

Lead Service Line Replacement Plan

Glade Springs WV3304111

☑ New Plan ☐ Updated Plan - Date: 10/04/2024

The attached Lead Service Line Replacement Plan (LSLR Plan) is submitted to the WV DHHR in accordance with 40 CFR 141.84(b) and the proposed Lead and Copper Rule Improvements. The WV American Water Company affirms that it will implement this plan effective immediately.

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1. Plan Certification

I have verified and certify the information listed in this LSLR Plan is true and accurate to the best of my knowledge and belief:

Plan Preparer Signature	//////////////////////////////////////
Philip Bright Plan Preparer Name (Print)	EAM Manager Title 10 - 10 - 24
VP Operations (System Owner) Signature	Date
Chris Carew	Vice President of Operations
VP Operations (System Owner) Name (Print)	Title

2. 0110	nge Log	Page Number	Person Making the Change
Date of Change	Description of Change	and Section	
CHange			
			2.6

3. General Water System Information			
System Name: Glade Springs	PWSID Number: WV3304111		
Total Number of Service Connections: 864			
Number of Known Lead Service Lines: 0			
Number of Service Lines of Unknown Material: 156			
Number of Non-Lead Service Lines: 708			
3a. Contact Information			
Water System Owner			
Name: Chris Carew	Title: Vice President of Operations		
Phone: 304-340-2005	Email: Chris.Carew@amwater.com		
Distribution Supervision			
Name: Todd Boroski	Title: Supervisor Field Operations		
Phone: 304-913-3274	Email: Todd.Boroski@amwater.com		
License Type:	License Number:		
Licensed Distribution Operator (if different than above			
Name: Jason Vest	Title: Senior Manager Production		
Phone: 304-913-3277	Email: Jason.Vest@amwater.com		
License Type: 4	License Number: WVOP10976		
Plan Preparer			
Name: Philip Bright	Title: EAM Manager		
Phone: 304-340-2857	Email: Philip.Bright@amwater.com		

4. LSLR Governance

List names, titles, and details for the individuals responsible for the following:

- Creating and maintaining the Lead Service Line Replacement Plan: Philip Bright, West Virginia American Water EAM Manager, 4002 Ohio River Rd, Huntington, WV, 304-340-2857, Philip.Bright@amwater.com
- Identification of lead service lines: Philip Bright, West Virginia American Water EAM Manager, 4002 Ohio River
 Rd, Huntington, WV, 304-340-2857, Philip.Bright@amwater.com
- Maintenance of service line inventory: Philip Bright, West Virginia American Water EAM Manager, 4002 Ohio River Rd, Huntington, WV, 304-340-2857, Philip.Bright@amwater.com
- Construction Oversight: Anthony G. Treadway, Construction Manager, West Virginia American Water, 1600
 Pennsylvania Avenue, Charleston, WV 25302, 304-340-2874, Anthony.Treadway@amwater.com
- Funding: Michael P. Raymo, P.E., Director of Engineering, West Virginia American Water, 1600 Pennsylvania Avenue, Charleston, WV 25302, 304-340-2011, Michael.Raymo@amwater.com
- Public Outreach Coordinator: Megan Hannah, Sr. Manager, Government and External Affairs West Virginia American Water, 1600 Pennsylvania Ave, Charleston, WV 25302 O: 304-340-2088, Megan.Hannah@amwater.com
- Maintenance of online inventory updates: Philip Bright, West Virginia American Water EAM Manager, 4002 Ohio River Rd, Huntington, WV, 304-340-2857, Philip.Bright@amwater.com
- Annual Resubmission of the Lead Service Line Replacement Plan: Philip Bright, West Virginia American Water EAM Manager, 4002 Ohio River Rd, Huntington, WV, 304-340-2857, Philip.Bright@amwater.com
- Other:

5. EPA LCRR and LCRI Background

In accordance with the LCRR 40 CFR § 141.84 (b), all water systems with one or more <u>lead</u>, <u>galvanized requiring</u> replacement, or <u>lead status unknown</u> service lines must prepare and submit a lead service line replacement plan to the WV DHHR following guidelines set by 40 CFR § 141.90(e). The initial plan must be submitted by October 16, 2024.

This plan must be updated, and submitted to the WVDHHR when new information becomes available regarding the replacements, identification of lead service lines, changing priorities, contract expirations, or changes in staff. This includes changes introduced by the finalization of the proposed <u>Lead and Copper Rule Improvements</u>.

In December 2023 the EPA proposed improvements to the Lead and Coper Rule Revisions, known as the Lead and Copper Rule Improvements (LCRI), regarding the replacement of lead service lines (LSLs) and galvanized requiring replacement (GRR) service lines¹.

The LCRI includes the same information required under the LCRR with the following changes.

- Elimination of the Lead Service Line Replacement Goal
- Addition of a regulation to develop a Legal Obstruction Strategy, known in this LSLR Plan as "Statutory
 Considerations Restricting Access", that identifies existing laws, regulations, and/or water tariffs that impede the
 implementation of the LSLR Plan
- Addition of a regulation to develop a Customer Communication Strategy to inform residential and nonresidential customers and consumers (e.g., property owners, renters, and tenants) served by the water system about the service line replacement plan and program
- Addition of a regulation to develop a Lead Service Line Replacement Plan Visibility Strategy, requiring water systems serving greater than 50,000 persons to make the plan available to the public online

This Plan is required to be kept on site and made available for review upon request.

40 CFR 141.90(e)(3)(ii) - If a water system, previously demonstrating that it has no <u>lead</u>, <u>galvanized requiring</u> replacement or <u>lead status unknown</u> service lines subsequently discovers any service lines in these categories in its distribution system, it must notify the primacy agency within 30 days of identifying the service line(s) and prepare an updated inventory in accordance with <u>40 CFR § 141.84(a)</u> and a lead service line replacement plan in accordance with <u>40 CFR § 141.84(b)</u>.

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¹ National Primary Drinking Water Regulations for Lead and Copper: Improvements. *Regulations.gov*, 6 December 2023, https://www.regulations.gov/document/EPA-HQ-OW-2022-0801-0036

6. Service Line Inventory Development and Material Verification 6a. Service Line Inventory Development Strategy for identifying service lines of unknown materials, including both the company owned and the customer owned portion of the service line. 40 CFR 141.84(b)(1) & 40 CFR 141.84(a)(2) West Virginia American Water will attempt to identify all service lines of unknown material using the methods listed below, while implementing a replacement plan to remove lead and GRR if identified. Check all applicable boxes of the strategies the system is using to develop the service line inventory. We do not have service lines of unknown material within our water system's service area. **Status** Methods of Investigation Ongoing □ Review historical and building records **Ongoing** ☑ Review distribution system maps and record drawings Ongoing ⋈ Field/visual inspection with or without full excavation **Ongoing** ☑ Review capital improvement plans and/or master plans for distribution system development Ongoing ☑ Review utility records including meter installation records, customer complaint investigations, etc. Ongoing ☑ Review documentation which indicates and/or confirms the location of lead service lines: Ongoing □ Conduct customer survey Ongoing □ Review county appraisal district records ☐ Documented interviews of local contractors, developers, and builders Review of municipality plumbing permits Predictive modeling using machine learning ☐ Other: 6b. Service Line Inventory Assumptions The service line inventory includes the following assumptions for service lines with unknown material. All company and customer service lines installed after 1988 lead ban are considered non-lead. 6c. Service Line Material Verification Check all applicable boxes of the strategies the system is using to verify unknown service line material. We do not have service lines of unknown material within our water system's service area. Methods of Verification Information Type

□ Documentation

□ Pictures

☑ Documenting service line material information provided by customer

self-reporting tools.

□ Documenting service line material during	service lin	ne repair and	□ Documentation □ Documentation	
replacements.			□ Pictures □ Pictures	
□ Documenting service line material during	water ma	in repair and	□ Documentation □ Documentation	
replacements.			□ Pictures □	
□ Documenting service line material during	cross con	nection and/or	□ Documentation □ Documentation	
backflow prevention device inspections.			□ Pictures □	
☐ Documenting service line material inform			☐ Documentation	
partnerships with local community organization	ions (i.e. p	lumbers unions,	☐ Pictures	
building inspectors, etc.)				
☑ Other: Documenting service line material through potholing and in-			□ Documentation □ Signature □ Documentation □	
home inspections.			□ Pictures □	
T. D. I Colo dulo Dovo	lonmo	nt and Donlace	mont	
7. Replacement Schedule Deve	nobine	ent anu Kepiace	ment	14,14,3
Considerations				
7a. Prioritization Methods				
Develop a lead service line replacement prioritize	zation stra	tegy. 40 CFR 141.84(b)(6	1	
Check all applicable boxes and use numbers	to indica	te the level of priority	, with "1" being the high	hest
priority.				
				limaa
☐ We do not have lead service lines within are found in the future, we will prioritize re				
are found in the future, we will prioritize re	piacemen	t pased on the conside	erations material	
Criterion	Priority	Crit	erion	
	Rating			Priority
	3			Rating
		□ Areas with schools*		_
	5			Rating
	5	☐ Age of current wate		Rating
	5		r main	Rating
		☐ Age of current wate	r main	Rating
		☐ Age of current wate	r main	Rating
☑ Known GRR Service Lines*☐ Proximity to high lead results*		☐ Age of current wate	r main	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* 	6	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient ☐ Road moratoriums	r main	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* ☐ Areas that receive a lot of water quality 	6	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient	r main	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* 	6	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient ☐ Road moratoriums	r main	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* ☐ Areas that receive a lot of water quality 	6	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient ☐ Road moratoriums ☐ Ownership ☐ LSLs close to interco	nown contaminants	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* ☐ Areas that receive a lot of water quality complaints 	7	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient ☐ Road moratoriums ☐ Ownership	nown contaminants	Rating
 ☑ Known GRR Service Lines* ☐ Proximity to high lead results* ☑ Previous partial replacement* ☐ Areas that receive a lot of water quality complaints 	7	☐ Age of current wate ☐ Proximity to other k ☐ Pressure gradient ☐ Road moratoriums ☐ Ownership ☐ LSLs close to intercomples aler which utilize	nown contaminants	Rating

□ Documentation

□ Pictures

☑ Documenting service line material during water meter maintenance.

☐ Areas where there are no service lines o	f	Areas where all residents	have agreed to	
unknown material		articipate in the program		
☐ Areas where all service lines are of unkn	own [☐ Service lines containing le	ad only on the	
material		vater system side		
☐ Areas where pipe replacements are already	ady	☐ Service lines containing le	ad only on the	
being conducted		roperty-owner side		
☑ Previous participation in PbCu sampling	8 [Predictive modeling resu	ilts	
*Prioritization consideration should foc Infants, young children, and preg	us on sensitive po nant women are t	pulations and previously ki he most vulnerable to pote	nown lead concentration in the state of the	ons.
				11111
7b. Prioritization Explanation			untinum identified up	dor
Explanation of how the system is prior	itizing replaceme	ent based on the conside	rations identified un	uer
7a. above, and how a replacement sch	edule will be imp	olemented.		
The Company will prioritize the replacemen	nt of lead service li	nes (LSLs) with a primary fo	cus on protecting and	
mitigating lead exposure risks to sensitive p	populations. This p	olan combines a targeted ap	proach to address area	is with
high lead concentrations and vulnerable po	pulations. The Co	mpany will collaborate with	i municipalities, scriooi	٥,
healthcare facilities, and other stakeholder	's to coordinate LSI	L replacements.		
Ti.				
7c. Coordination with Proper	ty Owners			5.01
What portion of the service line is \Box	The system owns		☐ The system does n	
owned by the water system? the	entire service line	portion of the service	any portion of the s	ervice
(main to house)	line (main to	line	
		curb/meter pit)		
How will the system conduct public outre	ach regarding its le	and cornice line replacemen	a managa Drovido liv	
all publicly available materials. LCRI - 41	0	ead service line replacemen	it program: Provide ili	ıks to
	CFR 141.84(c)(1)(v	ii) & 40 CFR 141.84(c)(2)	it program: Provide iii	ıks to
	CFR 141.84(c)(1)(v	ii) & 40 CFR 141.84(c)(2)		nks to
The Company developed a robust and inte	ractive website that	ii) & 40 CFR 141.84(c)(2) at includes program informa	ation, a public facing	
The Company developed a robust and inte inventory map, steps on how to identify se	cractive website the ervice line material	ii) & 40 CFR 141.84(c)(2) at includes program informa , a frequently asked questio	ation, a public facing n section related to the	2
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho	ractive website that ervice line material ow to assess and re	 at includes program information a frequently asked question a duce potential lead exposure 	ation, a public facing n section related to the re. The website also in	e cludes
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t	cractive website that ervice line material, but to assess and re- to ask specific ques	at includes program informa , a frequently asked question educe potential lead exposutions and receive a respons	ation, a public facing n section related to the re. The website also in e back from a dedicate	e cludes d local
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on he an online form that customers can utilize to staff member. This can all be found at can	cractive website that ervice line material, bow to assess and re- to ask specific ques	at includes program informa , a frequently asked question educe potential lead exposutions and receive a response. .amwater.com/wvaw/water	ation, a public facing n section related to the re. The website also in e back from a dedicate -quality/Lead-And-Dri	e cludes d local nking-
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on he an online form that customers can utilize to staff member. This can all be found at can	cractive website that ervice line material, bow to assess and re- to ask specific ques	at includes program informa , a frequently asked question educe potential lead exposutions and receive a response. .amwater.com/wvaw/water	ation, a public facing n section related to the re. The website also in e back from a dedicate -quality/Lead-And-Dri	e cludes d local nking-
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on he an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on www.amwater.	cractive website that ervice line material, bow to assess and re- to ask specific ques	at includes program informa , a frequently asked question educe potential lead exposutions and receive a response. .amwater.com/wvaw/water	ation, a public facing n section related to the re. The website also in e back from a dedicate -quality/Lead-And-Dri	e cludes d local nking-
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on <a href="https://www.amwater.to.com/www.to.com/www.amwater.to.com/www.amwater.to.com/ww.amwater.to.com/ww.amwater.to.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/ww.com/</th><th>cractive website that
ervice line material,
bow to assess and re-
to ask specific ques
be found at www.
com, selecting stat</th><td>at includes program informa
, a frequently asked question
educe potential lead exposu
tions and receive a respons
amwater.com/wvaw/water
e then under Water Quality</td><td>ation, a public facing
n section related to the
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e back from a dedicate
r-quality/Lead-And-Drin
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ing</td></tr><tr><th>The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on <a href=" https:="" th="" water.com="" water.com<="" www.amwater.com=""><th>cractive website that ervice line material, ow to assess and reso ask specific quest be found at www.com, selecting stat</th><td>at includes program information, a frequently asked question and receive a responstant amount of the theorem and receive a responstant amount of the then under Water Quality ustomer education campaigns.</td><td>ation, a public facing n section related to the re. The website also in e back from a dedicate r-quality/Lead-And-Drin , select Lead and Drink gn to support the comp</td><td>e cludes d local nking- ing any's</td>	cractive website that ervice line material, ow to assess and reso ask specific quest be found at www.com, selecting stat	at includes program information, a frequently asked question and receive a responstant amount of the theorem and receive a responstant amount of the then under Water Quality ustomer education campaigns.	ation, a public facing n section related to the re. The website also in e back from a dedicate r-quality/Lead-And-Drin , select Lead and Drink gn to support the comp	e cludes d local nking- ing any's
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on www.amwater.com/www.amwater.com/water. In addition to these resources, American V	cractive website that ervice line material, ow to assess and response to ask specific questo be found at www.com, selecting state.	at includes program information, a frequently asked question and receive a responsion amwater.com/wvaw/water e then under Water Quality ustomer education campaig des communications direct	ation, a public facing n section related to the re. The website also in e back from a dedicate r-quality/Lead-And-Drin , select Lead and Drink on to support the comp ly to customers via con	e cludes d local nking- ing any's
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on www.amwater.com/www.amwater.com/water. In addition to these resources, American V Lead Service Line Replacement Program. Temails, social media postings, postcards, a	cractive website that ervice line material, ow to assess and reso ask specific quest be found at www.com, selecting state. Vater launched a community community including mailings as well	at includes program information, a frequently asked question educe potential lead exposutions and receive a responstant amwater.com/wvaw/water e then under Water Quality ustomer education campaigness communications direct as targeted digital and cab	ation, a public facing n section related to the re. The website also in- e back from a dedicate r-quality/Lead-And-Drink , select Lead and Drink on to support the comp by to customers via con le advertising. It also in	e cludes d local nking- ing any's npany ncludes
The Company developed a robust and inte inventory map, steps on how to identify se company's program and information on ho an online form that customers can utilize t staff member. This can all be found at can Water or by navigating on				

WVAW partnered with Mott MacDonald to collect point of entry material from customers to update the inventory. Areas are selected based on inventory record reviews. When an area is ready for point of entry inspection post cards and emails are utilized to provide community awareness of the program. Mott MacDonald field staff will canvass a prepared area door to door to request entry to perform a point of entry inspection to identify the service line material entering the structure. As part of this process a self ID tool has been created where customers can do their own point of entry investigation and submit the results to WVAW for inventory update. A link and QR code is included in the outreach messaging to direct customers to the self ID tool on the WVAW website. All self ID submittals are reviewed and analyzed to determine validity and accuracy, prior to including in the final inventory. More details about the education outreach effort can be found in the press release here:

www.amwater.com/wvaw/water-quality/Lead-And-Drinking-Water/

How will the system solicit property owner/customer's approval to replace lead service lines?

The Company will implement a comprehensive strategy to obtain property owner and/or customer approval prior to initiating lead service line replacement (LSLR) projects. This strategy involves clear communication, multiple contact attempts, and detailed documentation. The Company will provide a written notice to all impacted residents, including electronic delivery when possible, containing scope of work, project timeline, contact information for project management, and health and safety information. By requirement of the LCRR, this notice will be provided in multiple languages (Spanish, Polish, Chinese, Tagalog, Arabic, Korean, German, Urdu, Gujarati) to ensure understanding. In addition, the Company will utilize public outreach and direct customer engagement (door-to-door, phone, email) to reinforce key messages and answer questions.

The Company will provide a consent agreement outlining the LSLR process, warranty, and contact information. The Company will make at least four attempts to obtain customer consent. Responses and consent agreements will be documented both electronically and in paper format. The same process will be followed regardless of whether the customer is the property owner. Non-responsive customers will be added to a designated list.

Customer acknowledgement and legal agreements are signed on paper or electronically. Records are maintained through company assets and work management system.

7d. Coordination	with	Munici	palities	& DOT
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How will the water system work with local municipalities in our service area and DOT to coordinate replacement efforts to minimize costs, impacts on roads, and neighborhood disturbances? ⊠ By meeting with municipalities:
 ☐ Monthly
 ☐ Bi-monthly
 ☐ Other: Periodically ⊠ By meeting with DOT: □ Monthly □ Bi-monthly ☑ Other: Periodically ■ By participating in public meetings ☐ By attending council meetings ☐ By checking WVDOT website monthly ☐ By developing an outreach program with the municipalities/local authorities ☐ Other Explanation:

7e. Disposal of Lead Service Lines

How will the water system take steps to make sure all lead service lines removed are disposed of properly?

 ☑ By ensuring that the contractors remove them to an appropriate facility/scrapyard for disposal ☑ By keeping records of the sale ticket and receipts on file for our records. ☐ Other Description:
7f. Emergency Replacement
What steps will the water system take in the event an emergency replacement is necessary?
 ☑ Pre-Planning: Necessary materials stocked, staff resources, and procedures in place to replace the service line. ☑ Replace the lead service line as part of the emergency repair. ☑ Document the service line materials if they are made known and schedule a future replacement. ☑ Other: Describe: Leaking or damaged service lines will be scheduled for replacement within regulatory requirements.
List sampling and notification procedures that will be implemented during an emergency replacement:
LSLR administrative and field staff will perform outreach by phone, mail, email or doorhanger to notify the customer/property owner of emergency replacement and get consent agreement signed if necessary.
8. Financing
Develop a funding strategy for conducting lead service line replacements. 40 CFR 141.84(b)(7)
8a. Lead Service Line Replacement Financing
Will the water system require approval from another agency or governing body prior to beginning replacements (due to budgetary issues):
☐ Yes ⊠ No
If yes, explain:
List financial approvals, if any, that will need to be obtained before beginning replacements: None
Replacement Funding:
Is the water system government-owned? ☐ Yes ☒ No • If yes will the property owner be responsible for a portion of the replacement cost? ☐ Yes ☒ No

If yes, what amount?
Does the water system intend to utilize the resources available through the Drinking Water State Revolving Fund (DWSRF)? ⊠ Yes □ No
Drinking Water State Revolving Fund The Infrastructure Investment and Jobs Act (IIJA)
How will the water system accommodate consumers that are unable to pay to replace the portion of the service line that they own?
There is no direct cost to the customer for replacement of the utility or customer-side lead or GRR service line.
8b. Setting Aside Funds for Mailings and Other Future Costs
To ensure that there are adequate funds to cover the cost of lead service line replacement activities, check all that apply:
 ✓ Securing and setting aside funds on a yearly basis to cover the additional costs of certified mailing associated with each phase of replacement. ✓ Securing and setting aside funds for any outreach costs associated with replacements. ✓ Securing and setting aside funds for customer samples following an LSL replacement. ✓ Securing and setting aside funds for filter pitchers and replacements provided following an LSL replacement. ✓ Making sure that there is adequate funding set aside if additional staffing is needed. ✓ Securing and setting aside funds if additional lead service lines and galvanized requiring replacement service lines are identified and must be replaced.
9. LSL Replacement Procedure
Develop a strategy to replace lead service lines. 40 CFR § 141.84(b)(2)
 We will comply with ANSI/AWWA C810-17 Replacement and Flushing of Lead Service Lines. □ We will use alternative procedures, attached in APPENDIX###. □ The LSL Replacement Procedure will follow the requirements set forth by 40 CFR 141.84(e), including • Customer notification including requirements set forth by 40 CFR 141.85(a) • Service line flushing information set forth by 40 CFR 141.84(b)(5) • Providing ANSI accredited pitcher filters as stated by 40 CFR 141.84(e)(3)

See Appendix A

the customer.

10. Notification Requirements

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Offering sample collection between 3-6 months after the LSL replacement and communicating the results to

*All notification letters must also include a written notification in any language in which greater than 10% of the population served by the water system speaks less than very well, notifying the customer of the importance of the document and to contact the water system to seek assistance with a translation.
We will notify property owners and customers of plans to conduct a full or partial service line replacement 40 CFR § 141.84(b)(3)
□ Public Education Letters □ Public Education Let
☑ Annual notification to customers with known LSLs, GRR, or unknown material service lines.
☐ Properties with newly identified LSLs will receive a certified letter.
Replacement notifications before and after each replacement (full/partial/planned/emergency) - 40 CFR 141.84(d)(1)(i)
Service line disturbance notifications to customers with known or potential lead service line.
11. Lead Exposure Mitigation
11a. Filter Distribution The following are filter distribution practices that will occur after a lead service line replacement or
11a. Filter Distribution The following are filter distribution practices that will occur after a lead service line replacement or disturbance* event to help reduce customer exposure to lead particulates. 40 CFR 141.84(d)(1)(iii) & 40 CFR
11a. Filter Distribution The following are filter distribution practices that will occur after a lead service line replacement or
11a. Filter Distribution The following are filter distribution practices that will occur after a lead service line replacement or disturbance* event to help reduce customer exposure to lead particulates. 40 CFR 141.84(d)(1)(iii) & 40 CFR 141.84(e)(3) We will provide water filters under these circumstances: ☑ When a partial or full replacement occurs ☑ When a lead connector is replaced ☑ When a disturbance occurs In the event of a lead action level exceedance, filters will be provided to:
11a. Filter Distribution The following are filter distribution practices that will occur after a lead service line replacement or disturbance* event to help reduce customer exposure to lead particulates. 40 CFR 141.84(d)(1)(iii) & 40 CFR 141.84(e)(3) We will provide water filters under these circumstances: When a partial or full replacement occurs When a lead connector is replaced When a disturbance occurs

Customer Notifications

What types of filters will be provided?
Brita pitcher style filter, part number 980338556. Brita Wave Pitcher (model# OB53 with LONGLAST+ FILTER (MODEL# OB06)
Will additional replacement filters be provided? Yes ⊠ No □
Will replacement cartridges be supplied for up to 6 months? Yes \boxtimes No \square
Will instructions on how to use the filters be provided? Yes $oxtimes$ No $oxtimes$
Describe the methods used to track the properties which have received filters and properties who were not provided filters:
American Water uses a work and asset management system designed to track filter distribution for LSLR/GRR activities. A POST-LSLR record is created that includes the following:
 Date of replacement or disturbance activity. Acknowledgement that a pitcher filter was distributed. If not distributed, then the entry requires a reason why the pitcher filter was not delivered. The date that the pitcher filter was delivered. An option to designate the property as multi-tenant. If yes, then the record requires a value for the number of pitcher filters delivered and a description that identifies each unit that received a filter.
*Disturbance is defined as the full or partial replacement of lead and GRR service lines, as well as replacement of a lead connector, inline water meter, or water meter setter. 40 CFR 141.85(f)(2)
11b. Flushing Procedures
Per 40 CFR 141.84(b)(5), water systems are required to provide a procedure for consumers to flush service lines and premise plumbing of particulate lead.
*All notification letters must also include a written statement in any language in which greater than 10% of the population served by the water system speaks less than very well, notifying the customer of the importance of the document and to contact the water system to seek assistance with a translation.
We will provide flushing instructions to customers after a lead service line replacement and/or lead service line disturbance. Yes ⊠ No □ • If yes, then describe the system's procedure for providing this information to consumers:
After a full or partial replacement of a lead or galvanized requiring replacement service line, a "Flushing Instruction"

After a full or partial replacement of a lead or galvanized requiring replacement service line, a "Flushing Instruction" document is provided to each affected customer. This document includes step-by-step instructions to perform a whole house flush, as well as additional information about the replacement work performed, recommended daily and monthly maintenance, and resources for additional information about lead in the drinking water.

12. Other Considerations
12a. Inventory and Sample Plan Consistency
Lead Service Line Inventory and Lead and Copper Sampling Plan: Check the boxes to indicate that your system will make the following updates as needed.
☑ LSL Inventory and the Lead and Copper Sampling Plan should be updated in conjunction with each other. We will update the lead and copper sampling plan to reflect lead service line replacements.
☑ The Lead and Copper Sample Location Spreadsheet will be submitted to the primacy agency within 30 days of making sample site changes due to lead service line replacements.
12b. Replacement Goal Rate:
Per 40 CFR 141.84(b)(4), a water system that serves over 10,000 customers and incurs a lead trigger level exceedance is required to set a replacement goal rate. If applicable, what is the system's replacement goal rate?
Not Applicable at this time. Have not had a lead trigger exceedance for system.
Between 2024 and 2026 the company will replace lead and GRR service lines as they are discovered. Between 2027 and 2037 the company will implement an annual 10% goal replacement rate to eliminate the lead and GRR lines.
12c. Communication Attempts and Refusal Tracking
"In accordance with § 141.90(e), a water system will provide upon request a list of customer refusals including a refusal signed by the customer, documentation of a verbal statement made by the customer refusing replacement, or documentation of no response from the customer after the water system made a minimum of four good faith attempts using 2 different methods to reach the customer regarding full lead service line replacement." 40 CFR 141.84(g)(7)
To ensure that water systems make a sufficient effort at replacing the customer owned portion of the service line, water systems will track their communication attempts. Systems will track the annual number of attempts to replace the customer-owned portion of the service line, number of non-responses and refusals for each address, as well as the dates associated with these communication attempts.
We will track communication attempts and refusals. Yes $oxtimes$ No $oxtimes$
In the event of a property owner/customer's refusal to replace the service line the water system will:

☑ Document the incident.
☑ Continue to contact the property owner/customer each year for participation and continue to document all outreach efforts.
\square When applicable, inform the customer, the property-owner refused to replace their portion of the lead service line; therefore, the lead service line must remain as is.
12d. Customer-Owned and Initiated Service Line Replacements
When customers either notify the PWS, or the PWS learns otherwise that the customer has replaced the customerowned LSL, the PWS must follow requirements set forth by $\underline{40 \text{ CFR } 141.84(d)(3)}$ or $\underline{40 \text{ CFR } 141.84(d)(4)}$.
40 CFR 141.84(d)(3)
☑ When a water system is notified by the customer that the customer's portion of the lead service line will be replaced, the water system will make a good faith effort to coordinate simultaneous replacement of its portion of the lead service line. If simultaneous replacement cannot be conducted, the water system must replace its lead portion as soon as practicable but no later than 45 days from the date the customer replaces its portion of the lead service line.
☑ The water system must provide a 45-day advanced notification of the planned company-owned LSL replacement.
☑ If the water system fails to replace its portion of the lead service line within 45 days from the date the customer replaces the customer's portion of the lead service line, the water system must notify the State within 30 days of failing to meet the deadline and complete the replacement no later than 180 days of the date the customer replaces its portion.
40 CFR 141.84(d)(4)
☑ When a water system is notified or otherwise learns that replacement of a customer-owned lead service line has occurred within the previous six months and left in place a system-owned lead service line, the water system must replace its portion within 45 days from the day of becoming aware of the customer replacement.
☑ The water system must provide a 45-day LSLR notification and lead exposure mitigation materials within 24 hours of becoming aware of the customer replacement.
☑ If the water system fails to replace its portion of the lead service line within 45 days from the date the customer replaces the customer's portion of the lead service line, the water system must notify the State within 30 days of failing to meet the deadline and complete the replacement no later than 180 days of the date the customer replaces its portion.

13. APPENDIX Check all that apply and are enclosed

Appendix A: WVAW Lead Service Line Replacement Strategy	
☐ Appendix B:	
☐ Appendix C:	
☐ Appendix D:	