

Pennichuck Water Lead and Copper Work Plan

Revision Date: October 2024

Introduction

The United States Environmental Protection Agency (EPA) on January 15, 2021, issued the Lead and Copper Rule Revisions (LCRR) that will apply to all Community Water Systems (CWS) and Non-Transient Non-Community Water Systems (NTNCWS). The initial inventory requirements of the LCRR specify the following:

- Information that water systems must include in their service line inventory
- When water systems must submit their initial inventories to their primary agency
- Requirements for water systems to make their information publicly accessible and to notify all persons served by the water system at the service connection with a Lead, Galvanized Requiring Replacement (GRR), or lead status unknown service line
- Reporting Requirements for states

The lead service line replacement plan must include the following:

1. A strategy for determining the composition of lead status unknown service lines in its inventory.
2. A procedure for full lead service line replacement.
3. A strategy for informing customers before a full or partial lead service line replacement.
4. For systems that serve more than 10,000 persons, a lead service line replacement goal rate recommended by the system in the event of a lead trigger level exceedance.
5. A procedure for customers to flush service lines and premise plumbing of particulate lead.
6. A lead service line replacement prioritization strategy based on factors including but not limited to the targeting of known lead service lines, lead service line replacement for disadvantaged consumers and populations most sensitive to the effects of lead.
7. A funding strategy for conducting lead service line replacements which considers ways to accommodate customers that are unable to pay to replace the portion they own.

Inventory Requirements

The EPA has outlined what needs to be included in the initial inventory requirements due to our state agency, the New Hampshire Department of Environmental Services (NHDES) on October 16, 2024. A detailed inventory of each CWS, by unique PWS Id serviced by Pennichuck has been submitted to NHDES as of October 16, 2024. The information collected in the detailed inventory spreadsheet by property location for the system-owned and customer-owned portion are:

- Service Line Material, Install Date and Size
- If we know if the material was ever previously lead
- Basis of Material Classification
- Field Verification Method and Date

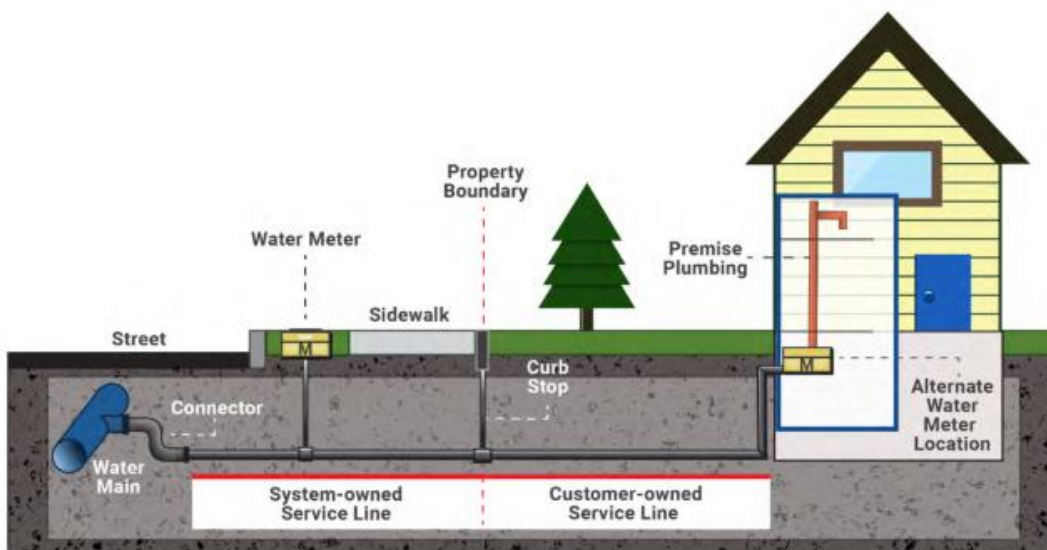
The Service Line Material classifications are Lead, Non-lead, Galvanized Requiring Replacement (GRR) or Unknown. After we have completed the detailed inventory and submitted to the NHDES, we have 30 days to notify any customer that has a Lead Service Line (LSL), GRR or unknown service line. This inventory will be updated on an annual basis, by saving a new version of the detailed inventory spreadsheet so all prior

information is retained and sent to the NHDES for those systems that have found LSLs or GRRs. All this information will be made available to the public, as well.

If we find that we have LSLs or GRR, we will be required to replace over the next ten years. All unknown service lines must also be identified in this time frame.

A service line is made of two segments: the main to stop (main to the curb stop) which is owned by Pennichuck and the stop to end (curb stop to home/meter pit) which is owned by the owner of the property as illustrated below.

Example of Service Line Ownership Distinction between the Water System and Customer



The EPA established guidelines that we need to comply with the LCRR requirements when classifying the entire service line when ownership is split:

- Service line is lead if either portion is a lead service line (LSL)
- Service line is GRR if the downstream portion is galvanized and the upstream portion is unknown or currently non-lead, but the system is unable to demonstrate that it was never previously lead
- Service line is lead status unknown if both portions are unknown, or one portion is non-lead and one portion is unknown
- Service line is non-lead only if both portions meet the definition of non-lead. This would include copper tubing and plastic piping.

After we have identified all service lines as either LSL, GRR, non-lead, or status unknown we need to develop a plan on how we will verify those unknown service lines. The number of unknowns should decrease over time as we gather information through our normal operations and with the customers help by self-reporting the material type of the pipe coming through the foundation.

Inventory Preparation/Verification Process

Pennichuck has completed the inventory requirements of the LCRR and submitted all records for our 63 systems to the NHDES in advance of the October 16, 2024 deadline. The results of this inventory resulted in the following:

	Lead	GRR	Unknown
System-Owned	0	280	681
Customer-Owned	0	823	949

Total Service Line Records 39,780

Here is the verification processes we used to compile the inventory.

For our systems that were installed in original Pennichuck service territory, we have good records that document when the service was installed, the size and material of the service lines. Our GIS System and billing system, hold the record information for all service information collected through field observation or inspections. Also included in our GIS System, are attachments of As-builts, Field Book Sketches and Pictures. For systems that were not originally built to Pennichuck specifications ie: acquired systems, records were limited in some areas we service now.

Another verification method is Potholing. Potholing is a hole that is dug above the service line. This exposes the pipe in the public space and/or on private property. It provides visual confirmation of the size and material of the service line that is bringing water to a property. We performed Potholing in one system that had limited records in an effort to reduce the number of unknowns.

We have also been performing visual inspections when inside a customer's premises when applicable. The certified technicians will provide material type and pictures as documentation to support the classification.

Service Line Replacement and Identification Plan

Pennichuck will continue its efforts to identify the remaining unknown service material information for both the system-owned and the customer-owned service lines. We will also be working to replace the service lines identified through our inventory process as GRR.

Pennichuck will perform inspections of the Main to Stop and/or the Stop to End to determine the actual material of our unknown service lines. This will be done through excavation at the Curb Stop. Once the material is confirmed, if it is determined to be lead or galvanized, we will need to come up with a replacement plan.

In addition to performing the Inspections of the unknowns, we will also find other opportunities for data collection or verification under normal operations. This will be done through service line repair or

replacements, water main repair or replacements or other capital projects where there are open cuts to observe the line.

Pennichuck will perform inspections of the line coming into the customer's home or building while technicians are there for scheduled appointments. These could be in conjunction with a Meter Periodic Test, Meter Repair or Backflow Test.

We will also be providing an option for property owners to self-identify the water service line that comes into their property. More information is provided on this process in the Customer Outreach and Education section of this document.

Customer Outreach and Education

On our external website, there is a section to talk about Lead and Copper and what the company is doing to confirm that the service lines do not contain lead. We want to educate the customers on our efforts and the importance of performing this inventory and how it is important that they allow us access to the property to confirm whether lead is present or not. We have provided information about ways the customer can confirm if they have a lead service line entering the house through documents and videos. We also have a map that will allow the customer to enter in their address to then see from our records if either the main to stop or stop to end has lead.

A form for the customer is included on our website that can be completed which will assist them in identifying their service line. This form will include their address, allow them to submit pictures of their service line entering the home, and provide sections to submit the results of the scratch and magnet tests. These forms will be reviewed by a Pennichuck representative to verify the results of the tests and identification of the service line.

We must notify customers who have LSLs, GRR, or unknown services within 30 days of completing the inventory and then on an annual basis until the entire service line is no longer lead, GRR or unknown. When there is a new homeowner of one of these properties, we must provide them notice when the transfer occurs.

Pennichuck is utilizing the template letters provided by NHDES for the lead/GRR and unknown notifications. The unknown group will be provided inserts for self-identification and are able to request a sample kit. The Lead/GRR classification group will be provided information on requesting sample kit and flushing recommendations.