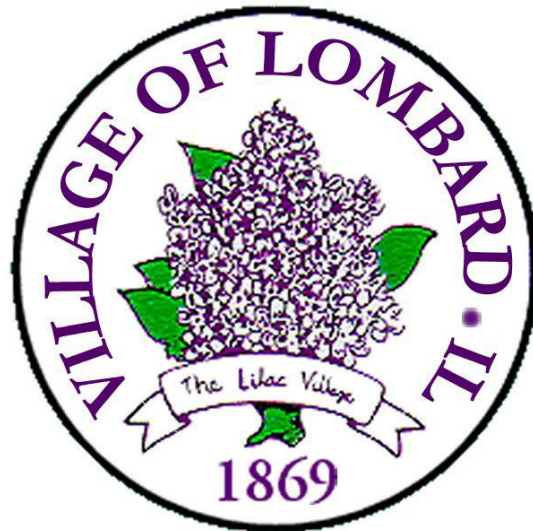


Village of Lombard



PWS ID No.: IL0430600

Initial Plan – April 15, 2024

LEAD SERVICE LINE REPLACEMENT PLAN

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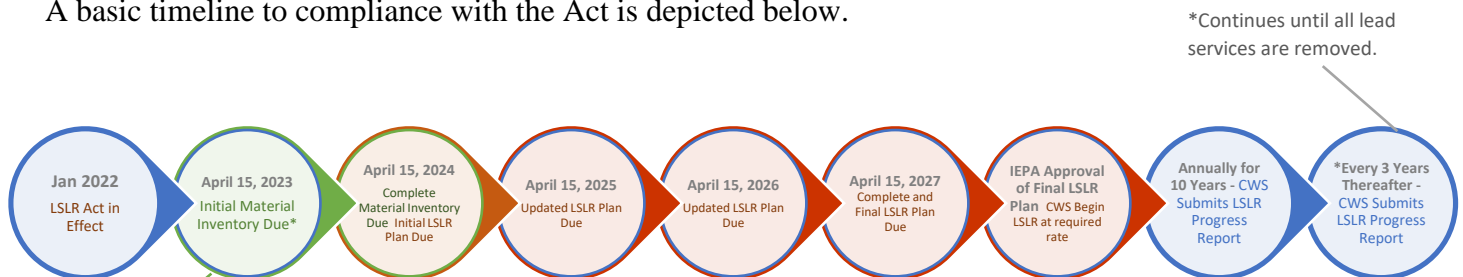
INTRODUCTION

Lead is generally not present in source water but can be present in tap water through corrosion of the water service pipe and plumbing materials that are made of lead. Homes that were built before 1970 most likely have lead service lines, or that have internal plumbing and fixtures that contain lead. The Safe Drinking Water Act (SDWA) Section 1417 (a)(1) required that after June 19, 1986, only “lead-free” pipe, solder, or flux shall be used for the installation or repair of any plumbing in residential or non-residential properties providing water for human consumption, which is connected to a public water supply.

BACKGROUND

Effective January 1, 2022, the Lead Service Line Replacement and Notification Act (LSLRNA Public Act 102-0613) replaced the former lead materials inventory requirements found in the Illinois Environmental Protection Agency Act 415 ILCS 5/17.11. The purpose of the new Act is to require community water suppliers to develop, implement, and maintain a comprehensive water service line inventory and replacement plan for lead water services. Illinois is estimated to have over 680,000 lead-based water service lines still in use.

A basic timeline to compliance with the Act is depicted below.



*Updated Material Inventories are due annually per IEPA requirements.

Starting April 15, 2024, each community water supply is required to submit a complete material inventory stating the composition of water service material on both the public and private sides as well as type of connection to the community’s water distribution system as well as the initial Lead Service Line Replacement Plan to the IEPA. The initial plan will include the following:

- A preliminary replacement schedule for all lead and galvanized requiring replacement.
- An analysis of cost and financing options.
- Identify high risk properties, i.e. schools, day care, retirement/assisted living facilities.
- A map with an estimated replacement timeline; and
- A Public Notification Plan.

The following April 15th of 2025 and 2026 an updated LSLR plan is required to be submitted to the IEPA with updated to the material inventory depicting the number of lead lines replaced and unknown lines field verified.

Beginning April 15, 2027, the final LSLR Plan is due to the IEPA for official approval. Once the plan is approved by the IEPA, the community water supply is required to begin the replacement of lead lines at a schedule calculated from the number of lead service lines within the community water supply. The Village of Lombard falls into the category of 1,200 – 4,999 verified lead lines which will be replaced at an annual rate of no less than 6% for up to 17 years.

A link to the Lead Service Line Replacement and Notification Act (LSLRNA Public Act 102-0613) is: <https://www.ilga.gov/legislation/publicacts/102/102-0613.htm>.

LOMBARD SERVICE LINE MATERIAL INVENTORY

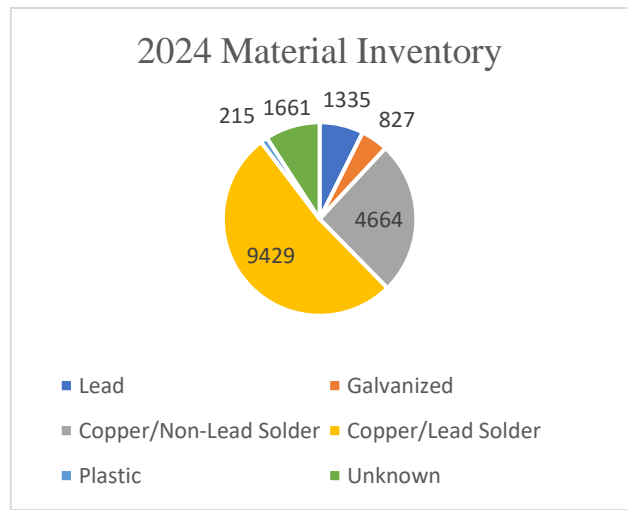
The initial service line material inventory submitted in 2018 was based upon the structures’ build year, and information collected during the water meter replacement program of 2018/2019. The water meter installers noted the water service material type as they inspected the water service inside the structures. For the properties where we were unable to collect material type data, the construction year of the building was used to surmise the dominant material for water services at that time.

Each year since 2018, the material inventory has been updated to reflect field verification of water services as well as information required to be reported to include both public and private sides of the service line as well as the connection type to the water main.

The chart below is the basic material inventory for the Village of Lombard as of April 15, 2024:

	Lead	Galvanized	Copper	Copper w/Lead Solder	Plastic	Unknown	Total Connections
Public	1,335	827	3,464	9,429	215	0	15,270
Private	364	468	3,336	9,226	215	1,661*	15,270

*Unknowns are considered lead until material type is field verified.



Historically, the Village would replace lead water service lines in the public right-of-way during water main capital improvement projects and leave the potential lead or galvanized water services on the private side alone for the homeowner to replace at their discretion. This was an acceptable practice until August 2021 when the IEPA prohibited partial lead service line replacements as part of the Lead Service Line Replacement and Notification Act. Studies show that partial lead service replacements release more lead particles into the water than leaving the lead service line undisturbed.

The Village of Lombard Board of Trustees approved a Lead Service Line Replacement Reimbursement Program in 2017 to aid homeowners in the cost of replacing the private side of the lead or galvanized water service in conjunction with the Village replacing the public side of the lead water service. This program provides homeowners a reimbursement of 75% of the private side cost up to \$5,000 along with the Village covering 100% of the cost of the public side of the lead service.

Since the Village’s Lead Service Line Replacement Reimbursement Program began the following is the number of lead services replaced:

Time Period	Public Side	Private Side
1/1/2017 - 12/31/2019	21	5
1/1/2020 - 4/15/2024	51	23

LEAD SERVICE LINE REPLACEMENT PLAN

In accordance with the Lead Service Line Replacement and Notification Act (LSLRNA Public Act 102-0613), the following sections will describe the plan and procedures for the full replacement of lead and galvanized water service lines connected to the Village of Lombard’s water distribution system.

The Village of Lombard reports the number of lead service lines in its inventory of more than 1,200 but fewer than 5,000 lead service lines. The replacement schedule shall consist of replacing all lead service lines at an annual rate of no less than 6% of the amount reported within a timeline of 17 years beginning in 2027 and concluding in 2044.

Listed below is the current material inventory replacement schedule analytics based upon public and private water service material type. Unknowns are considered lead until field verified.

	Lead	Galvanized	Unknowns	Total	Confirmed Lead/Galvanized	Full LSL	Total LSLR	6% < Annual Replacements
Public	1,335	827*	0	2,162	2,162	585	4,657*	280*
Private	364	468	1,661*	2,495	834			

*Number will most likely be reduced during the field verification process.

The lead and galvanized water service lines were field verified during the residential water meter replacement program of 2018/2019. The material type of the private side of the water service was identified and recorded where the service line entered the building at the water meter by the water meter installer.

Replacement scheduling of lead lines will be identified through current Capital Improvement Projects where high clusters of lead lines are located. Areas of high-risk residents with lead lines will be prioritized for individual replacements. A systematic approach to complete the remaining lead lines will be done through a zoned grid of clusters of lead lines that will incorporate routine maintenance programs of pavement replacement and restorations to take advantage of cost savings by linking projects together.

REPLACEMENT SCHEDULE GOALS

Emergency Repairs

Emergency repairs will be handled on a case-by-case basis as they arise. If full lead service line replacement cannot be completed at the time of the repair, a temporary repair will be completed to restore water service to the property. The resident will be supplied an NSF/ANSI 53 and NSF/ANSI 42 certified point of use filters at no cost to the resident until the permanent full lead service line is replaced. Conditions in which a temporary repair will be made; climate/whether conditions, denial or refusal of access by property owner, other conditions out of the control of the community water service such as utility conflicts, etc.

Phase 1: One-Year (Present – 2027)

A Water Network Analysis will be completed (June 2024) for recommendations and cost estimates for water main replacement Capital Improvement Projects to incorporate clusters of lead service lines with cost estimates.

Routine Maintenance Programs and Capital Improvement Projects such as pavement restoration areas and water main replacements will be reviewed, lead service lines identified and accelerated to be included in these projects.

Residents wishing to upgrade their water service line at their own cost or taking by taking advantage of the Lead Service Line Replacement Reimbursement Program will be accelerated with the public side of the water service if applicable.

Phase 2: 1 – 5 Years (2028 – 2032)

Routine Maintenance Programs and Capital Improvement Projects such as pavement restoration areas and water main replacements will be reviewed, lead service lines identified and accelerated to be included in these projects.

Local Capital Improvement Project for water main replacement of Lombard Fire District 501 (bordered with Parkside Ave. to the north, Madison St. to the south, Main St. to the West, and Grace St. to the east) incorporating 417 know lead or galvanized needing replacement service lines.

Phase 2 radius as depicted on Lead Service Line Replacement Schedule Map identifying an additional 983 lead service lines.

Phase 3: 6 – 10 Years (2033 – 2037)

Routine Maintenance Programs and Capital Improvement Projects such as pavement restoration areas and water main replacements will be reviewed, lead service lines identified and accelerated to be included in these projects.

Phase 3 radius as depicted on Lead Service Line Replacement Schedule Map identifying an additional 1,400 lead service lines.

Phase 4: 11 – 15 Years (2038 – 2042)

Routine Maintenance Programs and Capital Improvement Projects such as pavement restoration areas and water main replacements will be reviewed, lead service lines identified and accelerated to be included in these projects.

Phase 4 radius as depicted on Lead Service Line Replacement Schedule Map identifying an additional 1,400 lead service lines.

Phase 5: 16 – 17 Years (2043 – 2044)

Routine Maintenance Programs and Capital Improvement Projects such as pavement restoration areas and water main replacements will be reviewed, lead service lines identified and accelerated to be included in these projects.

Phase 5 radius as depicted on Lead Service Line Replacement Schedule Map identifying the approximate remaining 457 lead service lines.

MATERIAL INVENTORY MAP REPLACEMENT SEQUENCE

More information along with an interactive Material Inventory Map can be viewed on the Village of Lombard’s web page at the link listed below. See Exhibit 1 for a static map.

www.villageoflombard.org/leadindrinkingwater

COST ANALYSIS AND FINANCING OPTIONS

Currently the Village of Lombard is funding lead service line replacements with local funds within the Water and Sewer Enterprise funded by water rates and offers assistance to residents through the Lead Service Line Replacement Reimbursement Program (75% of the private side cost up to \$5,000 and 100% of the cost of the public side performed by Village staff). As service line replacement increases coming years, the Village will continue to fund replacements through local funds as well as seeking funding through the IEPA State Revolving Fund (SRF Program), the Water Infrastructure Finance and Innovation Act (WIFIA), as well as potential grants and loan forgiveness funding options. A detailed cost analysis of the lead and galvanized requiring replacement service lines as of the April 15, 2024, Lombard Material Inventory is as follows:

Village of Lombard Lead Service Line Estimated Replacement Cost			
Category	Public	Private	Category Subtotal Cost
Average Replacement Cost	\$ 3,111.20	\$ 6,429.24	
Known Lead/Galvanized	2,162	832	\$ 6,726,414.40 (Public)
			\$ 5,349,912.60 (Private)
Unknowns		1661	\$ 10,678,967.64 (Private)
Total Cost			\$ 22,755,294.60

The Village of Lombard will be performing a water rate study in 2024 to identify potential funding shortfalls in the current water rate structure. This rate study will incorporate the current 10-year Capital Improvement Program that will include lead service line replacements programs in place as well as future funding needs beyond the current 10-year program.

HIGH RISK FACILITIES

High risk facilities such as preschools, day care centers, group day care homes, parks, playgrounds, hospitals, and clinics will be identified and reviewed via the current material inventory and field verified if necessary to identify water service material on both public and private sides of the water service. This verification process will begin in 2024 until it is completed. Any locations verified as lead or galvanized needing replacement shall be prioritized for replacement once verification is completed. Village Staff do not anticipate a large number of locations that will be categorized as high risk.

PUBLIC NOTIFICATION PLAN / PUBLIC COMMENT

The Village of Lombard Lead Service Line Replacement Plan will be presented to the Lombard Public Works and Environmental Concerns Committee that consists of two Village of Lombard Elected Board of Trustees, and eight Village of Lombard residents. The Committee will review the plan and present its recommendations to the full Village of Lombard Board of Trustees pursuant to the Illinois Open Meetings Act where the Lead Service Line Replacement Plan will be introduced for public comment. The initial and yearly updates of the Lead Service Line Replacement Plan will be posted on the Village of Lombard's web page as well as released to the residents of Lombard via public press release, notifications on social media outlets, and a direct link to the plan noted in the annual Consumer Confidence Report.

Once the final Lead Service Line Replacement Plan is approved by the Illinois Environmental Protection Agency, the Village Board, the plan will be officially adopted as Village policy.

NON-DISCRIMINATION AND EQUITABLE DIVERSITY IN HIRING AND CONTRACTS

The Village of Lombard is an "equal opportunity employer" that will refrain from unlawful discrimination in employment and undertake affirmative action to assure equality of employment opportunity and eliminate the effects of past discrimination. All contractors are required to certify that they are as well an "equal opportunity employer" as defined by Section 2000(e) of Chapter 21, Title 42, U.S. Code Annotated and Executive Orders #11246 and #11375 (42 U.S.C., Section 2000 (e)); Exec. Order No. 11246, 30 F.R. 12319 (1965); Exec. Order No. 11375, 32 F.R. 14303 (1967) which are incorporated herein by reference. The Equal Opportunity Clause, Section 6.1 of the Rules and Regulations of the Department of Human Rights of the State of Illinois, will be a material part of any contract awarded for lead service line replacements.

The Village and its contractors shall not discriminate on the basis of race, color, sex, national origin, ancestry, age, marital status, physical or mental handicap or unfavorable discharge for military service. Bidder/supplier shall comply with standards set forth in Title VII of the Civil Rights Act of 1964, 42 U.S.C. S2000 et seq. and The Human Rights Act of the State of Illinois (775 ILCS 5/1 - 101).

The Village of Lombard commits following the State of Illinois Business Enterprise Program to provide the opportunity for M/W/PBE firms to be awarded contracts for the purchase of materials and services for the replacement of lead service lines within the Village of Lombard.

CUSTOMER NOTIFICATION OF LEAD SERVICE LINE REPLACEMENT

As the Lead Service Line Replacement Act 415 ILCS 5/17.11 went into effect, the Village of Lombard notified by mail all known lead service lines within Lombard's Community Water Supply that their home/business had a lead service line. This notification included information regarding the health hazards of lead in drinking water and ways to mitigate the risk of exposure to lead in drinking water. See Exhibit 2.

As more lead service lines were/are identified and verified, individual customers received the same notification regarding lead in drinking water and information regarding the Village's Lead Service Line Replacement Reimbursement Program. If a partial lead service replacement was/is necessary, the resident is supplied an NSF/ANSI 53 and NSF/ANSI 42 certified point of use filters at no cost to the resident until the permanent full lead service line is replaced.

The Replacement Schedule Map will be posted on the Village of Lombard's website page dedicated to lead service line replacements with an anticipated schedule for each area of the Village. Customers will be initially notified by mail at least six months prior to their anticipated replacement schedule, as well as at least two weeks before the actual work will be performed at their home/business. Instructions on how to flush their service line will be distributed to the customer ahead of replacement so they can properly remove any particulates from their service line and interior plumbing.

LEAD SERVICE LINE REPLACEMENT PROCEDURE

The following will be the general procedures for both the replacement of an existing partial service line (lead on only one side (public or private) of the service line) and full lead service lines (lead or galvanized on both (public and private) sides of the service line).

Existing Partial Service Line (Lead or Galvanized on One Side, Non-Lead on Other Side)

Customers with verified lead or galvanized needed replacement service lines on one side of the water service and non-lead on the other side will be notified via mail when their anticipated replacement schedule approaches with the information stated in the Customer Notification of Lead Service Line Replacement section above along with the estimate time frame and contractor information. A pre

service line replacement lead water sample will be taken to establish a base line, with a post service line replacement sample taken after work is completed.

Full Lead Service Line Replacements

Customers with verified full lead or galvanized needed replacement service lines will be notified via mail when their anticipated replacement schedule approaches with the information stated in the Customer Notification of Lead Service Line Replacement section above along with the estimate time frame and contractor information. A pre service line replacement lead water sample will be taken to establish a base line, with a post service line replacement sample taken after work is completed.

Village Crews or Village contactors will coordinate with the customer to complete the full lead service line replacement at the same time. If the public and private side of the service line are being replaced by different contractors or Village Crews, the public side of the service line will be installed first leaving the undisturbed existing service line in place until the private side of the service line can be installed and connected to the new public side service line. After this is completed the lead service line will be disconnected from the community water supply and the home/business to avoid any partial lead service line replacements and the risk of elevated lead levels due to the disturbance of the existing lead service line. New service lines will be installed per the Illinois Plumbing Code and Title 35 of the IEPA.

Waiver of Complete Lead Service Line Replacement

The Village of Lombard strongly recommends all affected Lombard water customers comply with the Lead Service Line Replacement Plan. In the event a customer waives or denies a complete lead service line replacement they must complete the Illinois Department of Public Health Waiver of Complete Lead Service Line Replacement Form and return to the Village of Lombard.

The Village of Lombard is required to provide notification to the Illinois Department of Public Health when a waiver is submitted. The Village shall also maintain a record of properties that have submitted waivers in the Village's Asset Management and Water Billing Systems of partial lead service lines for future sale and property owners information.

The waiver form and more information regarding the health effects of lead service lines can be found at the link below.

<https://dph.illinois.gov/topics-services/environmental-health-protection/lead-in-water/lead-service-lines.html>

CONTACT FOR MORE INFORMATION

For more information, you can contact Brian Jack, Utilities Superintendent at (630) 620.5740 or via email at jackb@villageoflombard.org.

EXHIBIT 2 – LEAD INFORMATION NOTICE

Lead Information Notice



IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Lead, a metal found in natural deposits, is harmful to human health. The most common exposure to lead is swallowing or breathing in lead paint chips and dust. However, lead in drinking water can also be a source of lead exposure. In the past, lead was used in some water service lines and household plumbing materials. Lead in water usually occurs through corrosion of plumbing products containing lead; however, disruption (construction or maintenance) of lead service lines may also temporarily increase lead levels in the water supply. This disruption may be sometimes caused by water main maintenance/replacement. As of June 19, 1986, new or replaced water serviced lines and new household plumbing materials could not contain more than 8% lead. Lead content was further reduced on January 4, 2014, when plumbing materials must now be certified as "lead-free" to be used (weighted average of wetted surface cannot be more than 0.25% lead).

The purpose of this notice is for informational purposes only. While it's not known for certain whether or not the replacement of your water meter will adversely affect the lead (if present) plumbing inside your home, below describes some preventative measures you can take to help reduce the amount of lead in drinking water.

What you can do to reduce lead exposure in drinking water:

Run your water to flush out lead. If the plumbing in your home is accessible; you may be able to inspect your own plumbing to determine whether or not you have a lead service line. Otherwise, you will most likely have to hire a plumber.

- If you do not have a lead service line, running the water for 1 – 2 minutes at the kitchen tap should clear the lead from your household plumbing to the kitchen tap. Once you have done this, fill a container with water and store it in the refrigerator for drinking, cooking, and preparing baby formula throughout the day.
- If you do have a lead service line, flushing times can vary based on the length of your lead service line and the plumbing configuration in your home. The length of lead service lines varies considerably. Flushing for at least 3 – 5 minutes is recommended.

Use cold water for drinking, cooking, and preparing baby formula. Do not cook with or drink water from the hot water tap; lead dissolves more easily into hot water. Do not use water from the hot water tap to make baby formula.

Look for alternative sources or treatment of water. You may want to consider purchasing bottled water or a water filter that is certified to remove "total lead".

Clean and remove any debris from faucet aerators on a regular basis.

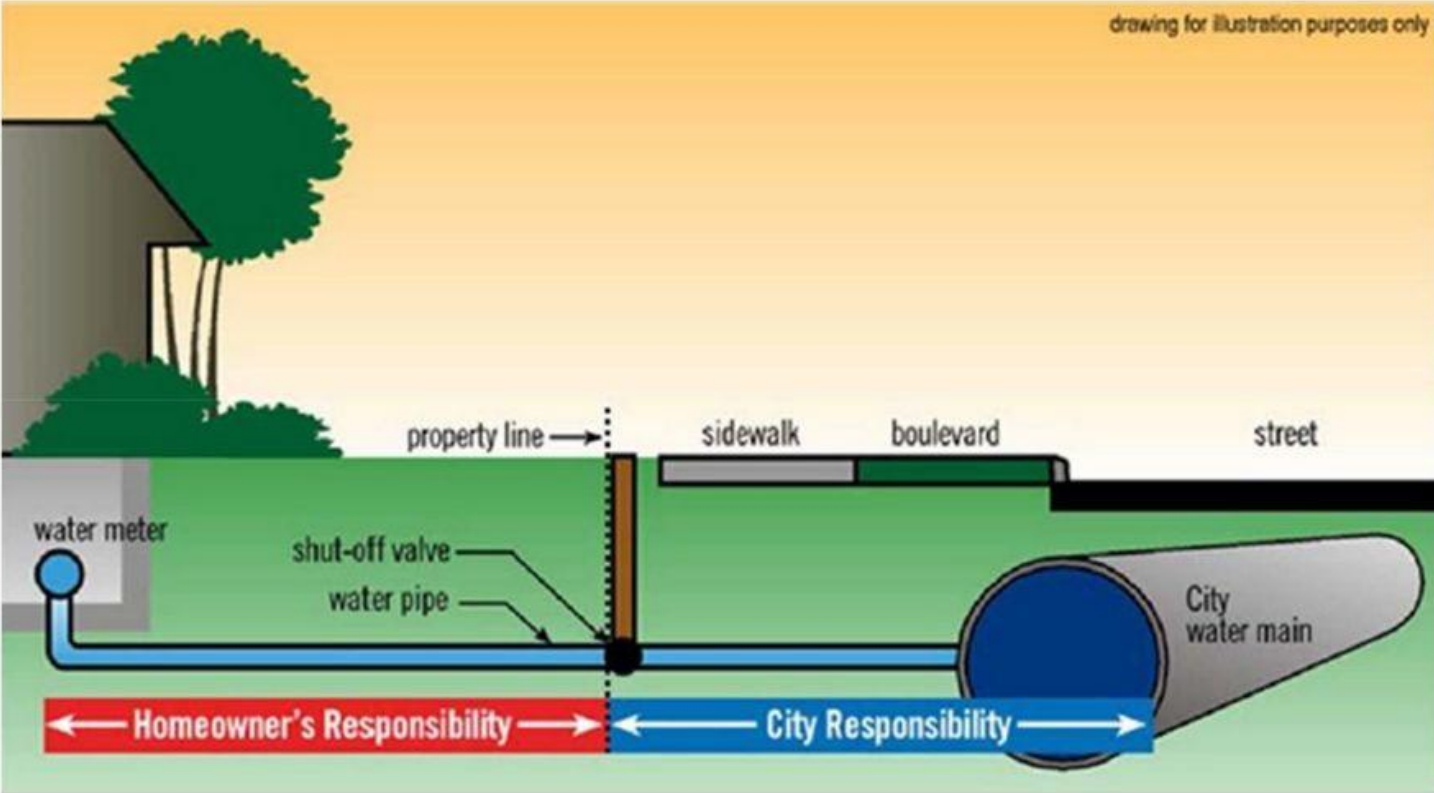
Do not boil water to remove lead. Boiling water will not reduce lead.

Purchase lead-free faucets and plumbing components. Remove the entire lead service line.

Test your water for lead. Call the Village of Lombard Public Works Department at: [630-620-5740](tel:630-620-5740) to find out how to get your water tested for lead. The Village does not do the testing, however, we can provide a list of laboratories certified to do the testing. The Laboratories will send you the sample bottles and instructions, the Village can answer any questions you have about the testing process. The cost of the sample is the residents responsibility.

- If test results indicate a lead level above 15 ug/L, bottled water should be used by pregnant women, breast-feeding women, young children, and formula-fed infants.

EXHIBIT 3: WATER SERVICE DIAGRAM



Source: Evaluation of Lead Service Line Lining and Coating Technologies, Water Research Foundation, 2017

EXHIBIT 4

**LEAD WATER SERVICE LINE REPLACEMENT
REIMBURSEMENT**

LETTER OF AGREEMENT

I understand and agree that the Village of Lombard established the lead service line replacement program to assist residents in mitigating the risks of consuming lead in drinking water. The program provides for 75% reimbursement of eligible costs (up to a maximum of \$5,000) upon approval.

Prior to the installation of any plumbing work, the specific plans including the Proposal shall be submitted to the Village for review and approval along with the submission of the pre-construction water sample. No work shall commence until Village approval is obtained and a permit is issued. The Village shall be notified to inspect the plumbing work as required under any permit.

Reimbursement of eligible items at approved amounts will be made after work is completed, inspected and approved by the Village. A completed Request for Disbursement form must be completed and submitted with other documentation, such as the detailed invoice marked “paid” and a copy of the cancelled check (both sides) or credit card receipt which evidences that the project was paid for, in full, by the homeowner and the submission of the post construction lead water sample.

Liability – The Village shall have no liability for any defective work or other damage, injury and/or loss on account of any act or omission of the Contractor in the performance of the work. The Homeowner shall make any claim for such matters directly against the Contractor or Contractor’s insurance carrier. Homeowner hereby agrees to indemnify and hold Village harmless against any and all claims and further covenants not to sue the Village for any and all claims, as no system is absolutely fail safe. Homeowner responsible for all maintenance of system including but not limited to replacement parts, pumps, circuit breakers, valves, pipes, etc.

Disclaimer – The Program is designed to eliminate lead from the water distribution system. The replacement of the lead water service lines will substantially reduce the risk of consuming lead in drinking water; however, interior plumbing fixtures may still contain lead or lead solder. It is recommended that old fixtures be replaced with new Watersense® labeled fixtures. Faucets should be flushed for 3 – 5 minutes after not being used for several hours, depending on the length of the water service line to flush potential lead out of the pipes before consuming. Water should be flushed until it runs consistently cold.

Information on lead in drinking water can be found at www.villageoflombard.org/waterquality or www.epa.gov/safewater/lead. You can also contact the Village of Lombard Public Works Department at 630.620.5740 or via email at publicworks@villageoflombard.org.

Breach – If the Homeowner fails to comply with all requirements of this Agreement or to complete installation as provided in this Agreement, the Village shall have no obligation to reimburse the Homeowner.

I understand and agree with all of the above statements and agree to comply accordingly.

Homeowner – Printed Name

Signature

Date

Property Address

_____, LOMBARD, IL 60148