S&WB has made progress to overcome the restraints that prevented them from implementing the OIG's recommendation to fund or offer options to residents to replace the private portions of LSLs. In December 2024, S&WB secured $86 million from the LDH's Drinking Water Revolving Loan Fund (DWRLF) to inspect the City's water service lines for lead and to replace LSLs noted during the inspections.[21] The LDH received federal funding through the EPA's Drinking Water State Revolving Fund (DWSRF), which provides federal funding to states for drinking water infrastructure projects. EPA distributes congressional funds to states, which must add a 20% match.[22] Per EPA requirements, projects funded by the DWSRF "must replace the entire LSL unless a portion has already been replaced", which prevented S&WB from using the funding for LSLs with private-side portions under current Louisiana law.[23]

S&WB leadership stated it was actively seeking legal authority to replace private-side LSLs with public funds and submitted a request for a legal opinion to the Louisiana Office of the Attorney General (Attorney General) in February 2025. This demonstrates the S&WB's intent to eventually offer full replacement at little or no cost to its customers. In May 2026, the Attorney General issued an opinion in response to S&WB's request. The Attorney General opined that S&WB may conduct LSL replacements on customer-owned portions of LSLs, stating the following:

> The Sewerage and Water Board of New Orleans may conduct lead service line replacements on customer-owned portions of the service lines as long as the SWBNO has a demonstrable, objective, and reasonable expectation of receiving something real and substantial in exchange for conducting the replacements.[24]

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[21] Raeven Poole, "$86M Awarded to Inspect New Orleans Water Line System," *WGNO*, updated January 10, 2025, https://wgno.com/news/louisiana/orleans-parish/86m-awarded-to-inspect-new-orleans-water-line-system/.

[22] U.S. Environmental Protection Agency, "How the Drinking Water State Revolving Fund Works," updated August 17, 2026. https://www.epa.gov/dwsrf/how-drinking-water-state-revolving-fund-works

[23] U.S. Environmental Protection Agency, "Planning and Conducting Lead Service Line Replacement," updated March 8, 2024. https://www.epa.gov/ground-water-and-drinking-water/planning-and-conducting-lead-service-line-replacement.

[24] Attorney General of Louisiana. *Opinion No. 26-0052.* Baton Rouge, LA: Louisiana Department of Justice, 2026. https://www.ag.state.la.us/Opinions.

At the time of the Attorney General's opinion, S&WB was also tracking legislation in the Louisiana Senate, which proposed a constitutional amendment allowing political subdivisions to use public funds to identify and replace water service lines on private property in accordance with updated EPA lead and copper requirements. The Senate Bill, SB228, proposed adding language to the Louisiana Constitution to permit "the use of public funds … for the purpose of identifying, inventorying, removing or replacing drinking water utility service lines made of or affected by hazardous materials…on property owned by utility customers."[25] In June 2026, the Louisiana legislature enacted SB228 as Act 607 and the amendment will appear on the November 3, 2026, statewide ballot.

S&WB cited the ongoing legal restrictions that prevented it from using public funds to replace private-side portions of LSLs or provide any form of financial assistance for customers seeking private-side LSL replacement. Therefore, S&WB's efforts to provide support for customers to replace the private portions of LSLs remained limited. At the time of this letter, S&WB offered no subsidies, grants, payment plans, or cost-sharing for private-side LSL replacement due to these legal restrictions. Customers must pay the full cost themselves, which S&WB acknowledged was often prohibitively expensive, which limited customers' ability to replace the private-side portions of LSLs. S&WB leadership stated it gives customers the option to coordinate private-side replacements so both sides can be replaced simultaneously, reducing disruption and costs. At the time of this letter, this was the only form of assistance S&WB offered to customers. Although S&WB has made significant progress by securing federal funding, pursuing legal authority to conduct full LSL replacements, and supporting constitutional changes that would permit the use of public funds on private property, these efforts have not resulted in any current programs that provide financial assistance for private-side LSL replacements. Regardless of the outcome of the proposed constitutional amendment, the S&WB will need to develop practical assistance mechanisms that reduce the financial burden on customers and support full, equitable replacement of lead service lines across the city.

S&WB Response to Recent Federal Regulatory Changes

Since the release of the OIG's 2017 Report, the federal regulatory landscape governing lead in drinking water has changed substantially. The EPA's 2021 Lead and Copper Rule Revisions (LCRR) and the 2024 Lead and Copper Rule Improvements (LCRI) significantly expanded requirements that water systems, such as the S&WB, must comply with for service line inventories, customer notification, sampling, and long-term service line replacement. LCRI criteria required S&WB to fully replace all lead and galvanized requiring replacement (GRR) service lines under their control within

[25] LegiScan. "Louisiana Senate Bill 228 (2026 Regular Session), Act No. 607." Accessed June 10, 2026. https://legiscan.com/LA/text/SB228/id/3445844.

ten years of the LCRI's compliance start date of November 1, 2027.[26,27] The updated rules also lowered the lead action level and strengthened sampling protocols.[28] Together, these requirements increased both the urgency and the volume of LSL replacement work S&WB must complete.

In its written response to the OIG's 2017 Report, S&WB leadership acknowledged S&WB did not have a detailed inventory of the location of every LSL in New Orleans [and] began taking inventory of the approximately 140,000 water service lines in fall 2016 using GIS mapping."[29] S&WB leadership stated it had recorded over 3,000 water service lines as of July 2017 and determined approximately 800 (27%) of those 3,000 lines were composed of lead.[30] The 2021 LCRR required all water systems to develop a complete, publicly accessible service line inventory and to issue timely notifications to customers, expanding S&WB's previous communication responsibilities beyond what federal regulations had previously required at the time of the OIG's 2017 Report. The LCRR required water systems to include all public and private service lines in an initial service line inventory by October 2024 and to categorize each line as lead, non-lead, GRR, or unknown.[31]

The purpose of the LCRR's initial inventory requirement was to ensure water systems mapped out all service lines, identified problem areas, and notified customers when LSLs were identified. The LCRR required water systems to notify customers of known or potential service lines containing lead within 30 days of the initial completion of the inventory and repeat notification on an annual basis until the entire service connection was no longer lead, galvanized requiring replacement, or unknown. The 2024 LCRI built upon the LCRR's initial inventory criteria, requiring water systems to establish a baseline inventory that was a finalized comprehensive roadmap used to mandate and track full-scale LSL replacements. In addition to the baseline inventory, "All water systems with at least one lead, galvanized requiring replacement, or unknown service line must submit a service line

[26] Galvanized service lines are made of iron or steel. GRR service lines are galvanized service lines that are or ever were downstream of an LSL or currently downstream of a lead status unknown service line.

[27]Environmental Protection Agency. *Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements.* October 2024. https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_service-line-inventory.pdf.

[28] The lead action level is the concentration of lead in drinking water that requires a water system to take corrective action. The LCRI lowered the drinking water lead action level from 15 parts per billion (ppb) to ten ppb. If a water system's 90th percentile sample exceeds ten ppb, the S&WB must accelerate LSL replacements, improve corrosion control, and increase public notifications as soon as unacceptable lead levels are identified.

[29] New Orleans Office of Inspector General, *Lead Exposure and Infrastructure Reconstruction*, Issued July 19, 2017, 62.

[30] Ibid.

[31]Environmental Protection Agency. *Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements.* October 2024. https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_service-line-inventory.pdf.

replacement plan."[32] The LCRI established a November 1, 2027 deadline for the baseline inventory and the service line replacement plan.[33]

The OIG reviewed a draft copy of the S&WB's LSL Replacement Plan and concluded the plan was likely compliant with the LCRI's requirements for what water systems must include in their service line replacement plan.[34] S&WB leadership asserted its LSL Replacement Plan will be finalized prior to the LCRI's November 1, 2027 deadline. The OIG verified S&WB completed and published its initial service line inventory by the October 2024 compliance deadline.[35] S&WB made the inventory accessible to the public through an interactive map on the S&WB website.[36] S&WB leadership stated its service line inventory included all known public and private portions of service lines and incorporated predictive modeling based on historical plumbing records, work orders, meter installation dates, parcel data, and census information. To ensure accuracy, S&WB leadership stated that it digitized decades of historical plumbing records, conducted multiple internal reviews, and relied on data scientists to validate the completeness of the inventory during the development of the public mapping tool.

S&WB stated that it updated the service line inventory as new information became available, as required by the LCRI. S&WB leadership stated that reclassification of service lines in the inventory occurred when field crews visually confirmed service line material during excavation or repair work. S&WB also received customer-submitted information, but must obtain LDH approval before using it to update the service line inventory. Beginning July 1, 2025, the LCRI required S&WB to annually report to the state that it provided the required notifications and delivered LSL information materials to customers with lead, GRR, or unknown service lines by providing copies of those notifications and informational materials to LDH.[37] S&WB leadership stated that it had submitted all required inventory and notification reports to the LDH and had not received any deficiency notes, describing LDH as a strong partner in the process.

S&WB leadership stated that its LSL Replacement Program had begun developing a long-term LSL replacement plan to meet the LCRI's ten-year replacement mandate. S&WB's draft LSL Replacement

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[32] Environmental Protection Agency, "2021 LCRR Requirements that Are Retained in the Final Lead and Copper Rule Improvements and Compliance Dates," October 2024. https://www.epa.gov/system/files/documents/2024-04/revised-508_lcrr-compliance-fact-sheet_4.17.24.pdf.

[33] Environmental Protection Agency. *Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements.* October 2024. https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_service-line-inventory.pdf.

[34] Sewerage and Water Board of New Orleans. *SWBNO Lead Service Line Replacement Plan* (Draft, November 2024).

[35] Sewerage & Water Board of New Orleans. "SWBNO releases Initial Water Service Line Material Inventory." Press release, October 11, 2024. https://www.swbno.org.

[36] The service line inventory can be found at https://www.swbno.org/Projects/LeadAwarenessMap.

[37] Environmental Protection Agency, "2021 LCRR Requirements that Are Retained in the Final Lead and Copper Rule Improvements and Compliance Dates," October 2024. https://www.epa.gov/system/files/documents/2024-04/revised-508_lcrr-compliance-fact-sheet_4.17.24.pdf

Plan included both public and private-side service line replacements. S&WB leadership stated that its LSL Replacement Program staff worked full-time on S&WB's compliance with LCRR and LCRI requirements. In May 2026, S&WB selected an engineering firm to support and manage aspects of the LSL Replacement Program.[38] S&WB staff remain responsible for overseeing the LSL Replacement Program and working closely with the engineering firm to accomplish its objectives. S&WB leadership asserted it aims to complete its LSL replacement plan by the LCRI's December 2037 deadline. However, S&WB emphasized that implementation of the plan was dependent on securing adequate funding. The S&WB estimated its LSL Replacement Program will cost approximately $1 billion to identify and replace all LSLs in the S&WB's inventory by the LCRI's December 31, 2037 deadline.[39] Because S&WB did not yet have a permanent funding source, it was unable to estimate a timeline for full city-wide service line replacement. S&WB drafted a formal policy to comply with the LCRI. [40] However, S&WB leadership explicitly stated that achieving full replacement within ten years was "funding-dependent."

In addition to the LCRI's deadline for LSL replacement, it also required water systems to notify and protect customers whenever a full or partial lead or galvanized service line replacement occurs, since these activities can temporarily increase lead levels.[41] In order to meet the LCRI's customer service notification requirements, S&WB stated that it notified customers by mail and door-hangers as soon as lead, GRR, or unknown service lines were identified.[42,43] The LCRI also required water systems to supply an ANSI-certified lead-reducing pitcher with six months of replacement cartridges and use instructions to all impacted customers.[44,45] As of September 2026, S&WB only provided water filter pitchers to customers upon request. S&WB must begin distributing certified lead-reducing filters with six months of cartridges to all impacted customers by November 1, 2027 in order to be LCRI-compliant. The LCRI also required water systems offer a follow-up tap sample for

[38] "The Sewerage and Water Board of New Orleans selects CDM Smith to Manage $1 Billion Lead Service Line Replacement Program." Press release, May 12, 2026. https://www.cdmsmith.com/news/the-swbno-selects-cdm-smith-to-manage-$1-billion-lead-line-replacement-program.

[39] Ibid.

[40] Sewerage and Water Board of New Orleans. *SWBNO Lead Service Line Replacement Plan* (Draft, November 2024).

[41] The LCRI required notification of known or potential service lines containing lead within 30 days of the initial identification and repeat notification on an annual basis until the entire service connection was no longer lead, galvanized requiring replacement, or unknown. For new customers, water systems must also provide the notice at the time of service initiation.

[42] The OIG verified S&WB's notification templates included LCRI-required language but did not conduct independent testing to determine S&WB distributed the notifications to customers as soon as lead, GRR, or unknown service lines were identified.

[43] Residents can request a lead test kit by contacting S&WB's lab by calling 504-52-WATER or online at https://www.swbno.org/Form/LeadTestingKitRequest

[44] American National Standards Institute (ANSI) is a private, non-profit organization that accredits certifiers of product safety and performance standards.

[45] Environmental Protection Agency. *Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements.* October 2024. https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_service-line-inventory.pdf.

lead testing between three and six months after the service line replacement.[46] Although S&WB's customer-initiated water quality testing did not fully meet the OIG's 2017 recommendation for proactive testing, it did align with LCRI requirements.

While S&WB has made progress in developing its initial service line inventory and improving customer notifications as LSLs are identified, it has not yet implemented the persuasive communication strategies or financial support mechanisms recommended by the OIG in the 2017 Report. These gaps will become increasingly critical as the S&WB must fully replace all lead and GRR service lines in its inventory before the LCRI's December 2037 compliance deadline.

Conclusion

The OIG concluded that S&WB adopted several operational measures that aligned with the intent of the OIG's 2017 recommendations to reduce the potential risk to the public of lead exposure in drinking water resulting from infrastructure reconstruction work. In particular, S&WB established a service line inventory, improved customer notifications, provided water quality testing, and established procedures for notifying customers when lead or GRR lines were identified. These actions demonstrated that S&WB has implemented the procedural components of the OIG's recommendation concerning resident notification and lead-risk communication and appeared to be on track for compliance with LCRI requirements specific to public outreach.

Taken together, the recent LCRR and LCRI regulatory changes make clear that the OIG's recommendations in the 2017 Report are no longer merely advisory, but foundational to S&WB's future compliance with federal requirements. The LCRI's ten-year full LSL replacement mandate, combined with the strengthened public communication requirements, means S&WB will need to continue expanding its public outreach and implement a strategy to reduce or eliminate the financial burden on its customers to replace private-side LSLs. Separately, securing the estimated $1 billion in funding for S&WB's LSL Replacement Program remains critical. To date, S&WB has secured $86 million from the DWSRF and S&WB is currently pursuing an additional $66 million through another DWSRF funding opportunity to further support LSL replacements.[47]

However, S&WB did not undertake measures that fully fulfilled the OIG's recommendation to communicate the advantages of full LSL replacement to its customers and reduce the financial barriers to doing so. The City's recent assumption of control of the S&WB comes at a pivotal moment as the S&WB must submit its updated baseline inventory and its finalized LSL replacement plan by

[46] Environmental Protection Agency. *Final Lead and Copper Rule Improvements Technical Fact Sheet: Service Line Inventory and Replacement Requirements.* October 2024. https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_service-line-inventory.pdf.

[47] Sewerage & Water Board of New Orleans, "Lead Awareness." https://www.swbno.org/Projects/LeadAwareness. Accessed August 17, 2026.

November 1, 2027, and replace all lead and GRR service lines by December 31, 2037 to comply with federal compliance deadlines. The transition creates a single point of accountability for addressing long-standing challenges in meeting the federal deadlines, as well as full implementation of the OIG's 2017 recommendations, including legal barriers to funding private-side LSL replacement and the need for long-term funding. Without fully implementing the OIG's 2017 recommendations, the S&WB will continue to face major constraints in meeting federal mandates and protecting public health.

Sincerely,



Edward Michel, CIG
Inspector General