

Initial Lead Service Line Identification and Replacement Plan

BOROUGH OF HIGHTSTOWN

NJ1104001

July 21, 2022

New Plan Revised Plan as of **date revised**

1. Plan Certification

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



Plan Preparer Signature

July 21, 2022

Date

Carmela Roberts

Plan Preparer Name (Print)

Borough Engineer

Title

Supplier of Water Signature



Lawrence D. Quattrone

Supplier of Water Name (Print)

Date

7/22/22

Mayor

Title



Licensed Operator Signature

7/22/2022

Date

Rich Lewis

Licensed Operator Name (Print)

T2 - 726582, W2 - 747741

License Number

2. General Water System Information	
System Name: Borough of Hightstown	PWSID: NJ1104001
Total Number of Service Connections: 1735	
Number of Lead Service Lines: 80	
*See Lead Service Line Inventory for a breakdown of materials and ownership.	
Number of Service Lines of Unknown Material: 1214	
Number of Service Lines Comprised of Other Materials: 441	
Total Population Served (excluding transient populations): 5494	

2a. Contact Information	
<u>System owner</u> contact information:	
Name: Dimitri Musing	Title: Borough Administrator
Phone: 609-490-5100	Email: administrator@hightstownborough.com
<u>Licensed operator</u> contact information	
Name: Rich Lewis	Title: Licensed Operator
Phone: (609) 490-5117	Email: water@hightstownborough.com
License (VSWS, T1, W1, etc.): T2/W2	License Number: T2 – 726582, W2 - 747741
<u>Additional Licensed operator</u> contact information (if applicable)	
Name: Ken Lewis	Title: Public Works Superintendent
Phone: (609) 490-5115	Email: publicworks@hightstownborough.com
License (VSWS, T1, W1, etc.): T2/W2	License Number: 0023404 (T2), 0024094 (W2)
<u>Plan Preparer</u> contact information	
Name: Carmela Roberts	Title: Borough Engineer
Phone: (609) 586-1141	Email: CRoberts@robertsengineeringgroup.com

Under N.J.S.A. 58:12A-44, a public community water system must create a lead service line replacement plan. The Plan must be updated annually or when new information becomes available regarding the replacements, identification of lead service lines, changing priorities, contract expirations, or changes in staff. This Plan is required to be kept on site, and made available for State review upon request

3. Responsible Parties	
List names, titles, and details for the following:	
1.	Creating and maintaining the Lead Service Line Replacement Plan: Carmela Roberts
2.	Identification of lead service lines: Rich Lewis and Ken Lewis
3.	Maintenance of service line inventory: Rich Lewis
4.	Construction Oversight: Carmela Roberts
5.	Funding: IBank
6.	Public Outreach Coordinator: Dimitri Musing
7.	Maintaining the online inventory updates: Rich Lewis
8.	Annual resubmission of the Lead Service Line Replacement Plan: Rich Lewis and Carmela Roberts (REG)
9.	Other:

4. Service Line Inventory Development and Maintenance	
Strategy for identifying service lines of unknown materials	
Check all applicable boxes. When completed, include completion date.	
<input type="checkbox"/> We do not have service lines of unknown material within our water system's service area	
Type of Review	Completion Date
<input checked="" type="checkbox"/> Review historical records	
<input checked="" type="checkbox"/> Review distribution system maps and record drawings	
<input checked="" type="checkbox"/> Review building records	
<input checked="" type="checkbox"/> Field/visual inspection with or without full excavation	
<input type="checkbox"/> Sampling results and water quality information	
<input type="checkbox"/> Sequential monitoring	
<input checked="" type="checkbox"/> Capital improvement plans and/or master plans for distribution system development	
<input checked="" type="checkbox"/> Utility records including meter installation records, customer complaint investigations and all historical	
<input checked="" type="checkbox"/> Documentation which indicates and/or confirms the location of lead service lines: Description of documentation – Photos	
<input checked="" type="checkbox"/> Review Existing connections	

May 2022

<input checked="" type="checkbox"/> Results from service line sampling where lead service lines are suspected to exist, but their presence is not confirmed	
<input type="checkbox"/> Community survey	
<input type="checkbox"/> County appraisal district records	
<input checked="" type="checkbox"/> Contacts within the water system, municipal office, or other local officials	G. Chin
<input type="checkbox"/> County and municipal ordinances	
<input type="checkbox"/> Survey results from area plumbers	
<input type="checkbox"/> Documented interviews of residents- letters, phone survey, personal contact, etc.	
<input type="checkbox"/> Documented interviews of local contractors, developers, and builders	
<input type="checkbox"/> Other:	
<i>Note that all service lines must be identified by 2031, regardless of their composition material.</i>	

5. Replacement Schedule Development and Replacement Considerations

5a. Methods used to identify the prioritization of lead service line replacements (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, the prioritization methods to be used are identified below.

<ul style="list-style-type: none"> <input type="checkbox"/> Sensitive populations* <input type="checkbox"/> Proximity to high lead results* <input type="checkbox"/> Previous partial replacement* <input type="checkbox"/> Areas that receive a lot of water quality complaints* <input type="checkbox"/> Overburdened Communities * <input type="checkbox"/> Licensed childcare centers * <input type="checkbox"/> Areas where there are no service lines of unknown material <input type="checkbox"/> Areas where all service lines are of unknown material <input checked="" type="checkbox"/> Areas where pipe replacements are already being conducted (Dey, Bennett, Lincoln) <input type="checkbox"/> Previous participation in PbCu sampling <input type="checkbox"/> Areas with high density of children <p>*prioritization consideration should focus on sensitive populations and previously known lead concentrations</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Age of current water main <input type="checkbox"/> Proximity to other known contaminants <input type="checkbox"/> Pressure gradient <input checked="" type="checkbox"/> Road moratoriums <input type="checkbox"/> Ownership <input type="checkbox"/> LSLs close to interconnections with a wholesaler which utilizes CCT <input type="checkbox"/> Areas of source water or treatment changes <input type="checkbox"/> Areas where all residents have agreed to participate in the program <input checked="" type="checkbox"/> Service lines containing lead only on the water system side <input checked="" type="checkbox"/> Service lines containing lead only on the property-owner side <input type="checkbox"/> Predictive modeling results
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5b. Explanation of how the system is prioritizing replacement locations using the methods identified above and how the schedule will be implemented. Example: The prioritization of the replacements is focused

on identifying areas with sensitive populations such as nursing homes and nursery schools. Past sampling events have shown that these areas also have high lead results. By focusing replacement on these areas first, we are addressing the areas where lead contamination has the most adverse impacts on the health of those who drink the water.

1. Areas where pipe replacements are already being conducted.
2. Road moratoriums.
3. Service lines containing lead only on the water system side.
4. Service lines containing lead on the property-owner side.
5. Age of current water main.

5c. Coordination with Property Owners

What portion of the service line is owned by the water system?	<input type="checkbox"/> The system owns the entire service line (main to house)	<input checked="" type="checkbox"/> The system owns a portion of the service line (main to curb)	<input type="checkbox"/> The system does not own any portion of the service line
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If the water system does not own the entire service line, will an ordinance need to be created which mandates the replacement of all lead service lines, regardless of ownership? Yes No

How will the system conduct public outreach regarding its lead service line replacement program? Provide links to all publicly available materials.

Letters
 Website (<https://www.hightstownborough.com/water-sewer/>)
 Facebook (<https://www.facebook.com/BoroughofHightstown>)

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

Provide a summary of any legal requirements or anticipated obstacles. *E.g., prior to replacing the property-owner portion of a lead service line, a contract between the water system, contractor and property-owner must be signed and executed through the following process.*

None anticipated

In the event of a property owner/customer's refusal to replace the service line the water system will:

Document the incident using the Department's Customer Refusal Form located on the Department's website:
 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; and therefore, the lead service line in its entirety must remain.

5d. Coordination with Municipalities & NJDOT

How will the water system work with local municipalities in our service area and NJDOT to coordinate replacement efforts to minimize costs, impacts on roads, and neighborhood disturbances?:

- By meeting with municipalities on a monthly bi-monthly basis
- By participating in public meetings
- By attending council meetings
- By checking NJDOT website monthly
- By developing an outreach program with the municipalities/local authorities
- Other. Explain: Plan for joint projects

5e. Disposal of Lead Service Lines

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

- 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.

5f. Emergency Replacement

What steps will the water system take in the event an emergency replacement is necessary?

- By having materials, staff resources, and procedures in place to replace the service line.
- By replacing the line as part of the emergency repair.
- By documenting the service line materials if they are made known and will replace at a later date.

- List sampling and notification procedures that will be implemented during an emergency replacement:

6. Prioritization of Lead Service Line Replacements Map

Clearly identify the following water system components identified on the Distribution Map included in the Appendix

Required:

- Each area of priority
- Delineation of pressure zones # of pressure zones: _____
- Lead service lines
- Service lines of unknown material
- Areas of replacement
- Scheduled year of replacement (phase)
- Delineation of areas receiving CCT
- Delineation of areas receiving no/different CCT from seasonal EPTDS
- Treatment plant(s)

7. Financing

7a. Lead Service Line Replacement Financing

Will the water system need to have approval from another agency or governing body prior to beginning replacements (due to budgetary issues):
 Yes
 No
If yes, explain: Water Infrastructure Bank

List certifications, if any, that will need to be obtained before beginning replacements: N/A

How will replacement be funded?
NJ Water Bank

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

- If yes, which funding does the system intend to utilize? Water Bank or any other available

Does the water system serve any municipalities that meet New Jersey's Affordability Criteria? Yes No

For more information, visit the Department's Water Infrastructure Investment Plan webpage at:
<https://www.nj.gov/dep/wiip/index.html>

7b. Setting Aside Funds for Mailings and Other Future Costs
Our water system will ensure that there are adequate funds to cover the cost of lead service line replacement activities by:

- 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 request samples in the event the system triggers an Action Level Exceedance.
- Securing and setting aside funds for additional customer request samples for partial replacements if performed. (Customers may request a partial replacement up to 6 months after the replacement is complete.)
- Making sure that there is adequate funding set aside in the event that additional staffing is needed
- Securing and setting aside funds in the event that additional lead service lines are identified and must be replaced

8. Notification Requirements

Notification letters
We will draft and/or use NJDEP template letters for the following notifications:

- Public Education Letters
- Annual notifications of LSLs – Each year customers who still have an LSL must receive a letter.

- Properties with newly identified LSLs will received a certified letter on the template created by the Bureau.
- Replacement notifications before and after each replacement

If applicable, refer to your system's Lead and Copper Sampling Plan for additional public education and notification requirements under an ALE. , The information will need to include what your water system is doing regarding your LSLR program.

**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. The Department has put together guidance to assist water systems in determining if the people within the municipality(ies) they serve primarily speak a language other than English, which can be found here: <https://www.state.nj.us/dep/watersupply/pdf/secondary-language-directions.pdf>. If you cannot find information on a specific municipality, the Department recommends that you consult with the municipality(ies) for this information.*

9. Annual Reporting

For initial submissions:

- Our initial lead service line count was submitted to NJDEP by 9/20/2021
- Our initial LSL inventory report was submitted to NJDEP by 1/22/2022
- Our initial Customer Notice of LSL Material letters* were sent to properties served by LSLs by 2/22/2022

- An initial LSL replacement plan will be submitted to NJDEP by 7/22/2022
- An updated LSL inventory will be submitted to NJDEP by 7/22/2022
- Our annual progress report will be submitted to NJDEP for the period of 7/1/2021 – 06/30/2022 by 7/22/2022
- We will send out Customer Notice of LSL Material letters* to properties with newly identified LSLs by 8/22/2022
- Lead Service Line Notification Form will be sent to NJDEP by September 1, 2022

For submissions beginning in 2023:

- An updated LSL inventory will be submitted to NJDEP by 7/10/2023
- Our annual progress report will be submitted to NJDEP for the period of 7/1/2022 – 06/30/2023 by 7/10/2023
- An updated LSL replacement plan will be submitted to NJDEP by 7/31/2023
- We will send out Customer Notice of LSL Material letters to properties with newly identified LSLs via certified mail, and all other properties served by a LSL via standard mail by 8/10/2023
- Lead Service Line Notification Form will be sent to NJDEP by August 20, 2023

*Attach a copy of the Customer Notice of LSL Material letters to this Plan.

10. Other Considerations

10a. Lead Service Line Inventory and Lead and Copper Sampling Plan

- LSL Inventory and the Lead and Copper Sampling Plan should be updated in conjunction with each other. We will update lead and copper plan to reflect lead service line replacements on a semi-annual basis and keep on file for our records.

May 2022

The Lead and Copper Sample Location Spreadsheet (BWSE-18) will be submitted to the Department within 30 days of making sample site changes due to lead service line replacements.

10b. Filter Distribution

Will the water system provide filters to residents?

We will provide filters to customers:

- Yes
- No

We will provide water filters under these circumstances:

- We will provide filters to customers without cause
- When a partial or full replacement occurs
- When an ALE occurs
- When lead results come back high

Under an ALE, these filters will be provided to:

- To all consumers served by the water system
- Only those affected by known LSLs

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 LSLs

What types of filters will be provided (i.e. faucet mounted/point of use, pitchers, etc)? Include specific brand and model # if known:

Will additional replacement filters be provided? Yes No

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

What tracking will be in place to track the properties which have received filters and properties who were not provided filters?:

11. Division of Water Supply & Geoscience Contact Information

Bureau of Safe Drinking Water	(609) 292-5550
Bureau of Water System Engineering	(609) 292-2957
Bureau of Water Resources & Geoscience	(609) 292-2576

12. APPENDIX *Check all that apply and are enclosed*

- Appendix A: Lead Service Line (LSL) Inventory Report (DEP_10-S_00014)
- Appendix B: Map
- Appendix C: Progress Report
- Appendix D:

