

Lead Service Line Identification and Replacement Plan

SYSTEM NAME
(Woodbury City Water Dept.) NJ0822001

Date of Plan 7-22-2022 Revised Plan as of 6-10-2024

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

Richard Leidy

Plan Preparer Name (Print)



Supplier of Water Signature

Woodbury City Water Department

Supplier of Water Name (Print)



Licensed Operator Signature

Richard Leidy

Licensed Operator Name (Print)

6/10/2024

Date

Public Works Manager

Title

6/10/2024

Date

Public Works Manager

Title

6/10/2024

Date

W2-0019495, T2-0021077

License Number

2. General Water System Information

System Name: Woodbury City Water Department	PWSID: NJ0822001
Total Number of Service Connections: 3393	
Number of Lead Service Lines: 179 GALV	
*Galvanized service lines are considered to be lead service lines and should be included in this total.	
Number of Service Lines of Unknown Material: 1554	
Number of Service Lines Comprised of Other Materials: 1660	
Total Population Served (excluding transient populations): 9963	

2a. Contact Information

System owner contact information:	
Name: JOHN LEECH	Title: ADMINISTRATOR
Phone: 856-845-1300 EXT	Email: JLEECH@WOODBURY.NJ.US
Licensed operator contact information	
Name: RICHARD LEIDY	Title: MANAGER
Phone: 856-853-0892 EXT.202	Email: RLEIDY@WOODBURY.NJ.US
License (VSWS, T1, W1, etc.):	License Number: W2-0019495,T2-0021077
Additional Licensed operator contact information (if applicable)	
Name: JOSEPH SMITH	Title: OPERATIONS MANAGER
Phone: 856-853-0892 EXT.205	Email: JSMITH@WOODBURY.NJ.US
License (VSWS, T1, W1, etc.):	License Number: W2-779889,T2-779890
Plan Preparer contact information	
Name: JOSEPH SMITH	Title: OPERATIONS MANAGER
Phone: 856-853-0892 EXT.205	Email: JSMITH@WOODBURY.NJ.US

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 replacements, identification of lead service lines, or changes in staff. This plan is required to be kept on site, and made available for review upon request.

3. Responsible Parties	
List names, titles, and details for the following:	
1.	Creation and maintenance of the Lead Service Line Replacement Plan: (JOSEPH SMITH OPERATIONS MANAGER)
2.	Identification of lead service lines: (JOSEPH SMITH OPERATIONS MANAGER)
3.	Maintenance of service line inventory: (JOSEPH SMITH OPERATIONS MANAGER)
4.	Construction Oversight: (JOSEPH SMITH OPERATIONS MANAGER)
5.	Funding: (CITY OF WOODBURY)
6.	Public Outreach Coordinator: (CASSIDY SWANSON,CITY CLERK)
7.	Maintenance of online inventory updates: (JOSEPH SMITH OPERATIONS MANAGER)
8.	Annual resubmission of the Lead Service Line Replacement Plan: (RICHARD LEIDY MANAGER)
9.	Other:

4. Service Line Inventory Development and Maintenance	
Strategy for identifying service lines of unknown materials. <i>Note that all service lines must be identified by 2031, regardless of their composition material.</i> Check all applicable boxes of the strategies that your system is using to develop their service line inventory.	
<input type="checkbox"/> We do not have service lines of unknown material within our water system's service area	
Methods of Investigation	Completion Date
<input type="checkbox"/> Review historical and building records	
<input checked="" type="checkbox"/> Review distribution system maps and record drawings	10-1-2021
<input checked="" type="checkbox"/> Field/visual inspection with or without full excavation	ONGOING
<input checked="" type="checkbox"/> Review sampling results and water quality information	9-30-2021
<input type="checkbox"/> Sequential monitoring	
<input checked="" type="checkbox"/> Review capital improvement plans and/or master plans for distribution system development	5-16-2022
<input checked="" type="checkbox"/> Review utility records including meter installation records, customer complaint investigations, etc.	ONGOING
<input checked="" type="checkbox"/> Review documentation which indicates and/or confirms the location of lead service lines:	ONGOING
<input type="checkbox"/> Review existing connections	
<input type="checkbox"/> Review results from service line sampling where lead service lines are suspected to exist, but their presence is not confirmed	

<input checked="" type="checkbox"/> Conduct customer survey	ONGOING
<input type="checkbox"/> Review county appraisal district records	
<input type="checkbox"/> Review county and municipal ordinances	
<input type="checkbox"/> Records from area plumbers	
<input type="checkbox"/> Documented interviews of local contractors, developers, and builders	
<input checked="" type="checkbox"/> Other: METER TECHNICIAN LOGS THE WATER SERVICE MATERIAL ON EVERY INSTALL	ONGOING

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, we will prioritize replacement based on the considerations indicated below.**

<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 checked="" 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 <input type="checkbox"/> Previous participation in Pb Cu sampling <input type="checkbox"/> Areas with high density of children *Prioritization consideration should focus on sensitive populations and previously known lead concentrations	<input checked="" type="checkbox"/> Age of current water main <input type="checkbox"/> Proximity to other known contaminants <input type="checkbox"/> Pressure gradient <input 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 based on the considerations identified under 5a. above, and how a replacement 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 public health.

THE WATER UTILITY IS SECTIONING OFF CERTAIN AREAS OF THE WATER SYSTEM TO IDENTIFY THE MATERIALS OF THE SERVICE LINE.

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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How will the system conduct public outreach regarding its lead service line replacement program? Provide links to all publicly available materials. **HTTP://WOODBURY.NJ.US/CITY-DEPARTMENTS/WATER-AND-SEWER-RATES**

How will the system solicit property owner/customer's approval to replace lead service lines? **THE CITY SENDS OUT A MAILER.**

Provide a summary of any applicable legal requirements or other considerations. *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.* **WE WILL WORK WITH THE CITY SOLICITOR TO CREATE DOCUMENTATION FOR THIS PROCESS.**

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 <https://www.nj.gov/dep/lead/resources.html>:
- ☐ 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:

5e. Disposal of Lead Service Lines

Water systems should take steps to make sure all lead service lines removed are disposed of properly. Check the boxes of the steps your system will take to ensure service lines are properly disposed. 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.
☐ Other _____

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.
☒ Replace the lead service line as part of the emergency repair.
☒ Document the service line materials if they are made known and replace at a later date.
☐ Other _____
☐ List sampling and notification procedures that will be implemented during an emergency replacement:

6. Prioritization of Lead Service Line Replacements Map

Identify the following water system components as provided on the Distribution Map (see Appendix)

Included items:

- ☐ 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 require approval from another agency or governing body prior to beginning replacements (due to budgetary issues):

☒ Yes

☐ No

If yes, explain:

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

How will replacement be funded?

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? **ALL**

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>

How will the water system accommodate consumers that are unable to pay to replace the portion of the service line that they own? TBD

7b. 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 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 if additional lead service lines are identified and must be replaced

8. Notification Requirements

Notification Letters

We will use NJDEP templates and send letters to consumers for the following notifications:

- ☒ Public Education Letters
- ☒ Annual notifications of LSLs
- ☒ Properties with newly identified LSLs will received a certified letter on the template created by the Bureau.
- ☒ Replacement notifications before and after each replacement
- ☒ Annual notification of unknown service lines-

If applicable, refer to your system's Lead and Copper Sampling Plan for additional public education and notification requirements in the event of a lead action level exceedance. 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 submissions beginning in 2023:

- An updated LSL inventory will be submitted to NJDEP by 7/10 annually
- Our annual progress report will be submitted to NJDEP for the period of 7/1 – 06/30 by 7/10 annually
- An updated LSL replacement plan will be submitted to NJDEP by 7/31 annually
- 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 annually
- Lead Service Line Notification Form will be sent to NJDEP by 8/20 annually

- ☒ Check to certify that your water system is in compliance with these reporting requirements

**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: *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 lead and copper plan to reflect lead service line replacements on a semi-annual basis and keep on file for our records.

☒ 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

The LCRR, effective October 16, 2024, requires pitcher filters or point of use devices to reduce lead in drinking water to be distributed to consumers following a partial or full service line replacement, replacement of a lead connector and some disturbances before the affected line is returned to service.

We will provide filters to customers:

☐ Yes

We will provide water filters under these circumstances (bolded choices are required and must be checked):

☐ **When a partial or full replacement occurs**

☐ **When a lead connector is replaced**

☐ **When a disturbance occurs**

☐ When an ALE occurs

☐ When lead results come back high

☐ We will provide filters to customers without cause

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

Will additional replacement filters be provided? **(when filters are provided, replacement cartridges are required to be supplied for 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?:

10c. 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. Explain the system's procedure for providing this information to consumers:

WE ASK THE CONSUMERS TO FLUSH THERE WATER FOR AWHILE TO WATER CLEARS UP.

10d. 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? **NA**

10e. Communication Attempts and Refusal Tracking

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 for replacing 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. Department has created a tracking spreadsheet for water systems to use located on our Additional Resources website <https://www.nj.gov/dep/lead/resources.html>

Check this box indicating that the water system will track communication attempts and refusals, either using the Department's form, or another system or electronic tracking method. ☒

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*

<input checked="" type="checkbox"/> Appendix A: Lead Service Line (LSL) Inventory Report (DEP_10-S_00014)
<input checked="" type="checkbox"/> Appendix B: Map
<input checked="" type="checkbox"/> Appendix C: Progress Report (DEP_10-S_00027)
<input checked="" type="checkbox"/> Appendix D: