



April 25, 2025

**VIA E-FILING**

**Jonathan P. Nase**

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Secretary Matthew Homsher  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Buck Hill Water Company's Petition for Lead Service Line Replacement Program;  
Docket No. P-2025-3053570  
Filing of Petition for Lead Service Line Replacement Program**

Dear Secretary Homsher:

In accordance with the Secretarial Letter issued on March 28, 2025 in the above-referenced matter, enclosed please find Buck Hill Water Company's Petition for Lead Service Line Replacement Program. The electronic version of the service line inventory will be filed via the Pennsylvania Public Utility Commission's sharepoint site.

Copies have been served as shown on the enclosed certificate of service.

Thank you for your attention to this matter. Please contact me if you have any questions about this filing.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase  
Counsel for *Buck Hill Water Company*

JPN

cc: Per Certificate of Service  
Garry Cramer, President and Chief Operating Officer



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120

**LEAD SERVICE LINE REPLACEMENT PROGRAM PETITION**

Re: Petition for Lead Service Line Replacement Program

Docket No. P-2025-3053570

Pursuant to Section 1311(b)(2) of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1311(b)(2), and the Pennsylvania Public Utility Commission's (Commission's) Lead Service Line Replacement (LSLR) Regulations, 52 Pa. Code § 65.51, *et seq.*, the Company seeks Commission approval of its LSLR program and plan to replace Company-owned and customer-owned lead service lines (LSLs) and to recover the associated costs related to those replacements as set forth in the Company's Lead Service Line Replacement Program (LSLR Program). In accordance with the LSLR Program and proposed tariff revisions, upon approval by the Commission, the Company will be able to begin replacing customer-owned LSLs at its sole cost and recover a return on and of those costs pursuant to Act 120.

**Company Name:** Buck Hill Water Company

**Company Address:** P.O. Box 426  
Buck Hill Falls PA 18360

**Telephone No.:** 570-595-7511

**Email Address:** gaouad@buckhillfalls.com

**Point of Contact:** Name: Georges Aouad  
Title: Chief Financial Officer  
Telephone No.: 570-595-7511  
Email Address: gaouad@buckhillfalls.com

## **Appendix A**

### **Pro Forma LSLR Program Tariff Supplement**

**BUCK HILL WATER COMPANY**  
RATES, RULES AND REGULATIONS GOVERNING  
THE DISTRIBUTION OF WATER  
TO THE PUBLIC IN BUCK HILL FALLS AND VICINITY,  
THE TOWNSHIP OF BARRETT,  
MONROE COUNTY, PENNSYLVANIA

ISSUED: \_\_\_\_\_

EFFECTIVE: \_\_\_\_\_

BY: GARRY D. CRAMER, PRESIDENT/COO  
BUCK HILL WATER COMPANY  
P.O. Box426  
Buck Hill Falls, PA 18360

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**NOTICE**

This Tariff supplement implements the Company's lead service line replacement program.

LIST OF CHANGES

Tariff supplement No. 35 implements the Company's lead service line replacement program, which addresses the Company's efforts to replace Company owned and customer owned lead service lines.

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PART V: LEAD SERVICE LINE REPLACEMENT (LSLR) PROGRAM

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(1) Supersession

This section of the Company’s tariff supersedes all other conflicting provisions of this tariff for purposes of implementing the Company’s LSLR Program.

(2) Definitions

The following words and phrases, when used in Part V of this tariff, shall have the meanings assigned below unless the context clearly indicates otherwise:

Curb Stop: A water service shutoff valve located in a water service line near the curb or edge of the street and between the water main and the building.

Customer: A party contracting with an entity for service.

Customer-owned Lead Service Line (Customer-owned LSL): The portion of the lead service line extending from the curb, property line or entity connection to an entity’s water meter or, if the entity’s meter is located outside of the structure or water is not metered by the entity, at the first shutoff valve located within the interior of the structure.

Company: Buck Hill Water Company

Company-owned Lead Service Line (Company-owned LSL): The portion of the lead service line extending from the Company’s main to the Curb Stop.

Distribution system improvement charge (DSIC): The term as defined in 52 Pa. Code § 121.2.

Entity: A public utility as defined in 66 Pa.C.S. § 102 (relating to definitions) engaged in diverting, developing, pumping, impounding, distributing or furnishing water service to or for the public for compensation, a municipal corporation as defined in 52 Pa. Code § 65.52 (relating to definitions), and an authority as defined in 66 Pa.C.S. § 3201(1) (relating to definitions).

Galvanized service line: Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.

Independent Legal Restrictions: Commission regulations or Orders which otherwise prevent termination of water service at a property including but not limited to winter moratorium, medical certifications, or Commission directed moratoriums or suspensions.

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Lead service line (LSL): A service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

Lead service line replacement (LSLR): A service line, whether entity-owned or customer-owned, installed to replace a lead service line.

Lead service line replacement plan (LSLR Plan): A plan and supporting documents submitted to and approved by the Commission that specify how an entity intends to implement its lead service line replacement program.

Lead service line replacement program (LSLR Program): A program submitted to and approved by the Commission for the replacement of lead service lines by an entity.

Lead service line replacement project (LSLR Project): An entity-scheduled lead service line replacement activity either in conjunction with main replacements or as part of a lead service line replacement program.

Lead service line replacement project area (LSLR Project Area): The area encompassing an entity's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a lead service line replacement project if served by the entity.

LSLR Project Commencement: Installation of the first lead service line replacement within a lead service line replacement project area.

Partial lead service line replacement (Partial LSLR): A lead service line replacement that does not replace both the entity-owned and customer-owned portions of a lead service line.

Property Owner Agreement: An agreement between the Company and a property owner for the replacement of a customer-owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL.

Service line: The pipe and appurtenances which connect any main to an entity's water meter or, if the entity's water meter is located outside of the structure or the connection is not metered by the entity, at the first shutoff valve located within the interior of the structure.

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(3) LSLR Plan

Notwithstanding the Rules in this tariff relating to customer responsibility for customer service lines, the Company will replace customer-owned LSLs pursuant to its LSLR Program and LSLR Plan as initially approved by the Commission at Docket No. P-2025-3053570, together with future Commission-approved updates. The Company may modify its annual cap for LSLRs with Commission approval. The costs incurred by the Company to undertake remediation efforts pursuant to its LSLR Plan shall be recoverable in the Company's DSIC, PENNVEST Surcharge, and in base rates, as applicable.

The Company's LSLR Plan applies to any LSL serving any customer, the replacement of which is operationally feasible, and where the property owner authorizes the replacement or replaces the line in accordance with the Company's LSLR Program.

(4) LSLR Annual Cap

The Company will cap LSLR Projects at 12 customer-owned LSLRs on an annual basis. If a customer reimbursement provided pursuant to this tariff or an emergency LSLR causes the Company to exceed its annual cap, the Company will increase its current annual cap by the number of emergency repairs and/or reimbursements and decrease its annual cap by the same amount for the following year only.

(5) LSL Replacements

The Company will offer to replace customer-owned LSLs at no direct cost to the customer or property owner, if the customer is not the property owner: (i) at any residential or non-residential property where the Company replaces a Company-owned main connected to a customer-owned LSL; (ii) at any property where the Company replaces a company-owned LSL connected to a customer-owned LSL; and (iii) at any property with a private-side only LSL located within a LSLR Project Area where LSLRs are performed; (iv) when the Company's operations crew replaces a Company-owned facility regardless of material, in emergencies, including line breaks, leaks, or other unplanned emergency replacements, that is a LSL or that is connected to a LSL; (v) and any other circumstance as required to avoid the replacement of a partial LSL.

Except in the case of non-owner occupied properties at which the Company has received the customer's acceptance of the Company's offer to replace the customer-owned LSL as set forth in Section (7) below, the Company shall enter into a property owner Agreement with the property owner for replacement of a customer-owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL. The Property Owner Agreement shall be in a form provided by the Company and shall include provisions that require property owners to release and hold harmless the Company from any and all claims, causes of action,

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damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors that are not covered by the Company's LSLR Program warranty.

(6) Customer Refusal

Except as set forth below, if after being notified of the Company's offer to replace at no cost a customer-owned LSL, the property owner has not provided an executed Property Owner Agreement authorizing the replacement of the customer service line or has refused replacement, the Company will (1) provide the customer and property owner, if the customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, (2) inform the customer or property owner, if the customer is not the property owner, that refusal or failure to accept will require replacement of the customer-owned LSL, at the customer or property owner's expense, within 1 year from LSLR Project Commencement for the customer or property owner, if the customer is not the property owner, to be eligible for reimbursement, and (3) communicate to the customer and property owner, if the customer is not the property owner, that failure to allow the Company to complete the LSLR or to replace the customer-owned LSL concurrent with the Company replacing the Company-owned LSL will lead to termination of water service under the provisions of this tariff prior to the Company replacing the Company-Owned LSL.

If the customer or property owner, if the customer is not the property owner, does not sign the Property Owner Agreement or refuses replacement of the customer-owned LSL within ten days after the Company undertakes the aforementioned steps, the Company will require the customer or property owner, if the customer is not the property owner, to sign a form documenting their refusal. If the customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal or failure to sign the refusal form. The Company will then schedule to replace its portion of the Company-owned LSL and notify the customer in writing of this replacement no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-owned LSL. The Company will proceed with termination of water service to a location irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such notice and termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

At any time prior to completing termination, or, within ten days after termination, the property owner executes the Property Owner Agreement, water service will be restored to the property, provided that service will not be restored until either both the Company-owned LSL and the customer-owned LSL have been replaced or, in the Company's sole discretion, an alternative, non-lead temporary bypass is installed until both the Company-owned LSL and the customer-owned LSL have been replaced.

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The Company will not connect an Applicant to water service where a property owner previously refused or failed to accept the Company's offer of a LSLR until the Applicant verifies the replacement of the customer-owned LSL by providing a paid invoice from a licensed contractor or a notarized statement from a licensed contractor attesting to completion of the LSLR.

(7) Service Line Demarcation

If a shutoff valve is not located within 12 inches of the structure wall of the property, the Company may install a shutoff valve during the LSLR to serve as a point of demarcation between the property's service line and the property's interior water distribution piping.

The Company shall perfect its ownership of the portion of the service line located within the then-existing right-of-way in conformance with its tariff to ensure that the Company can obtain necessary permits during the planning phase of a LSLR Project.

(8) Prohibition on Partial LSLRs and Notice Requirements

Neither a customer nor a property owner may install a Partial LSLR. A Partial LSLR installed after July 23, 2022, must result in termination of service until both the Company-owned LSL and customer-owned LSL have been replaced. The Company will proceed with immediate termination of water service to a location being served by a partial LSLR installed after July 23, 2022, irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

Where a customer or a property owner, if the customer is not the property owner, elects to replace the customer-owned LSL, the customer or property owner shall replace the customer-owned LSL concurrent with the Company replacing the Company-owned LSL, provided that the customer or property owner, if the customer is not the property owner, provides the Company at least 180 days' notice prior to replacing the customer-owned LSL.

The Company shall not connect an Applicant for water service to the Company-owned service line at a property where a customer or property owner, if the customer is not the property owner, previously refused or failed to accept the Company's offer of a LSLR until the Applicant verifies the replacement of the customer-owned LSL by providing a paid invoice from a licensed contractor or a verified statement from a licensed contractor attesting to completion of the LSLR.

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(9) Reimbursement

Where a customer or property owner, if the customer is not the property owner, has replaced its own customer-owned LSL, the customer or property owner shall submit to the Company a reimbursement form, which may be provided by the Company to a customer or property owner by mail or email upon request or on the Company's website, and which must be completed by the customer or property owner and provided to the Company by mail, email, fax, or hand delivery as specified by the Company on its reimbursement form, which contains, at a minimum, a detailed estimate and paid invoice from a licensed contractor verifying the replacement of the customer-owned LSL. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of a LSLR may be sufficient in the Company's discretion. A paid invoice must be submitted.

Upon submission of the reimbursement form, the Company will review the information that was provided within 90 days of receiving the reimbursement form to determine eligibility for a reimbursement. If sufficient information has not been provided at the time of submitting the reimbursement form, the Company will contact the customer or property owner to request the necessary information to determine eligibility. The Company will have an additional 45 days from the time it receives the additional information to determine a customer's eligibility for reimbursement.

A customer or property owner, if the customer is not the property owner, is eligible to receive a reimbursement if the customer or property owner's service address is located within a LSLR Project Area and the customer-owned LSL is replaced within one year before or from LSLR Project Commencement. A customer or property owner, if the customer is not the property owner, located within a LSLR Project Area is eligible for a reimbursement of LSLR expenses up to 125% of the average cost the Company would have incurred to perform the replacement of a similarly-sized service line, not to exceed the actual cost to the customer or property owner.

Reimbursements will be paid directly to the customer or property owner, if the customer is not the property owner, through the issuance of a check. The Company will issue a check within 90 days after verifying that the customer or property owner is eligible for reimbursement.

(10) Warranty

For customer-owned LSLs replaced by the Company or its contractor, the Company will provide a two-year warranty for materials and workmanship of the Company's LSLR work, including the Company's restoration of surfaces consistent with this tariff, commencing from the date the LSLR is complete. This warranty shall cover repairs and replacements conducted by the Company or its contractor of the LSLR work up to a maximum warranty coverage amount of 125% of the Company's cost for the LSLR work, so long as the customer allows access to the property for repairs.

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The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

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(11) Limitation of Liability

The Company's liability relating to LSLR efforts is limited as set forth in this tariff.

(12) Restoration

The Company will backfill to the previous grade any trenches excavated as part of the LSLR process and will fill and seal any wall or floor penetrations in the private home. The Company will restore roadways and sidewalks within the public right-of-way. No other restoration will be conducted for LSLRs. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the customer or property owner, if the customer is not the property owner, unless otherwise required by the Company's LSLR Program warranty.

(13) Ownership of Replacement Service Line

After a customer-owned LSL is replaced by the Company, the customer shall continue to own the customer portion of the Service Line and shall have full responsibility for the repair, replacement and maintenance of the new customer portion of the Service Line.

## Appendix B

### Data Responses to 52 Pa. Code § 53.52

The following data responses are provided by Buck Hill Water Company in accordance with 52 Pa. Code § 53.52, to support the proposed Tariff Supplement implementing the Lead Service Line Replacement (LSLR) Program

<b>Data Responses to 52 Pa. Code § 53.52</b>	
<b>Part (a)</b>	Whenever a public utility, other than a canal, turnpike, tunnel, bridge or wharf company files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it shall submit to the Commission, with the tariff, revision or supplement, statements showing all the following:
(1)	The specific reasons for each change.
<b>Response:</b>	To implement the Company's LSLR Program, which will allow the replacement of Company-owned and customer-owned lead service lines and allow for recovery of associated costs in accordance with LSLR and PUC compliance and regulations.
(2)	The total number of customers served by the utility.
<b>Response:</b>	328
(3)	A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.
<b>Response:</b>	The exact number of customers affected will depend on the number of identified LSLR and customer participation; impact on bills will be addressed in a future base rate filing.
(4)	The effect of the change on the utility's customers.
<b>Response:</b>	The Program will improve water quality and public health without immediate rate changes. Costs may be recovered in future rate proceedings, subject to Commission approval.
(5)	The direct or indirect effect of the proposed change on the utility's revenue and expenses.

<b>Response:</b> The Program represents a long-term capital investment. Costs may be recovered in future rate proceedings, subject to Commission approval.
(6) The effect of the change on the service rendered by the utility.
<b>Response:</b> Service reliability and water quality will be further safeguarded through the proactive removal of lead service lines. Although the Company's current water quality is not hazardous and no lead-related exceedances have been detected, the replacement program is being implemented to ensure continued compliance with evolving regulatory standards and to eliminate any future risk in accordance with state guidelines.
(7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each.
<b>Response:</b> 1) compliance with Act 120 and Commission regulations, 2) known public health hazards associated with lead, 3) infrastructure modernization needs. The primary factors are regulatory compliance and health protection.
(8) Studies undertaken by the utility in order to draft its proposed change.
<b>Response:</b> The Company relied on internal infrastructure records, DEP guidance, and EPA technical documentation. No third-party studies were commissioned at this stage.
(9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.
<b>Response:</b> No formal customer polls were conducted. Informal feedback from the community and board members supports the proactive removal of lead service lines and ensuring compliance with all DEP and PUC Regulations.
(10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.
<b>Response:</b> The Company will notify ratepayers via email, printed mail, and public meetings. A dedicated page on the Company's website will house all educational materials and updates on the program.
(11) Commission orders or rulings applicable to the filing.
<b>Response:</b> <i>Rulemaking to Implement Act 120 of 2018 at 52 Pa. Code Chapters 65 and 66, Docket No. L-2020-3019521 (Final Rulemaking Order entered Mar. 14, 2022)</i>

## Appendix C

### Lead Service Line Replacement Plan

<b>Lead Service Line Replacement Plan Requirements</b> <b>52 Pa. Code § 65.56</b>	
<b>(a) Service line inventory:</b>	
(1) Entities subject to this chapter shall submit to the Commission a service line inventory that complies with United States Environmental Protection Agency regulation at 40 CFR 141.1—143.20 as enforced by the Department of Environmental Protection, inclusive of future changes as those regulations may be amended. Submit one electronic working copy and one hard copy of the Company’s current service line inventory in a worksheet format and specify the Petition appendices where this information is provided.	
<b>Response:</b> The Company has prepared a service line inventory consistent with 40 CFR 141.1–143.20, as enforced by the Pennsylvania Department of Environmental Protection. The inventory identifies the materials of construction for all known service lines within the system and categorizes each as lead, non-lead, or unknown.  Exhibit 1 includes a working electronic copy of the inventory in Excel format. Exhibit 2 contains a printed hard copy of the same inventory.	
(2) Identify the assumptions that the entity used or will use in completing its service line inventory.	
<b>Response:</b> The Company assumes that homes built in the last third of the development do not contain lead service lines based on engineering records, historical materials procurement, and field inspections.	
(3) Until the inventory is complete, an entity shall provide detailed information regarding the progress of its service line inventory as part of its annual LSLR program report under § 65.59 (relating to LSLR program reports). Submit a statement acknowledging this requirement.	
<b>Response:</b> Buck Hill Water Company acknowledges its obligation to report progress annually per 52 Pa. Code § 65.59 until the inventory is complete.	

(4) After an entity's service line inventory is complete, it must be incorporated into the entity's next LSLR plan update under § 65.57 (relating to periodic review of LSLR plan). Submit a statement acknowledging this requirement.

**Response:** Buck Hill Water Company acknowledges its obligation to incorporate its completed service line inventory in its next LSLR plan update after the inventory is completed.

**(b) Planning and replacements:**

(1) Provide the entity's projected annual investment in LSLRs with an explanation of the entity's anticipated sources of financing.

**Response:** The Company anticipates an investment schedule based on an annual capital expenditure of approximately \$80,000, phased over 20 years. Investment will be sourced through base rate filings, capital planning, or cost recovery mechanisms such as DSIC.

(2) Provide the entity's projected number of LSLRs per calendar year with an explanation of how the projection was determined and a statement that this number is consistent with the entity's annual cap on LSLRs.

**Response:** Buck Hill Water Company projects the replacement of approximately 10 lead service lines per calendar year over the course of its 20-year Lead Service Line Replacement (LSLR) Program.

This projection was determined based on:

A review of the Company's detailed service line inventory (see Exhibit 1), which identifies 196 service lines classified as "Unknown" and thus prioritized under PUC and DEP regulations;

The absence of confirmed lead service lines, requiring proactive confirmation and inspection of unknown materials;

Practical scheduling and contractor availability in the Buck Hill Falls region;

Financial planning aligned with the Company's approved annual capital allocation of \$80,000 per year;

The Company believes that this replacement pace is achievable and consistent with its technical and financial capacity, as well as regulatory expectations. It represents the Company's annual cap on LSLRs under current funding and resource availability.

As additional data becomes available (e.g., verified material inspections or customer feedback), the Company will reassess this projection during the triennial LSLR Plan review per 52 Pa. Code § 65.57.

(3) Identify the prioritization criteria considered by the entity when developing its LSLR schedule.

**Response:** Priority is given to lines requiring emergency service, those in high-risk areas, and homes with known vulnerable occupants (e.g., children, elderly).

(4) Provide an explanation of the entity's processes and procedures to address emergency repairs or replacements which reveal LSLs.

**Response:** If an LSL is discovered during emergency repairs, the Company will notify the customer or property owner, initiate immediate replacement with appropriate consent, and document all work and notifications.

(5) Provide the entity's processes and procedures to obtain acceptance of a LSLR prior to LSLR project commencement if the customer is the property owner, and the entity's processes and procedures to obtain acceptance prior to LSLR project commencement if the customer is not the property owner

**Response:** Prior to the commencement of any lead service line replacement (LSLR) project, Buck Hill Water Company obtains written acceptance from the affected party through a standardized consent process. If the customer is the property owner, the Company provides advance written notice outlining the scope of work, health risks associated with lead, and the public benefits of the program. This notice includes EPA-mandated disclosures and a Consent Agreement Form (see Exhibit 3), which must be signed and returned prior to any replacement activity. If the customer is not the property owner, the Company provides parallel notification to both the customer and the property owner, requesting authorization to proceed. Multiple outreach methods, including certified mail and door postings, are employed to ensure delivery. In cases where consent is not obtained, the Company issues a final notice explaining the health risks, outlining the customer's or property owner's obligation to replace the service line within one year to maintain reimbursement eligibility, and notifying them of potential consequences under 52 Pa. Code § 65.56(f), including future replacement at their own cost and possible termination of water service.

(6) Provide the entity's processes and procedures based upon acceptance of a LSLR, including:

(i) A copy of the consent agreement form by which the customer or property owner, if the customer is not the property owner, will authorize the LSLR. Specify the Petition appendices where this information is provided.

**Response:** The Company uses a standardized Lead Service Line Replacement Consent Agreement Form that outlines the scope of work, health disclosures, scheduling expectations, and grants permission to access the service line and property. The

<p>form ensures informed authorization from either the customer or property owner, depending on who holds responsibility. A copy of this form is provided in Exhibit 3.</p>
<p>(ii) A brief description of the entity’s process for LSLRs under normal conditions and under atypical conditions.</p>
<p><b>Response:</b> Under normal conditions, replacements are scheduled with a minimum of 30 days’ notice to the customer and/or property owner. The Company confirms site readiness, access permissions, and arranges a mutually agreeable date for the replacement. Construction typically occurs within a single day, followed by surface restoration. Emergency responses or high priority replacements will receive expedited notice detailing the same processes on a 7-14 day schedule.</p>
<p>(iii) An explanation of the entity’s process for coordination with the customer, and property owner, if the customer is not the property owner, and the information the entity will provide to the customer and the property owner throughout the LSLR process.</p>
<p><b>Response:</b> Upon scheduling a replacement, the Company will provide written notice detailing the LSLR timeline, expected duration, public health benefits, and contact information for questions. If the customer is not the property owner, the Company will coordinate separately with both parties to ensure access and authorization. Communication will include: pre-installation instructions, water shut-off expectations, restoration timelines, and a post-installation packet that confirms the work completed and next steps. All communication will be logged and retained for compliance and program tracking.</p>
<p>(iv) The entity’s process for addressing LSLR completion or closeout, or both, with the customer and property owner, if the customer is not the property owner.</p>
<p><b>Response:</b> Upon completion of the LSLR, the Company performs a final inspection to ensure proper installation and safety compliance. A Completion Notice is sent to the customer and/or property owner, including confirmation of restored water service, restoration status (if applicable), and post-replacement guidance. The customer is invited to provide feedback. Any disturbed surfaces (e.g., landscaping or paving) are restored per agreement and documented through photos and field reports. Final completion is logged in the Company’s service inventory database for regulatory reporting and audit readiness.</p>
<p>(7) Provide the entity’s lead/material recycling and disposal efforts, including a description of what the entity will do with proceeds from recycling and disposal efforts.</p>
<p><b>Response:</b> All lead service line materials removed during the LSLR process will be handled and disposed of in accordance with applicable federal, state, and local environmental regulations, including guidance issued by the U.S. Environmental Protection Agency and the Pennsylvania Department of Environmental Protection. Buck Hill Water Company will use certified recycling facilities for recovered lead materials. Any proceeds obtained from the recycling of lead piping will be credited to the Company’s LSLR Program</p>

and applied as an offset to capital expenditures associated with replacements, thereby reducing the recoverable costs to ratepayers.

- (8) Provide a detailed explanation of the industry-accepted practices that the entity plans to use to replace entity-owned and customer-owned LSLs.

**Response:** Buck Hill Water Company will use full-service line replacement as the standard, replacing the entire length of the lead service line from the main to the premises with no partial replacements, per EPA best practices. All materials installed will meet standards for drinking water system components. Work will be performed by trained contractors or in-house crews qualified under Pennsylvania plumbing codes and supervised to ensure compliance with public health and safety requirements.

- (9) Provide a detailed explanation of how the entity's acquisition of water distribution systems will be integrated into the entity's efforts to complete LSLRs throughout its water distribution systems.

**Response:** N/A - The company does not plan for the acquisition of any water distribution system.

- (10) Provide a copy of the entity's procedure for documenting refusal of, or failure to accept, the offer by the entity to replace a LSL, including the entity's duty to: (i) provide the customer and property owner, if the customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, (ii) inform the customer or property owner, if the customer is not the property owner, that refusal or failure to accept will require replacement of the customer-owned LSL, at the customer or property owner's expense, within 1 year from LSLR project commencement for the customer or property owner, if the customer is not the property owner, to be eligible for reimbursement, and (iii) communicate to the customer and property owner, if the customer is not the property owner, that failure to allow the entity to complete the LSLR or to replace the customer-owned LSL concurrent with the entity replacing the entity-owned LSL will lead to termination of water service under the provisions of the entity's tariff. Specify the Petition appendices where this information is provided.

**Response:** Buck Hill Water Company has established a formal procedure for documenting any refusal or failure by a customer or property owner to accept the Company's offer to replace a lead service line. A template of this refusal procedure and notification package is included in Exhibit 4. This procedure ensures compliance with 52 Pa. Code § 65.56(f) and includes the following:

#### Written Notice and Health Hazard Disclosure

The Company provides a written notice to the customer and the property owner (if different) clearly disclosing the known health hazards associated with the continued use of lead service lines, including increased risk of lead exposure, particularly in children, infants, and pregnant women. This notice includes EPA and DEP guidance and is delivered via certified mail or hand delivery with acknowledgment of receipt.

### Replacement Timeline and Reimbursement Eligibility

The refusal notice also informs the customer and property owner that if they decline or fail to authorize the replacement at the time offered by the Company, they will be responsible for replacing the customer-owned lead service line at their own expense within one (1) year from the date of the Company's LSLR project commencement. Only customers who complete the replacement within this one-year window will remain eligible for reimbursement, in accordance with Commission regulations.

### Service Termination Disclosure

The notice clearly communicates that refusal to allow the Company to complete the replacement of the customer-owned LSL concurrently with the Company owned LSL may result in termination of water service, consistent with the Company's tariff and the termination procedures outlined under 52 Pa. Code Chapter 56.

### Documentation and Recordkeeping

All communications regarding the refusal including copies of notices sent, delivery confirmation, phone logs, and follow-up attempts are retained in the customer's file and logged into the Company's LSLR tracking system. A template of this refusal procedure and notification package is included in Exhibit 4 of the Petition.

### **(c) Communications, outreach and education:**

(1) Provide copies of all printed and broadcast material to be distributed under the entity's LSLR program. Specify the Petition appendices where this information is provided.

**Response:** Buck Hill Water Company will implement a multi-channel communications strategy to ensure customers and property owners are well-informed about the Lead Service Line Replacement (LSLR) Program. Outreach will include Breezemails (Buck Hill's digital bulletin), Boardmails (targeted owner communication), and direct customer notices delivered by mail, email, or door tags. See Exhibit 5.

**Exhibit 1**

**Service Line Inventory Electronic Working Copy**

**Exhibit 2**

**Service Line Inventory Hard Copy**

**SERVICE LINE INVENTORY FORM**
**What is the purpose of this template?**

The purpose of this template is to help water systems comply with the Service Line Inventory requirements of the January 15, 2021 Lead and Copper Rule Revisions (LCRR). This template provides fillable forms and tables that water systems can use to document their methods, organize their inventory, submit the initial inventory and inventory updates to the state, and document how they are making the inventory publicly available. Note that DEP does **NOT** require systems use this template for their inventory, but it is recommended. Refer to the worksheet "Reg Q&A" and EPA's 2022 Inventory Guidance for the regulated minimum inventory requirements and recommendations.

**How is the template organized?**

This workbook contains several worksheets, which are accessed by clicking the tabs at the bottom of the workbook window. They appear like this:



The worksheets and cells in this template are color coded:

- Yellow sheets are instructions and background, blue sheets are templates for water systems.
- Gray shaded cells are background or instructions. Light blue cells are for data entry by the water system and light green cells are for data entry by the state. See the table below for a description of each worksheet.

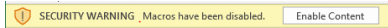
**Information Relevant to this Template:**
**Template Organization**

Worksheet Type	Worksheet Name	Description
Background	Introduction	Introductory template information
	Instructions	Contains detailed instructions for systems and States.
	Class & Tier Info	Contains information on: - how service line classification is determined when ownership is split between the system & customer; - how LCRR tap sampling tiers are determined.
	Reg Q&A	Explains the regulatory service line inventory requirements of the January 15, 2021 LCRR in Q&A format.
Templates for Water Systems	General Information	For systems to document relevant information about their system.
	Inventory Methods	For systems to document the methods and resources they used to develop their service line inventory.
	Detailed Inventory	For systems to organize their detailed inventory. Each row equals one service line connecting the water main to the customer's plumbing. Separate columns track locational information, the system-owned portion, the customer-owned portion, other possible sources of lead, and information for assigning a tap sample tiering classification.
Summary	Summary Information	This sheet automatically generates totals based on information in the Detailed Inventory worksheet.

**Template Use - General Steps**

**Open the spreadsheet.** If you have a large amount of data it may take a few minutes. Please be patient.

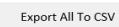
- This template will work with a Windows based PC and Excel 2013 or newer.
  - This spreadsheet may not support use by Mac PCs.
- If you see this message, click on Enable Content before you begin:



- If you do not see this message, and the macros do not work, contact [ra-padwis@pa.gov](mailto:ra-padwis@pa.gov) for assistance.

**Fill out the spreadsheet.** Detailed instructions are provided on the Instructions tab.

**Create export.** Once the inventory is final, use the "Export All To CSV" button to create the export files. **DO NOT OPEN THE EXPORTED CSV FILES.**



- A folder called "PA\_SLI" will be created on your desktop and the export files will be placed inside the folder:



- In addition, a hyperlink will be inserted into the spreadsheet which will link directly to the created folder:

**Export Location:**  
[C:\Users\JohnDoe\OneDrive\Desktop\PA\\_SLI](C:\Users\JohnDoe\OneDrive\Desktop\PA_SLI)

- Three export files will be created with "GenInfo", "InvMeth", and "Details" appended to the file name.
- Each export file name will be date stamped using YMMDD format.
- The date stamp appears at the beginning of the file name so that the export files will automatically sort by date.

**IMPORTANT NOTES about CSV files and spreadsheet. DO NOT OPEN THE CSV FILES.**

- Each time CSV files are uploaded to DWELR, also save the SLI spreadsheet in the same folder. The spreadsheet should be saved with a unique name that includes the date (should match the date on the CSV file) and whether it is an initial or Updated inventory.
- It is highly recommended to also save a backup copy of the CSV files and spreadsheet in another location to prevent accidental loss.
- **DO NOT OPEN THE CSV FILES.** Opening the CSV files will corrupt them and cause errors when uploading to DWELR.

**Upload CSV files to DWELR.** Once the CSV export files are created they should be immediately uploaded to DWELR. **DO NOT OPEN THE CSV FILES.**

- All three CSV files must be uploaded! Compliance with the inventory reporting deadline will be determined based on the date of the LAST file uploaded.
- The CSV files can be uploaded to DWELR using either a "P" (View Only) or "L" (Enter Results) DWELR account.
- If the system does not already have an active DWELR account, a new account must be requested at least one month before the deadline.
- Instructions for uploading the inventory to DWELR can be found on the DWELR main page. You must have a DWELR account to access the upload instructions.

**Template Updates**

**Update spreadsheet to the latest revision.** It is recommended to periodically upgrade the SLI spreadsheet to the newest revision.

**WHY should I upgrade?**

- Older revisions may have bugs that cause errors or difficulty uploaded to DWELR.
- Future revisions may include enhancements or additional options for Determination of Non-Lead
- The SLI is a living document, which must be maintained and updated on a regular basis until the system has achieved 100% replacement of all Lead, Galvanized Requiring Replacement, and Lead Status Unknown service lines.

**HOW do I upgrade?**

- First, determine if a newer revision is available:
  - Email notification from PA DEP
  - Check [eLibrary/Forms/Safe Drinking Water/Service Line Inventory Forms](#)
  - Notification on the LCRR website (Google "PA DEP LCRR")
- If an upgrade is available:
  - email your current spreadsheet to [ra-padwis@pa.gov](mailto:ra-padwis@pa.gov) with subject line "(insert PWSID here) SLI Inventory Upgrade"
  - Your spreadsheet will be upgraded to the newest revision and returned to the email address it was sent from



## SERVICE LINE INVENTORY FORM

### Getting Started

For best results READ and FOLLOW these instructions.

- Complete the **General Information** tab first. Some information entered on that tab carries through to the other tabs.
- Next complete the **Inventory Methods** and **Detailed Inventory** tabs. Your system totals will then appear in the **Summary Information** tab.
- The Detailed Inventory is entered **line by line**:
  - Information is initially typed into Row 7.
  - When the row is complete, click on the "Add To Inventory" button at the far right (column AM).
  - The values will be transferred to the list below. **Values in the list cannot be edited directly.**
  - *To edit previously entered service line information*, re-enter the Unique Service Line ID in Row 7, Column E. This will call up the previously entered information for that service line, which can then be edited and re-entered.
  - Each line entry will be date & time stamped in Column AN. Entries will be in order from newest to oldest.
  - If the spreadsheet gets "stuck" (can't enter data), click on the "Clear Top Row" button at the top of the page.
  - If the spreadsheet gets "stuck" after clicking Add to Inventory, look for a pop up window hidden behind the spreadsheet.
- After all tabs have been completed, export the information to csv files, following the steps on the Introduction tab under the section Template Use.

Add To Inventory

Clear Top Row

### General Template Instructions:

- The display size of the spreadsheet may be adjusted using the slider bar at the bottom right.

• All <LIGHT BLUE> fields should be completed.

• Failure to complete all required fields could result in mis-classification of service lines.

• Many boxes have dropdown menus. Click on the cell, then click on the arrow that appears to the right of the cell. The dropdown menu can also be accessed by using Alt-Down Arrow on the keyboard. Select a response from the list that appears. If an answer is not applicable, leave the dropdown response set to the default value (first item in list).

• Filtering has been enabled to allow the user to easily search for occurrences of certain text values or cell colors. Each column heading in Row 9 has an arrow at the bottom right. Click on the arrow to access the filter options.

- Filtering can be used to easily find, for example, responses that require information to be entered into the Additional Comments field.

• If a selection from a dropdown menu causes the cell color to change to light brown, additional information needs to be entered in the Additional Comments field.

• If a cell or set of cells is XX'd out, those questions should not be answered.

• Where more detailed instructions are necessary, links have been provided from the form to this instruction page. Links are shown in **blue underlined text**. There are also links to return to the original form.

### Click the following links for specific Instructions:

[Initial Inventory](#)  
[First Inventory Update](#)  
[Inventory Updates after First Update](#)  
[General Information Tab](#)  
[Detailed Inventory Tab - State Determined Values](#)  
[Detailed Inventory Tab - Locational Information](#)  
[Detailed Inventory Tab - System-Owned Portion](#)  
[Detailed Inventory Tab - Customer Owned Portion](#)  
[Detailed Inventory Tab - Tap Sampling Information](#)  
[Summary Information Tab](#)

### Initial Inventory

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1. On the General Information tab select "Yes" for "Initial Inventory?" and enter the date the initial inventory was completed.
2. On the Detailed Inventory tab, column F "Record Type" must remain as "Initial" for each service line being entered.
3. Proceed using Detailed Instructions by Tab below.
4. After all information is entered, export the csv files and save the spreadsheet.



## SERVICE LINE INVENTORY FORM

### First Inventory Update

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1. Start with the most recent version of the Inventory.
2. On the General Information tab select "Yes" for "Updated Inventory?" and enter the date of the update.
  - Always retain the Initial Inventory date!
  - Enter or edit the information that is being updated.
3. On the Inventory Methods & Detailed Inventory tabs, answer the question "Are there any updates on this page?"
4. On the Detailed Inventory tab, in Column F "Record Type", select Update, Add or Inactive from the dropdown box for each line being updated.
  - If the record is being updated because the service line was replaced, enter the Date Replacement Completed in Column G.
  - Note: The Unique ID must match an existing ID unless the Record Type is Add.
5. After making updates, export the csv file and save the spreadsheet with a new file name. Retain a copy of each revision of the spreadsheet submitted to PA DEP.

### Inventory Updates after First Update

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1. Start with the most recent version of the Inventory
2. On the General Information tab select "Yes" for "Updated Inventory?" and enter the date of the update
  - Always retain the Initial Inventory date!
  - Enter or overwrite the information that is being updated
3. On the Inventory Methods tab, answer the question "Are there any updates on this page?"
4. On the Detailed Inventory tab, use the filter (Row 8) on the Record Type column (Column F) to select all of the records that were updated in the previous inventory (types Update, Add, Inactive).
  - Change each previously updated Record Type to Retain.
  - Continue with Inventory Updates as described under First Inventory Update

### General Information Tab

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#### Select "Yes" or "No" in response to the questions about Initial and Updated Inventory

- The Inventory type must be EITHER Initial or Updated. Do not select "Yes" for both of the questions.
- Enter the Initial Inventory date
- If this is an Updated Inventory, also enter the Updated Inventory date

**Total Population Served:** The number of residential customers; plus the average of the number of regular consumers served, per day, during a month; plus the average of the number of transient consumers served, per day, during a month.

**Number of Service Connections:** This field will auto-populate based on the number of entries in the Detailed Inventory.

**PWS Type:** Select either CWS or NTNCWS. All CWS and NTNCWS are required to submit a Service Line Inventory.

**Question 1:** If the PWS Type is CWS, this question must be answered "Yes" or "No". If the PWS type is NTNCWS, select "Not Applicable".

**Question 2:** AFTER completing the Detailed Inventory, the total number of service lines will be listed above. Confirm that the number of service lines listed matches the number of service connections reported on the most recent annual Average Daily Water Use form submitted to DEP.

**Question 3:** Indicate if the system serves any Disadvantaged Communities and the approximate percentage of service lines that are connected to members of a Disadvantaged Community. "Disadvantaged Community" is as defined in the most recent PennVest Intended Use Plan, which is available on line. Systems that serve Disadvantaged Communities may be eligible for additional funding under the Bipartisan Infrastructure Law.

### Detailed Inventory Tab - State Determined Values

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Unique Service line ID **MAY NOT BE CHANGED or DELETED** after submission to DEP. New unique service line IDs may be added during inventory updates. In limited instances, service line IDs may be inactivated.

**Column A, Service Line Classification:** Will be determined automatically for each unique service line ID based on the responses in the Detailed Inventory. If the assigned classification is different than anticipated please double check the responses entered in this form. Service line classifications for joint ownership are determined according to the Class & Tier Info tab of this spreadsheet

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- If the designation is Galvanized Requiring Replacement, only the galvanized portion of the line needs to be replaced
- All determinations are subject to review and approval by Department staff



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## SERVICE LINE INVENTORY FORM

**Column B, Sufficient Evidence for Determination of Non-Lead?** : Will be determined automatically based on responses. All determinations are subject to review and approval by Department staff. To provide sufficient evidence of the Non-Lead classification the system is expected to:

- Identify records that indicate Installation/replacement date after January 6, 1991 - OR -
- Conduct CCTV inspection inside service line over the full length - OR -
- Conduct mechanical excavation in at least 3 locations over the length of the service line\* - OR -
- Combine any TWO other investigation techniques from the dropdown lists
- Note: for jointly owned service lines, both portions must meet the criteria for the service line to be classified as Non-Lead

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\* Refer to [Class & Tier Info tab](#) for more information

**NOTE:** If insufficient evidence-based techniques are indicated on the inventory form, this cell will turn RED

**Column C, LCRR Sampling Tier:** Suggested Tiering Level based on responses in the Detailed Inventory. This field is determined automatically. This field is provided as a convenience for the water system and is not binding. Tiering is determined according to the Class & Tier Info tab of this spreadsheet.

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\*For CWS, if the %MFRs is > 20%, a proportional number of MFRs may be assigned to Tier 1

### Detailed Inventory Tab - Locational Information

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**Column E, Unique Service Line ID** : The system-assigned unique ID for this service line (required field). The Unique ID:

- May contain up to 30 characters
- Can use letters and/or numbers in any combination
- Use only uppercase letters; lowercase letters will be converted to uppercase
- Can use hyphen (-), underscore (\_), period(.)
- May not use spaces, commas or other special characters (i.e., \*, !, @, etc.)

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**NOTE:** If a duplicate ID or address is entered the boxes will turn RED

### Column F, Record Type

- Initial – Use this designation for the initial inventory submitted on or before October 16, 2024
- Update – Use this designation when submitting an updated inventory, to indicate the record is being revised
  - If the update is due to a service line replacement, enter the replacement date in Column G
- Add – Use this designation to add more service lines to an existing inventory
- Inactive – Use this designation to indicate a record is being inactivated. Records cannot be deleted.
  - Example: Property was made into a parking lot and the service line was decommissioned.
  - Add a text comment explaining the reason for inactivation in columns Y and/or AH.

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**Column G, Date Replacement Completed:** If the SL has been replaced since the initial inventory (or last inventory update), enter the replacement date here. Also change the Record Type in Column F to "Update". Remember to revise the Material Type and other information affected by the replacement for both the system and customer portions of the line.

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**Column H, Ownership Type:** Indicate whether the service line is owned, in its entirety, by the System, the Customer, or Jointly.

**IMPORTANT:** If the Ownership Type selected is System, any answers entered in the Customer-Owned columns will be grayed out, and vice versa.

→ Be careful when selecting Ownership Type as this affects the determination of the Service Line Classification.

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**NOTE:** If the service line is not jointly owned, but the user would like to submit information about two different segments of the line, select Joint ownership. Comments clarifying the ownership status may be entered under Question 4 on the General Information tab or in columns Y and/or AH of the Detailed Inventory.

**Columns M & N, School/Childcare Facility?:** Indicate if the service line provides water to a school and/or childcare facility.

- A child care facility is "a location that houses a licensed provider of child care, day care, or early learning services to children as determined by the State licensing agency."
- A school is "any building associated with public, non-public/private, or charter institutions that primarily provides teaching and learning for elementary or secondary students."
- An **elementary** school contains students in grades up to and including grade 8 (includes pre-school).
- A **secondary** school contains students in grades no less than 9 and no greater than 12.

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## SERVICE LINE INVENTORY FORM

Detailed Inventory Tab - System-Owned Portion	<a href="#">Return to Top</a>
<p><b>Columns O through Y</b> : Complete the information in these columns for the <b>System-Owned Portion</b> of the service line <b>ONLY</b>.</p> <ul style="list-style-type: none"> <li>– If there is a portion of the service line that is customer-owned, that information should be entered in columns Z through AH.</li> <li>– If there is no system-owned portion, leave these boxes empty or set to the default value.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Column P, Was Material Ever Previously Lead?</b> : If the response is "no", enter the evidence in the Additional Comments field (Column Y)</p>	<a href="#">Return to Form</a>
<p><b>Column Q, Lead Pigtails, Goosenecks or Connectors Upstream?</b> Indicate if there is a lead pigtail, gooseneck or connector between the main and the system-owned portion of the service line. If the response is "no", enter the evidence in the Additional Comments field (Column Y).</p>	<a href="#">Return to Form</a>
<p><b>Columns R &amp; S, Installation Date:</b></p> <ul style="list-style-type: none"> <li>– Select the decade from the dropdown box</li> <li>– If a more specific date is known, enter it in column S</li> <li>– If no information about installation date is available, note that under Additional Comments (Column Y).</li> </ul>	<a href="#">Return to Form</a>
<p><b>Column T, Diameter</b> : Enter the service line pipe inner diameter, in inches. Use up to two decimal places.</p>	<a href="#">Return to Form</a>
<p><b>Columns U through X, Basis of Material Classification</b> : <b>At least one</b> Basis of Material Classification must be selected for all service lines. Selections in these columns will be used to determine if there is sufficient evidence for a designation of Non-Lead. Refer to instructions for Column B for more information.</p> <ul style="list-style-type: none"> <li>– Use the dropdown menus in columns U &amp; V to select non-field-based investigation method(s).</li> <li>– Use the dropdown menu in column W to select field-based verification method(s), and enter the date performed in Column X.</li> <li>– <b>IMPORTANT NOTE:</b> Water sampling can only be used as a basis for investigation if the system does not have Corrosion Control Treatment.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Column Y, System-Owned Service Line Additional Comments</b> : Free form text field to enter additional pertinent or required information.</p>	<a href="#">Return to Form</a>
Detailed Inventory Tab - Customer Owned Portion	<a href="#">Return to Top</a>
<p><b>Columns Z through AH</b> : Complete the information in these columns for the <b>Customer-Owned Portion</b> of the service line <b>ONLY</b>.</p> <ul style="list-style-type: none"> <li>– If there is a portion of the service line that is system-owned, that information should be entered in columns O through Y.</li> <li>– If there is no customer-owned portion, leave these boxes empty or set to the default value.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Column AA, Lead Pigtails, Goosenecks or Connectors Upstream?</b> Indicate if there is a lead pigtail, gooseneck or connector <u>upstream</u> of the customer-owned portion of the service line. If the response is "no", enter the evidence in the Additional Comments field (Column AH).</p> <ul style="list-style-type: none"> <li>– Do not include pigtails, goosenecks or connectors in the System-Owned portion of the service line; these should be accounted for in Column Q.</li> <li>– Do not include pigtails, goosenecks or connectors that are downstream of the service line.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Columns AB &amp; AC, Installation Date:</b></p> <ul style="list-style-type: none"> <li>– Select the decade from the dropdown box</li> <li>– If a more specific date is known, enter it in column AC <ul style="list-style-type: none"> <li>– Enter the date in mm/dd/yyyy format</li> </ul> </li> <li>– If no information about installation date is available, note that under Additional Comments.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Columns AD through AG, Basis of Material Classification</b> : <b>At least one</b> Basis of Material Classification must be selected for all service lines. Selections in these columns will be used to determine if there is sufficient evidence for a designation of Non-Lead. Refer to the instructions for Column B for more information.</p> <ul style="list-style-type: none"> <li>– Use the dropdown menus in columns AD &amp; AE to select non-field-based investigation method(s).</li> <li>– Use the dropdown menu in column AF to select field-based verification method(s), and enter the date performed in Column AG.</li> <li>– <b>IMPORTANT NOTE:</b> Water sampling can only be used as a basis for investigation if the system does not have Corrosion Control Treatment.</li> </ul>	<a href="#">Return to Form</a>
<p><b>Column AH, Customer-Owned Service Line Additional Comments</b> : Free form text field to enter additional pertinent information.</p>	<a href="#">Return to Form</a>



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## SERVICE LINE INVENTORY FORM

### Detailed Inventory Tab - Tap Sampling Information

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**Columns AI through AL, Information to Assign Tap Monitoring Tiering :** Fill out information in these columns to automatically assign Tiers to tap sampling monitoring locations.

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**Column AI, Service Line Connected To :** Indicate if the service line is connected to a Single Family Residence (SFR), Multi-Family Residence (MFR), or Other type of building

- The building is considered a single family residence if one service line provides drinking water for one family.
- The building is considered a multi-family residence if one service line provides drinking water for multiple families (e.g., apartment complex where there is only a single service line).
- If the connection cannot be categorized as an SFR or MFR choose Building/Other.

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**Column AJ, POE Treatment Present?** Locations with Point-Of-Entry treatment for Inorganic Chemicals are not eligible for sampling under the Lead and Copper Rule.

- POE refers to treatment where the service line enters the building/residence. POE does NOT include treatment at or prior to the entry point into the distribution system.
- IMPORTANT: If the location has a POU (Point-Of-Use) filter, sample from a different tap. For example, if the kitchen tap has a filter, collect a sample from the bathroom tap.
- Do NOT collect LCR samples from a location with a POU filter. Do not remove the POU filter to collect a sample.

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### Summary Information

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No information needs to be entered in this form. The tables will auto-populate based on the answers provided in this spreadsheet.

**Service Line Classification Summaries:** The total number of Lead, Galvanized Requiring Replacement, Lead Status Unknown, and Non-Lead services lines is displayed. Breakout information regarding Schools & Daycares is also provided.

**Tap Sampling Monitoring Locations by Tier:** A breakdown of the tap sampling location Tier assignments based on the information entered in the Detailed Inventory.

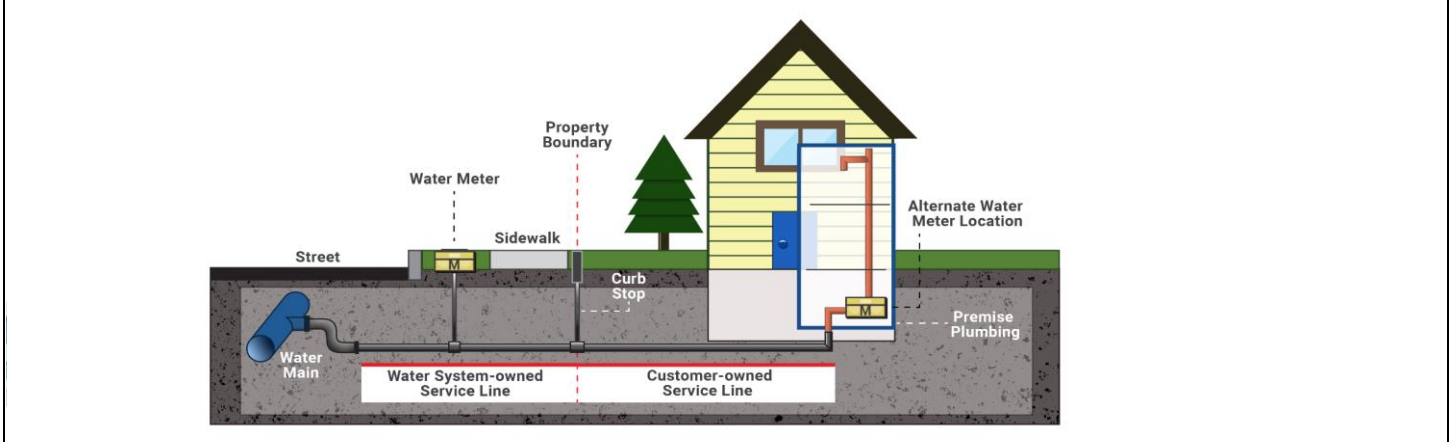


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**SERVICE LINE INVENTORY FORM**

**IMPORTANT NOTE:** The classification of a service line applies to the entire length of the service line, regardless of ownership

**Service Line Designation Where Ownership Is Split Between the Water System and Customer**



System-Owned Portion		Customer-Owned Portion		Service Line Classification <sup>2,3,4,5</sup>
Material Type		Material Type		
Lead or lead-lined		Any material		Lead
Any material		Lead or lead-lined		Lead
Unknown		Any material but lead or lead-lined		Lead Status Unknown
Any material but lead or lead-lined		Unknown		Lead Status Unknown
Any material but lead, lead-lined, galvanized, or unknown		Any material but lead, lead-lined, galvanized, or unknown		Non-Lead <sup>1</sup>
System-Owned Portion		Customer-Owned Portion		
Lead Connector Upstream?	Material Type	Lead Connector Upstream?	Material Type	
No	Any material but lead, lead-lined, or unknown	No	Galvanized	Non-Lead
No	Galvanized	No	Any material but lead, lead-lined, or unknown	Non-Lead
No	Galvanized	No	Galvanized	Non-Lead
No	Not previously lead	No	Galvanized	Non-Lead
Yes or Not sure	Galvanized	Any response	Any material but lead, lead-lined or unknown	Galvanized Requiring Replacement
Yes or Not sure	Any material but lead, lead-lined or unknown	Any response	Galvanized	Galvanized Requiring Replacement
No	Any material but lead, lead-lined or unknown	Yes or Not sure	Galvanized	Galvanized Requiring Replacement
Any response	Previously lead or unsure if previously lead	Any response	Galvanized	Galvanized Requiring Replacement

<sup>1</sup> Any determination of Non-Lead is subject to review and approval by the Department

<sup>2</sup> It is only necessary to replace the portions of the service line that are Lead or Galvanized Requiring Replacement.

<sup>3</sup> When both portions of the service line are Lead or Galvanized Requiring Replacement, both portions must be replaced at the same time. Partial replacements are not allowed.

<sup>4</sup> If either portion of the service line is classified as Lead Status Unknown, it must be replaced unless further investigation changes the classification to Non-Lead. The change in classification must be submitted to the Department in the Updated Inventory.

<sup>5</sup> The presence of lead connectors, goosenecks or pigtails is only relevant to the determination of Galvanized Requiring Replacement.



COMMONWEALTH OF PENNSYLVANIA  
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**SERVICE LINE INVENTORY FORM**

LCRR Tap Sampling Tier Determination			
Tier Level	Applies To:	* May Apply To:	**Does NOT apply to:
1	CWS Systems: Single Family Residence connected to a Lead Service Line  NTNC Systems: Any building type connected to a Lead Service Line	CWS Systems: Multi Family Residence connected to a Lead Service Line if Multi Family Residences make up MORE than 20% of the distribution system	CWS & NTNC Systems: Service lines classified as Galvanized Requiring Replacement or Lead Status Unknown
2	CWS Systems: Any Building/Other connected to a Lead Service Line	CWS Systems: Multi Family Residence connected to a Lead Service Line if Multi Family Residences make up LESS than 20% of the distribution system	CWS Systems: Service lines classified as Galvanized Requiring Replacement or Lead Status Unknown;  NTNC Systems
3	CWS Systems: Single Family Residences connected to a Galvanized Requiring Replacement Service Line  NTNC Systems: Any building type connected to a Galvanized Requiring Replacement Service Line		CWS & NTNC Systems: Services lines classified as Lead Status Unknown
4	CWS Systems: Service lines connected to a Single Family Residence that contains copper pipes with lead solder		CWS Systems: Services lines classified as Lead Status Unknown;  NTNC Systems
5	CWS Systems: Single Family and Multi Family Residences where the plumbing is representative of other locations served by the system  NTNC Systems: Any building type where the plumbing is representative of other locations served by the system	CWS Systems: Service lines connected to a Building/Other location IF there are an insufficient number of Single Family or Multi Family Residential Tier 5 sites available	

\* Buildings/residences with a Point of Use (POU) treatment device MAY be used for LCRR Tap Sampling - IF - there is another tap location that is used to dispense potable which does NOT have a POU device installed. It is not acceptable to sample from a location where the POU device has been removed for purposes of collecting a sample.

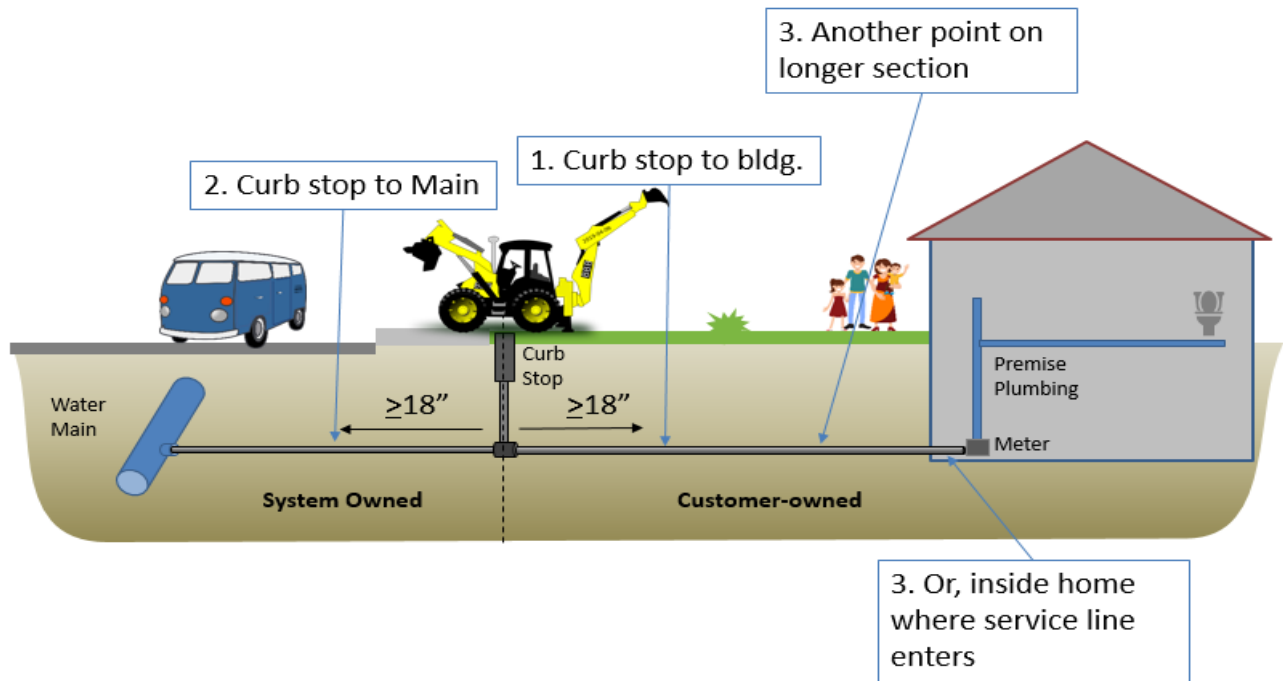
\*\* Buildings/residences with a Point of Entry (POE) treatment device may NOT be used for LCRR Tap Sampling.

### SERVICE LINE INVENTORY FORM

**Using Mechanical Excavation as Evidence of Non-Lead** [Return to Instructions](#)

- "Mechanical Excavation" refers to any technique that allows physical access to the exterior of the service line piping, including but not limited to: trenching, potholing, and vacuum extraction.
  - To provide sufficient evidence for a designation of Non-Lead, mechanical excavation must be performed at a minimum of 3 locations across the length of the service line, as follows\*:
    1. Curb stop to building
      - A minimum of 18 inches from the curb stop
        - OR –
        - If the distance to the building is less than 18 inches, halfway to the building
    2. Curb stop to water main
      - A minimum of 18 inches from the curb stop
        - OR –
        - If the distance to the water main is less than 18 inches, halfway to the main
    3. Third point (choose one)
      - Inside the home where the service line enters if visible (must be inspected by system personnel - OR - the home owner must submit a clear photograph to the water system)
        - OR –
        - A second excavation point in the longer section of the service line that is at least halfway between the first point and the building or water main
- \*EXCEPTION: If the system is using Mechanical Excavation as the means of identification on only one side of a Jointly-owned system, then only two-points of verification are needed on that side.

## ▶ 3-Point Field Verification – Non-Lead





COMMONWEALTH OF PENNSYLVANIA  
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BUREAU OF SAFE DRINKING WATER

**SERVICE LINE INVENTORY FORM**

**Inventory Requirements of the LCRR**

Question	Answer	Regulatory Citation(s)
1. Who must prepare a service line inventory?	All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs).	40 CFR §141.84(a)
2. What material classification should I use?	Service lines must be classified as one of four types: – Lead, – Galvanized Requiring Replacement (GRR), – Non-Lead, (specify the actual material such as copper or plastic), or – Lead Status Unknown. → This spreadsheet will determine the service line classification for you if completed correctly. → Where the material is unknown, EPA recommends that systems consider using subclassifications to capture additional information (e.g., unknown - unlikely lead).	40 CFR §141.84(a)(4) and §109.706
3. What if the service lines in my system are split ownership, meaning that my system owns a portion and the customer owns a portion?	The inventory <b>must</b> include both the system-owned and customer-owned portions of the service line; however, systems must count each service line from the water main to the interior building plumbing <b>only once</b> for determining the number of service lines requiring replacement (i.e., lead service lines and GRR), assigning a tap sample tiering classification, and facilitating reporting of inventory information to states and EPA. See the "Class & Tier Info" tab for information on how the spreadsheet classifies service lines that have split ownership.	40 CFR §§141.84(a)(2) & (a)(7)(i)
4. What information should I use to identify service line material and prepare my inventory?	You <b>must</b> use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal operations, and state-specified information to prepare your inventory. EPA recommends systems consider additional service line investigation methods such as visual inspection, water quality sampling, and excavation.	40 CFR §§141.84(a)(3) & (a)(5)
5. When is the initial inventory due?	October 16, 2024.	40 CFR §141.80(a)(3) <sup>1</sup>
6. What if I have no Lead, Galvanized Requiring Replacement (GRR), or Lead Status Unknown service lines?	You have some different requirements that are explained in the answers to questions 7, 8, and 9.	N/A
7. Do I need to update my inventory?	<b>For systems with Lead, GRR, or Lead Status Unknown service lines</b> The service line inventory should improve over time with better information. You <b>must submit inventory updates</b> to your state on the following frequency: (1) Annually if you conduct lead tap sampling semi-annually or annually. (2) Triennially (i.e., once every 3 years) if you conduct lead tap sampling triennially. <b>For systems with only Non-Lead service lines</b> You are not required to provide an update. However, if you subsequently find any LSL or galvanized requiring replacement service line, you <b>must</b> notify your state within 30 days and prepare an updated inventory on a schedule established by the state.	40 CFR §141.90(e)(3)
8. Do I need to make my information publicly available?	<b>For systems with Lead, GRR, or Lead Status Unknown service lines</b> You <b>must</b> make the inventory publicly available and include a locational identifier for lead service lines and GRR. Water systems serving more than 50,000 people <b>must</b> provide inventories on-line. <b>For systems with only Non-Lead service lines</b> You can provide a written statement, in lieu of the inventory, that your distribution system has no lead service lines or GRR service lines along with a general description of all applicable sources used to make that determination.	40 CFR §§141.84(a)(8) & (a)(9)
9. Do I need to include a statement in my Consumer Confidence Report (CCR)?	<b>For systems with Lead, GRR, or Lead Status Unknown service lines</b> CWSs <b>must</b> indicate how the public can access the service line inventory information in their CCR. <b>For systems with only Non-Lead service lines</b> CWSs <b>must</b> include a statement that a service line inventory contains no lead service lines and instructions on how to access the information.	40 CFR §141.153(d)(4)(xi)
10. What information must States report to EPA?	For each water system, the number of Lead, GRR, and Lead Status Unknown service lines in its distribution system, reported separately.	40 CFR §142.15(c)(4)(iii)(D)

**Notes:**

<sup>1</sup> On June 10, 2021, EPA signed a rule extending the compliance date from January 16, 2024 to October 16, 2024 (86 FR 31939).



COMMONWEALTH OF PENNSYLVANIA  
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## SERVICE LINE INVENTORY FORM

### General Information

#### Revision Tracking

Inventory Type: <i>Initial</i>	Initial Inventory Date (Required): 10/16/2024	Updated Inventory Date:
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#### Facility Information

Water System Name:

**Buck Hill Water Company**

PWSID (7-digit number): <b>2450020</b>	Total Population Served (number of people): <b>876</b>	Number of Service Connections: <b>328</b>	PWS Type: <i>CWS</i>
1. If CWS, do multi-family residences comprise $\geq$ 20% of the structures served?			<i>No</i>
2. Does the number of service connections reported on the Detailed Inventory tab (shown above), match the number reported to DEP on the annual Average Daily Water Use form?			<i>No</i>
3. Does the water system serve any Disadvantaged Communities? <i>If Yes, enter approximate percentage:</i>			<i>No</i> <i>0%</i>
4. Is there documentation that defines service line ownership in this system, such as a local ordinance? <i>If Yes, describe below (250 character maximum):</i>			<i>No</i>

#### Physical Address

Street (No P.O. Boxes):

**270 Golf Drive**

City or Town: <b>Buck Hill Falls</b>	State: <b>PA</b>	Zip Code: <b>18323</b>
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#### Mailing Address (if different from Physical Address)

Street or P.O. Box:

**PO Box 426**

City or Town: <b>Buck Hill Falls</b>	State: <b>PA</b>	Zip Code: <b>18323</b>
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#### Contact Person

Name: <b>Garry Cramer</b>	Title: <b>President/CEO</b>
Telephone (ten digit): <b>(570) 595-7511</b>	Email: <a href="mailto:gcramer@buckhillfalls.com">gcramer@buckhillfalls.com</a>

#### Report Prepared By:

Same as Contact Person?

**No**

Name: <b>Jeremy Price</b>	Title/Affiliation: <b>Operator</b>
Telephone (ten digit): <b>570-595-7511</b>	Email: <a href="mailto:jprice@buckhillfalls.com">jprice@buckhillfalls.com</a>

### Public Access Documentation

How is the system making its inventory accessible to the public? Check all that apply.

NOTE: *If the system serves > 50,000 people, the inventory MUST be provided on-line.*

- |   |  |
|---|--|
| <input type="checkbox"/> Interactive on-line map  | <input type="checkbox"/> Information on water utility mailings or newsletter               |
| <input type="checkbox"/> Static on-line map       | <input checked="" type="checkbox"/> Hard copy information available in water system office |
| <input type="checkbox"/> Printed service line map | <input type="checkbox"/> Other   |
| <input type="checkbox"/> Printed tabular data     |  |

*If "Other", please describe (250 character maximum):*



**SERVICE LINE INVENTORY FORM**

Inventory Methodology	
PWS Name: Buck Hill Water Company	
PWSID: 2450020	No

Part 1: Historical Records Review			
Type of Record	Examples	Describe the Records Reviewed (250 character maximum)	Level of Confidence in Records
1. Previous Materials Evaluation	<i>Locations of Tier 1 lead tap sampling locations that are served by a lead service line.</i>		No Records
2. Construction and Plumbing Codes and Records	<i>Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.</i>	No known local ordinances	Low
3. Water System Records	<i>Distribution system maps. Tap cards. Meter installation records. Standard operating procedures.</i>	design blueprints	Low
4. Distribution System Inspections and Records	<i>Service line repair/replacement records. Inspection records.</i>	main and service line repair/replacement, visual	Low
5. Other			No Records

Part 2: Identifying Service Line Material During Normal Operations	
1. During which normal operating activities is information collected about service line material? Check all that apply.	
<input type="checkbox"/> Water meter reading <input checked="" type="checkbox"/> Water meter repair or replacement <input checked="" type="checkbox"/> Service line repair or replacement	<input checked="" type="checkbox"/> Water main repair or replacement <input type="checkbox"/> Backflow prevention device <input type="checkbox"/> Other
<i>If "Other", please explain (250 character maximum):</i>	
2. Has the system developed standard operating procedures (SOPs) for collecting service line material information?	
No	
<i>If "Yes", please describe (250 character maximum):</i>	

Part 3: Service Line Investigations																		
1. Identify the service line investigation methods used by the system to prepare this inventory (check all that apply).																		
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #0056b3; color: white;"> <th style="padding: 5px;">Column A: File/Record Review</th> </tr> </thead> <tbody> <tr><td style="padding: 5px;"><input type="checkbox"/> Customer Self-Identification</td></tr> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Previous Materials Evaluation Installation Record (e.g., tap card)</td></tr> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Repair or Replacement Record</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> Other type of record review</td></tr> </tbody> </table>	Column A: File/Record Review	<input type="checkbox"/> Customer Self-Identification	<input checked="" type="checkbox"/> Previous Materials Evaluation Installation Record (e.g., tap card)	<input checked="" type="checkbox"/> Repair or Replacement Record	<input type="checkbox"/> Other type of record review	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #0056b3; color: white;"> <th style="padding: 5px;">Column B: Analytics</th> </tr> </thead> <tbody> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Statistical Analysis</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> Predictive Modeling</td></tr> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Water Quality Sampling</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> Other analytics technique</td></tr> </tbody> </table>	Column B: Analytics	<input checked="" type="checkbox"/> Statistical Analysis	<input type="checkbox"/> Predictive Modeling	<input checked="" type="checkbox"/> Water Quality Sampling	<input type="checkbox"/> Other analytics technique	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #0056b3; color: white;"> <th style="padding: 5px;">Column C: Physical Inspection</th> </tr> </thead> <tbody> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Visual Inspection at Existing Access Point</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> CCTV Inspection Inside Pipe</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> CCTV Inspection Outside Pipe (Curb Box)</td></tr> <tr><td style="padding: 5px;"><input checked="" type="checkbox"/> Mechanical Excavation (e.g., Potholing, Trenching)</td></tr> <tr><td style="padding: 5px;"><input type="checkbox"/> Other physical inspection method</td></tr> </tbody> </table>	Column C: Physical Inspection	<input checked="" type="checkbox"/> Visual Inspection at Existing Access Point	<input type="checkbox"/> CCTV Inspection Inside Pipe	<input type="checkbox"/> CCTV Inspection Outside Pipe (Curb Box)	<input checked="" type="checkbox"/> Mechanical Excavation (e.g., Potholing, Trenching)	<input type="checkbox"/> Other physical inspection method
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<input type="checkbox"/> Other physical inspection method																		
<i>If "Other", please explain (250 character maximum):</i>																		
2. How are service line locations selected for physical inspection? For example, environmental justice, sensitive populations, statistical modeling, or targeting areas with high numbers of Lead Status Unknowns? (250 character maximum)																		
Service lines selected from known year of main install and structure built.																		







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BUREAU OF SAFE DRINKING WATER

## SERVICE LINE INVENTORY FORM

### Inventory Response Summary information

PWS Name: Buck Hill Water Company

PWSID: 2450020

**NOTES:** Information will autofill based on the responses in the Detailed Inventory. Record types marked "Inactive" are not included.

#### Service Line Classification Summary

Service Line Classification	Definition	Number	Percentage
<b>Lead</b>	Any portion of the service line is known to be made of lead.	0	
<b>Galvanized Requiring Replacement</b>	A portion of the service line is galvanized and is downstream from: – a portion that was previously lead or is of unknown lead status – connectors that are lead or unknown	0	
<b>Lead Status Unknown</b>	The service line material is not known. There is not enough evidence to support material classification.	217	66%
<b>Non-Lead</b>	An evidence-based record, method, or technique has demonstrated that ALL portions of the service line are NOT lead or GRR.	111	34%
<b>TOTAL NUMBER OF ACTIVE SERVICE LINES ENTERED IN THE DETAILED INVENTORY</b>		328	100%

#### Service Line Classification by School/Childcare Summary

	Number	Percentage
<b>Service Lines Connected to a Childcare facility:</b>	1	100%
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	1	100%
Non-Lead	0	
<b>Service Lines Connected to an Elementary School:</b>	0	
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	0	
Non-Lead	0	
<b>Service Lines Connected to an Secondary School:</b>	0	
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	0	
Non-Lead	0	
<b>Lead Status Unknown Service Lines:</b>	0	
Likely Lead	0	
Unlikely Lead	0	



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## SERVICE LINE INVENTORY FORM

### Inventory Response Summary information

PWS Name: Buck Hill Water Company

PWSID: 2450020

**NOTES:** Information will autofill based on the responses in the Detailed Inventory. Record types marked "Inactive" are not included.

#### Tap Sample Monitoring Locations by Tier

Tier	Number	Percentage
Tier 1	0	
*Tier 1 – or – Tier 2	0	
Tier 2	0	
Tier 3	0	
Tier 3 (if not enough Tier 1)	0	
Tier 4	0	
Tier 5	304	93%
**Tier 5 (if not enough SFR & MFR)	24	7%
Tier 5 (if not enough Tier 1 & 3)	0	
Systems w/POE do not meet tiering criteria	0	
<b>NUMBER OF TIERED LOCATIONS:</b>	328	
<b>NUMBER OF SERVICE LINE LOCATIONS NOT TIERED:</b>	0	

\*For CWS, if the %MFRs is > 20%, a proportional number of MFRs may be assigned to Tier 1

\*\*For CWS, if there are insufficient SFR & MFR Tier 5 structures, may use Building/Other

### Exhibit 3

## LSLR Consent Agreement Form

Property Address: \_\_\_\_\_

Customer Name: \_\_\_\_\_

Property Owner (if different): \_\_\_\_\_

Buck Hill Water Company (“Company”) is replacing lead service lines to improve water quality and ensure public health. This form grants the Company permission to access and replace the customer-owned portion of the lead service line at the above property.

By signing below, I acknowledge and agree to the following:

1. I authorize the Company and/or its contractors to perform excavation, removal, and replacement of the service line from the water main to the premises.
2. I understand that the work may involve temporary service interruptions and restoration of disturbed surfaces.
3. I have received the EPA disclosure of health risks associated with lead in drinking water.
4. I understand that the replacement is being provided at no cost to me and that failure to authorize the work may result in future replacement costs at my expense or termination of water service in accordance with the Company’s tariff.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

(If tenant) I confirm that I am the legal occupant of the premises:

Tenant Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## **\*Health Effects of Exposures to Lead in Drinking Water**

\*The health effects information on this page is not intended to catalog all possible health effects for lead. Rather, it is intended to let you know about the most significant and probable health effects associated with lead in drinking water.

### **Is there a safe level of lead in drinking water?**

The Safe Drinking Water Act requires EPA to determine the level of contaminants in drinking water at which no adverse health effects are likely to occur with an adequate margin of safety. These non-enforceable health goals, based solely on possible health risks, are called maximum contaminant level goals (MCLGs). EPA has set the maximum contaminant level goal for lead in drinking water at zero because lead is a toxic metal that can be harmful to human health even at low exposure levels. Lead is persistent, and it can bioaccumulate in the body over time.

Young children, infants, and fetuses are particularly vulnerable to lead because the physical and behavioral effects of lead occur at lower exposure levels in children than in adults. A dose of lead that would have little effect on an adult can have a significant effect on a child. In children, low levels of exposure have been linked to damage to the central and peripheral nervous system, learning disabilities, shorter stature, impaired hearing, and impaired formation and function of blood cells.

The Centers for Disease Control and Prevention (CDC) recommends that public health actions be initiated when the level of lead in a child's blood is 5 micrograms per deciliter ( $\mu\text{g}/\text{dL}$ ) or more.

It is important to recognize all the ways a child can be exposed to lead. Children are exposed to lead in paint, dust, soil, air, and food, as well as drinking water. If the level of lead in a child's blood is at or above the CDC action level of 5 micrograms per deciliter, it may be due to lead exposures from a combination of sources. EPA estimates that drinking water can make up 20 percent or more of a person's total exposure to lead. Infants who consume mostly mixed formulas can receive 40 percent to 60 percent of their exposure to lead from drinking water.

### **Children**

Even low levels of lead in the blood of children can result in:

- Behavior and learning problems
- Lower IQ and hyperactivity
- Slowed growth
- Hearing problems
- Anemia

In rare cases, ingestion of lead can cause seizures, coma and even death.

### **Pregnant Women**

Lead can accumulate in our bodies over time, where it is stored in bones along with calcium. During pregnancy, lead is released from bones as maternal calcium and is used to help form the bones of the fetus. This is particularly true if a woman does not have enough dietary calcium. Lead can also cross the placental barrier exposing the fetus to lead. This can result in serious effects on the mother and her developing fetus, including:

- Reduced growth of the fetus
- Premature birth

## **Exhibit 4**

### **LSLR Refusal and Non-Acceptance Procedure**

In compliance with 52 Pa. Code § 65.56(f), Buck Hill Water Company follows the procedure below when a customer or property owner refuses or fails to authorize a Lead Service Line Replacement (LSLR):

1. **Written Notice:** A notice is sent by certified mail detailing the health hazards of lead, replacement process, and customer responsibilities.
2. **One-Year Replacement Rule:** The notice explains that refusal to replace the customer-owned LSL will require the owner to complete the replacement at their own expense within one year to remain eligible for reimbursement.
3. **Service Termination:** The notice informs the customer that refusal may result in termination of water service, consistent with the Company's tariff and 52 Pa. Code Chapter 56.
4. **Documentation:** All communications, attempts at contact, and signed refusals are logged and retained in the Company's compliance records.
5. **Final Reminder:** A follow-up reminder is sent within 60 days of the initial notice.

Templates of notices are included as part of this exhibit.

Template 1: Initial Refusal Notice

[Date]

[Customer Name]  
[Property Address]  
[City, State ZIP]

RE: IMPORTANT HEALTH NOTICE – LEAD SERVICE LINE REPLACEMENT PROGRAM

Dear [Customer Name],

Buck Hill Water Company has identified your service line as potentially containing lead or as an unknown material. In accordance with state regulations, we are offering to replace the service line at no cost to you under our Lead Service Line Replacement (LSLR) Program.

You have not yet signed and returned the required consent agreement form, which is necessary to proceed. Continued use of lead lines poses known health risks, especially to children and pregnant women.

IMPORTANT:

- If you decline or do not respond, you must replace the service line at your own expense within one (1) year to qualify for reimbursement.
- Refusal to allow access may result in termination of water service in accordance with our tariff and 52 Pa. Code Chapter 56.

Please contact us at 570-595-7511 or [gaouad@buckhillfalls.com](mailto:gaouad@buckhillfalls.com) to avoid any disruption.

Sincerely,

Buck Hill Water Company

Template 2: Final Notice Before Termination

[Date]

[Customer Name]

[Property Address]

[City, State ZIP]

RE: FINAL NOTICE – IMMEDIATE ACTION REQUIRED

Dear [Customer Name],

This is a final notice regarding the required Lead Service Line Replacement at your property. You have previously been informed of the health hazards associated with lead service lines and our offer to replace them at no cost to you.

To date, we have not received your signed consent form or access authorization. As required by 52 Pa. Code § 65.56(f), we must inform you that:

- You will be responsible for replacement costs if work is not authorized within one year.
- Water service may be discontinued in accordance with our approved tariff if access continues to be denied.

This is your final opportunity to avoid service disruption and financial responsibility.

Please respond within 10 business days of the date of this letter.

For any inquiries please reach out to Georges Aouad CFO at [gaouad@buckhillfalls.com](mailto:gaouad@buckhillfalls.com) or via phone at 570 595 7511

Sincerely,

Buck Hill Water Company

## Exhibit 5

### LSLR Program Print and Broadcast Materials

Sample Email Newsletter (Breezemail) and US Post Mail:

Subject: Important Notice: Lead Service Line Replacement Coming to Your Property

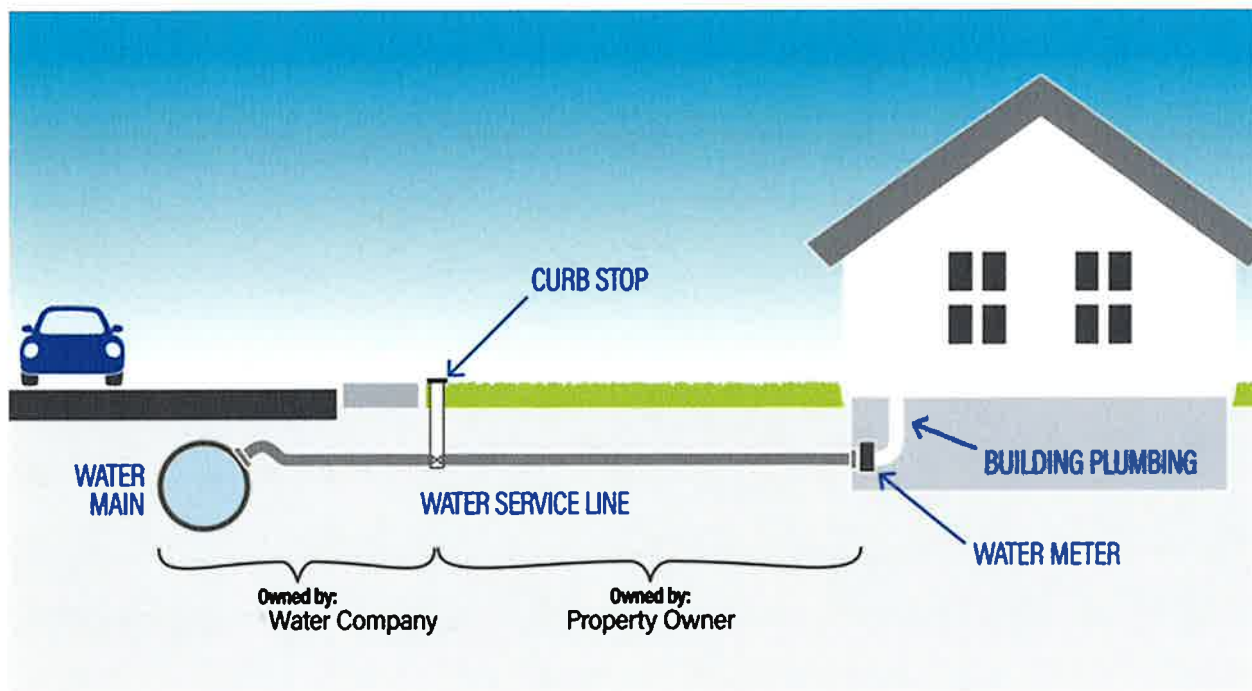
Dear Buck Hill Resident,

Dear Water Customer,

The Buck Hill Water Company would like to inform you that the water service line to the above address has been classified as a **Lead Service Line**. This means that some or all the service line piping contains lead or that the service line has not yet been physically confirmed to not contain lead. Water supplied through a lead service line has the potential to increase your risk of exposure to lead. For further information regarding your service line, our service line inventory is accessible at The Buck Hill Water Company Headquarters located at 270 Golf Drive Buck Hill Falls PA, 18323 and at the website [www.Buckhillfalls.com](http://www.Buckhillfalls.com).

#### **What is a Service Line?**

A service line is the piping that connects your household or building plumbing to the water main in the street. Ownership varies by water system but is typically split between the water system and the customer. The Buck Hill Water Company owns the section of the service line from the water main to the curb stop, while the section from the curb stop to the water meter is owned by the customer.



### How Can I Replace My Service Line?

1. The Buck Hill Water Company will offer to replace customer-owned LSLs at no direct cost to the customer or property owner through a lead service line replacement program.

In addition, we are required to replace the water system company-owned portion of the service line upon notification that the customer-owned portion will be undergoing replacement. If you are replacing the customer-owned portion of the service line, please notify us as soon as possible at (570) 595-7511 so we may coordinate our efforts.

### What are the Health Effects of Lead?

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

### What Can I do to Reduce Exposure to Lead in Drinking Water?

- **Run your water to flush out lead.** If the water hasn't been used for several hours, run the water for 15-30 seconds to flush lead from interior plumbing or run the water until it

becomes cold or reaches a steady temperature before using it for drinking or cooking. Only use cold water for drinking and cooking.

- **Do NOT use water from the hot water tap to make baby formula.**
- **Do NOT boil water to remove lead. Boiling water will not reduce lead.**
- **Look for alternative sources or treatment of water, such as use of a pitcher filter that is certified to remove lead and replace the cartridges on a routine frequency or use bottled water.**
- **Identify and replace premise plumbing fixtures containing lead.** Brass faucets, fittings, and valves, including those advertised as “lead free” installed prior to 2014, may contribute lead to drinking water because the law allowed fixtures with up to 8% lead to be labeled as lead free.
- **Regularly clean your aerators/screens on plumbing fixtures.** Sediment, debris, and lead particles can collect in your aerator. If lead particles are caught in the aerator, lead can get into your water.

For more information, call us at (570) 595-7511, or visit our website at [www.buckhillfalls.com](http://www.buckhillfalls.com). For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA’s website at <http://www.epa.gov/lead> or contact your health care provider.

Sincerely,

Buck Hill Falls Water Company

Sample Board Mail Notice:

ATTENTION RESIDENTS:

The Company will be replacing lead service lines this season. Properties with unknown service line material may be contacted. Please respond promptly to all mailed consent forms.

Contact Information:

Phone: 570-595-7511


Email: [gaouad@buckhillfalls.com](mailto:gaouad@buckhillfalls.com)

Website: [www.buckhillfalls.com](http://www.buckhillfalls.com)

## Appendix D

### Verification Statement

I, Georges Aouad, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: 

Title: Chief Financial Officer

Date: 04/24/2025

## **Appendix E**

### **Certificate of Service**

## CERTIFICATE OF SERVICE

I hereby certify that I have this day, the 25th day of April 2025, served a true copy of the foregoing documents upon the parties listed below in accordance with the requirements of §§ 1.54 (relating to service by a party) and 65.55(a) (relating to LSLR program requirements):

### SERVED VIA ELECTRONIC MAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
akaster@pa.gov

Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101  
ra-sba@pa.gov

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Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101  
ra-oca@paoca.org

Respectfully submitted,



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Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second St., Suite 1410  
Harrisburg, PA 17101  
Phone: (717) 773-4191  
Email: jnase@cozen.com

Counsel for *Buck Hill Water Company*