

Lead Service Line Replacement Plan

WSID:

DATE:

Section 1: Strategy for determining the composition of lead status unknown service lines in the inventory

The Water System determines the composition of lead status unknown service lines in its inventory by utilizing the methodologies listed below:

Water Quality Sampling

Service Line Sampling

Calculate premise plumbing volume, flush out premise plumbing, then collect and analyze a service line sample.

Flushed Sampling

After a set flushing time, collect and analyze a sample.

Sequential Sampling

Collect and analyze a series of consecutive samples from the interior tap to the service line.

Excavation

Mechanical Excavation

Vacuum Excavation

Modeling

Predictive Modeling

Geostatistical Modeling

Emerging Method approved by Vermont Department of Environmental Conservation

Other Method approved by Vermont Department of Environmental Conservation

Non-applicable: The water system does not have lead status unknown material service lines. If lead status unknown material service lines are discovered, the water system will revise and resubmit this plan to the Vermont Department of Environmental Conservation.

Section 2: Procedure for conducting full lead service line replacement

When conducting full lead service line replacement projects, the Water System implements the procedure outlined below.

Section 3: Strategy for informing customers before a service line replacement

Before a service line replacement, the Water System will provide information to customers with lead, galvanized requiring replacement, and unknown material service lines.

The information must:

- provide persons served by a lead, GRR, or lead status unknown service line information regarding the water system's lead service line replacement program and opportunities for replacement of the lead service line;
- be provided to persons served at the service connection with a lead, GRR, or lead status unknown service line either in-person or by mail; and
- (if applicable) be sent within 30 days of the end of the tap sampling period in which a trigger level exceedance occurred.

The water system will notify customers at least 45 days prior to the replacement of a water system's portion of a service line. In the notification, the water system will offer to replace the customer-owned portion of the service line.

The water system will utilize the methods selected below for informing customers of a service line replacement:

- Door-to-door Conversations
- Door Hangers
- Mailings (letters and/or postcards)
- E-mails
- Public Notices

- Media Outreach
- Social Media Posts
- Other Method approved by Vermont Department of Environmental Conservation

Section 4: Lead service line replacement goal rate

The Water System serves 10,000 or fewer persons and is not required to provide a replacement goal rate at the time of this plan's submission.

OR

In the event of a lead trigger level exceedance, the Water System has set a lead service line replacement goal rate of

Section 5: Procedure for customers to flush service lines and premise plumbing of particulate lead

Before, during, and after a gooseneck replacement, service line replacement, or other activity necessitating this procedure, the Water System will instruct customers to follow a procedure to flush service lines and premise plumbing of particulate lead.

When possible, the Water System will notify customers in advance of service line replacements in accordance with the strategy described in Section 3 of this Plan.

Prior to working on the service line, the Water System will close water flow to the building interior at a shut-off valve. Then, the Water System will complete the service line replacement. After the work is completed, the Water System will open flow to the building and premise plumbing.

Customers will be instructed to follow this procedure for flushing service line and premise plumbing of particulate lead:

- Do not consume tap water, open hot water taps, use icemaker, or use filtered water dispenser until after this flushing procedure is complete.
- Remove faucet aerators, screens, and shower heads from all cold water taps in the building.
- Beginning with the lowest level, fully open the cold water taps throughout the building including showers, baths, and hose bibs.
- After all the faucets are open, let the water run for at least 30 minutes.
- Turn off each tap starting with the taps at the lowest level of the building.
- Clean aerators and screens of solid debris place them back on faucets.

Section 6: Lead service replacement prioritization strategy

Vermont Department of Environmental Conservation's priority replacement strategy factors are summarized in the table below.

Priority Points	Prioritization Factor	LCRR Requirement
10	Known Lead Service Line	Required
10	Populations Most Sensitive to the Effects of Lead <ul style="list-style-type: none"> • Schools and Day Care Facilities • Homes with children and/or adults who are pregnant or may become pregnant 	Required
10	Disadvantaged Communities	Required
8	Known GRR Service Line	Required
5	Populations Most Sensitive to the Effects of Lead <ul style="list-style-type: none"> • Nursing Homes • Medical Facilities 	Required
5	Companion Projects (concurrent infrastructure projects)	Not Required
5	Compact Projects (concurrent project in the same area)	Not Required
3	Long Length Lead Pipe Projects	Not Required
2	Other Factors Listed in ANSI/AWWA C810-17 § II.A. <ul style="list-style-type: none"> • Service lines physically disturbed by digging, excavation, repair, or other activities • Existing partial lead service line replacements • Consideration of presence of lead goosenecks or pigtails 	Not Required
1	Other Factors Significant to the Water System	Not Required

Section 7: Funding strategy for conducting lead service line replacements

The Water System will fund lead service line replacements by:

For customers that are unable to pay to replace the portion of service line they own, the Water System plans to: