Montgomery County Water District #1
Lead and Copper Line and Components Assessment Plan

1) **A description of goals to be achieved and products to be created is required as well as a schedule:**

The goal of the project is to support the development of a service line inventory and replacement plan as required in the 2021 Lead and Copper Rule Revisions. Following EPA and state guidance, the Montgomery County Water District #1 will establish a service line inventory, identify the service line pipe material, provide a proper data collection and storage method related to the project and future, identify the service lines in need of replacement, and prepare a replacement plan and customer notification program. The following work streams and deliverables would be included.

Scope of Services	
Work Stream	**Deliverables**
Project Management	• Overall Project management to deliver Service Line Inventory & Replacement Plan as described in the Lead & Copper Rule Revisions. • Manage resources to complete scope of work
Initial Inventory Creation	• Consolidate and index the existing records and develop a digital inventory of 755 service connections • Utilize the EPA service line inventory template for service line identification within the distribution system and update for submission by Oct 16, 2024.
Pipeline Material Identification	• Conduct inspections for material identification from curb to meter (lead swabs & visual identification) for service lines installed pre-1987.
Data Management: GIS -based Inventory & System Updates	• Gather record drawings, parcel data & billing points to develop service points in GIS for the entire water system of 755 customers. • Develop existing GIS to support the lead service line inventory • Develop ESRI application for Lead service tracking: - Field Map for data collection, for instance the swabbing results & capturing pictures - Dashboard for progress visualization - Web App for editing - Website with the publicly available inventory • GPS assets to develop robust GIS data in combination with in-home inspections
Replacement Plan	• Develop contracting and construction procedures for full LSL Replacement

	• Develop flushing procedures and SOPs for identification, replacement, and disturbances of galvanized and lead goosenecks. • Replacement plan document as required by EPA by Oct 16th, 2024.
	• Communication strategies with sample messaging in the LSLR Plan for full LSLRs
Customer Communication	• Develop content for the customer letter • Coordinate approval from relevant regulatory agency on the customer letter • Develop Frequently Asked Questions (FAQs) for responses to customer inquiries • Customer service representative training.

2) A process for documenting all property owners declining replacement of privately owned portions of LSL:

The Montgomery County Water District #1 will use the GIS application/survey to capture customer refusals and attempts. This information is also available on a dashboard for the District to use in monitoring compliance. Additionally, as part of the project the District will review how its billing system can be used to provide notification reminders. Below is a generic approach that maybe use but will adapt this approach to guidance from KY DEP.

The District is going to make a good-faith effort to work with the property owner to replace its portion of the service line. This will be one time but the District as part of this project and with guidance from KY DOW can make repeated requests over time. This could be at least once annually after initially requesting to gain access to private property for replacement. Checking in annually is important because the property owner may change. If the property owner continues to refuse replacement, such refusal and any efforts to contact the property owner will be documented on the Customer Refusal Form. There would also be a public outreach program in place to educate property owners in the service area about opportunities to replace their lead service lines.

Please note this project is to determine if and to what extent the District may have a problem with LSL and develop a plan for addressing the extent of the problem identified.

The District will document instances where a property owner refuses to replace its portion of the lead service line. A sample Customer Refusal Form for the District or property owner to complete is provided below. Again, the project submitted is to help the District in creating the required forms and meeting DOW and EPA requirements.

DRAFT Montgomery County Water District #1 Customer Lead and Copper Sampling Refusal Form	
By Submitting this form, I hereby certify:	
a	The information listed in this form is true and accurate to the best of my knowledge and belief.
b	The water system has made an effort to reach out to the resident for sampling and was denied.
c	The water system shall document the reason for not sampling.
Acknowledgement	
	☐ By checking this box I verify and certify the criteria listed above.
System Representative Name:	
System Representative Signature:	
Date:	
Phone:	
Email:	
	☐ By checking this box I verify and certify the criteria listed above.
Licensed Operator of Record Name:	
Licensed Operator of Record Signature:	
Date:	
Phone:	
Email:	

3) A procedure for customers to flush service lines and premise plumbing:

This application is being submitted to fund a project to identify the proper procedures for flushing customer services for full and partial service line replacement. The process will follow DOW guidance, AWWA Standards C810-17 “Replacement and Flushing of Lead Service Lines”, EPAs guidance, the National Lead Information Center, the Safe Drinking Water Hotline and Lead Service Line Collaborative website.

4) A proposed plan for conducting LSL replacement utilizing all funding:

The purpose of this application is to fund the survey of service lines, identify LSL, and develop a replacement plan and communication approach to the project. The District will then act upon the request accordingly. See the following table for Planned Utilization of Funding.

5) A funding strategy for conducting LSLR utilizing all requested funding:

A funding strategy will be developed once the extent of lead service lines are identified and a plan to replace developed.

6) The method for data management & projected format to submit the LSL Inventory to the Division of Water will be as follows:

Gateway Area Development District has created, in cooperation with Kentucky Rural Water Association, an ArcGIS Dashboard that will be utilized by Montgomery County Water District #1 Water District to review, update, and log the verification and location of Lead Service Lines and components. Montgomery County Water District #1 can specify the method of verification of each service line and its location. The District can also identify the length of the line and any components that may also need to be replaced, such as goosenecks, within the created Dashboard. The data will be collected and processed through the ArcGIS Dashboard, which will be reviewed by Gateway Area Development District. Gateway Area Development District will then generate a Lead Service Line Inventory Assessment for each utility to submit to the Division of Water by the October 2024 Deadline.

Montgomery County Water District #1					
Total Service Lines in 2023	800				
Total Service Lines in 2000 (WMP)	554				
Estimated Service Lines in 1990	< 500				
Phase	**Description**	**Estimated Service Lines**	**Cost/SL**	**Cost**	**Schedule**
LSL Inventory Dashboard	Gateway ADD Administration & ArcGIS Online Setup	800	Lump Sum	$ 5,000.00	July 2023 - September 2023
Historical Records Review	Review of PVA data, system as-builts, tap cards, historical aerial imagery, and other utility records to determine total structures constructed after appropriate LSL dates. Review of materials will be completed by system staff with the assistance of Gateway Area Development District.	800	$ -	$ -	July 2023 - December 2023
Customer Provided Data	Customer education campaign, surveys, & mailings. Advertisement in local paper and other platforms to provide education for lead and copper inventory requirements. Digital and paper surveys to collect customer feedback. Preparation and distribution of materials will be completed by system staff with the assistance of Gateway Area Development District.	250	$ 8.00	$ 2,000.00	September 2023 - March 2024
Sampling/Door-to-Door	Water quality sampling and door-to-door inspections will be completed by system staff.	100	$ 100.00	$ 10,000.00	January 2024 - July 2024
Mechanical Excavation	Mechanical excavation will be completed as needed for service lines that cannot be evaulated by other methods.	83	$ 1,000.00	$ 83,000.00	March 2024 - September 2024
Total Cost				**$ 100,000.00**	