



Lead Service Line Replacement Plan Clear Water Service Corporation PWSID # IL0295100 Coles County, Illinois



Prepared for:
CLEAR WATER SERVICE CORPORATION
2020 N. COUNTY RD 150 E
MATTOON, IL 61938

Prepared by:

FARNSWORTH GROUP
400 W. JEFFERSON, SUITE A
EFFINGHAM, IL 62401

Submitted by:
Barbara Healy
p 217.342.5668
bhealy@F-W.com
April 12, 2024

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Contact Information:

Barbara Healy

p 217.342.5668

bhealy@F-W.com

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INTRODUCTION

Clear Water Service Corporation (CWSC) has developed a Lead Service Line Replacement Plan (LSLR) according to Lead Service Line Replacement and Notification Act (415 ILCS 5/17.12). This act requires the replacement of all lead service lines in the State of Illinois. In addition, CWSC must establish a service line material inventory within their jurisdiction and create a long-term plan to replace lead services.

1.0 CLEAR WATER SERVICE CORPORATION PWS

1.1 GENERAL SYSTEM INFORMATION

Clear Water Service Corporation (CWSC) is in Coles County, Illinois. CWSC has approximately 3,000 service connections. The PWS ID No. is IL0295100.

1.2 LEAD SERVICE CONNECTIONS

CWSC is actively completing the Lead Service Line Inventory (LSLI) and has submitted the final inventory. CWSC has identified one (1) lead service. CWSC has 1,837 unknown services left to identify. The number of lead services could increase depending on the service material identified as CWSC continues to receive surveys.

1.3 LEAD SERVICE CONNECTION PREVIOUSLY REPLACED

Clear Water Service Corporation has not replaced lead services lines connected to the distribution system of the community water supply since 2020 or earlier.

2.0 REPLACEMENT SCHEDULE AND FINANCING

2.1 PROPOSED REPLACEMENT PLAN SCHEDULE

Clear Water Service Corporation (CWSC) is required to replace at an annual rate of no less than 7% of the amount reported in the final inventory when reporting 1,200 or fewer lead service lines or at an annual rate of 6% when reporting more than 1,200 but fewer than 5,000 lead services lines, per IEPA Act 415 ILCS 5/17.12. Currently, CWSC has identified one (1) lead service line and there are no suspected lead services. If the remaining 1,837 unknown service lines are all identified as lead services, the Corporation would have to replace 111 services a year.

The replacement plan schedule will be updated once the remaining unknown services are identified.

2.2 REPLACEMENT COST ANALYSIS

The approximate cost for replacing the lead service line varies from \$6,000 to \$20,000. The cost varies because of whether the water meter needs replaced, a new meter and meter pit needs installed, and/or the length of service pipe. Tables 1 breaks down the cost associated with the replacing a lead service line.

Item	Cost	Unit
Water Service Connection	\$4,000	EACH
Service Pipe	\$70	LINEAL FOOT (LF)
New Meter and Meter Pit	\$7,000	EACH

Table 1, Cost Associated with Replacing Lead Service Lines

2.3 FINANCING OPTIONS

Clear Water Service Corporation (CSWC) is responsible for the public side water service, which is from the meter to the water main. Lead services from the meter to the house on the private side are the homeowner’s responsibility. CWSC is reviewing financing options for the lead service line replacement to ensure the customer’s needs are met and customer-owned replacement cost is accessible to all. CWSC will address affordability and prevent service shut offs for customers. CWSC will consider different scenarios for payment options between CWSC and the customer. Different financing options CWSC is considering is self-funding or IEPA Loan/Grant.

3.0 LEAD SERVICE LINE REPLACEMENT CONSTRUCTION

3.1 PRIORITIZING HIGH RISK FACILITIES

Clear Water Service Corporation (CWSC) recognizes that some facilities, such as preschools, day care centers, group day care homes, parks, playgrounds, hospitals, and clinics, may represent an increase in lead exposure to children, who are the most susceptible to the effects of lead. According to the Center for Disease Control and Prevention, children less than six years old are at a higher risk of lead exposure. This is because their bodies are rapidly developing and more susceptible to taking in lead if exposed.

Although CWSC has sought to identify lead service lines that serve such facilities, to date CWSC has not identified such facilities having lead service lines.

3.2 INFORMING COMMUNITY OF PLAN

The LSLR plan will be presented to the Board during a regular meeting. The Plan will be included in the meeting agenda packet and residents will be given an opportunity to comment on the Plan during the meeting.

In addition, CWSC will post the Plan on its website. The posting will provide instructions on how residents can submit comments regarding the Plan to CWSC. Comments received will be considered during the implementation or future updates of the Plan.

3.3 MEASURES TO ENCOURAGE DIVERSITY

Clear Water Service Corporation will comply with Section 17.12(n) of the Lead Service Line Replacement and Notification (415 ILCS 5/17.12(n)) requiring that it demonstrates a good faith effort in using contractors and vendors owned by minority persons, women, and persons with a disability for not less than 20% of the total contracts awarded.

3.4 PROCEDURE FOR CONDUCTING FULL LEAD SERVICE LINE REPLACEMENT

Prior to replacement, Clear Water Service Corporation (CWSC) will provide door hangers to impacted residents that states a temporary water shutoff will be occurring because of LSLR work. Contact information for the CWSC office will also be provided so any additional questions can be addressed.

When conducting LSLR, the CWSC will utilize one of the two common methods: open cut excavation or horizontal directional drilling (HDD). Open cut excavation is a conventional approach that requires the cutting of service materials and excavation of soil from the water main along the entire length of the service line to be replaced. In this technique, precautions must be taken since other underground utilities may have not been properly located. Safety measures shall be implemented concerning both the resident's property and any nearby pedestrian and/or vehicular traffic. Upon proper exposure and identification of the service line, the existing pipe shall be disconnected from the main as well as the private side of the connection. The new service line shall properly connect to the main and private side and the new material shall meet the requirements of the Safe Drinking Water Act and other federal regulations for potable water systems. Select bedding and/or designated fill material, in conjunction with the surface restoration. The new service line placement shall reduce or eliminate the possibility of settling beyond the allowable limit along the excavation path.

An HDD LSLR involves the use of equipment to install a new service line in a new location while abandoning the old pipe in place in the ground. HDD method requires minimal excavation, and typically only two access pits are required to be excavated: one at the water main to make the new connection, and one at the meter pit. Additional access pits may be required when connecting the private side, but typically excavation is kept to a minimum and no open cutting is required along the new service line. HDD methods are not viable options in every service line replacement instance.

In the event of an emergency repair where a partial service replacement is being completed (either main to meter or meter to house) and lead is discovered on the other side of the service, additional measures must be taken to ensure compliance. Currently, regulations do not allow for partial replacements, so if the remainder of the lead service to be removed is on the private side, the resident will either have to allow for the replacement of the private side of the service or sign a waiver indicating they are opting out of the program. Removal of the remaining lead service line must be completed within 30 days of the initial repair or partial replacement of the lead service line.

3.5 NOTIFICATION AFTER LEAD SERVICE LINE REPLACEMENT

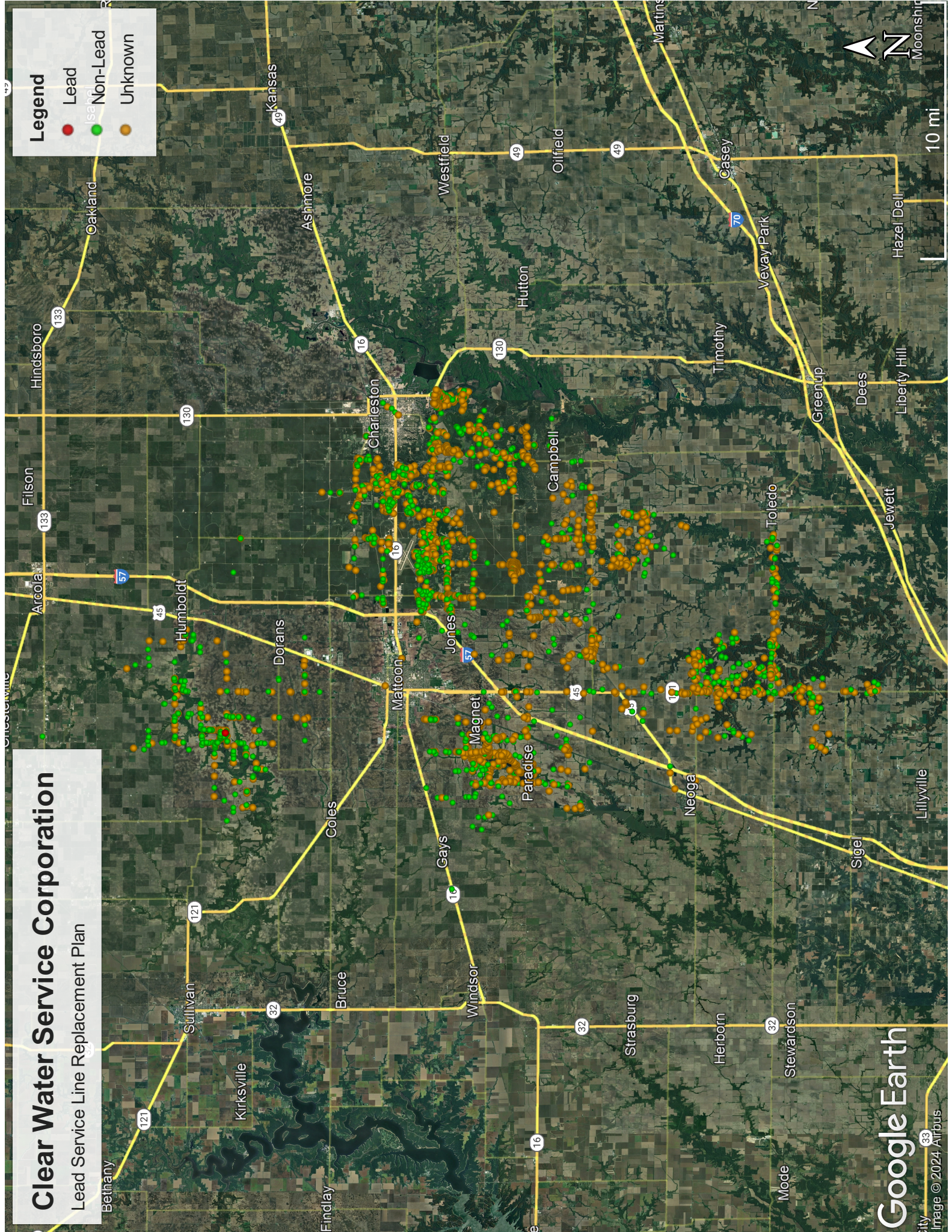
After the replacement of the lead service, the line will be properly flushed, and the resident(s) will be notified of the replacement. Notification must also be provided to the IDPH if a full lead service line replacement could not be completed due to refusal of entry or denial by the property owner.

Clear Water Service Corporation

Lead Service Line Replacement Plan

Legend

- Lead
- Non-Lead
- Unknown





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WAIVER OF COMPLETE LEAD SERVICE LINE REPLACEMENT

You are receiving this form because your property has been identified by your community water supply (CWS) as being served by a lead service line or galvanized service line located downstream of lead and you are refusing to allow the community water supply (CWS) to replace your entire service line.

The purpose of this form is to provide you, the property owner, with information necessary to make an informed decision about replacing your service line. In accordance with the Lead Service Line Replacement and Notification Act, Public Act 102-0613, the owner or operator of your CWS is required to replace your lead service line in its entirety, including any portion of the service line running on private property and within the building's plumbing at the first shut-off valve or 18 inches inside the building, whichever is shorter. If you deny the CWS the ability to perform a complete lead service line replacement, then you, the property owner, must sign this waiver form in accordance with 415 ILCS 5/17.12 (ff)(1)(D) and 17.12 (ii).

The following items should be considered by property owners regarding lead service line replacement:

- **Lead service lines and galvanized service lines downstream of lead can be significant contributors of lead contamination in drinking (tap) water through the corrosion of these materials.** Service lines are pipes that carry drinking water from the CWS water main to a home or building. A study published by American Water Works Association (AWWA) Water Research Foundation (2008) "Contributions of Service Line and Plumbing Fixtures to Lead and Copper Rule Compliance Issues" (Sandvig et al, 2008) estimates that 50% – 75% of lead in drinking water comes from lead service lines.
- **Lead is a toxic metal that is harmful to human health even at low exposure levels.** Young children are particularly vulnerable to lead. The adverse health effects of lead exposure include damage to the brain and nervous system, slowed growth and development, learning and behavior problems, hearing and speech problems, lower IQ, decreased ability to pay attention, and underperformance in school. Please see the CDC's website, <https://www.cdc.gov/nceh/lead/prevention/health-effects.htm> for additional information regarding health effects of lead.
- **Partial lead service line replacements can increase lead levels for long periods of time.** Partial lead service line replacement means replacement of only a portion of a lead service line or a galvanized service line downstream of lead. Following a partial lead service line replacement, lead levels increase and construction activities such as digging and cutting release particulate lead. Particulate lead is a concern because the lead content can be very high. Additionally, new materials from partial lead service line replacements can increase corrosion or create galvanic corrosion.
- **Property owners of nonresidential properties or properties operating as rental property have responsibilities under the Lead Service Line Replacement and Notification Act after denial of complete lead service line replacement.** In accordance with 415 ILCS 5/17.12 (ff), owners of nonresidential buildings or a residence operating as a rental property shall be responsible for installing and maintaining certified point-of-use filters for the reduction of lead (NSF/ANSI Standard 53) and

particulates (NSF/ANSI Standard 42) at all plumbing fixtures intended to supply water for the purposes of drinking, food preparation, or making baby formula until such time that the property owner has affected the remaining portions of the lead or galvanized service line to be replaced.

- ***Unsafe conditions and knowledge of the remaining lead piping must be disclosed appropriately.*** Waiver or denial of complete replacement of a lead service line may create unsafe concentrations of lead and/or unsafe conditions relating to the remaining lead water pipe. If the property is a residential real property as defined by the Residential Real Property Disclosure Act (765 ILCS 77/5), appropriate disclosure shall be made at any transfer of sale, exchange, installment land sale contract, assignment of beneficial interest, lease with an option to purchase, ground lease, or assignment of ground lease.
- ***Service lines are plumbing and are required to be replaced by individuals authorized by the Plumbing License Law (225 ILCS 320/3).*** Service lines are plumbing as defined by the Plumbing License Law (225 ILCS 320/3). As plumbing, service lines are required to be repaired, replaced, and installed by authorized individuals and in accordance with the requirements of the Illinois Plumbing Code (77 Ill. Adm. Code 890).
- ***If the property is operating as a childcare operation, there are additional requirements regarding lead in drinking water under Department of Family and Children Services (DCFS) licensing standards.*** Under DCFS licensing standards, changes in water profile including changes to the water service line require retesting of the drinking water for presence of lead. Where lead is detected at or above DCFS's action level, a mitigation plan to reduce the concentration of lead is required.

More information about lead in drinking water and the effects of lead can be found at IDPH's website: <https://dph.illinois.gov>.

In consideration of the above information, IDPH strongly recommends you allow your CWS to replace your lead service line in its entirety. If you choose to waive and deny a complete lead service line replacement at your property, this form must be completed and returned to your CWS. Sections 1,2, and 3 of this form are to be completed by the CWS and Sections 4 and 5 of this form are to be completed by, you, the property owner of the affected property.

WAIVER OF COMPLETE LEAD SERVICE LINE REPLACEMENT

Sections 1, 2, and 3 must be completed by the CWS prior to providing the form to the property owner.

SECTION 1: COMMUNITY WATER SUPPLY INFORMATION	
CWS Name	ID Number
Phone	Email
CWS Mailing Address	
CWS City	Zip Code
SECTION 2: SERVICE LINE ACTIVITY INFORMATION	
<input type="checkbox"/> Emergency Repair <input type="checkbox"/> Planned Replacement	Date of Activity
SECTION 3: AFFECTED PROPERTY	
Street Address	
City	Zip Code

Sections 4 and 5 must be completed by the owner of the affected building identified above and returned to the community water supply.

SECTION 4: Property Owner Information	
Full Name (First Name Last Name)	
Phone	Email
SECTION 5: DENIAL OF COMPLETE LEAD SERVICE LINE REPLACEMENT	
<input type="checkbox"/> By signing this waiver, I acknowledge that I am the property owner of the affected property located at the address listed in Section 3 of this form and I have been informed by the CWS that my property has a lead service line. I have read and understand the information provided within this waiver regarding the hazards of lead in drinking water, partial lead service line replacement, and Illinois laws about responsibilities of property owners for providing filters, disclosing the presence of lead water service lines, and requirements for child care facilities.	
<input type="checkbox"/> By signing this waiver, I acknowledge that I am waiving the community water supply's requirement to replace my lead service line in its entirety. I acknowledge that this waiver will result in a partial lead service line replacement and it may be unsafe to drink, cook with, or otherwise consume water from the tap, unless it has been filtered with a filter certified to meet NSF/ANSI Standard 53 and 42.	
Signature	Date

All parties should retain a copy of this form for their records. The Community Water Supply must also provide notification to IDPH using the electronic forms located at <https://dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water.html>.



Illinois Environmental Protection Agency

1021 North Grand Avenue East • P.O. Box 19276 • Springfield • Illinois • 62794-9276 • (217) 782-3397

Lead Service Line Replacement Plan Checklist

PWS ID No.: IL0295100

Name: Clear Water Service Corporation

Lead Service Line Replacement Plan Self-Assessment

This section should be completed after your plan has been developed to ensure it meets all sections required by Section 17.12 of the Environmental Protection Act.

Please certify the inclusion of each lead service line replacement requirement and note the location in the appropriate box. Failure to include any required information in the lead service line replacement plan will result in the plan be rejected.

Initials	Location (e.g. Pg. 3 Para. 6)	Please initial each box to confirm that that required section is included in the plan and include the page number and paragraph number for where that information can be found in the plan.	Citation
BMH	Section 1.1, pg. 2	The name and identification number of the community water supply.	415 ILCS 5/17.12 (q)(1)
BMH	Section 1.1, pg. 2	The number of service lines connected to the distribution system of the community water supply.	415 ILCS 5/17.12 (q)(2)
BMH	Section 1.2, pg. 2	The total number and location of suspected lead service lines connected to the distribution system of the community water supply.	415 ILCS 5/17.12 (q)(3)
BMH	Section 1.2, pg. 2	The total number and location of known lead service lines connected to the distribution system of the community water supply.	415 ILCS 5/17.12 (q)(4)
BMH	Section 1.3, pg. 2	The total number and locations of lead service lines connected to the distribution system of the community water supply that have been replaced since 2020.	415 ILCS 5/17.12 (q)(5)
BMH	Section 2.1, pg. 2	A proposed lead service line replacement schedule that includes one-year, 5-year, 10-year, 15-year, 20-year, 25-year, 30-year goals.	415 ILCS 5/17.12 (q)(6)
BMH	Section 2.2, pg. 2-3	An analysis of costs and financing options for replacing the lead service lines connected to the community water supply's distribution system.	415 ILCS 5/17.12 (q)(7)
BMH	Section 2.2, pg. 2	A detailed accounting of costs associated with replacing lead service lines and galvanized lines requiring replacement.	415 ILCS 5/17.12 (q)(7)(A)
BMH	Section 2.3, pg. 3	Measures to address affordability and prevent service shut-offs for customers or ratepayers.	415 ILCS 5/17.12 (q)(7)(B)
BMH	Section 2.3, pg. 3	Consideration of different scenarios for structuring payments between the utility and its customers over time.	415 ILCS 5/17.12 (q)(7)(C)
BMH	Section 3.1, pg. 3	A plan for prioritizing high risk facilities such as preschools, day care centers, group day care homes, parks, playgrounds, hospitals, and clinics, as well as high-risk areas identified by the community water supply.	415 ILCS 5/17.12 (q)(8)
BMH	Exhibit A	A map of the areas where lead service lines are expected to be found and the sequence with which those areas will be inventoried and lead service lines replaced.	415 ILCS 5/17.12 (q)(9)
BMH	Section 3.2, pg. 3	Measures for how the community water supply will inform the public of the plan and provide opportunity for public comment.	415 ILCS 5/17.12 (q)(10)
BMH	Section 3.3, pg. 3	Measures to encourage diversity in hiring in the workforce required to implement the plan as identified under subsection (n).	415 ILCS 5/17.12 (q)(11)
BMH	Section 3.4, pg. 4	Procedure for conducting full lead service line replacement.	40 CFR 141.84 (b)(2)
BMH	Section 3.5, pg. 4	Procedure for informing customers before a lead service line replacement and flushing directions to remove particulate lead from service lines and premise plumbing.	40 CFR 141.84 (b)(3), 40 CFR 141.84 (b)(5)

Please include a copy of this checklist when submitting the Lead Service Line Replacement Plan to the Illinois EPA.