

# Source Water Protection Plan Mountain Top PSD

PWSID: WV3301205

Grant County

April 2024

Prepared By:

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In cooperation with Mountain Top PSD

WV Bureau for Public Health, Source Water Assessment and Protection Program

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I Certify the information in the source water protection plan is complete and accurate to the best of my knowledge.

Responsible party of designee authorized to sign for water utility is on file:

Douglas Lyons

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Name of Authorizing Signatory:

Board Chairman

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Title of Authorizing Signatory:

4/25/2024

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Date of Submission (mm/dd/yyyy):

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## SOURCE WATER PROGRAM ACRONYMS

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AST	Aboveground Storage Tank
BMP	Best Management Practices
ERP	Emergency Response Plan
GWUDI	Ground Water Under the Direct Influence of Surface Water
LEPC	Local Emergency Planning Committee
OEHS	EED Office of Environmental Health Services/Environmental Engineering Division
PE	Professional Engineer
PSSCs	Potential Source of Significant Contamination
PWSU	Public Water System Utility
RAIN	River Alert Information Network
RPDC	Regional Planning and Development Council
SDWA	Safe Drinking Water Act
SWAP	Source Water Assessment and Protection
SWAPP	Source Water Assessment and Protection Program
SWP	Source Water Protection
SWPA	Source Water Protection Area
SWPP	Source Water Protection Plan
WARN	Water/Wastewater Agency Response Network
WHPA	Wellhead Protection Area
WHPP	Wellhead Protection Program
WSDA	Watershed Delineation Area
WVBPH	West Virginia Bureau for Public Health
WVDEP	West Virginia Department of Environmental Protection
WVDHHR	West Virginia Department of Health and Human Resources
WVDHSEM	West Virginia Division of Homeland Security and Emergency Management
ZCC	Zone of Critical Concern
ZPC	Zone of Peripheral Concern

## 1.0 PURPOSE

The goal of the West Virginia Bureau of Public Health (WVBPH) source water assessment and protection (SWAP) program is to prevent degradation of source waters which may preclude present and future uses of drinking water supplies to provide safe water in sufficient quantity to users. The most efficient way to accomplish this goal is to encourage and oversee source water protection on a local level. Many aspects of source water protection may be best addressed by engaging local stakeholders.

The intent of this document is to describe what Mountain Top PSD has done, is currently doing, and plans to do to protect its source of drinking water. Although this water system treats the water to meet federal and state drinking water standards, conventional treatment does not fully eradicate all potential contaminants and treatment that goes beyond conventional methods is often very expensive. By completing this plan, Mountain Top PSD acknowledges that implementing measures to minimize and mitigate contamination can be a relatively economical way to help ensure the safety of the drinking water.

### 1.1. WHAT ARE THE BENEFITS OF PREPARING A SOURCE WATER PROTECTION PLAN?

- Fulfilling the requirement for the public water utilities to complete or update their source water protection plan.
- Identifying and prioritizing potential threats to the source of drinking water; and establishing strategies to minimize the threats.
- Planning for emergency response to incidents that compromise the water supply by contamination or depletion, including how the public, state, and local agencies will be informed.
- Planning for future expansion and development, including establishing secondary sources of water.
- Ensuring conditions to provide the safest and highest quality drinking water to customers at the lowest possible cost.
- Providing more opportunities for funding to improve infrastructure, purchase land in the protection area, and other improvements to the intake or source water protection areas.



## 2.0 BACKGROUND: WV SOURCE WATER ASSESSMENT AND PROTECTION PROGRAM

Since 1974, the federal Safe Drinking Water Act (SDWA) has set minimum standards on the construction, operation, and quality of water provided by public water systems. In 1986, Congress amended the SDWA. A portion of those amendments were designed to protect the source water contribution areas around ground water supply wells. This program eventually became known as the Wellhead Protection Program (WHPP). The purpose of the WHPP is to prevent pollution of the source water supplying the wells.

The Safe Drinking Water Act Amendments of 1996 expanded the concept of wellhead protection to include surface water sources under the umbrella term of Source Water Protection. The amendments encourage states to establish SWAP programs to protect all public drinking water supplies. As part of this initiative states must explain how protection areas for each public water system will be delineated, how potential contaminant sources will be inventoried, and how susceptibility ratings will be established.

In 1999, the WVBPH published the West Virginia Source Water Assessment and Protection Program, which was endorsed by the United States Environmental Protection Agency. Over the next few years, WVBPH staff completed an assessment (i.e., delineation, inventory and susceptibility analysis) for all of West Virginia's public water systems. Each public water system was sent a copy of its assessment report. Information regarding assessment reports for Mountain Top PSD can be found in **Table 1**.

## 3.0 STATE REGULATORY REQUIREMENTS

On June 6, 2014, §16 1 2 and §16 1 9a of the Code of West Virginia, 1931, was reenacted and amended by adding three new sections, designated §16 1 9c, §16 1 9d and §16-1-9e. The changes to the code outlines specific requirements for public water utilities that draw water from a surface water source or a surface water influenced groundwater source.

Under the amended and new codes each existing public water utility using surface water or ground water influenced by surface water as a source must have completed or updated a source water protection plan by July 1, 2016, and must continue to update their plan every three years. Existing source water protection plans have been developed for many public water utilities in the past. If available, these plans were reviewed and considered in the development of this updated plan. Any new water system established after July 1, 2016 must submit a source water protection plan before they start to operate. A new plan is also required when there is a significant change in the potential sources of significant contamination (PSSC) within the zone of critical concern (ZCC).

The code also requires that public water utilities include details regarding PSSCs, protection measures, system capacities, contingency plans, and communication plans. Before a plan can be approved, the local health department and public will be invited to contribute information for consideration. In some instances, public water utilities may be asked to conduct independent studies of the source water protection area and specific threats to gain additional information.

## 4.0 SYSTEM INFORMATION

MOUNTAIN TOP PSD is classified as a state regulated public utility and operates a community public water system. A community public water system is a system that regularly supplies drinking water from its own sources to at least 15 service connections used by year round residents of the area or regularly serves 25 or more people throughout the entire year. For purposes of this source water protection plan, community public water systems are also referred to as public water utilities. Information on the population served by this utility is presented in **Table 1** below.

**Table 1. Population Served by MOUNTAIN TOP PSD**

Administrative office location:	4150 Bismarck Road, Mt. Storm, GRANT, WV, 26739		
Is the system a public utility, according to the Public Service Commission rule?	Yes		
Date of Most Recent Source Water Assessment Report:	3/1/2003		
Date of Most Recent Source Water Protection Plan:	7/6/2021		
Population served directly:	2072		
Bulk Water Purchaser Systems:	System Name	PWSID Number	Population
Total Population Served by the Utility:	2072		
Does utility have multiple Source Water Protection Areas(SWPAs)?	No		
How many SWPAs does the utility have?	1		

## 5.0 WATER TREATMENT AND STORAGE

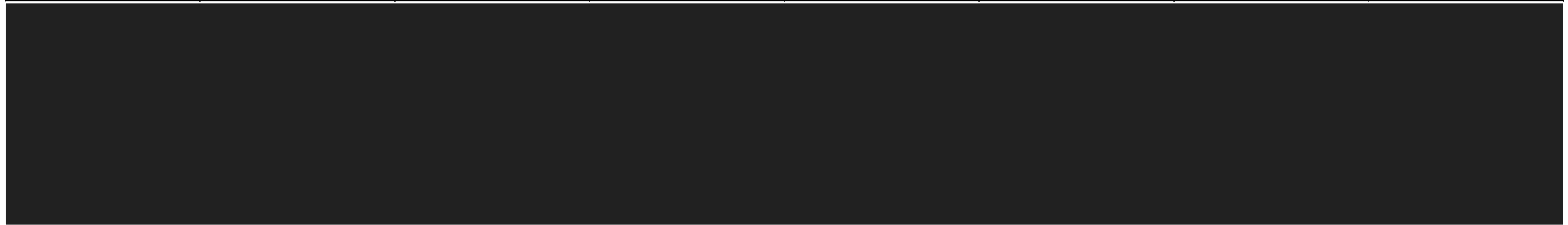
As required, Mountain Top PSD has assessed their system (e.g., treatment capacity, storage capacity, unaccounted for water, contingency plans) to evaluate their ability to provide drinking water and protect public health. **Table 2** contains information on the water treatment methods and capacity of the utility. Information about the surface sources from which Mountain Top PSD draws water can be found in **Table 3**. If the utility draws water from any groundwater sources to blend with the surface water the information about these ground water sources can be found in **Table 4**.

**Table 2. Mountain Top PSD Water Treatment Information**

Default Facility	
Water treatment processes (in order of occurrence) includes:	
The treatment capacity is approximately (GPD):	
Current average production is approximately (GPD):	
Maximum gallons of water treated and produced at that plant in one day during the past year was:	
Minimum gallons of water treated and produced at that plant in one day during the past year was:	
Plant is operated an average of hours a day:	
Maximum number of hours of operation in one day at that plant during the past year was:	
Minimum number of hours of operation in one day at that plant during the past year was:	
How many storage tank(s) are maintained on systems distribution system:	
Total gallons of treated water storage:	
Total gallons of raw water storage (GALs):	

**Table 3. Mountain Top PSD Surface Water Sources**

Intake Name	Facility #	Local Name	Describe Intake	State Id Code	Date Constructed / Modified	Frequency of Use (Primary / Backup / Emergency)	Activity Status (Active/Inactive)
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**Table 4. Mountain Top PSD Ground Water Sources**

Well/Spring Name	Facility #	Local Name	Date Constructed / Modified	Completion Report Available (Yes/No)	Well Depth (ft)	Casting Depth (ft)	Grout (Yes/No)	Frequency of Use (Primary / Backup / Emergency)	Activity Status (Active/Inactive)
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## 6.0 DELINEATIONS

For surface water systems, delineation is the process used to identify and map the drainage basin that supplies water to a surface water intake. This area is generally referred to as the source water protection area (SWPA). All surface waters are susceptible to contamination because they are exposed at the surface and lack a protective barrier from contamination. Accidental spills, releases, sudden precipitation events that result in overland runoff, or storm sewer discharges can allow pollutants to readily enter the source water and potentially contaminate the drinking water at the intake. The SWPA for surface water is distinguished as a Watershed Delineation Area (WSDA) for planning purposes; and the Zone of Peripheral Concern (ZPC) and Zone of Critical Concern (ZCC) are defined for regulatory purposes.

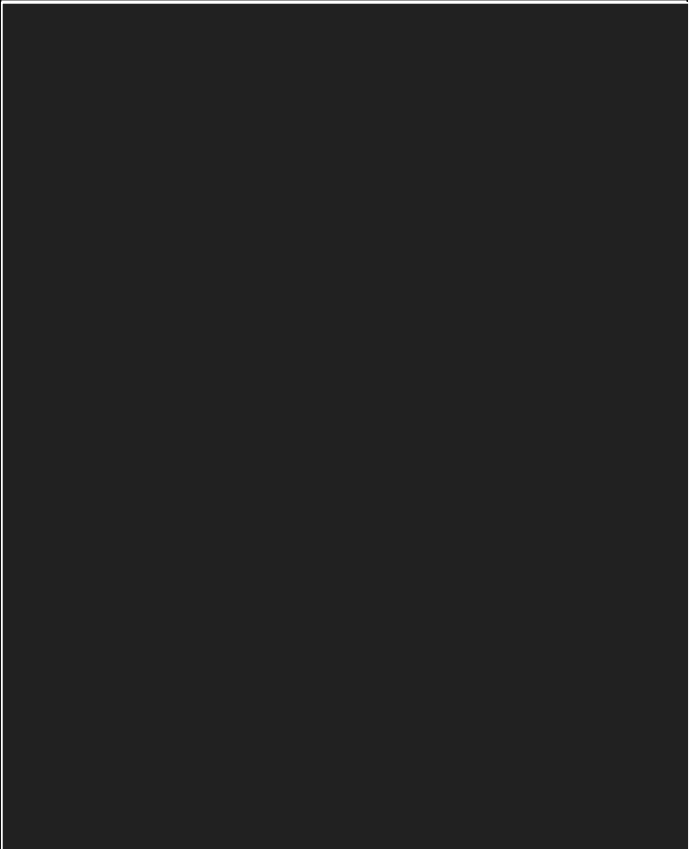
The WSDA includes the entire watershed area upstream of the intake to the boundary of the State of West Virginia border, or a topographic boundary. The ZCC for a public surface water supply is a corridor along streams within the watershed that warrant more detailed scrutiny due to its proximity to the surface water intake and the intake's susceptibility to potential contaminants within that corridor. The ZCC is determined using a mathematical model that accounts for stream flows, gradient and area topography. The length of the ZCC is based on a five-hour time-of-travel of water in the streams to the water intake, plus an additional one-quarter mile below the water intake. The width of the zone of critical concern is 1,000 feet measured horizontally from each bank of the principal stream, and five hundred feet measured horizontally from each bank of the tributaries draining into the principal stream. Ohio River ZCC delineations are based on ORSANCO guidance and extend 25 miles above the intake. The Ohio River ZCC delineations include 1,320 feet (1/4 mile) measured from the bank of the main stem of the Ohio River and 500 feet on a tributary.

The ZPC for a public surface water supply source and for a public surface water influenced groundwater supply source is a corridor along streams within a watershed that warrants scrutiny due to its proximity to the surface water intake and the intake's susceptibility to potential contaminants within that corridor. The ZPC is determined using a mathematical model that accounts for stream flows, gradient and area topography. The length of the zone of peripheral concern is based on an additional five-hour time-of-travel of water in the streams beyond the perimeter of the zone of critical concern, which creates a protection zone of ten hours above the water intake. The width of the zone of peripheral concern is one thousand feet measured horizontally from each bank of the principal stream and five hundred feet measured horizontally from each bank of the tributaries draining into the principal stream.

For groundwater supplies there are two types of SWPA delineations: 1) wellhead delineations and 2) conjunctive delineations, which are developed for supplies identified as groundwater under the direct influence of surface water, or GWUDIs. A wellhead protection area is determined to be the area contributing to the recharge of the groundwater source (well or spring), within a five year time of travel. A conjunctive delineation combines a wellhead protection area for the hydrogeologic recharge and a connected surface area contributing to the wellhead.

Information and maps of the WSDA, ZCC, ZPC and Wellhead Protection Area for this public water supply were provided to the utility and are attached to this report. See **Appendix A. Figures**. Other information about the WSDA is shown in **Table 5**.

**Table 5. Watershed Delineation Information**

Well / Spring Name	
Size of WSDA (Square Miles)	
River Watershed Name (8-digit HUC)	
Size of Zone of Critical Concern (Acres)	
Size of Zone of Peripheral Concern (Acres) (Include ZCC area)	
Do you blend with ground water	
Do you have an intake or well/spring missing from the list?	
Well / Spring Name	
Size of WSDA (Square Miles)	
River Watershed Name (8-digit HUC)	
Size of Zone of Critical Concern (Acres)	
Size of Zone of Peripheral Concern (Acres) (Include ZCC area)	
Do you blend with ground water	
Do you have an intake or well/spring missing from the list?	

## 7.0 PROTECTION TEAM

One important step in preparing a source water protection plan is to organize a source water protection team who will help develop and implement the plan. The legislative rule requires that water utilities make every effort to inform and engage the public, local government, local emergency planners, the local health department and affected residents at all levels of the development of the protection plan. WVBPH recommends that the water utility invite representatives from these organizations to join the protection team, which will ensure that they are given an opportunity to contribute in all aspects of source water protection plan development. Public water utilities should document their efforts to engage representatives and provide an explanation if any local stakeholder is unable to participate. In addition, other local stakeholders may be invited to participate on the team or contribute information to be considered. These individuals may be emergency response personnel, local decision makers, business and industry representatives, land owners (of land in the protection area), and additional concerned citizens.

The administrative contact for Mountain Top PSD is responsible for assembling the protection team and ensuring that members are provided the opportunity to contribute to the development of the plan. The acting members of the Protection Team are listed in **Table 6**.

The role of the protection team members will be to contribute information to the development of the source water protection plan, review draft plans and make recommendations to ensure accuracy and completeness, and when possible contribute to implementation and maintenance of the protection plan. The protection team members are chosen as trusted representatives of the community served by the water utility and may be designated to access confidential data that contains details about the local PSSCs. The input of the protection team will be carefully considered by the water utility when making final decisions relative to the documentation and implementation of the source water protection plan.

Mountain Top PSD will be responsible for updating the source water protection plan and rely upon input from the protection team and the public to better inform their decisions. To find out how you can become involved as a participant or contributor, visit the utility website or call the utility phone number, which are provided in **Table 6**.



**Table 6. Protection Team Member and Contact Information**

Name	Representing	Title	Phone Number	Email
Douglas Lyons	Mountain Top PSD	Board of Directors Chairman		
Forrest Harvey, Jr	Mountain Top PSD	Chief Operator		
	Mountain Top PSD			
Ellen Hanlin	Mountain Top PSD	Land owner		
Peggy Bobo	Mountain Top PSD	Grant OEM Director		
	Mountain Top PSD			
Tonya Lough	Mt. Top PSD	Office Personnel		
Jennifer Daugherty	Mt. Top PSD	Board of Directors secretary		
Rusty Kitzmiller	Mt. Top PSD	General Manager		
Diane Junkins	Mt. Top PSD	Office Manager		
Michael Delaney	Mr. Top PSD	Board Member		
Jerry Dotson	WVRWA	Source Water Specialist		
Date of First Protection Team Meeting:		Protection Team Meeting was held Monday, April 18, 2016 at Mountain Top PSD. Meeting minutes attached in Appendix E.		
Efforts made to inform and engage local stakeholders (public, local government, local emergency planners, local health department, and affected residents) and explain absence of recommended stakeholders		A public meeting was held on June 18, 2019 to provide an overview of the updated source water protection plan. The meeting was advertised at our office location and in all local businesses and post offices. A protection team meeting was held on April 17, 2024 at 4:00, and a public meeting was held at 4:30 PM.		

## 8.0 POTENTIAL SOURCES OF SIGNIFICANT CONTAMINATION

Source water protection plans should provide a complete and comprehensive list of the PSSCs contained within the ZCC, based upon information obtained from the WVBPH, working in cooperation with the West Virginia Department of Environmental Protection (WVDEP) and the West Virginia Division of Homeland Security and Emergency Management (WVDHSEM). A facility or activity is listed as a PSSC if it has the potential to release a contaminant that could potentially impact a nearby public water supply, and it does not necessarily indicate that any release has occurred.

The list of PSSCs located in the SWPA is organized into two types: 1) SWAP PSSCs, and 2) Regulated Data. SWAP PSSCs are those that have been collected and verified by the WVBPH SWAP program during previous field investigations to form source water assessment reports and source water protection plans. Regulated PSSCs are derived from federal and state regulated databases, and may include data from WVDEP, US Environmental Protection Agency, WVDHSEM, and from state data sources.

### 8.1. CONFIDENTIALITY OF PSSCS

A list of the PSSCs contained within the ZCC should be included in the source water protection plan. In the event of a chemical spill, release or other related emergency, information pertaining to the contaminant shall be immediately disseminated to any emergency responders reporting to the site. The designees for Mountain Top PSD are identified in the communication planning section of the source water protection plan.

PSSC data from some agencies (ex. WVDHSEM, WVDEP, etc.) may be restricted due to the sensitive nature of the data. Locational data will be provided to the public water utility. However, to obtain specific details regarding contaminants, (such as information included in Tier II reports), water utilities should contact the local emergency planning commission (LEPC) or agencies, directly. While the maps and lists of the PSSCs and regulated sites are to be maintained in a confidential manner, these data are provided in **Appendix A. Figures** for internal review and planning uses only.

### 8.2. LOCAL AND REGIONAL PSSCS

For the purposes of this source water protection plan, local PSSCs are those that are identified by local stakeholders in addition to the PSSCs lists distributed by the WVBPH and other agencies. Local stakeholders may identify local PSSCs for two main reasons. The first is that it is possible that threats exist from unregulated sources and land uses that have not already been inventoried and do not appear in regulated databases. For this reason each public water utility should investigate their protection area for local PSSCs. A PSSC inventory should identify all contaminant sources and land uses in the delineated ZCC. The second reason local PSSCs are identified is because public water utilities may consider expanding the PSSC inventory effort outside of the ZCC into the ZPC and WSDA if necessary to properly identify all threats that could impact the drinking water source. As the utility considers threats in the watershed they may consider collaborating with upstream communities to identify and manage regional PSSCs.

When conducting local and regional PSSC inventories, utilities should consider that some sources may be obvious like above ground storage tanks, landfills, livestock confinement areas, highway or railroad right of ways, and sewage treatment facilities. Others are harder to locate like abandoned cesspools, underground tanks, French

drains, dry wells, or old dumps and mines.

The Mountain Top PSD reviewed intake locations and the delineated SWPAs to verify the existence of PSSCs provided by the WVBPH and identify new PSSCs. If possible, locations of regulated sites within the SWPA were confirmed. Information on any new or updated PSSCs identified by Mountain Top PSD and not already appearing in datasets from the WVBPH can be found in **Table 7**.

**Table 7. Locally Identified potential Sources of Significant Contamination**

Please see Appendix A to view this information.

### 8.3. PRIORITIZATION OF THREATS AND MANAGEMENT STRATEGIES

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Once the utility has identified local concerns, they must develop a management plan that identifies specific activities that will be pursued by the public water utility in cooperation and concert with the WVBPH, local health departments, local emergency responders, LEPC and other agencies and organizations to protect the source water from contamination threats.

Depending on the number identified, it may not be feasible to develop management strategies for all of the PSSCs in the SWPA. The identified PSSCs can be prioritized by potential threat to water quality, proximity to the intake(s), and local concern. The highest priority PSSCs can be addressed first in the initial management plan. Lower ranked PSSCs can be addressed in the future as time and resources allow. To assess the threat to the source water, water systems should consider confidential information about each PSSC. This information may be obtained from state or local emergency planning agencies, Tier II reports, facility owner, facility groundwater protection plans, spill prevention response plans, results of field investigations, etc.

In addition to identifying and prioritizing PSSCs within the SWPA, local source water concerns may also focus on critical areas. For the purposes of this source water protection plan, a critical area is defined as an area that is identified by local stakeholders and can lie within or outside of the ZCC. Critical areas may contain one or more PSSCs which would require immediate response to address a potential incident that could impact the source water.

A list of these priority PSSCs was selected and ranked by the Mountain Top PSD Protection Team. This list reflects the concerns of this specific utility and may contain PSSCs not previously identified and not within the ZCC or ZPC. **Table 8** contains a description of why each critical area or PSSC is considered a threat and what management strategies the utility is either currently using or could use in the future to address each threat.

## 9.0 IMPLEMENTATION PLAN FOR MANAGEMENT STRATEGIES

Mountain Top PSD reviewed the recommended strategies listed in their previous source water protection plan, to consider if any of them should be adopted and incorporated in this updated plan. **Table 9** provides a brief statement summarizing the status of the recommended strategies. **Table 9** also lists strategies from a previous plan that are being incorporated in this plan update.

When considering source management strategies and education and outreach strategies, this utility has considered how and when the strategies will be implemented. The initial step in implementation is to establish responsible parties and timelines to implement the strategies. The water utility, working in conjunction with the Protection Team members, can determine the best process for completing activities within the projected time periods. Additional meetings may be needed during the initial effort to complete activities, after which the Protection Team should consider meeting annually to review and update the Source Water Protection Plan. A system of regular updates should be included in every implementation plan.

Proposed commitments and schedules may change but should be well documented and reported to the local stakeholders. If possible, utilities should include cost estimates for strategies to better plan for implementation and possible funding opportunities. Mountain Top PSD has developed an implementation plan for priority concerns listed in **Table 8**. The responsible team member, timeline, and potential cost of each strategy are presented in **Table 9**. Note: Because timelines may change, future plan updates should describe the status of each strategy and explain the lack of progress.

**Table 8. Priority PSSCs or Critical Areas**

PSSC or Critical Area	Priority Number	Reason for Concern
Backup generators	1	Mountain Top PSD has a generator mounted at the water treatment plant to provide power during an outage, however, generators are not currently connected to the booster pump stations in the distribution system. Generators would allow the stations to continue to pump water even if normal power is not available.
Develop Emergency Reponses Plan	2	Any contaminant during an emergency situation
Emergency planning and coordination	3	Any contaminant during an emergency situation
Education of water plant maintenance staff	4	The utility staff are the best people to watch for potential sources of contamination and to investigate suspected contaminants. Training the staff to be on the alert for potential problems will help protect the utility against contamination of it's source water.
Communication with logging companies	5	Silvicultural activities
Participate in public comment periods related to new mining developments	6	Abandoned or Underground Mine Lands
Communicate with abandoned or underground mine lands property owners or facility operators	7	Abandoned or Underground Mine Lands
Watershed	8	Monitor any contaminant threat from future development
Poultry production facilites	9	There are currently eight chicken houses in the watershed area. The owner is preparing to construct eight more in the near future. Due to concerns of potential contamination and the water removed from the watershed for the poultry production may potentially interfere with the utility having adequate supply for their customers the utility intends to contact the facility owner to ask about their operations to get answers to their concerns.
Early warning equipment	10	Early Warning Equipment would make the utility able to monitor the raw water for certain parameters that provide an indication of potential contamination.

**Table 9. Priority PSSC Management Strategies**

PSSC or Critical Area	Management Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Poultry production facilities	The utility intends to contact the facility owner to engage in communications to answer these concerns	Utility personnel	Not Started		Minimal - staff time
Early warning equipment	Investigate the possibility of purchasing and installing early warning equipment in the raw water stream to provide a warning if certain parameters change that may indicate potential contamination.	Utility team	Not Started		\$50,000 to \$100,000
Emergency planning and coordination	Mt. Top PSD participates with local fire departments and County Emergency Services on a regular basis. This ensures that all the agencies are in constant communication with one another and prepared in the event of an emergency.	Mt. Top PSD and protection team members, Volunteer Fire Department, and OEHS/911	Ongoing		None.
Education of water plant maintenance staff	Operations personnel are aware of the vulnerability of the source and take precautions to identify contaminants and reduce potential impacts from contamination. Administrative contact and operator should continue to communicate with maintenance staff the importance of preventing and cleaning up spills at the water plant. Staff will also be trained on identification of PSSCs in the watershed.	Mt. Top PSD administrative contact and operator	Ongoing		Minimal - staff time



**Table 9. Priority PSSC Management Strategies**

PSSC or Critical Area	Management Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Backup generators	In the event of a power outage that affects the water treatment plant, Mt. Top PSD will need another source of power. Mt. Top PSD has generators in place that can be used should the treatment plant lose power. The outlying pump stations are not served. Additional generators to serve these outlying pump stations could be added should funding become available.	Mt. Top PSD	Ongoing		Significant if purchasing. If necessary, repair or replacement could be significant.
Participate in public comment periods related to new mining developments	Mt. Top PSD will participate in public comment periods before WVDEP issues mining permits for new permits or permit renewals for activities within or near the Mt. Top PSD watershed. For more information on the public comment process and WVDEP program, concerned citizens can visit: <a href="http://www.dep.wv.gov/environmentaladvocate/Documents/DEP2008CitizensGuide.pdf">http://www.dep.wv.gov/environmentaladvocate/Documents/DEP2008CitizensGuide.pdf</a>	Mt. Top PSD	Ongoing		Minimal - staff time
Develop Emergency Responses Plan	Mt. Top PSD has a formal Emergency Response Plan (ERP). It will be kept up and followed. Information on creating and updating the ERP can be found here: <a href="http://www.nesc.wvu.edu/plan_ahead4.cfm">http://www.nesc.wvu.edu/plan_ahead4.cfm</a>	Mt. Top PSD	Ongoing		Minimal - staff time

**Table 9. Priority PSSC Management Strategies**

PSSC or Critical Area	Management Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Communication with logging companies	Mt. Top PSD will request that timber operators notify the PSD prior to the start of removal activities (road construction and harvest) within the Mt. Top PSD watershed.	Mt. Top PSD	Ongoing		Minimal - staff time.
Communicate with abandoned or underground mine lands property owners or facility operators	Mt. Top PSD will provide watershed and ZCC boundaries to the company holding the underground mining permit and communicate the source water vulnerability and ask that they follow BMPs to reduce the potential from contamination through automotive fluids and/or acid mine drainage. Mt. Top PSD should also request Tier II forms or Safety Data Sheets for any chemicals stored onsite. A template for a letter that can be used to initiate communications with property owners is included in Appendix F.	Mt. Top PSD	Ongoing		Minimal - staff time
Watershed	Mt. Top PSD will focus on the connection between land conservation and source water protection. If the need should arise, we will collaborate with conservation organizations to explore strategies to accelerate conservation easements that benefit our public drinking water source. The resulting management strategy will be a joint effort to identify priority conservation areas, especially along streams, to conserve land and protect source water.	Mt. Top PSD WV Rivers Coalition	Not Started		Moderate

## 10.0 EDUCATION AND OUTREACH STRATEGIES

The goal of education and outreach is to raise awareness of the need to protect drinking water supplies and build support for implementation strategies. Education and outreach activities will also ensure that affected citizens and other local stakeholders are kept informed and provided an opportunity to contribute to the development of the source water protection plan. Mountain Top PSD has created an Education and Outreach plan that describes activities it has either already implemented or could implement in the future to keep the local community involved in protecting their source of drinking water. This information can be found in **Table 10**.

**Table 10. Education and Outreach Implementation Plan**

Education and Outreach Strategy	Description of Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Public meeting	Mt. Top PSD will hold an informational meeting with local residents about source water protection efforts. The system will hold one meeting annually to discuss opportunities for updating our plan with the most recent information on PSSCs, management, education & outreach strategies. We will continue to increase awareness of the connection between land use and drinking water quality. Information about these meetings will be publicly posted.	Mt. Top PSD WV Rivers Coalition	Ongoing	A public meeting was held on April 17, 2024.	Minimal - staff time
Individual septic systems	Mt. Top PSD will provide information regarding contamination and source water protection in mailings to homeowners and include nonemergency contact information. Outreach materials will encourage them to have their septic system inspected regularly and pumped every 5-10 years as needed. The utility may encourage the local sewer provider to consider reducing the amount of septic systems in use by extension of the public sewer system. If expansion of the existing wastewater system is not feasible, consider alternate treatments such as decentralized and/or cluster wastewater systems.	Mt. Top PSD and Grant County Health Department	Not Started	The USEPA provides a complete guide for residents to maintain their septic systems, for the guide, visit: <a href="http://epa.gov/owm/septic/pubs/homeowner_guide_long.pdf">http://epa.gov/owm/septic/pubs/homeowner_guide_long.pdf</a>	Minimal

**Table 10. Education and Outreach Implementation Plan**

Education and Outreach Strategy	Description of Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Communication with PSSC and facility owners	Mt. Top PSD will establish communications with PCS owners and regulated facility owners, explain that they are operating within the ZCC, and emphasize the need to follow all regulatory Best Management Practices (BMPs).	Mt. Top PSD	Not Started	A template of a letter that can be sent to PSSC owners is included in Appendix F.	Minimal.
Consumer Confidence Report	Mt. Top PSD publishes a Consumer Confidence Report (CCR) annually, as required by the Safe Drinking Water Act. The CCR is available to all water customers. The CCR describes the source water for the system, the levels of contaminants in the source water, the EPA safe contaminant levels, and information about Cryptosporidium. The system will also include information about their source water protection program.	Mt. Top PSD	Ongoing	The following paragraph or similar paragraph will be included in the CCR: Mt. Top PSD is committed to protecting its drinking water sources. The drinking water for Mt. Top is sourced from Mill Creek. We updated our Source Water Protection Plans (SWPP) in 2019, based on the requirements of Senate Bill 373. The SWPP includes physical actions to protect the drinking water sources such as ensuring that the source spring is secured, and planning actions such as creating an emergency response plan. It also includes an assessment of potential sources of contamination. The SWPPs were developed by the PSD in collaboration with a local source water protection team, and with the involvement of the public. Please contact Mt. Top PSD to learn more about source water protection.	Minimal.

**Table 10. Education and Outreach Implementation Plan**

Education and Outreach Strategy	Description of Activity	Responsible Protection Team Member	Status / Schedule	Comments	Estimated Cost
Public-Private Partnerships	Mt. Top PSD will attempt to engage in activities that support public-private partnerships for source water protection, including the Safe Water for WV program coordinated by the WV Rivers Coalition. This program will support the implementation of our SWPP through community involvement and watershed protection that emphasize solutions upstream from our intake. These solutions shall include education and outreach components to raise awareness of threats to drinking water sources and encourage voluntary implementation of best management practices for source water protection.	Mt. Top PSD WV Rivers Coalition	Not Started		Minimal

## 11.0 CONTINGENCY PLAN

The goal of contingency planning is to identify and document how the utility will prepare for and respond to any drinking water shortages or emergencies that may occur due to short and long term water interruption, or incidents of spill or contamination. During contingency planning, utilities should examine their capacity to protect their intake, treatment, and distribution system from contamination. They should also review their ability to use alternative sources and minimize water loss, as well as their ability to operate during power outages. In addition, utilities should report the feasibility of establishing an early warning monitoring system and meeting future water demands.

Isolating or diverting any possible contaminant from the intake for a public water system is an important strategy in the event of an emergency. One commonly used method of diverting contaminants from an intake is establishing booms around the intake. This can be effective, but only for contaminants that float on the surface of the water. Alternatively, utilities can choose to pump floating contaminants from the water or chemically neutralize the contaminant before it enters the treatment facility.

Public utilities using surface sources should be able to close the intake by one means or another. However, depending upon the system, methods for doing so could vary greatly and include closing valves, lowering hatches or gates, raising the intake piping out of the water, or shutting down pumps. Systems should have plans in place in advance as to the best method to protect the intake and treatment facility. Utilities may benefit from turning off pumps and, if possible, closing the intake opening to prevent contaminants from entering the piping leading to the pumps. Utilities should also have a plan in place to sample raw water to identify the movement of a contaminant plume and allow for maximum pumping time before shutting down an intake (See Early Warning Monitoring System). The amount of time that an intake can remain closed depends on the water infrastructure and should be determined by the utility before an emergency occurs. The longer an intake can remain closed in such a case, the better.

Raw and treated water storage capacity also becomes extremely important in the event of such an emergency. Storage capacity can directly determine how effectively a water system can respond to a contamination event and how long an intake can remain closed. Information regarding the water shortage response capability of Mountain Top PSD is provided in **Table 11**.

### 11.1. RESPONSE NETWORKS AND COMMUNICATION

PSSC data from some agencies (ex. WVDHSEM, WVDEP, etc.) may be restricted due to the sensitive nature of the data. Locational data will be provided to the public water utility. However, to obtain specific details regarding contaminants, (such as information included in Tier II reports), water utilities should contact the local emergency planning commission (LEPC) or agencies, directly. While the maps and lists of the PSSCs and regulated sites are to be maintained in a confidential manner, these data are provided in **Appendix A. Figures** for internal review and planning uses only.

**Table 11. Mountain Top PSD Water Shortage Response Capacity**

Can the water utility isolate or divert contamination from the intake and groundwater supply?	Yes
Describe the results of an examination and analysis of the public water system's ability to isolate or divert contaminated waters from its surface water intake or groundwater supply:	Manual closing valves
Describe the results of an examination and analysis of the public water system's existing ability to switch to an alternative water source or intake in the event of contamination of its primary water source:	n/a
Is the Utility able to close the water intake in the event of a spill?	Yes
How long can the Utility keep the intake closed?	4.39 Days average production 2.5 Days peak
Describe the process to close the intake:	Manually close valves at the intake structure.
Describe the treated water system's storage capacity of the water system:	158,000 gallons at plant 155,000 gallon tank 75,000 gallon tank 75,000 gallon tank 200,000 gallon tank 75,000 gallon tank
Gallons of storage capacity (raw water)	0
Gallons of storage capacity (treated water)	738,000
Is the Utility a member of WVRWA Emergency Response Team?:	Yes
Is the Utility a member of WV-WARN?:	Yes
List other agreements to provide receive assistance in case of emergency:	n/a

## 11.2. OPERATION DURING LOSS OF POWER

Mountain Top PSD analyzed its ability to operate effectively during a loss of power. This involved ensuring a means to supply water through treatment, storage, and distribution without creating a public health emergency. Information regarding the utility's capacity for operation during power outages is summarized in **Table 12**.

**Table 12. Generator Capacity**

Can you connect to a generator at the intake/wellhead?:	No
Please provide a scenario that best describes your system:	
What do you have (KW)?	
What do you need (KW)?	
Can you connect to a generator at the treatment facility?:	Yes
Please provide a scenario that best describes your system:	Generator installed (50 kW) at the water plant. The raw water flows from the impoundment to the plant by gravity.
What do you have (KW)?	50.00



What do you need (KW)?	50.00		
Can you connect to a generator at the distribution system?:	Yes		
Please provide a scenario that best describes your system:	A generator would have to be hard wired into the pump station.		
What do you have (KW)?	0.00		
What do you need (KW)?	25.00		
Does the utility have fuel on hand for generator?:	Yes		
Hours:	12		
Gallons:	100		
Provide a list of suppliers and alternate suppliers that could provide fuel in the event of an emergency:		Supplier	Phone Number
	Fuel	Liberty	(304)693-7431
Does the utility test the generator(s) periodically?:	Yes		
Does the utility routinely maintain the generator(s)?:	Yes		
If the Utility does not have generator or the ability to connect to a generator, describe plans to respond to power outages:			

### 11.3. FUTURE WATER SUPPLY NEEDS

When planning for potential emergencies and developing contingency plans, a utility needs to not only consider their current demands for treated water but also account for likely future needs. This could mean expanding current intake sources or developing new ones in the near future. This can be an expensive and time consuming process, and any water utility should take this into account when determining emergency preparedness. Mountain Top PSD has analyzed its ability to meet future water demands at current capacity, and this information is included in **Table 13**.

**Table 13. Future Water Supply Needs for Mountain Top PSD**

Is the Utility able to meet water demands with the current capacity for the next five years?	Yes
Explain how you plan to do so:	There is no anticipated growth in the area, so the utility has ample capacity to meet the demand for the next 5 years.

### 11.4. WATER LOSS CALCULATION

In any public water system there is a certain percentage of the total treated water that does not reach the customer. Some of this water is used in treatment plant processes such as back washing filters or flushing piping, but there is usually at least a small percentage that goes unaccounted for. To measure and report on this unaccounted for water, a public utility must use the method described in the Public Service Commission’s rule, Rules for the Government of Water Utilities, 150CSR7, section 5.6. The rule defines unaccounted for water as the volume of water introduced into the distribution system less all metered usage and all known non-metered usage which can be estimated with reasonable accuracy.

To further clarify, metered usages are most often those that are distributed to customers. Non-metered usages that are being estimated include usage by fire departments for fires or training, un-metered bulk sells, flushing to

maintain the distribution system, and water used for backwashing filters and cleaning settling basins. By totaling the known metered and non-metered uses the utility calculates unaccounted for water. Note: To complete annual reports submitted to the PSC, utilities typically account for known water main breaks by estimating the amount of water lost. However, for the purposes of the source water protection plan, any water lost due to leaks, even if the system is aware of how much water is lost at a main break, is not considered a use. Water lost through leaks and main breaks cannot be controlled during a water shortages or other emergencies and should be included in the calculation of percentage of water loss for purposes of the source water protection plan. The data in **Table 13** is taken from the most recently submitted Mountain Top PSD PSC Annual Report.

**Table 14. Water Loss Information**

Water pumped - Total Gallons:		59,783,000
*Water purchased - Total Gallons:		0
Total gallons of water pumped and purchased:		59,783,000
Total gallons of water loss accounted for except main leaks:	Mains, plant, filters, flushing, etc - Total Gallons:	1,639,000
	Fire department - Total Gallons:	14,000
	Back washing - Total Gallons:	2,915,000
	Blowing settling basins - Total Gallons:	0
Total Accounted for Water Loss		4,568,000
Unaccounted for lost water - Total Gallons:		22,416,000
Water sold - Gallons:		32,799,000
Water Lost From Main Leaks:		0
Total Gallons of Unaccounted for Lost Water and Water Lost from Main Leaks:		22,416,000
Total percent unaccounted for water		38
Describe the measures to correct water loss greater than 15%:	Continue to repair leaks in a timely manner to further increase water accountability.	

## 11.5. EARLY WARNING MONITORING SYSTEM

Public water utilities are required to provide an examination of the technical and economic feasibility of implementing an early warning monitoring system. Implementing an early warning monitoring system may be approached in different ways depending upon the water utility’s resources and threats to the source water. A utility may install a continuous monitoring system that will provide real time information regarding water quality conditions. This would require utilities to analyze the data to establish what condition is indicative of a contamination event. Continuous monitoring will provide results for a predetermined set of parameters. The more parameters that are being monitored, the more sophisticated the monitoring equipment will need to be. When establishing a continuous monitoring system, the utility should consider the logistics of placing and maintaining the equipment, and receiving output data from the equipment.

Alternately, or in addition, a utility may also pull periodic grab samples on a regular basis, or in case of a reported incident. The grab samples may be analyzed for specific contaminants. A utility should examine their PSSCs to determine what chemical contaminants could pose a threat to the water source. If possible, the utility should plan in

advance how those contaminants will be detected. Consideration should be given to where samples will be collected, the preservations and hold times for samples, available laboratories to analyze samples, and costs associated with the sampling event. Regardless of the type of monitoring (continuous or grab), utilities should collect samples for their source throughout the year to better understand the baseline water quality conditions and natural seasonal fluctuations. Establishing a baseline will help determine if changes in the water quality are indicative of a contamination event and inform the needed response.

Every utility should establish a system or process for receiving or detecting chemical threats with sufficient time to respond to protect the treatment facility and public health. All approaches to receiving and responding to an early warning should incorporate communication with facility owners and operators that pose a threat to the water quality, with state and local emergency response agencies, with surrounding water utilities, and with the public. Communication plays an important role in knowing how to interpret data and how to respond.

Mountain Top PSD has analyzed its ability to monitor for and detect potential contaminants that could impact its source water. Information regarding this utility’s early warning monitoring system capabilities is provided in **Table 15** and in **Appendix B**.

**Table 15. Early Warning Monitoring System Capabilities**

Does your system currently receive spill notifications from a state agency, neighboring water system, local emergency responders, or other facilities?	Yes	
From whom do you receive notices?	The utility receives spill information from the WVDEP, WVDH, and the Grant Co OEMS.	
Are you aware of any facilities, land uses, or critical areas within your protection areas where chemical contaminants could be released or spilled?	No	
Are you prepared to detect potential contaminants if notified of a spill?	Yes	
List laboratories (and contact information) on whom you would rely to analyze water samples in case of a reported spill.	Laboratories	
	Name	Phone Number
	Pace Analytical	(800)999-0105
	Analabs	(304)255-4821
	ALS Global	(304)356-3168
Clarksburg Water Board	(304)623-3711	
Do you have an understanding of baseline or normal conditions for your source water quality that accounts for seasonal fluctuations?	Yes	
Does your utility (aside from turbidity monitoring) currently monitor your raw water through continuous monitoring at the surface water intake or groundwater source to detect changes in water quality that could indicate contamination?	No	
Does your utility collect periodic grab samples (ex. possess reserved sample bottles, on-call laboratory services, and trained personnel) in response to a spill notification or to investigate changes in water quality that could indicate contamination?	Yes	
Please explain:	Yes – Grab Samples	

Provide or estimate the capital and O&M costs for your current or proposed early warning system or upgraded system.	Capital Cost:	54,824
	O&M Cost:	10,000
Do you serve more than 100,000 customers?	No	
Does your system currently receive spill notifications from a state agency, neighboring water system, local emergency responders, or other facilities?	Yes	
Are you prepared to detect potential contaminants if notified of a spill?	Yes	
Please describe the methods you use to monitor at the same technical levels utilized by ORSANCO:		

## 12.0 SINGLE SOURCE FEASIBILITY STUDY

If a public water utility's water supply plant is served by a single-source intake to a surface water source of supply or a surface water influenced source of supply, the submitted source water protection plan must also include an examination and analysis of the technical and economic feasibility of alternative sources of water to provide continued safe and reliable public water service in the event that its primary source of supply is detrimentally affected by contamination, release, spill event or other reason. These alternatives may include a secondary intake, two days of additional raw or treated water storage, an interconnection with neighboring systems, or other options identified on a local level. Note: a suitable secondary intake would draw water supplies from a substantially different location or water source.

To accomplish this requirement, utilities should examine all existing or possible alternatives and rank them by their technical, economic, and environmental feasibility. To have a consistent and complete method for ranking alternatives, WVBPH has developed a feasibility study guide. This guide provides several criteria to consider for each category, organized in a Feasibility Study Matrix. By completing the Feasibility Study Matrix, utilities will demonstrate the process used to examine the feasibility of each alternative and document scores that compare the alternatives. The Feasibility Study matrix and summary of the results are presented in an alternatives feasibility study attached as **Appendix D**.

## 13.0 COMMUNICATION PLAN

Mountain Top PSD has also developed a Communication Plan that documents the manner in which the public water utility, working in concert with state and local emergency response agencies, shall notify the local health agencies and the public of the initial spill or contamination event and provide updated information related to any contamination or impairment of the system's drinking water supply. The initial notification to the public will occur in any event no later than thirty minutes after the public water system becomes aware of the spill, release, or potential contamination of the public water system. A copy of the source water protection plan and the Communication Plan has been provided to the local fire department. Mountain Top PSD will update the Communication Plan as needed to ensure contact information is up to date.

Procedures should be in place to effectively react to the kinds of catastrophic spills that can reasonably be predicted at the source location or within the SWPA. The chain-of-command, notification procedures and response actions should be known by all water system employees.

The WVBPH has developed a recommended communication plan template that provides a tiered incident communication process to provide a universal system of alert levels to utilities and water system managers. The comprehensive Communication Plan for Mountain Top PSD is attached as **Appendix C** for internal review and planning purposes only.

The West Virginia Department of Environmental Protection is capable of providing expertise and assistance related to prevention, containment, and clean-up of chemical spills. The West Virginia Department of Environmental Protection Emergency Response 24-hour Phone is 1-800-642-3074. The West Virginia Department of Environmental Protection also operates an upstream distance estimator that can be used to determine the distance from a spill site to the closest public water supply surface water intake.

## 14.0 EMERGENCY RESPONSE

A public water utility must be prepared for any number of emergency scenarios and events that would require immediate response. It is imperative that information about key contacts, emergency services, and downstream water systems be posted and readily available in the event of an emergency. Elements of this source water protection plan, such as the contingency planning and communication plan, may contain similar information to the utility's emergency response plan. However, the emergency response plan is to be kept confidential and is not included in this source water protection plan. An Emergency Short Form is included in **Appendix C** to support the Communicate Plan by providing quick access to important information about emergency response and are to be used for internal review and planning purposes only.

## 15.0 CONCLUSION

This report represents a detailed explanation of the required elements of Mountain Top PSD's Source Water Protection Plan. Any supporting documentation or other materials that the utility considers relevant to their plan can be found in **Appendix E**.

This source water protection plan is intended to help prepare community public water systems all over West Virginia to properly handle any emergencies that might compromise the quality of the system's source water supply. It is imperative that this plan is updated as often as necessary to reflect the changing circumstances within the water system. The protection team should continue to meet regularly and continue to engage the public whenever possible. Communities taking local responsibility for the quality of their source water is the most effective way to prevent contamination and protect a water system against contaminated drinking water. Community cooperation, sufficient preparation, and accurate monitoring are all critical components of this source water protection plan, and a multi-faceted approach is the only way to ensure that a system is as protected as possible against source water degradation.



## APPENDIX A. FIGURES AND TABLES

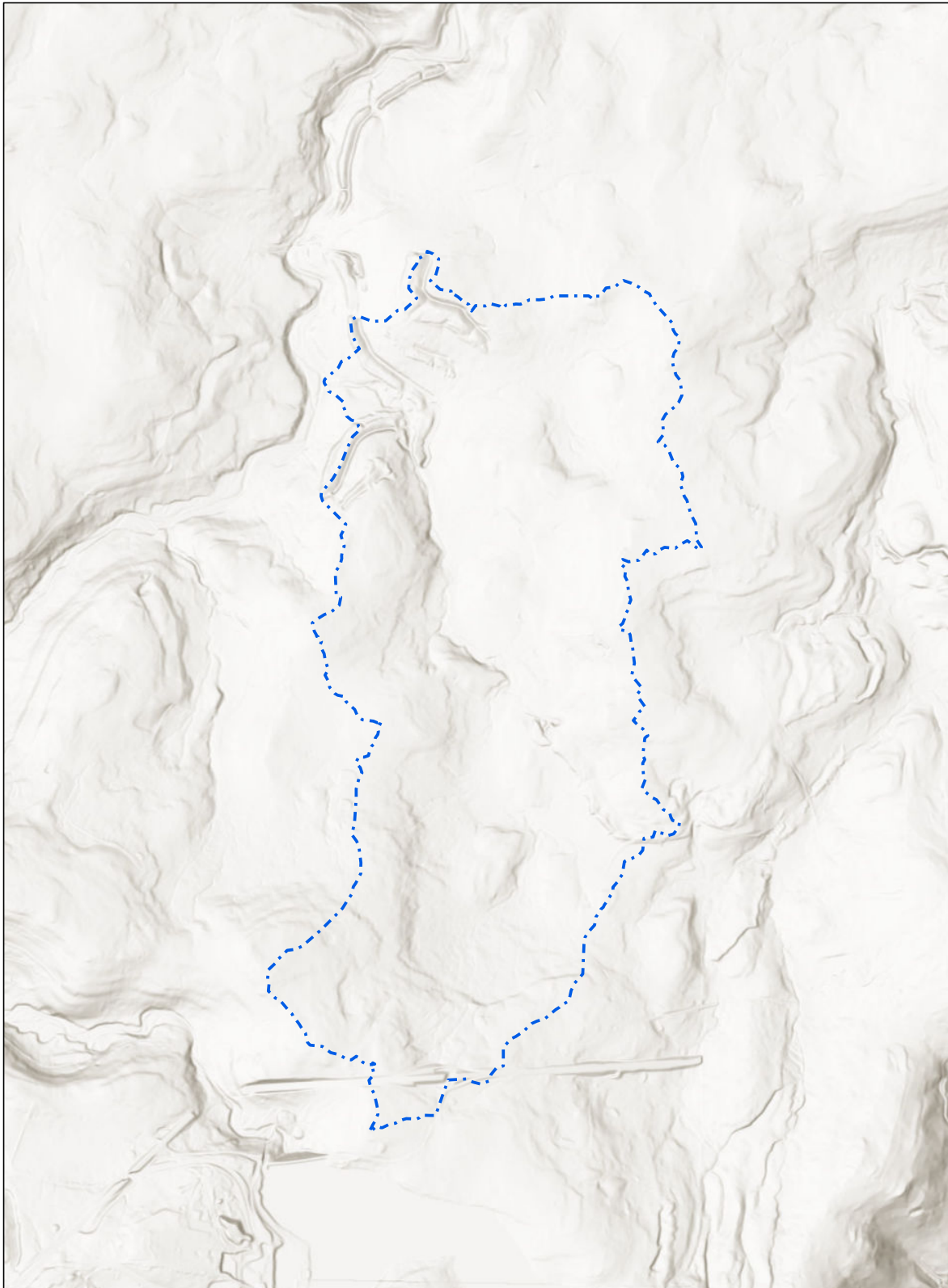
## Water Source / Delineation

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Map of watershed delineation area

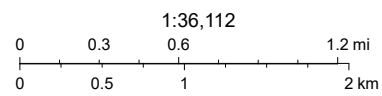
### Mountain Top PSD - Watershed Map



3/25/2024, 11:07:52 AM

 PWS Query: Watersheds

 State\_WV

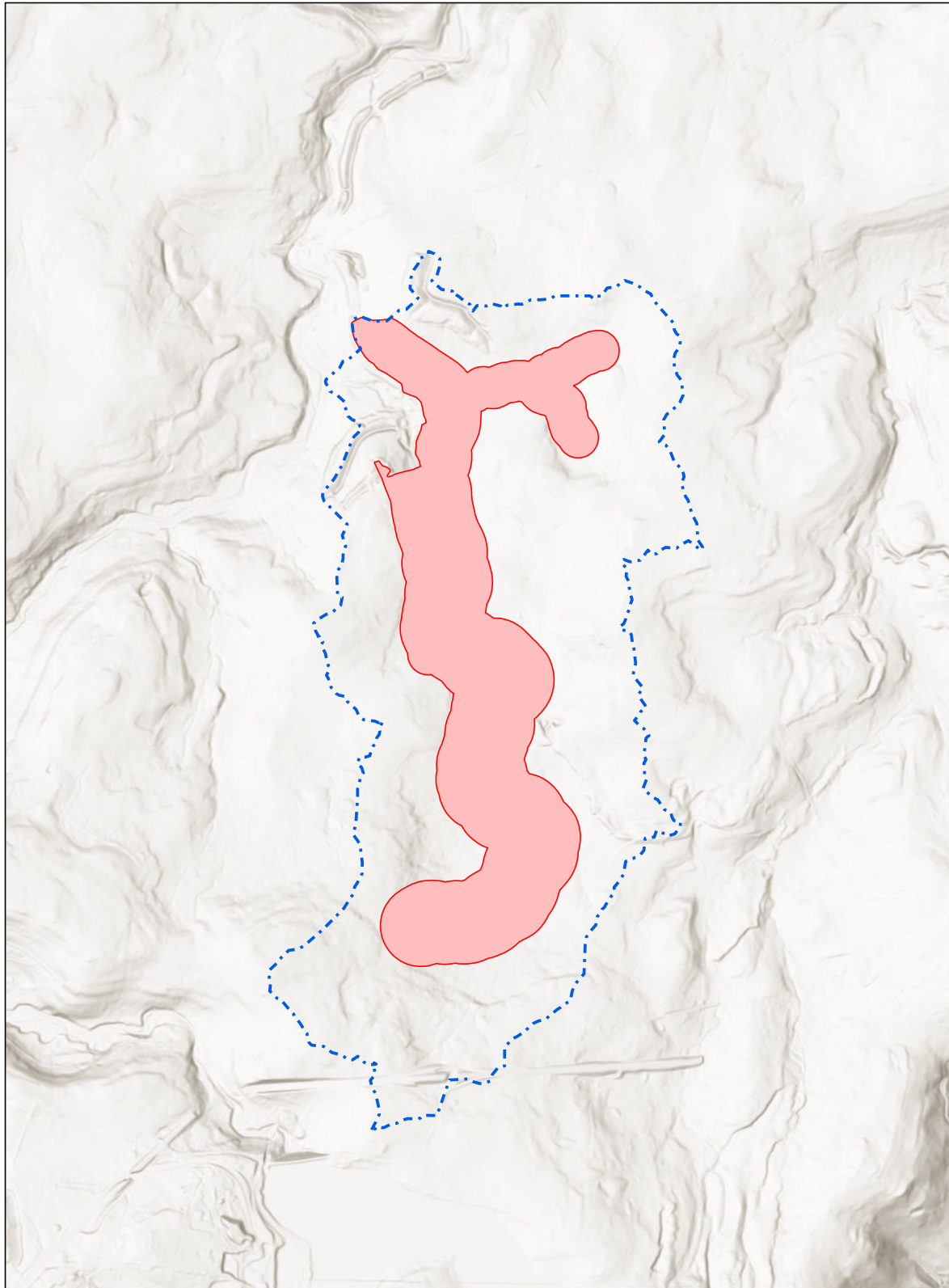


Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community




Source Water Assessment and Wellhead Protection Programs

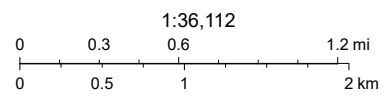
Map of zone of critical Concerns

### Mountain Top PSD - Zone of Critical Concern Map



3/25/2024, 11:09:04 AM

-  PWS Query: Watersheds
-  PWS Query: Zone of Critical Concern
-  State\_WV

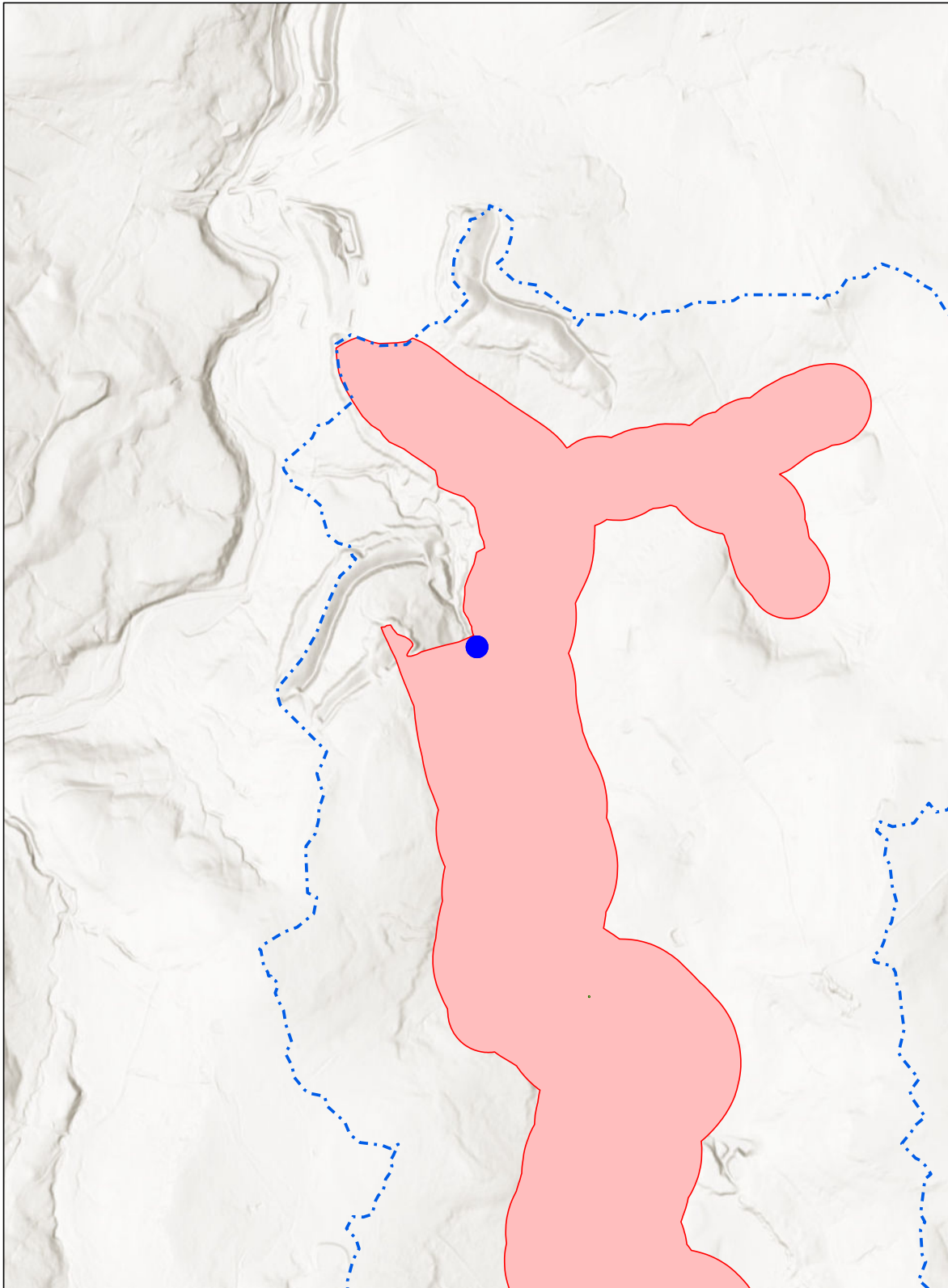


Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodastyrrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community





Source Water Assessment and Wellhead Protection Programs

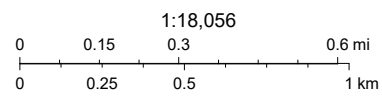
Map of watershed delineation area

### Mountain Top PSC - Mill Run Intake



3/26/2024, 11:25:20 AM

-  PWS Query: Watersheds
-  PWS Query: Zone of Peripheral Concern
-  PWS Query: Zone of Critical Concern
-  State\_WV



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Source Water Assessment and Wellhead Protection Programs

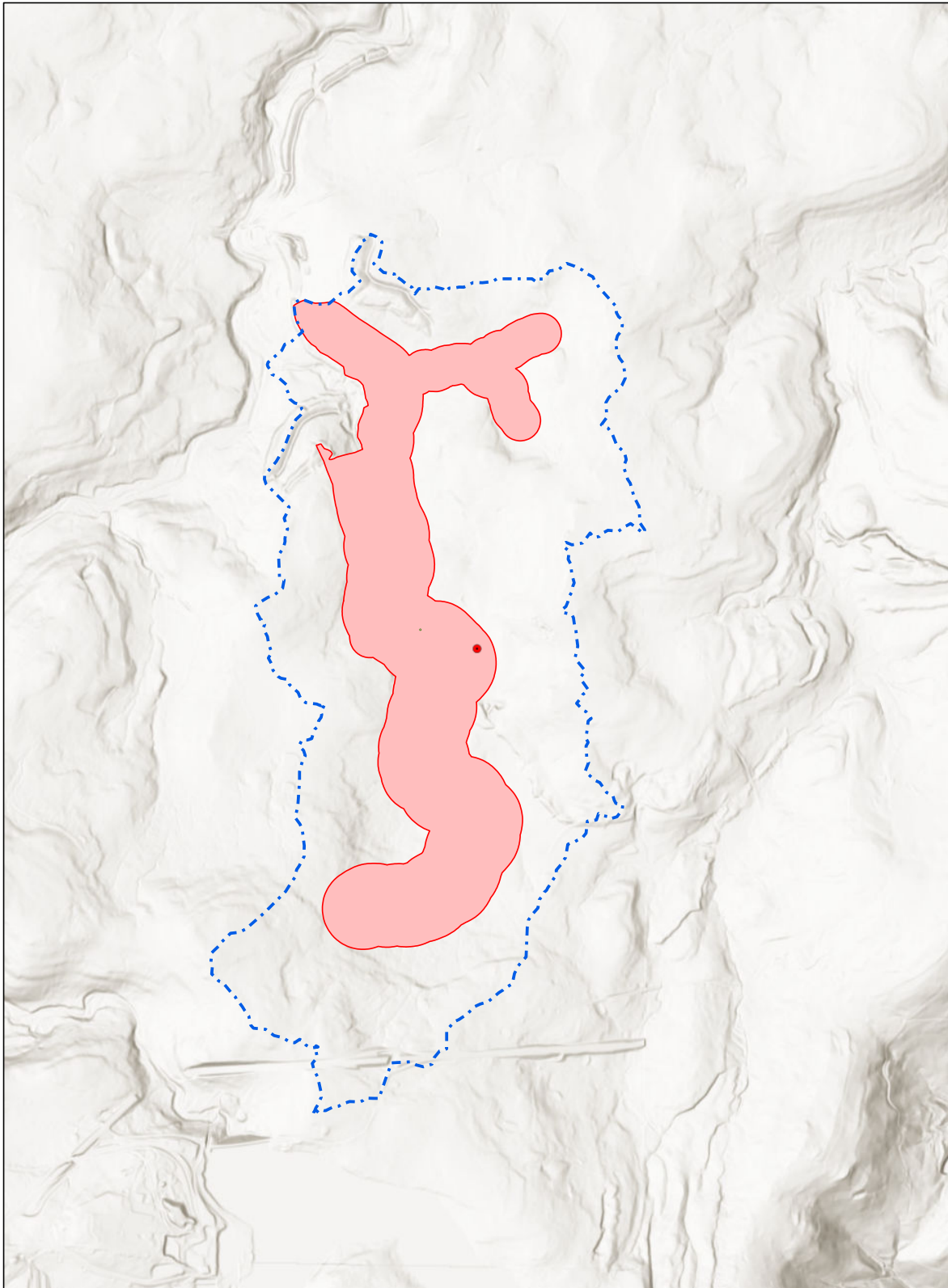


## PSSC Maps

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Local and Regional PSSC Map

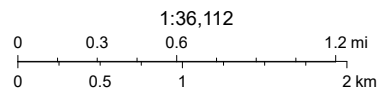
### Mountain Top PSD - Local and Regional PSSC Map



3/26/2024, 9:40:31 AM

PSSC Query: Source Water Protection PSSC

- Commercial
- PWS Query: Watersheds
- PWS Query: Zone of Peripheral Concern
- PWS Query: Zone of Critical Concern
- State\_WV

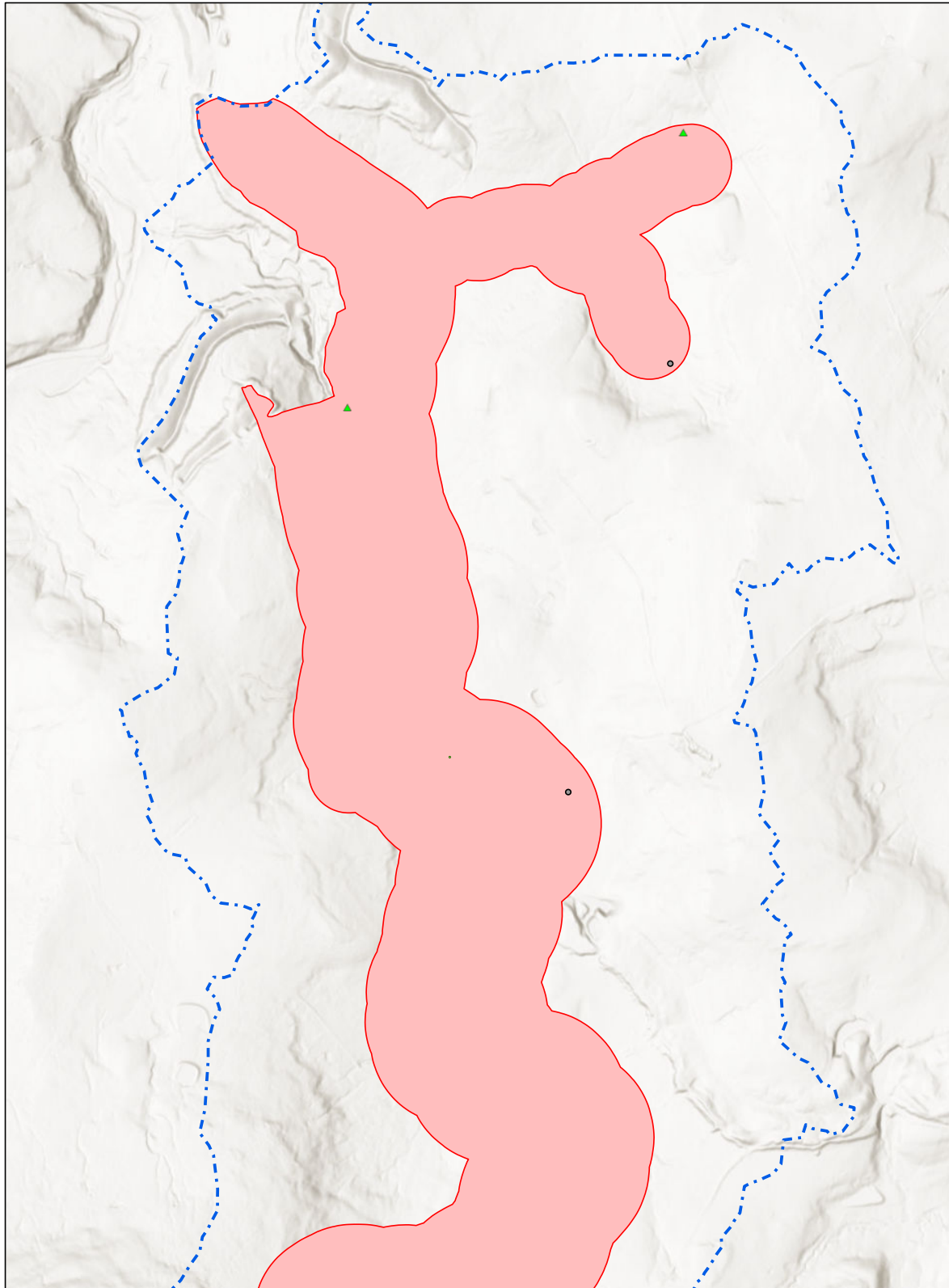


Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Source Water Assessment and Wellhead Protection Programs

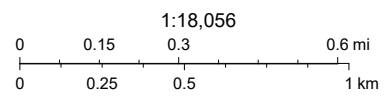
Regulated PSSC Map

### Mountain Top PSD - Regulated PSSC Map



3/25/2024, 11:35:40 AM

- PSSC Query: Mining Outlet
- ▲ PSSC Query: NPDES Permit
- PWS Query: Zone of Peripheral Concern
- PWS Query: Watersheds
- PWS Query: Zone of Critical Concern
- State\_WV



Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodatastyrelsen, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Source Water Assessment and Wellhead Protection Programs

## PSSC Lists

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Local and Regional PSSC List

**Mountain Top PSD - Local and Regional PSSC List**

Site Name	Description	Associated Chemicals	Threat
A.L.L. Construction equipment service	Equipment rental/repair shop	PH, M, VOC	L

## Regulated PSSC List

**Mountain Top PSD - Regulated PSSC List****NPDES Permit:**

Object ID	Permit	Name	Description	Permit type
21076	14275		Septic Seal Permit	Septic Tank
79308	64927		Septic Seal Permit	Septic Tank

**Mining Outlet:**

Outlet ID	Permit	Responsible Party	Permit type
1079	WV0036781	NEW ALLEGHENY, INC.	HPU
1080	WV0036781	NEW ALLEGHENY, INC.	HPU



## APPENDIX B. EARLY WARNING MONITORING SYSTEM FORMS

### Select and Attach the Appropriate Form for Your System

**Form A** - Complete if you currently have an early warning monitoring system for a groundwater source.

**Form B** - Complete if you currently have an early warning monitoring system installed for a surface water source.

**Form C** - If you do not currently have an early warning monitoring system installed for a surface water intake or are planning to upgrade or replace your current system, complete this form.

**Form D** - If you do not currently have an early warning monitoring system installed for a groundwater source or are planning to upgrade or replace your current system, complete this form.

**Note:** You may need to fill out and attach more than one form to your Protection Plan, depending on your current situation.

**Appendix B - Form B**  
**Proposed Ground Monitoring Worksheet**

Describe the type of early warning detection equipment that could be installed, including design:
Multi-parameter Universal Controller with the capability of monitoring several different parameters. The controller is mounted on a panel that also serves as a trough. A separate pump is necessary to pump the raw water to and through the trough. The trough is capable of receiving up to 6 different probe sensors that can monitor parameters such as: Oil and gas, pH, temperature, conductivity, DO, turbidity, nitrates, ammonium, or organics. The controller would be programmed to alarm the operators through the existing telemetry when any of the monitored parameters got above a certain point.
Where would the equipment be located?:
The equipment would be mounted, out of the weather, at the control panel above the raw water intake.
What would the maintenance plan for the monitoring equipment entail?:
Daily checkup of the monitoring equipment. The probe/sensors can be unscrewed from the trough and wiped down as needed. The trough can also be wiped out or flushed as needed.
Describe the proposed sampling plan at the monitoring site:
Water would be drawn directly from the intake reservoir to the panel/trough with a single tap for a drain line. The controller would be continuously monitoring the water through the trough based on the probes mentioned above. If a parameter would go beyond the acceptable limits, the telemetry would alarm the Operators who in turn could shut down the intake before any contaminated water could reach the plant.
Describe the proposed procedures for data management and analysis:
The data gathered during the continuous monitoring could be added to the existing telemetry (SCADA) system. The telemetry would time stamp the information received and create a trending line graph for each parameter. The graph would be based on the time of sample and level. This would allow the District to see a base line and any changes that occur on a daily basis.

# APPENDIX C. COMMUNICATION PLAN TEMPLATE

**Mountain Top PSD**

PWSID: WV3301205

Authorizing Signature: Douglas Lyons

Contact Phone Number: [REDACTED]

Contact Email Address: [REDACTED]

Plan Developed On: April 2024

### ACKNOWLEDGMENTS:

This plan was developed by [insert name, title of person completing plan, and who they work for] to meet certain requirements of the Source Water and Assessment Protection Program (SWAPP) and the Wellhead Protection Program (WHPP) for the State of West Virginia, as directed by the federal Safe Drinking Water Act (SDWA) and state laws and regulations.

## INTRODUCTION

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Legislative Rule 64CSR3 requires public water systems to develop a Communication Plan that documents how public water suppliers, working in concert with state and local emergency response agencies, shall notify state and local health agencies and the public in the event of a spill or contamination event that poses a potential threat to public health and safety. The plan must indicate how the public water supplier will provide updated information, with an initial notification to the public to occur no later than thirty minutes after the supplier becomes aware that the spill, release or potential contamination of the public water system poses a potential threat to public health and safety.

The public water system has responsibility to communicate to the public, as well as to state and local health agencies. This plan is intended to comply with the requirements of Legislative Rule 64CSR3, and other state and federal regulations.

## TIERS REPORTING SYSTEM

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This water system has elected to use the Tiered Incident / Event Reporting System (TIERS) for communicating with the public, agencies, the media, and other entities in the event of a spill or other incident that may threaten water quality. TIERS provides a multi-level notification framework, which escalates the communicated threat level commensurate with the drinking water system risks associated with a particular contamination incident or event. TIERS also includes a procedural flow chart illustrating key incident response communication functions and how they interface with overall event response / incident management actions. Finally, TIERS identifies the roles and responsibilities for key people involved in risk response, public notification, news media and other communication.

TIERS provides an easy-to-remember five-tiered **A-B-C-D-E** risk-based incident response communication format, as described below. Table 1 provides also associated risk levels.

**A = Announcement.** The water system is issuing an announcement to the public and public agencies about an incident or event that may pose a threat to water quality. Additional information will be provided as it becomes available. As always, if water system customers notice anything unusual about their water, they should contact the water system.

**B = Boil Water Advisory.** A boil water advisory has been issued by the water system. Customers may use the water for showering, bathing, and other non-potable uses, but should boil water used for drinking or cooking.

**C = Cannot Drink.** The water system asks that users not drink or cook with the water at this time. Non-potable uses, such as showering, bathing, cleaning, and outdoor uses are not affected.

**D = Do Not Use.** An incident or event has occurred affecting nearly all uses of the water. Do not use the water for drinking, cooking, showering, bathing, cleaning, or other tasks where water can come in contact with your skin. Water can be used for flushing commodes and fire protection.

**E = Emergency.** Water cannot be used for any reason.

Tier	Tier Category	Risk Level	Tier Summary
A	Announcement	Low	The water system is issuing an announcement to the public and public agencies about an incident or event that could pose a threat to public health and safety. Additional information will be provided as it becomes available.
B	Boil Water Advisory	Moderate	Water system users are advised to boil any water to be used for drinking or cooking, due to possible microbial contamination. The system operator will notify users when the boil water advisory is lifted.
C	Cannot Drink	High	System users should not drink or cook with the water until further notice. The water can still be used for showering, bathing, cleaning, and other tasks.
D	Do Not Use	Very High	The water should only be used for flushing commodes and fire protection until further notice. More information on this notice will be provided as soon as it is available.
E	Emergency	Extremely High	The water should not be used for any purpose until further notice. More information on this notice will be provided as soon as it is available.

## COMMUNICATION TEAM

The Communication Team for the water system is listed in the table below, along with key roles. In the event of a spill or other incident that may affect water quality, the water system spokesperson will provide initial information, until the team assembles (if necessary) to provide follow-up communication

Water system communication team members, organizations, and roles.

Team Member Name	Organization	Phone	Email
Douglas Lyons	Mountain Top PSD		
Forrest Harvey	Mountain Top PSD		

In the event of a spill, release, or other incident that may threaten water quality, members of the team who are available will coordinate with the management staff of the local water supplier to:

- Collect information needed to investigate, analyze, and characterize the incident/event
- Provide information to the management staff, so they can decide how to respond
- Assist the management staff in handling event response and communication duties
- Coordinate fully and seamlessly with the management staff to ensure response effectiveness

## COMMUNICATION TEAM DUTIES

The communication team will be responsible for working cooperatively with the management staff and state and local emergency response agencies to notify local health agencies and the public of the initial spill or contamination event. The team will also provide updated information related to any contamination or impairment of the source water supply or the system's drinking water supply.

According to Legislative Rule 64CSR3, the initial notification to the public will occur no later than thirty minutes after the public water system becomes aware that the spill, release or potential contamination of the public water system poses a potential threat to public health and safety.

As part of the group implementing the Source Water Protection Plan, team members are expected to be familiar with the plan, including incident/event response and communication tasks. Specifically, team members should:

- Be knowledgeable on elements of the Source Water Protection Plan and Communication Plan
- Attend team meetings to ensure up-to-date knowledge of the system and its functions
- Participate in periodic exercises that “game out” incident response and communication tasks
- Help to educate local officials, the media, and others on source water protection
- Cooperate with water supplier efforts to coordinate incident response communication
- Be prepared to respond to requests for field investigations of reported incidents
- Not speak on behalf of the water supplier unless designated as the system’s spokesperson

The primary spokesperson will be responsible for speaking on behalf of the water system to local agencies, the public, and the news media. The spokesperson should work with the management staff and the team to ensure that all communication is clear, accurate, timely, and consistent. The spokesperson may authorize and/or direct others to issue news releases or other information that has been approved by the system’s management staff. The spokesperson is expected to be on call immediately when an incident or event which may threaten water quality occurs. The spokesperson will perform the following tasks in the event of a spill, release, or other event that threatens water quality:

- Announce which risk level (A, B, C, D, or E) will apply to the public notifications that are issued
- Issue news releases, updates, and other information regarding the incident/event
- Use the news media, email, social media, and other appropriate information venues
- Ensure that news releases are sent to local health agencies and the public
- Respond to questions from the news media and others regarding the incident/event
- Appear at news conferences and interviews to explain incident response, etc.

## INCIDENT / EVENT COMMUNICATION PROCEDURE

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The flow chart in this section illustrates how the water system will respond when it receives a report that a spill, release, or other contamination event may have occurred. Key elements of the flow chart are described below.

### **Communication with agencies, the public, and the media during threat incidents**

Upon initial notification of the incident/event, system managers and staff will collect information and verify the need for further investigation. Only properly trained personnel will perform onsite investigations if permitted by emergency responders. If further investigation is warranted, and the initial facts support it, the water system spokesperson will issue a public communication statement consistent with the threat level. In addition, water system personnel and partners will be dispatched to conduct reconnaissance, a threat assessment, and a threat characterization, if present. This work may include:

- Verification of the incident/event type (spill, release, etc.)
- Location of incident/event
- Type of material(s) involved in spill, release, etc.
- Quantity of material involved
- Potential of the material to move, migrate, or be transported
- Relevant time factor(s) in the risk assessment (e.g., downstream movement rate)
- Overall level of risk to water system, whether low, moderate, high, or very high
- Development of the initial risk characterization

As the flow chart indicates, several iterative cycles will occur after the initial threat assessment, including communication with local agencies and the public, further investigation of the incident, possible implementation of

the water system’s contingency plan, and eventual elimination of the threat and a return to normal operations.

Communication activities during this period will include:

- The initial release (i.e., Announcement, Boil Water Advisory, Cannot Drink, Do Not Use, or Emergency)
  - Sent to local health agencies, the public, and the news media within 30 minutes
- Notification of the local water system’s source water protection and communication teams
  - If warranted by initial findings regarding the spill, release, or incident
- Notification of the WV Bureau of Public Health
  - As required
- Periodic information updates, as incident response information is received
- Updates to the applicable A-B-C-D-E advisory tier, as necessary

If time permits and the need arises, after the threat level is reduced, and operations return to normal, the water system staff, the communication and source water protection teams, and their partners may conduct a post-event review and assessment. The purpose of the review is to examine the response to the incident, relevant communication activities, and overall outcomes. Plans and procedures may be updated, altered, or adapted based on lessons learned through this process.

## EMERGENCY SHORT FORMS

### Emergency Communication Information

	Name	Phone	Email	
Designated spokesperson:	Douglas Lyons			
Alternate spokesperson:	Forrest Harvey			
Designated location to disseminate information to media:	Mt. Storm Fire Hall			
Method of Contact:	Word of mouth Door-to-door canvassing radio group dialer			
Media Contacts:	Name	Title	Phone Number	Email
	WKHJ Radio	Benji Law Radio DJ	(301)533-1100	

**Emergency Service Contacts**

	Name	Emergency Phone	Alternative Phone	Email
Police	Grant County Sheriff Office	(911)___-____	(304)693-7654	
Fire	Mt. Storm VFD	(911)___-____	(304)693-7157	
Ambulance	Mt. Storm VFD	(911)___-____	(301)693-7157	
Hazmat	Mt. Storm VFD	(911)___-____	(301)693-7157	
Other				
Other				
Other				



### Sensitive Populations

Other Communities that are served by the Utility:	Bayard, Gormanian, Sulphur, Elk Garden				
Major User/Sensitive Population Notification	Name	Emergency Phone	Alternative Phone	Email	
	Union Education Complex	(304)693-7612			
	Elk Garden School	(304)446-5141			
	Mt Storm Health Center	(304)693-7616			
	Dominion	(304)259-4423			
EED District Office Contact	Name	Phone	Email		
	Justin Jordan	(304)641-6132	justin.e.jordan@wv.gov		
OEHS Readiness Coordinator	Lee Orr	(304)356-4290	Lee.e.Orr@wv.gov		
Downstream Water System Contacts	Water System Name	Contact Name	Emergency Phone	Alternate Phone	Email
	City of Piedmont	Timothy Jackson			
Are you planning on implementing the TIER Communications plan?:			Yes		

**Emergency Service Key Staff Members**

	Name	Title	Phone	Email
Key Staff Responsible for Coordinating Emergency Response Procedures:	Diane Junkins	Office Manager		
Staff Responsible for Keeping Confidential PSSC Information and Releasing to Emergency Responders.		Forrest Harvey	Chief Operator	
	Rusty Kitzmiller	General Manager		

### Emergency Response Information

List Laboratories available to perform sample analysis in case of emergency.	Name	Phone
	PACE	(800)999-0105
	WV Dept of Agriculture Lab Moorefield	(304)538-2397
Has utility developed a detailed Emergency Response Plan in accordance with the Public Health Security Bioterrorism preparedness and Response Plan Act of 2002 that covers the following areas?:	Yes	
When was the emergency response plan developed or last updated?:	2024	

## EMERGENCY CONTACT INFORMATION

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**State Emergency Spill Notification**

1-800-642-3074

**Office of Emergency Services**<http://www.wvdhsem.gov/>

Charleston, WV- (304) 558-5380

**WV Bureau for Public Health Office of Environmental Health Services (OEHS)**[www.wvdhhr.org/oehs](http://www.wvdhhr.org/oehs)**Readiness Coordinator - Lee Orr**

Phone: 304-356-4290

Cell: 304-550-5607

E-mail: [Lee.E.Orr@wv.gov](mailto:Lee.E.Orr@wv.gov)**Environmental Engineering Division Staff**

Charleston, Central Office (304) 558-2981

Beckley, District 1 (304) 256-6666

St. Albans, District 2 (304) 722-0611

Kearneysville, District 4 (304) 725-9453

Wheeling, District 5 (304) 238-1145

Fairmont, District 6 (304) 368-2530

**National Response Center - Chemical, Oil, & Chemical/Biological Terrorism**

1-800-424-8802

**WV State Fire Marshal's Office**

1-800-233-3473

**West Virginia State Police**

1-304-746-2100

**WV Watch – Report Suspicious Activity**

1-866-989-2824

**DEP Distance Calculator**<http://tagis.dep.wv.gov/pswicheck/>

## PRESS RELEASE ATTACHMENTS

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TIERS Levels A, B, C, D, and E

**UTILITY ISSUED NOTICE – LEVEL A  
PUBLIC WATER SYSTEM ANNOUNCEMENT  
A WATER SYSTEM INVESTIGATION IS UNDERWAY**

On \_\_\_\_\_ at \_\_\_\_:\_\_\_\_ AM/PM, the \_\_\_\_\_ Water System began investigating an incident that may affect local water quality.

The incident involves the following situation at this location:

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There are no restrictions on water use at this time. As always, if water system customers notice anything unusual about their water – such as abnormal odors, colors, sheen, etc. – they should contact the water system at \_\_\_\_\_.

At this time there is no need for concern if you have consumed or used the water.

Regular updates will be provided about this Announcement as water system staff continue their investigation. Again, there are no restrictions on water use at this time.

State Water System ID# \_\_\_\_\_ Date Distributed: \_\_\_\_\_

**UTILITY ISSUED NOTICE – LEVEL B  
BOIL WATER ADVISORY  
A BOIL WATER ADVISORY IS IN EFFECT**

On \_\_\_\_\_ at \_\_\_\_:\_\_\_\_ am/pm, a water problem occurred causing contamination of your water. The areas that are affected are as follows:

Entire Water System or  Other: \_\_\_\_\_  
\_\_\_\_\_

CONDITIONS INDICATE THERE IS A HIGH PROBABILITY THAT YOUR WATER IS CONTAMINATED. TESTING HAS NOT OCCURRED TO CONFIRM OR DENY THE PRESENCE OF CONTAMINATION IN YOUR WATER.

**What should I do?**

- **DO NOT DRINK THE WATER WITHOUT BOILING IT FIRST.** Bring all water to a boil, let it boil for one minute, and let it cool before using, or use bottled water. Boiled or bottled water should be used for drinking, making ice, brushing teeth, washing dishes, bathing, and food preparation until further notice. Boiling kills bacteria and other organisms in the water.

**What happened?**

- The problem is related to \_\_\_\_\_

**What is being done?**

- The water system is taking the following action: \_\_\_\_\_  
\_\_\_\_\_

**What should a customer do if they have consumed or used the water?**

- \_\_\_\_\_

We will inform you when you no longer need to boil your water. We anticipate resolving the problem within \_\_\_\_\_ hours/days. For more information, please contact \_\_\_\_\_ at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

General guidelines on ways to lessen the health risk are available from the EPA Safe Drinking Water Hotline at 1 (800) 426-4791.

*Please share this information others who use this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice was distributed by \_\_\_\_\_

State Water System ID# \_\_\_\_\_ Date Distributed: \_\_\_\_\_

UTILITY ISSUED NOTICE – LEVEL C  
“CANNOT DRINK” WATER NOTIFICATION  
A LEVEL C WATER ADVISORY IS IN EFFECT

On \_\_\_\_\_ at \_\_\_\_:\_\_\_\_ am/pm, a water problem occurred causing contamination of your water. The areas that are affected are as follows:

Entire Water System or  Other: \_\_\_\_\_  
\_\_\_\_\_

CONDITIONS INDICATE THERE IS A HIGH PROBABILITY THAT YOUR WATER IS CONTAMINATED. TESTING HAS NOT OCCURRED TO CONFIRM OR DENY THE PRESENCE OF CONTAMINATION IN YOUR WATER.

**What should I do?**

- **DO NOT DRINK THE WATER.** You can't drink the water, but you can use it for showering, bathing, toilet-flushing, and other non-potable purposes.
- **BOILING WILL NOT PURIFY THE WATER.** Do not drink the water, even if it is boiled.

**What happened?**

- The problem is related to \_\_\_\_\_

**What is being done?**

- The water system is taking the following action: \_\_\_\_\_  
\_\_\_\_\_

**What should a customer do if they have consumed or used the water?**

- \_\_\_\_\_

We will inform you when the water is safe to drink. We anticipate resolving the problem within \_\_\_\_\_ hours/days. For more information – or to report unusual water conditions such as abnormal odors, colors, sheen, etc. – please contact \_\_\_\_\_ at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

General guidelines on ways to lessen the health risk are available from the EPA Safe Drinking Water Hotline at 1 (800) 426-4791.

*Please share this information others who use this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice was distributed by \_\_\_\_\_

State Water System ID# \_\_\_\_\_ Date Distributed: \_\_\_\_\_

UTILITY ISSUED NOTICE – LEVEL D  
“DO NOT USE” WATER NOTIFICATION  
A LEVEL D WATER ADVISORY IS IN EFFECT

On \_\_\_\_\_ at \_\_\_\_:\_\_\_\_ am/pm, a water problem occurred causing contamination of your water. The areas that are affected are as follows:

Entire Water System or  Other: \_\_\_\_\_  
\_\_\_\_\_

CONDITIONS INDICATE THERE IS A HIGH PROBABILITY THAT YOUR WATER IS CONTAMINATED. TESTING HAS NOT OCCURRED TO CONFIRM OR DENY THE PRESENCE OF CONTAMINATION IN YOUR WATER.

What should I do?

- **DO NOT DRINK THE WATER.** The water is contaminated.
- **DO NOT SHOWER OR BATHE IN THE WATER.** You can't use the water for drinking, showering, or bathing. It can be used for toilet flushing and firefighting.
- **BOILING WILL NOT PURIFY THE WATER.** Do not use the water, even if it is boiled. The type of contamination suspected is not removed by boiling.

What happened?

- The problem is related to \_\_\_\_\_

What is being done?

- The water system is taking the following action: \_\_\_\_\_  
\_\_\_\_\_

What should a customer do if they have consumed or used the water?

- \_\_\_\_\_

We will inform you when the water is safe to drink. We anticipate resolving the problem within \_\_\_\_\_ hours/days. For more information – or to report unusual water conditions such as abnormal odors, colors, sheen, etc. – please contact \_\_\_\_\_ at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

*Please share this information others who use this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice was distributed by \_\_\_\_\_

State Water System ID# \_\_\_\_\_ Date Distributed: \_\_\_\_\_



UTILITY ISSUED NOTICE – LEVEL E  
EMERGENCY WATER NOTIFICATION  
A LEVEL E WATER ADVISORY IS IN EFFECT

On \_\_\_\_\_ at \_\_\_\_:\_\_\_\_ am/pm, a water problem occurred causing contamination of your water. The areas that are affected are as follows:

Entire Water System or  Other: \_\_\_\_\_  
\_\_\_\_\_

CONDITIONS INDICATE THERE IS A HIGH PROBABILITY THAT YOUR WATER IS CONTAMINATED. TESTING HAS NOT OCCURRED TO CONFIRM OR DENY THE PRESENCE OF CONTAMINATION IN YOUR WATER.

What should I do?

- **DO NOT DRINK THE WATER.** The water is contaminated.
- **DO NOT USE THE WATER FOR ANY PURPOSE!** You can't use the water for drinking, showering, or bathing, or any other use – not even for toilet flushing.
- **BOILING WILL NOT PURIFY THE WATER.** Do not use the water, even if it is boiled. The type of contamination suspected is not removed by boiling.

What happened?

- The problem is related to \_\_\_\_\_

What is being done?

- The water system is taking the following action: \_\_\_\_\_  
\_\_\_\_\_

What should a customer do if they have consumed or used the water?

- \_\_\_\_\_

We will inform you when the water is safe to drink. We anticipate resolving the problem within \_\_\_\_\_ hours/days. For more information – or to report unusual water conditions such as abnormal odors, colors, sheen, etc. – please contact \_\_\_\_\_ at \_\_\_\_\_ or \_\_\_\_\_ at \_\_\_\_\_.

*Please share this information others who use this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice was distributed by \_\_\_\_\_

State Water System ID# \_\_\_\_\_ Date Distributed: \_\_\_\_\_

# APPENDIX D. SINGLE SOURCE FEASIBILITY

## Water Source Alternative:

Back up intake	
Name of Alternative:	Stony River
Brief Description of the Alternative:	Stony River
Feasible?:	Yes
Provide Cost Estimate:	\$792,425
Would this alternative supply 100% of your needs?:	No
Economic Criteria - Operation and Maintenance Costs:	2
Economic Criteria - Capital Cost:	1
Technical Criteria - Permitting:	2
Technical Criteria - Flexibility:	2
Technical Criteria - Resilience:	1
Technical Criteria - Institutional Requirements:	2
Environmental Criteria - Environmental Impacts:	2
Environmental Criteria - Aesthetic Impacts:	2
Environmental Criteria - Stakeholder Issues:	0
Final Score:	50.89%
Interconnection	
Name of Alternative:	Interconnection
Brief Description of the Alternative:	Interconnection
Feasible?:	No
Provide Cost Estimate:	\$0
Would this alternative supply 100% of your needs?:	No
Economic Criteria - Operation and Maintenance Costs:	0
Economic Criteria - Capital Cost:	0
Technical Criteria - Permitting:	0
Technical Criteria - Flexibility:	0
Technical Criteria - Resilience:	0
Technical Criteria - Institutional Requirements:	0
Environmental Criteria - Environmental Impacts:	0
Environmental Criteria - Aesthetic Impacts:	0
Environmental Criteria - Stakeholder Issues:	0
Final Score:	0.00%
Treated water storage	
Name of Alternative:	Treated water storage

Brief Description of the Alternative:	Treated water storage
Feasible?:	No
Provide Cost Estimate:	\$0
Would this alternative supply 100% of your needs?:	No
Economic Criteria - Operation and Maintenance Costs:	0
Economic Criteria - Capital Cost:	0
Technical Criteria - Permitting:	0
Technical Criteria - Flexibility:	0
Technical Criteria - Resilience:	0
Technical Criteria - Institutional Requirements:	0
Environmental Criteria - Environmental Impacts:	0
Environmental Criteria - Aesthetic Impacts:	0
Environmental Criteria - Stakeholder Issues:	0
Final Score:	0.00%
Tank for Raw Water Storage	
Name of Alternative:	Raw Water Storage
Brief Description of the Alternative:	Raw Water Storage
Feasible?:	No
Provide Cost Estimate:	\$0
Would this alternative supply 100% of your needs?:	No
Economic Criteria - Operation and Maintenance Costs:	0
Economic Criteria - Capital Cost:	1
Technical Criteria - Permitting:	2
Technical Criteria - Flexibility:	3
Technical Criteria - Resilience:	3
Technical Criteria - Institutional Requirements:	3
Environmental Criteria - Environmental Impacts:	0
Environmental Criteria - Aesthetic Impacts:	0
Environmental Criteria - Stakeholder Issues:	3
Final Score:	49.00%

## Feasibility Study Narrative

**SINGLE SOURCE FEASIBILITY STUDY**

If a public water utility's water supply plant is served by a single-source intake to a surface water source of supply or a surface water influenced source of supply, the submitted source water contingency protection plan must also include an examination and analysis of the technical and economic feasibility of alternative sources of water to provide continued safe and reliable public water service in the event its primary source of supply is detrimentally affected by contamination, release, spill event or other reason. These alternatives may include a secondary intake\*, two days of raw or treated water storage, interconnections with neighboring systems, or other options identified on a local level.

In order to accomplish this requirement, utilities should examine all existing or possible alternatives and rank them by their technical, economic, and environmental feasibility. To have a consistent and complete method for ranking alternatives, WVBPH has developed a feasibility study guide. This guide provides several criteria to consider for each category, organized in a scoring matrix. By completing the matrix, utilities will demonstrate the process used to examine the feasibility of each alternative and document scores that compare the alternatives. The scoring matrix is then summarized in the Feasibility Study matrix which is weighted to display the most suitable alternative for the utility. Analysis of the evaluated alternatives and summary of the results are presented in an alternatives feasibility study attached as **Appendix D**.

**COMMUNICATION PLAN**

Mt. Top PSD has also developed a Communication Plan that documents the manner in which the public water utility, working in concert with state and local emergency response agencies, shall notify the local health agencies and the public of the initial spill or contamination event and provide updated information related to any contamination or impairment of the source water supply or the system's drinking water supply. The initial notification to the public will occur in any event no later than thirty minutes after the public water system becomes aware of the spill, release, or potential contamination of the public water system. A copy of the source water protection plan and the Communication Plan has been provided to the local fire department. Mt. Top PSD will update the Communication Plan as needed to ensure contact information is up to date.

Procedures should be in place for the kinds of catastrophic spills that can reasonably be predicted at the source location or within the SWPA. The chain-of-command, notification procedures and response

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\* A secondary water source would draw water supply from a substantially different location or water source.

**APPENDIX D. SINGLE SOURCE FEASIBILITY STUDY**

## **Alternatives Analysis**

### **1. Backup Intake**

The Mt. Top PSD currently receives raw water from its sole intake in the Mill Run quarry. A backup intake option would be to install an intake structure and pump the raw water to the Water Treatment Plant (WTP) from the Stony River.

### **2. Interconnection**

Due to location and topography, there is no feasible interconnection for the Mt. Top Public Service District.

### **3. Treated Water**

Mt. Top PSD has 738,000 gallons of treated water storage capacity. That equates to roughly 4.77 days based on average production and 2.5 days at peak production (296,000 gallons). Production at the WTP broke 200,000 gallons nine (9) times over the test year. The second highest production rate was 240,000 gallons which equates to 3.07 days of treated storage. Treated Water Storage capacity will not be discussed further because of the large volume of treated water and the rarity of peak production rates.

### **4. Raw Water**

Current raw water storage capacity is 5,700 gallons for the Mt. Top PSD. In order to increase capacity, a new raw water storage tank would be built at the WTP site. The tank would be sized at three (3) days average production or 450,000 gallons. The quarry would gravity feed to a booster station that would pump to the raw water storage tank. The tank would gravity feed to the WTP to supply raw water for treatment.

Matrix Document

Feasibility Matrix		Mountain Top Public Service District			PWSID#: WV 3301205			Date: February 2016			Completed By: Cerrone Associates, Inc.		
Criteria	Question	Backup Intake	Feasibility	Interconnect	Treated Water Storage	Feasibility	Raw Water Storage	Feasibility	Other	Feasibility			
Economic Criteria	What is the total current budget year cost to operate and maintain the PWSU (current budget year)?	\$280,908.00	2	\$280,908.00	\$280,908.00	2	\$280,908.00	2	\$280,908.00	2			
	Describe the major O&M cost requirements for the alternative?	Operation and Maintenance of a new intake structure and pump station.	2	N/A	N/A	0	Booster Station and Tank	0	N/A	0			
	What is the incremental cost (\$/gall) to operate and maintain the alternative?	\$10,016.000000	2	50,000.00	50,000.00	0	50,000.00	0	50,000.00	0			
	Cost comparison of the incremental cost to the current budgeted costs (%)	3.57%	2	0.00%	0.00%	0	0.00%	0	0.00%	0			
Describe the capital improvements required to implement the alternative.	<b>O and M Feasibility Score</b>		<b>2.0</b>			<b>0.0</b>		<b>0.0</b>		<b>0.0</b>			
	What is the total capital cost for the alternative?	New intake structure along with a pump station and raw water transfer from Stone River to the WTP.	2	N/A	N/A	0	Intake Structure modifications, raw water booster station, new tank, flow and operation control, tie in to existing lines	0	N/A	0			
	What is the annualized capital cost to implement the alternative, including land and easement costs, construction fees, etc. (\$/gall)?	\$792,425.00	1	50,000.00	50,000.00	0	\$1,269,500.00	1	50,000.00	0			
	Cost comparison of the annualized capital cost to the current budgeted costs (%)	\$37,427.00	1	50,000.00	50,000.00	0	\$56,842.00	1	50,000.00	0			
<b>Capital Cost Feasibility Score</b>			<b>1.0</b>			<b>0.0</b>			<b>1.0</b>				
Technical Criteria	Provide a listing of the expected permits required and the permitting agencies involved in their approval.	Health Permit, BPH, Public Lands - W/DNR, Nationwide Permit - COE, Site NPDES - DEP, DOI Permit	2	N/A	N/A	0	Health Permit, BPH, Site NPDES - DEP, DOI Permit	2		0			
	What is the timeframe for permit approval for each permit?	Health Permit, 30 days; Public Lands, 30 days; NPDES, 30 days; DOI Permit, 30 days	2	N/A	N/A	0	Health Permit, 30 days; Site NPDES - 6 months; DOI - Surety Bond	2		0			
	Describe the major requirements in obtaining the permit (environmental impact studies, public hearings, etc.)	Detailed Plans and Specifications	2	N/A	N/A	0	Detailed Plans and Specifications	2		0			
	What is the likelihood of successfully obtaining the permits?	Good	3	N/A	N/A	0	Very likely	2		0			
Permitting	Does the implementation of the alternative require regulatory exceptions or variances?	None Expected	0	N/A	N/A	0	None Expected	3		0			
	<b>Permitting Feasibility Score</b>		<b>1.6</b>			<b>0.0</b>		<b>2.2</b>		<b>0.0</b>			
	Will the alternative be needed on a regular basis or only used intermittently?	Intermittently	2	N/A	N/A	0	Regular	2		0			
	How will implementing the alternative affect the PWSU's current method of treating and delivering potable water including meeting Safe Drinking Water Act regulations? (ex. in the case of storage, will the alternative require construction byproducts?)	Depending on water quality - no change expected.	2	N/A	N/A	0	None Expected	3		0			
Flexibility	<b>Flexibility Feasibility Score</b>		<b>2.0</b>			<b>0.0</b>		<b>2.5</b>		<b>0.0</b>			
	Will the alternative provide any advantages or disadvantages to meeting seasonal changes in demand?	No	1	N/A	N/A	0	No real change in seasonal demand	3		0			
	How resistant will the alternative be to extreme weather conditions such as drought and flooding?	Drought could present issues with intake	1	N/A	N/A	0	Provides additional raw water storage	3		0			
	Will the alternative be explicable to meet the growing needs of the district?	No growth expected	1	N/A	N/A	0	No growth expected	3		0			
Resilience	<b>Resilience Feasibility Score</b>		<b>1.0</b>			<b>0.0</b>		<b>3.0</b>		<b>0.0</b>			
	Identify any agreements or other legal instruments with governmental entities, private institutions or other PWSU required to implement the alternative.	None Expected	2	N/A	N/A	0	None Expected	3		0			
	Are any development/planning restrictions in place that can act as a barrier to the implementation of the alternative.	None Expected	2	N/A	N/A	0	None Expected	3		0			
	Identify potential land acquisitions and easement requirements.	Pump station and transmission line easement	2	N/A	N/A	0	None Expected	3		0			
Institutional Requirements	<b>Institutional Requirements Feasibility Score</b>		<b>2.0</b>			<b>0.0</b>		<b>3.0</b>		<b>0.0</b>			
	Identify any environmentally protected areas or habitats that might be impacted by the alternative.	None Expected	2	N/A	N/A	0	None Expected	3		0			
	<b>Environmental Impact Feasibility Score</b>		<b>2.0</b>			<b>0.0</b>		<b>3.0</b>		<b>0.0</b>			
	Identify any visual or noise issues caused by the alternative that may affect local land uses?	Pump Station	2	N/A	N/A	0	50,000	0	50,000	0			
Aesthetic Impacts	Identify any major aesthetic impacts that may be required to address aesthetic impacts?	None Expected	2	N/A	N/A	0	50,000	0	50,000	0			
	<b>Aesthetic Impact Feasibility Score</b>		<b>2.0</b>			<b>0.0</b>		<b>0.0</b>		<b>0.0</b>			
	Identify the potential stakeholders affected by the alternative.	Identify the potential stakeholders for and against the alternative.	0			0		0		0			
	Identify the potential issues with stakeholders for and against the alternative.	Will stakeholder concerns represent a significant barrier to implementation (or assistance) of the alternative?	0			0		0		0			
Stakeholder Issues	<b>Stakeholder Issues Feasibility Score</b>		<b>0.0</b>			<b>0.0</b>		<b>0.0</b>		<b>0.0</b>			
	Comments												

Feasibility Matrix Alternative Strategy Description	Mountain Top Public Service District PMSD#: WV 3302205										Dates: February 2016			Completed By: Cerone Associates, Inc.							
	Economic Criteria					Technical Criteria					Environmental Criteria										
	Operation & Maintenance Costs	Capital Costs	Total	Total %	Weighted Total	Permitting	Flexibility	Resilience	Institutional Requirements	Total	Total %	Weighted Total	Environmental Impacts	Aesthetic Impacts	Stakeholder Issues	Total	Total %	Weighted Total	Final Score	Total Capital Cost	Comments
Backup Intake	2.0	1.0	3.0	50.0%	20.0%	1.6	2.0	1.0	2.0	6.6	55.0%	22.0%	2.0	2.0	-	4.0	44.4%	8.9%	50.9%	\$792,425.00	Comments
Interconnect	-	-	0.0	0.0%	0.0%	-	-	-	-	0.0	0.0%	0.0%	-	-	-	0.0	0.0%	0.0%	0.0%	\$0.00	Comments
Treated Water Storage	-	-	0.0	0.0%	0.0%	-	-	-	-	0.0	0.0%	0.0%	-	-	-	0.0	0.0%	0.0%	0.0%	\$0.00	Comments
Raw Water Storage	-	1.0	1.0	16.7%	6.7%	2.2	2.5	3.0	3.0	10.7	89.2%	35.7%	3.0	-	-	3.0	33.3%	6.7%	49.0%	#####	Comments
Other	-	-	0.0	0.0%	0.0%	-	-	-	-	0.0	0.0%	0.0%	-	-	-	0.0	0.0%	0.0%	-	\$0.00	Comments

Scoring

- 0 - Not feasible. Criterion cannot be met by this alternative and removes the alternative from further consideration.
- 1 - Feasible but difficult. Criterion represents a significant barrier to successful implementation but does not eliminate it from consideration.
- 2 - Feasible. Criterion can be met by the alternative.
- 3 - Very Feasible. Criterion can be easily met by the alternative.



### **Matrix Explanation**

The alternative analysis matrix evaluates the utility's ability to implement each of the additional sources outlined. Alternative sources are evaluated for economic, technical, and environmental feasibility. The matrix uses a zero (0) to three (3) rating system, with three (3) being very feasible and zero (0) being not feasible. Each category has sub questions to develop an average for the alternative. Once all areas are evaluated, a final feasibility score is given for each of the alternatives for use in determining which option will best suit the utility's needs.

Economic factors evaluated in the matrix include all information needed to fund the alternative source. The matrix considers the current utility budget available per the latest annual report, operation and maintenance costs for each alternative, and the capital cost needed to construct each alternative. Supporting documentation is included in **Appendix E** of the report, which provides a breakdown of costs for each alternative that are used as capital costs in the matrix. The economic feasibility of each alternative is compared on a cost per gallon ratio. This ratio is determined by dividing the capital cost of the improvements by the total number of gallons of water produced per year. An average of the economic feasibility factors is then calculated and entered into the overall feasibility matrix found in **Appendix D**.

Technical criteria evaluated include permitting, flexibility, institutional and resilience factors. Permitting costs are included in all supporting documentation for each alternative source. The permitting factors included the permits that would be needed to construct the alternative source for the utility. An additional environmental factor is the feasibility of obtaining each permit. Permits were rated from zero (0) to three (3) based on the difficulty of obtaining the permits for the project. Depending on the project area, some permits may be very difficult and costly to obtain. Flexibility factors evaluate the ability of the alternative to be used as a permanent source of water or if it can only be used on a temporary basis. The intake and interconnections can be used as both temporary and permanent sources. The alternatives' ability to help the utility during seasonal or population increases is also evaluated in the resilience factors. The alternatives that can produce additional water were rated as very feasible (3). Additional criteria evaluated are easements and rights-of-ways that will need to be acquired to construct the alternative source. For interconnections and intakes rights-of-ways would be needed to lay the new water line. The feasibility of obtaining the rights-of-ways was evaluated. All technical criteria was averaged and entered into the feasibility summary in **Appendix D**.

Environmental aspects for each alternative include impacts, aesthetics and stakeholders. Environmental impacts included any areas in the proposed alternative source area that are protected. Areas that are protected would have a low feasibility because the impacts could be large if the project were constructed. Aesthetics factors include noise, visual impacts, and mitigation measures that could affect the project's feasibility. The aesthetic factors relate to the stakeholder factors. The stakeholders' portion of the environmental criteria involves the community and their acceptance of the new source alternative and the structures that will be constructed.

## APPENDIX E. SUPPORTING DOCUMENTATION

## **Notice of Public Meeting**

**The Mountain Top PSD is updating their Source Water Protection Plan and will have a public meeting to discuss the plan updates. The public is invited to attend and make comments. The meeting will be held at the during the regular Board Meeting at the Mountain Top PSD Office at 4150 Bismarck Road, Mt. Storm, West Virginia on April 17, 2024 at 4:30 PM.**

**Mountain Top PSD  
Source Water Protection Plan  
Public Meeting  
April 17, 2024  
Sign In**

Name	Representing
Jerry Dodson	WURWA
Monica Whyte	WU&WAP
Michael Delaney	MTPSD
Doug [unclear]	MTPSD
Robert [unclear]	"SELF"
Forest Harwig	MT TOP PSD

**Mountain Top PSD  
Source Water Protection Plan  
Public Meeting Agenda  
April 17, 2024**

Introduction

Purpose of the Source Water Protection Plan

Mountain Top PSD Source Water Protection Plan Update

Water Sources and the Protection Area

- Potential sources of significant contamination within that watershed.
- Conservation Easement Possibility.
- The system's storage capacity and ability to divert water from the intake in the case of a contamination.
- Alternate sources that could be utilized in an emergency.
- Update the Communications Plan.
- Alternatives for back-up electricity.
- Potential alternate sources for water in case of a disaster.

Public Question and Comments

Adjourn.

**Mountain Top PSD  
Source Water Protection Meeting  
April 17, 2024**

Douglas Lyons, Board Chairman called meeting to order.

Introduced Jerry Dotson of West Virginia Rural Water and Monica Whyte of the West Virginia Department of Health.

Turned the meeting over to Jerry Dotson.

Mr. Dotson described the Source Water Protection process and the issues covered in the protection plan.

Mr. Lyons opened the floor to the public for questions and comments. There were no questions or comments about the source water protection plan from the public.

Mr. Lyons asked about the proposed construction of additional chicken houses near the water source.

Discussion ensued about the potential risks brought by the chicken houses. There are currently nine chicken houses in the watershed with an additional nine proposed that appear to be closer to the source water than the current houses.

Mr. Dotson suggested that the District write letters to the company that will own the chicken houses, the County Commission and possibly the USDA about their concerns.

Meeting adjourned.

**Mountain Top PSD  
Source Water Protection Plan  
Protection Meeting  
April 17, 2024  
Sign In**

Name	Representing
Jerry Dotson	WURWA
Diane Jenkins	MT TOP PSD
Tonya Lough	MT TOP PSD
Monica Whyte	WV SWAP



STATE OF WEST VIRGINIA  
DEPARTMENT OF HEALTH  
BUREAU FOR PUBLIC HEALTH

Sherri A. Young, DO, MBA, FAAFP  
Cabinet Secretary

Matthew Q. Christiansen, MD, MPH  
State Health Officer

MEMORANDUM

TO: MT. TOP PSD FILE  
FROM: M. Whyte  
DATE: April 22, 2024  
RE: Protection Team Meeting 4:00 PM  
Public SWPP Meeting 4:30 PM  
April 17, 2024

On April 17, 2024, I attended the Mt. Top PSD Protection Team Meeting. Attendees included Diane Junkins - Office Manager, Tonya Lough - Office Personnel, Forrest Harvey, Jr. - Chief Operator, additional representatives of Mt. Top PSD, a local landowner and Jerry Dotson - WVRWA and me. Jerry provided information about the Source Water Protection Plan (SWPP) and there was general discussion. SWPP strategies were discussed in reference to tying the water system's strategies to other related agencies management documents or to add future source water protection needs for their source water program implementation. The Source Water Protection grant was mentioned. The WV Forests & Drinking Water Forum was also mentioned. There were a number of issues discussed regarding the eight existing poultry houses and the eight new poultry houses being built in close proximity to Mill Run and the Mt. Top PSD intake. Concerns regarding this PSSC's possible effect on the WTP and groundwater quality and quantity were discussed, as well as Management Strategies to address these concerns.

The SWPP Public Meeting followed in conjunction with the Mt. Top PSD Water Board meeting. There were no additional members of the public at this meeting with discussion as noted above continuing. Jerry and I left after the SWPP portion of the meeting.



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