WEST VIRGINIA
AMERICAN WATER

Lead Service Line Replacement Plan

Mountain Water

WV3301963

☒ 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.

Contents

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

10/10/2024
Date

Philip Bright
Plan Preparer Name (Print)

EAM Manager
Title

VP Operations (System Owner) Signature

10-10-24
Date

Chris Carew
VP Operations (System Owner) Name (Print)

Vice President of Operations
Title

2. Change Log

Date of Change	Description of Change	Page Number and Section	Person Making the Change

3. General Water System Information

System Name: Mountain Water	PWSID Number: WV3301963
Total Number of Service Connections: 467	
Number of Known Lead Service Lines: 0	
Number of Service Lines of Unknown Material: 388	
Number of Non-Lead Service Lines: 79	

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: Stephanie Reel	Title: Operations Manager
Phone: 681-240-4192	Email: Stephanie.Reel@amwater.com
License Type:	License Number:
Licensed Distribution Operator (*if different than above*)	
Name: Dawn Shoemaker	Title: Supervisor Water Quality & Environmental Compliance
Phone: 681-240-4192	Email: Dawn.Shoemaker@amwater.com
License Type: 1	License Number: WVOP33069
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 lead, galvanized requiring replacement, or lead status unknown 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 Lead and Copper Rule Improvements.

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 lines[1].

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 non-residential 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 lead, galvanized requiring replacement or lead status unknown 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 40 CFR § 141.84(a) and a lead service line replacement plan in accordance with 40 CFR § 141.84(b).

[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.**

Methods of Investigation	Status
☒ 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	Ongoing
☐ 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
☒ Documenting service line material information provided by customer self-reporting tools.	☒ Documentation ☒ Pictures

☒ Documenting service line material during water meter maintenance.	☒ Documentation ☒ Pictures
☒ Documenting service line material during service line repair and replacements.	☒ Documentation ☒ Pictures
☒ Documenting service line material during water main repair and replacements.	☒ Documentation ☒ Pictures
☒ Documenting service line material during cross connection and/or backflow prevention device inspections.	☒ Documentation ☒ Pictures
☐ Documenting service line material information provided by established partnerships with local community organizations (i.e. plumbers unions, building inspectors, etc.)	☐ Documentation ☐ Pictures
☒ Other: Documenting service line material through potholing and in-home inspections.	☒ Documentation ☒ Pictures

7. Replacement Schedule Development and Replacement Considerations

7a. Prioritization Methods

Develop a lead service line replacement prioritization strategy. 40 CFR 141.84(b)(6)

Check all applicable boxes and use numbers to indicate the level of priority, with "1" being the highest priority.

☐ We do not have lead service lines within our service area. In the event one or more lead service lines are found in the future, we will prioritize replacement based on the considerations indicated below.

Criterion	Priority Rating	Criterion	Priority Rating
☒ **Areas with nursing homes and hospitals***	3	☒ **Areas with schools***	1
☒ **Known Lead Service Lines***	5	☐ Age of current water main	
☒ **Known GRR Service Lines***	6	☐ Proximity to other known contaminants	
☐ **Proximity to high lead results***		☐ Pressure gradient	
☒ **Previous partial replacement***	7	☐ Road moratoriums	
☐ Areas that receive a lot of water quality complaints		☐ Ownership	
☒ **Overburdened Communities ***	4	☐ LSLs close to interconnections with a wholesaler which utilizes CCT	
☒ **Licensed childcare centers ***	2	☐ Areas of source water or treatment changes	

☐ Areas where there are no service lines of unknown material		☐ Areas where all residents have agreed to participate in the program	
☐ Areas where all service lines are of unknown material		☐ Service lines containing lead only on the water system side	
☐ Areas where pipe replacements are already being conducted		☐ Service lines containing lead only on the property-owner side	
☒ Previous participation in PbCu sampling	8	☐ Predictive modeling results	

***Prioritization consideration should focus on sensitive populations and previously known lead concentrations. Infants, young children, and pregnant women are the most vulnerable to potential lead exposure.**

7b. Prioritization Explanation

Explanation of how the system is prioritizing replacement based on the considerations identified under 7a. above, and how a replacement schedule will be implemented.

The Company will prioritize the replacement of lead service lines (LSLs) with a primary focus on protecting and mitigating lead exposure risks to sensitive populations. This plan combines a targeted approach to address areas with high lead concentrations and vulnerable populations. The Company will collaborate with municipalities, schools, healthcare facilities, and other stakeholders to coordinate LSL replacements.

7c. Coordination with Property Owners

What portion of the service line is owned by the water system?	☐ The system owns the entire service line (main to house)	☒ The system owns a portion of the service line (main to curb/meter pit)	☐ The system does not own any portion of the service line

How will the system conduct public outreach regarding its lead service line replacement program? Provide links to all publicly available materials. LCRI - 41 CFR 141.84(c)(1)(vii) & 40 CFR 141.84(c)(2)

The Company developed a robust and interactive website that includes program information, a public facing inventory map, steps on how to identify service line material, a frequently asked question section related to the company's program and information on how to assess and reduce potential lead exposure. The website also includes an online form that customers can utilize to ask specific questions and receive a response back from a dedicated local staff member. This can all be found at can be found at www.amwater.com/wvaw/water-quality/Lead-And-Drinking-Water or by navigating on www.amwater.com, selecting state then under Water Quality, select Lead and Drinking Water.

In addition to these resources, American Water launched a customer education campaign to support the company's Lead Service Line Replacement Program. This campaign includes communications directly to customers via company emails, social media postings, postcards, and mailings as well as targeted digital and cable advertising. It also includes leveraging relationships and partnerships with elected officials and key stakeholders within the communities the company serves.

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 Municipalities & DOT

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)
- Offering sample collection between 3-6 months after the LSL replacement and communicating the results to the customer.
- See Appendix A

10. Notification Requirements

Customer Notifications

**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)

☒ Customers will receive planned partial service replacement notifications at least 45 days in advance. 40 CFR 141.84(d)(1)

☒ Public Education Letters

☒ 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 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:

☐ To all consumers served by the water system

☒ Only those affected by known lead service lines

When lead results come back high, these filters will be provided to:

☐ To all consumers served by the water system

☒ Only those affected by known lead service lines

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 ☒ No ☐

Will instructions on how to use the filters be provided? Yes ☒ No ☐

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" 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 ☒ No ☐

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.

☐ 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 customer-owned LSL, the PWS must follow requirements set forth by 40 CFR 141.84(d)(3) or 40 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: