Lead Service Line Replacement Plan
St. Johnsbury Water Department
WSID: 5045
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Section 1: Strategy for determining the composition of lead status unknown service lines in the inventory

St. Johnsbury Water Department (SJWD) intends to determine the composition of lead status unknown service lines in its inventory by utilizing the methodologies listed below:

1. Water Quality Sampling
    - Service Line Sampling
    - Calculate premise plumbing volume, flush out premise plumbing, then collect and analyze a service line sample.
    a. Flushed Sampling
        - After a set flushing time, collect and analyze a sample.
    b. Sequential Sampling
        - Collect and analyze a series of consecutive samples from the interior tap to the service line.
2. Excavation
    - Mechanical Excavation
    - Vacuum Excavation
3. Emerging Methods approved by Vermont Department of Environmental Conservation
4. Other Methods approved by Vermont Department of Environmental Conservation

Section 2: Procedure for conducting full lead service line replacement

When conducting full lead service line replacement projects, SJWD implements the procedure outlined below…

1. Assess Lead service replacement prioritization to determine service or services to be replaced.
2. Develop scope of work for replacement project.
3. Solicit bids from local contractors to complete service replacement.
4. Acquire local permits as necessary for service replacement.
5. Acquire property owner permissions for customer-owned portion of lines.
6. Complete service line replacement project.
7. Update service line inventory and replacement prioritization.

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

Before a service line replacement, SJWD 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.

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

SJWD 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

Section 4: Lead service line replacement goal rate

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

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, SJWD will instruct customers to follow a procedure to flush service lines and premise plumbing of particulate lead.

When possible, SJWD 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, SJWD will close water flow to the building interior at a shut-off valve. Then, SJWD will coordinate and complete the service line replacement. After the work is completed, SJWD 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:

- Until flushing is complete DO NOT:
    - Consume tap water,
    - Open hot water taps,
    - Use icemaker, or
    - Use filtered water dispenser.
- 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

Service line replacements will be prioritized using the guidance from the Vermont DEC's priority replacement strategy 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 - 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 - 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. - 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 using State and Federal funding agencies.