



The State of New Hampshire
Department of Environmental Services

Robert R. Scott, Commissioner



February 21, 2020

Bruce Richardson
Brandywine Owners Association
3 Cardinal Lane
East Kingston, NH 03827
brichardson1972@comcast.net

Transmitted via Email

**Subject: Water Conservation Plan Approval
East Kingston – Brandywine (PWS ID#: 0702020)
Water Conservation Plan, NHDES # 005300**

Dear Mr. Richardson:

On February 20, 2020, the New Hampshire Department of Environmental Services (“DES”) Drinking Water and Groundwater Bureau received a Water Conservation Plan (the “WCP”), signed on February 12, 2020, for Brandywine, located in East Kingston, New Hampshire. Pursuant to RSA 485:61 and Env-Wq 2101, community water systems seeking permits from DES for new sources of groundwater shall submit a water conservation plan to DES. Based on review of the WCP, DES has determined the WCP complies with Env-Wq 2101, *Water Conservation* rules.

Pursuant to Env-Wq 2101, the Town of East Kingston and the Rockingham Planning Commission were provided a copy of the WCP, along with other required materials.

DES approves the WCP based on the following conditions:

1. No later than source activation, all source meters shall be installed.
2. Within 3 years of this approval, all source meters shall be tested and/or replaced, and the meter testing reports or proof of replacement shall be submitted to the DES Water Conservation Program.
3. Within one year of source approval, a distribution meter shall be installed and night flow analysis shall commence at a rate of twice a year in accordance with the night flow analysis methodology in the WCP.
4. Source meters and any other meters measuring water consuming processes prior to distribution shall be read monthly, no sooner than 27 days and no later than 33 days from the last meter reading.
5. All meters shall be installed per the manufacturer’s instructions or American Water Works Association standards.
6. All meters shall be tested and maintained based on the schedule proposed in the WCP.
7. Leaks shall be repaired within 60 days of discovery.
8. Within one year of source approval, a water conservation outreach and education program shall be implemented in accordance with the WCP, including the distribution of water efficiency outreach materials twice a year.

9. From the date of this approval, all non-metallic pipes installed in the system shall be outfitted with detectable tracer tape or detectable tracer wire, or be GPS located and maintained in a GIS system.
10. Upon source approval, the system shall report monthly source production volumes to the DES Water Use Registration and Reporting Program on a quarterly basis. DES has assigned WUID 21047 to the facility. The water system shall register as a data provider and utilize the DES OneStop reporting tool to submit water use data. Instructions for using the tool are enclosed with this letter. If you have any questions about water use reporting or registering as a data provider, please contact Stacey Herbold by phone at (603) 271-6685 or by email at stacey.herbold@des.nh.gov.
11. The primary operator (Epping Well & Pump Co., Inc.) is already an authorized data provider for at least one other system. If you retain Epping Well & Pump Co., Inc. to report to the Water Use Registration and Reporting Program for your system, please contact Stacey Herbold by phone at (603) 271-6685 or by email at stacey.herbold@des.nh.gov to provide authorization.
12. Every three years from the date of this approval, a *Water Conservation Plan Ongoing Compliance Reporting Form* shall be submitted to DES documenting how the system has maintained compliance with the WCP. The following records shall be maintained by the water system to include with the report:
 - a. A leak log including the date a leak was discovered, the date a leak was repaired, the type of leak (ex. water main, service line, hydrant, valve), the approximate size of the leak (gpm), and the nearest address to the leak.
 - b. The title of water efficiency materials distributed and the date of distribution.
 - c. Date of installation and replacement of all meters as well as testing and calibration records.
 - d. Data from biannual night flow analyses and a brief summary of the analyses.
13. Proposed changes to the WCP shall not be implemented unless approved by DES.

Please feel free to contact me with any questions at (603) 271-0659 or via e-mail at kelsey.vaughn@des.nh.gov.

Sincerely,



Kelsey Vaughn
Water Conservation Program
Drinking Water and Groundwater Bureau

Attached: (2) Water Use Registration Guidance and Water Use Reporting Guidance

ec: David Acheson; Epping Well & Pump Co., Inc.
Town of East Kingston
Rockingham Planning Commission
Mary Clairmont, Kim Bourgoquin, Stacey Herbold, Andrew Koff; DES

WATER CONSERVATION PLAN

Brandywine

A community water system seeking authorization for a new source of water must submit a water conservation plan to the New Hampshire Department of Environmental Services (NHDES) for approval demonstrating how the water system proposes to comply with water conservation standards pursuant to Env-Wq 2101, *Water Conservation* rules. Brandywine is an existing small community water system.

Activities outlined in the water conservation plan will be completed by water system personnel under the supervision of a certified water system operator.

I. Introduction

A. Contact Information

1. Name and location of system: Brandywine- 8 Brandywine Drive, East Kingston, NH
2. Owner of system and mailing address: Brandywine Homeowners Association- 8 Brandywine Drive, East Kingston, NH 03827
3. Name and mailing address of preparer of water conservation plan: Epping Well and Pump Co., Inc.- 337 Calef Highway, Epping, NH 03042

B. System Overview

1. Description of the community being served: The community consists of 29 individual homes with an estimated population served of 90 people.
2. Description of water sources, including water sources to be developed for non-potable uses such as irrigation: There are two existing bedrock wells (BRW1 and BRW2). BRW2 demonstrated significant diminished capacity, causing bulk water deliveries in May, June, and July 2018. Emergency connection approval was issued in July 2018 for a new bedrock well, BRW3. BRW3 is considered a replacement source for BRW2, but BRW2 is not being abandoned in accordance with We 100 et seq. BRW2 will be kept as a back-up source in case of emergency. There are no sources specifically for irrigation or other non-potable uses.
3. Name designation of each proposed water source and any existing sources:
BRW1: existing well
BRW2: existing well, not formally abandoned, will be kept as a back-up source in case of emergency
BRW3: new well (replacement for BRW2)
4. Number of connections proposed for each of the following classes:
 - a) Residential: 29
 - b) Industrial/Commercial/Institutional: 0
 - c) Municipal: 0

5. The water system does not provide water to any consecutive water systems or privately owned redistribution systems.
6. There are no proposed connections that receive more than 20,000 gpd.
7. Please provide the following information based on metered source withdrawal volumes from the last complete year. Please report in gallons.

Year: 2017

Average daily use (ADU): 4,095 gpd

Lowest ADU in the winter: 3,751 gpd

Highest ADU in the summer: 5,127 gpd

C. Transfer of Ownership

1. The system ownership is not proposed to be transferred.

II. System Side Management

A. Water Meters

1. Source Meters

- a) No later than the source activation date, meters will be installed on each new and any existing water source.
- b) An irrigation well is not proposed.
- c) Source meter information for each existing source and if known, for each proposed source:
 - Source Name: BRW1
 - Meter Size: Sensus
 - Meter Make: SR II
 - Meter Model: 3/4"
 - Meter Installation Date: 4/17/15
 - Last Meter Test/Calibration Date: 4/17/15

 - Source Name: BRW3
 - Meter Size: Neptune
 - Meter Make: T-10
 - Meter Model: 5/8"
 - Meter Installation Date: 4/17/15
 - Last Meter Test/Calibration Date: 4/17/15
 - Note: The meter that had previously measured production volumes from BRW2 is now being used to measure production volumes from BRW3.
- d) If BRW2 is used at any point in the future, the production volumes will be measured with a meter and reported to the Water Use Registration and Reporting Program.
- e) No later than the source activation date, source meters will be read at least monthly.

2. Meter Selection, Installation, and Maintenance

- a) All meters will be American Water Works Association (AWWA) certified.
- b) The selected size of the meters will be based on projected flow rates.
- c) Meters will be installed as specified by the manufacturer, including requirements for horizontal or vertical placement, distance of straight run of pipe upstream and downstream of the meter, and strainer installation. If the manufacturer does not supply installation specifics, meters will be installed in accordance with the “Manual of Water Supply Practices M6, Water Meters-Selection, Installation, Testing, and Maintenance” (AWWA, 2012).
- d) The following meter testing and calibration schedule or meter change-out schedule will be implemented. If the manufacturer’s accuracy warranty extends beyond the schedule below, the meter will be tested or changed-out no later than the warranty expiration date.

Meter Size (inches)	Testing Rate (years)
<1"	10 yrs
1" - 2"	4 yrs
3"	2 yrs
>3"	1 yr

- e) A log of the date meters were installed, tested, calibrated, repaired, and replaced will be maintained. Calibration certificates will be kept on file.

B. Pressure Management

- 1. The design pressures of the system are from 55 psi to 65 psi.

C. Leak Detection and Repair

- 1. All non-metal pipes will either be GPS located and stored in a GIS system or equipped with detectable tracer tape or detectable tracer wire.
- 2. Leak detection will be conducted in accordance with the “Manual of Water Supply Practices M36, Water Audits and Loss Control Programs” (AWWA, 2016).
- 3. Leaks will be repaired within 60 days of discovery unless a waiver is obtained in accordance with Env-Wq 2101.23.
- 4. A log of all leaks will be maintained, including the date the leak was discovered, the date the leak was repaired, the type of leak (ex. service, main, hydrant, valve), the size of the leak (gpm), and the nearest street address to the leak.

D. Water Loss Minimization- Night Flow Analysis

1. Night flow analysis will be implemented no later than one year from the date of final source approval.
2. The system will conduct a night flow analysis at least twice a year.
3. A distribution meter capable of reading low flows will be installed on the distribution line. The make, model, and size of the proposed distribution meter is a 1.5" Pulsafeeder multi-jet meter (model MTR404-G).
4. See Appendix B for the night flow analysis methodology.

III. Consumption Side Management

A. Educational Outreach Initiative

1. No later than one year from the date of final source approval, the system will begin distributing water efficiency outreach materials twice a year. The delivery method will be by mail, door-to-door, or email. The materials distributed will be either NHDES Water Efficiency Fact Sheets located at <http://des.nh.gov/organization/commissioner/pip/factsheets/dwgb/index.htm#efficiency> or EPA WaterSense materials located at <http://www.epa.gov/watersense/>.
2. The system will maintain a log indicating how the system has complied with III. A.1., above. The log will include dates the outreach and education actions were taken and what was done.

IV. Reporting and Implementation

- A. The water system will submit a form supplied by NHDES once every three years from the date of the water conservation plan approval documenting how compliance with the requirements of Env-Wq 2101, *Water Conservation* rules, is being achieved.
- B. The data collected with each night flow analysis from the previous three years, as well as a statement as to whether a leak was suspected or not, will be submitted with the report form in IV.A., above.
- C. The water system will report monthly production volumes quarterly to the NHDES Water Use Registration and Reporting Program upon receiving a Water Use Identification Number from NHDES. Monthly means once every calendar month, but no sooner than 27 days after and no later than 33 days after the previous reading.

I certify that I have read this Water Conservation Plan, understand the responsibilities of the water system as referenced in the plan, and that all information provided is complete, accurate, and not misleading.

Owner Name (print): Bruce Richardson, Brandywine Owners Association

Owner Signature:  Date: 2-12-2020

Appendix A Definitions

Authorized metered consumption: billed metered water plus unbilled metered water.

Community water system (CWS): a public water system which serves at least 15 service connections used by year-round residents or regularly serves at least 25 year-round residents.

Consecutive water system: a public water system that buys or otherwise receives some or all of its finished water from one or more wholesale systems for at least 60 days per year.

Final source approval: the date of final well siting approval or the date of issuance of the large groundwater withdrawal permit.

Large community water system: a community water system that serves more than 1,000 persons.

Privately owned redistribution system (PORS): A system for the provision of piped water for human consumption which does not meet the definition of a public water system and meets all of the following criteria:

- (1) Obtains all of its water from, but is not owned or operated by, a public water system;
- (2) serves a population of at least 25 people, 10 household units or 15 service connections, whichever is fewest, for at least 60 days per year; and
- (3) has exterior pumping facilities, not including facilities used to reduce pressure, or exterior storage facilities which are not part of building plumbing.

Public water system (PWS): a system for the provision to the public of piped water for human consumption, if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

Small community water system: a community water system that serves 1,000 people or less.

Source activation date: the date the source is placed into use.

System input volume: the volume of water input to the water supply system after treatment, analysis, and storage.

Water balance: the difference between the system input volume and authorized metered consumption.

Water conservation: any beneficial reduction in water losses, waste or use.

Wholesale system: a public water system or an industrial, commercial or institutional (ICI) water user that treats source water and then sells or otherwise delivers finished water to a consecutive water system or privately owned distribution system.

Appendix B
Night Flow Analysis Methodology

1. Distribution Meter

- a. A meter capable of measuring flows less than 2 gallons per minute (gpm) will be installed on the distribution line and located after treatment, any other water consuming processes, and storage. The meter make, model, and size will be forwarded to NHDES prior to purchase/installation for review and approval.

2. Determining Baseline Flow

- a. Baseline flow will be determined when the system is tight. The system will be considered tight when (this may vary based on the size and age of the system):
 1. A leak detection survey is conducted and all leaks discovered are repaired; or
 2. An initial night flow analysis is conducted and night flow decreases to 0 gpm.
- b. The results of the initial night flow analysis and the proposed baseline flow will be submitted to NHDES for review.

3. Night Flow Analysis

- a. Night flow analysis will be conducted at least twice a year and no sooner or later than 6 months apart.
- b. Water usage will be recorded every minute for one hour during a period of anticipated low water demand using a distribution meter (between 1 am and 3 am is recommended). Prior to the night flow analysis, users of the system will be requested to refrain from using water during the date and time of the scheduled night flow analysis. (Night flow analysis will be conducted prior to sprinkler season.)
- c. If the lowest flow is above the baseline flow, then water usage will continue to be recorded every minute for an additional hour.
- d. If the lowest flow is more than 2 gpm above the baseline, a leak will be suspected.
 1. All residents will be asked to check their homes for leaks, including running toilets and outdoor spigots. The previous steps will then be repeated in 3 days. If the lowest flow is still above the baseline flow, the actions in Steps 2 and 3 below will be taken.
 2. Select portions of the system will be isolated and evaluated by closing valves while monitoring the change in flow as measured by the distribution meter. For example, when one valve is closed, the person in the field operating the valve will then communicate with a second person observing the distribution meter to monitor for a change in the background flow.
 3. No later than two weeks after isolating the leak to a branch of the system, a sub-contractor skilled in acoustic leak detection will be retained and will assist with pinpointing the leak.
- e. Records will be maintained of each night flow analysis, including recorded flows and leak repair results.

Appendix C Notification Process

Public Notification Instructions

Once a final draft of the water conservation plan is agreed upon by the applicant and NHDES, NHDES will send a signature line to the applicant for addition to the plan along with a summary of the requirements of Env-Wq 2101, which may be found at http://des.nh.gov/organization/divisions/water/dwgb/water_conservation/index.htm.

Within 10 working days of receiving the summary from NHDES, the applicant is required to provide a copy of the water conservation plan and rules summary via certified mail with return receipt requested to:

- the governing board of the municipality in which a proposed source is located,
- the governing board of all municipalities that receive water from the water system (if any),
- the governing board of all wholesale customers of the water system (if any), and
- the regional planning commission serving the location of the proposed source.

The applicant must also request that the governing board amend local site planning requirements to reflect the requirements of Env-Wq 2101 and to promote water conservation landscaping for new projects.

All signed copies of the certified mail return receipts (the green cards) must be forwarded to NHDES along with the final, signed water conservation plan before approval of the water conservation plan will be issued.

Notification of Consecutive Water Systems and Privately Owned Redistribution Systems

Within 5 working days of obtaining final approval of the source from NHDES, the system is required to notify any consecutive water system or privately owned redistribution system receiving water from the system of the following:

- The projected source activation date; and
- The system will be subject to Env-Wq 2101 as of the source activation date, pursuant to Env-Wq 2101.13 and should contact the NHDES Water Conservation Program using the contact information below.

Kelsey Vaughn, Water Conservationist
New Hampshire Department of Environmental Services
Drinking Water and Groundwater Bureau
PO Box 95
Concord, NH 03302-0095
kelsey.vaughn@des.nh.gov
Phone: (603) 271-0659
Fax: (603) 271-0656