



STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES
Bureau for Public Health
Office of Environmental Health Services

Bill J. Crouch
Cabinet Secretary

Ayne Amjad, MD, MPH
Commissioner & State Health Officer

MEMORANDUM

TO: Marie Prezioso, Technical and Funding Committee
WV Infrastructure and Jobs Development Council

FROM: Stephanie Hickerson, P. E. *SDH*
Water Technical and Funding Review Committee

DATE: April 26, 2022

RE: RMS PSD
IJDC Preliminary Application Number: **2022W-2086**
WV Route 97 Extension
Wyoming County

1. The Committee has reviewed the pre-application and preliminary engineering report submitted for the above referenced project in accordance with Chapter 31, Article 15-A. It has been determined that the project is:
 - a. Consistent with the intent of the Infrastructure and Jobs Development Act and is the most cost-effective and environmentally sound alternative for solving the drinking water needs in this area.
 - b. Consistent with the Act but may not be the most cost-effective and environmentally sound alternative for solving the drinking water needs in this area.
 - c. Consistent with the intent of the Act and most cost-effective and environmentally sound alternative for solving the drinking water needs in this area **except** that certain issues need to be addressed prior to design and construction, as the attached comments indicate.

 2. Our recommendation is that:
 - a. The Funding Committee needs to review the proposed sources of funding to determine the best mix of grant and/or loan funds in accordance with applicable guidelines.
-

RMS PSD

Project No.: **2022W-2086**

April 26, 2022

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- b. The Funding Committee should recommend that Council approve the proposed project and its funding plan.
- c. The Funding Committee does not need to review the funding assumptions on this project because of deficiencies in the application. The proposed project funding should be postponed until technical comments have been resolved.
- d. The project to be referred to the Consolidation Committee.

3. Other remarks:

PSC Comment:

- 1. Using Scenario 1 the preferred funding package consisting of a ARC Grant of **\$1,800,000**, an IJDC District 3 Grant of **\$500,000**, a Wyoming County Commission Grant of **\$100,000**, and a WV American Rescue Plan Act Grant of **\$1,212,000**, proposed rates of **\$53.63 for 3,400 gallons (1.91%MHI)** will provide a cash flow surplus of **\$43,190** and debt service coverage of **165.69%**.

pc: To be distributed at the Funding Committee Meeting



STATE OF WEST VIRGINIA
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MEMORANDUM

TO: Stephanie Hickerson, P.E.
Infrastructure & Capacity Development

FROM: William Herold, P.E.
Infrastructure & Capacity Development

DATE: April 26, 2022

SUBJECT: RMS PSD
IJDC Application- 2022W-2086
WV Route 97 Extension
Wyoming County

Recommendation:

This preliminary application appears technically feasible and is recommended to be forwarded to the Technical and Funding Committee.

Project Scope:

This Preliminary Application is to extend and upgrade water service to 53 customers along WV State Route 97 and an inter-connection between the RMS PSD water system and the Town of Pineville water system. The project will consist of the installation of approximately 8 miles (44,600 LF) 2" through 8" water line; one (1) transfer station; all necessary valves and appurtenances.

The cost per customer is **\$68,151** for the project. The total project cost is **\$3,612,000**. (ARC Grant: **\$1,800,000**; IJDC District 3 Grant: **\$500,000**; Wyoming County Commission: **\$100,000**; and WV American Rescue Plan Act: **\$1,212,000**).

Need for the Project:

The PER indicates the existing customers along the WV Route 97 area are served by private wells that have quantity and quality problems. This project will also inter-connect the RMS PSD water system and the Town of Pineville water system allowing a backup water supply for each utility.

Concerns:

1. The costs per customer of **\$68,151** is somewhat high however the proposed funding is all grants.

2. The RMS PSD has a score of 17 on the January 2022 quarter of the EPA's Compliance Tracking Tool (ETT.) The score was attained through various violations for monitoring Violation 2019 and multiple Public Notice Violations dating back to 2015. These violations need to be resolved.

Permits:

A permit **will be** required from the WV Bureau for Public Health prior to construction.

Construction activities with a disturbed area of one (1) acre or greater are required to register for the NPDES Storm Water Construction General Permit No. WV0115924.

A permit for stream crossings may be required.

A Certificate of Convenience and Necessity may not be required from the PSC.

A permit from the WV Division of Highways will be required for the construction activities that will take place within WVDOH right-of-way.

Engineering: 5.33% for design, 13.75% for total.

The Design Fees vs. Construction Cost for new construction is below both the average complexity curve and the very complex curve. The Design Fees vs. Construction Cost for modifications is below both the average complexity curve and the very complex curve. The Total Fees vs. Construction Cost for new construction is above the average complexity curve and below the very complex curve. The Total Fees vs. Construction Cost for modified construction is above the average complexity curve and below the very complex curve. A fee waiver **will not be** required for this project.

Asset Management Plan and Annual Maintenance Audit:

The system marked the question in the application concerning an asset management plan as "No". The RMS PSD does not currently have an approved Asset Management Plan on file with the BPH. The application indicates that the annual maintenance audit for the current year has been completed.

Capacity Development:

The question about having had a capacity development assessment (CDA) within the last 5 years was marked as "yes." This is incorrect, as a capacity and development assessment has not been conducted at the RMS PSD.

Additional information that may be helpful to the IJDC in their decisions regarding approval of this project relates to the system's overall compliance. The Ravencliff McGraws Saulsville PSD has a score of 17 on the January 2022 quarter of the EPA's Compliance Tracking Tool (ETT.) The score was attained through various violations for:

- Monitoring Violation 2019
- Multiple Public Notice Violations dating back to 2015

RMS PSD
Project No.: **2022W-2086**
April 26, 2022
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Based upon information from the Municipal Bond Commission, as of March 2022, the Ravencliff McGraws Saulsville PSD is current on their water reserve funding requirements.

IJDC Ranking:

- Public Health Benefit: 5
- Compliance: 5

Public Service Commission of West Virginia

201 Brooks Street, P.O. Box 812
Charleston, West Virginia 25323

Phone: (304) 340-0300
Fax: (304) 340-0325



April 18, 2022

Stephanie D. Hickerson
Office of Environmental Health Services
Capitol and Washington Streets
1 Davis Square, Suite 200
Charleston, West Virginia 25301-1798

Re: Public Service Commission Staff Review Comments
Application No. 2022W-2086
Ravencliff-McGraws-Saulsville PSD (Water)
Infrastructure Preliminary Application

Dear Ms. Hickerson:

As requested, the Technical Staff of the Public Service Commission of West Virginia has completed its review of the above-referenced Infrastructure application. In light of Technical Staff's comments enclosed herewith, we are recommending the application be:

- forwarded to the Funding Committee
 forwarded to the Consolidation Committee
 returned to the Applicant

Sincerely,

A handwritten signature in blue ink that reads "Jonathan M. Fowler".

Jonathan M. Fowler, P.E.
Engineering Division
JFowler@psc.state.wv.us

Enclosures
JMF:vb

**PUBLIC SERVICE COMMISSION STAFF
TECHNICAL REVIEW**

DATE: April 15, 2022

PROJECT SPONSOR: RAVENCLIFF-MCGRAWS-SAULSVILLE PSD - (WATER)

PROJECT SUMMARY: To provide water service and fire protection to new customers along WV Route 97 between McGraws and Pineville, WV.

PROPOSED FUNDING: ARC Grant	\$1,800,000
IJDC District 3 Grant	500,000
Wyoming County Commission Grant	100,000
WV American Rescue Plan Act Grant	<u>1,212,000</u>
	\$3,612,000

CURRENT AND

PROPOSED RATES: \$53.63 3,400 Gallons
\$61.59 4,000 Gallons

Application No. 2022W-2086

RECOMMENDATION: forward to the Funding Committee
 forward to the Consolidation Committee
 return to the Applicant

FINANCIAL: Versie Hill

1. Current rates (\$53.63 for 3,400 gallons) are above the rates attributable to 1.25% (\$35.14), 1.5% (\$42.16), and 1.75% (\$49.19) of the Median Household Income (MHI), but below the rates attributable to 2.0% (\$56.22) of the MHI. Increasing current rates to 2.0% of MHI would provide additional revenues of \$54,314.
2. Using Scenario 1 the preferred funding package consisting of an ARC Grant of \$1,800,000, an IJDC District 3 Grant of \$500,000, a Wyoming County Commission Grant of \$100,000, and a WV American Rescue Plan Act Grant of \$1,212,000, proposed rates (\$53.63 for 3,400 gallons) will provide a cash flow surplus of \$43,190 and debt service coverage of 165.69%.
3. Using the Scenario 2 alternate loan package of \$3,512,000 (in uncommitted funds) at 5% for 40 years (paid back over 38 years), and committed funds consisting of a Wyoming County Commission Grant of \$100,000, proposed rates (\$63.82 for 3,400 gallons) will provide a cash flow surplus of \$38,039 and debt service coverage of 141.86%.

4. Notes to Comments

- A. Staff's detailed adjustments are listed on Attachment A for Scenario 1 (Preferred Funding Package) and Attachment B for Scenario 2 (Loan Package).
- B. Staff prepared the attached Cash Flow Analysis utilizing information from the Annual Report for the Fiscal Year Ended June 30, 2021, and the applicant's Revised Cash Flow Analysis provided to the PSC.
- C. Staff used the MHI for Wyoming County of \$33,730 from the 2015 U.S. Census versus the MHI of \$53,375 that was listed in the application.
- D. The Applicant is requesting a waiver of the Rule 42 Exhibit requirement, given the project is entirely grant funded. Staff has no objection to such request.
- E. Senate Bill 234, effective June 12, 2012 required water and sewer utilities that are political subdivisions of the state to maintain a cash working capital reserve in an amount of no less than one-eighth (1/8), of actual operations and maintenance expenses. It should be noted that the cash flows provided by the project sponsor include funding for the 1/8 cash working capital reserve. Staff accepted that amount in its analyses. However, this amount may be reviewed by the Commission in future filings in accordance with Public Service Commission General Order 183.11.

ENGINEERING: Jim Spurlock

1. This project may not require a Certificate of Convenience and Necessity from the PSC. The project sponsor should consult with Commission Staff pursuant to the requirements of General Order No. 246 for such determination. Should a Certificate be required, the sponsor should reference this application number on the PSC's Form No. 4 when its application is filed at the Commission given the requirement of West Virginia Code 24-2-11 (c) and (e). Staff notes that an affirmative determination of need for the project must be established in a Certificate filing at the PSC.
2. Scope: Ravenscliff-McGraws-Saulsville PSD is proposing to install 32,600 feet of 8-inch, 9,000 feet of 6-inch, and 3,000 feet of 2-inch water line in order to extend service to 53 new customers along Route 97 between McGraws and Pineville, WV.

Customer Density: 6.3 new customers/mile; this is somewhat low.

Cost per Customer: \$68,151 (taken from the total project cost estimate of \$3,612,000 spread over 53 customers; this is somewhat high however, the proposed funding is all grants.

3. **Project Feasibility:** The project is technically feasible however, the cost per customer is somewhat high. The project will provide public water service to 53 new customers who currently rely upon private wells. The PER describes the well water as insufficient and low quality with no further elaboration. The proposed extension will connect the District's system to the City of Pineville's system, thereby providing an alternate water source for both utilities.
4. **Project Alternatives:** The option to serve the extension from the Saulsville Tank rather than the Keyrock Tank was considered, but eliminated due to increased cost and distance, as well as undesirable terrain and construction conditions.
5. **Consolidation:** There are no consolidation opportunities presented by this project.
6. **Inconsistencies:** None were noted.
7. **Operation and Maintenance (O & M) Expenses:** O & M expenses are projected to increase by \$28,300 as a result of the project. The increase is itemized, but supporting calculations were not provided. The PER notes, however, that the estimate is prorated based upon a simple ratio of new to existing customers.
8. **Engineering Agreement:** The application includes information to determine compliance with West Virginia Code §§5G-1-1, et seq. Total technical services (engineering) costs for the project are \$412,500 which is equal to 13.75% of the construction cost of \$3,000,000 (including contingency).

<i>Preliminary Project Ranking</i>		
O & M Capabilities		
Performance Measures:	1	Pt.
Asset Management:	1	Pt.
Environmental Management:	1	Pt.
Readiness to Proceed:	0	Pt.
Cost Effectiveness:	0	Pt.
Compliance with PSC Orders:	0	Pt.

RAVENCLIFF-MCGRAWS-SAULSVILLE PSD- WATER
 CASH FLOW ANALYSIS
 YEAR ENDED: June 30, 2021
 APPLICATION NO: 2022W-2086
 April 15, 2022

Attachment A
PREFERRED FUNDING PACKAGE
SCENARIO 1

	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<u>AVAILABLE CASH</u>				
Operating Revenues	1,126,149	1,160,258	(93,691) (1)	1,066,567
Other Operating Revenue	78,837	78,837	-	78,837
SB 234 Annual Working Cash Collections	-	-	93,691 (2)	93,691
Interest Income & Other Misc.	184	184	-	184
Total Cash Available	1,205,170	1,239,279	-	1,239,279
<u>OPERATING DEDUCTIONS</u>				
Operating Expenses	721,226	749,526	-	749,526
Taxes	32,751	32,751	-	32,751
Total Cash Requirements Before Debt Service	753,977	782,277	-	782,277
Cash Available for Debt Service (A)	451,193	457,002	-	457,002
<u>DEBT SERVICE REQUIREMENTS</u>				
Principal & Interest (B)	275,817	275,817	-	275,817
Other Debt	8,518	8,518	-	8,518
Reserve Account @ 10%	7,151	7,151	-	7,151
Renewal & Replacement Fund (2.5%)	30,129	30,982	(2,347) (3)	28,635
Total Debt Service Requirement	321,615	322,468	(2,347)	320,121
SB 234 Cash Working Capital	90,153	93,691	-	93,691
Remaining Cash	39,425	40,843	2,347	43,190
Percent Coverage (A) / (B)	163.58%	165.69%		165.69%
Average rate for 3,400 gallons	\$ 53.63	\$ 53.63	\$ -	\$ 53.63
Average rate for 4,000 gallons	\$ 61.59	\$ 61.59	\$ -	\$ 61.59

Staff Adjustments

<u>Adjustment Description</u>		\$	Increase <Decrease>
(1) Operating Revenues	Per Staff Analysis	1,066,567	(93,691)
	Per Application with Project	1,160,258	
Adjust revenues in accordance with PSC General Order 183.11.			
(2) SB 234 Annual Working Cash Collections	Per Staff Analysis	93,691	93,691
	Per Application with Project	-	
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3) Renewal & Replacement Fund (2.5%)	Per Staff Analysis	28,635	(2,347)
	Per Application with Project	30,982	
Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

RAVENCLIFF-MCGRAWS-SAULSVILLE PSD- WATER
 CASH FLOW ANALYSIS
 YEAR ENDED: June 30, 2021
 APPLICATION NO: 2022W-2086
 April 15, 2022

Attachment B
LOAN PACKAGE
SCENARIO 2

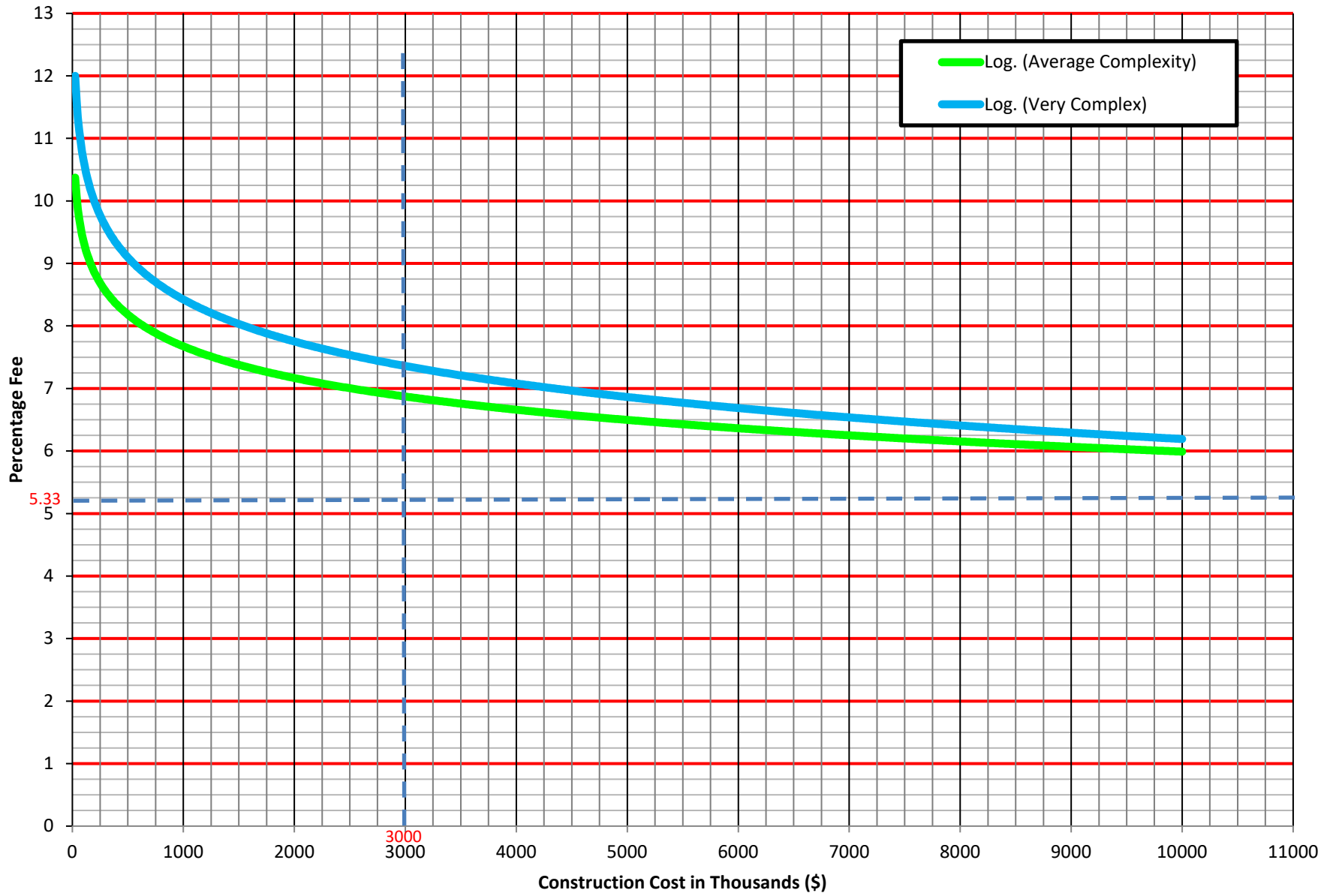
	Cash Flow Going Level Per Application Before Project	Cash Flow Proforma Per Application with Project	Staff Adjustments	Per Staff Analysis
	1	2	3	4
	\$	\$	\$	\$
<u>AVAILABLE CASH</u>				
Operating Revenues	1,126,149	1,380,707	(93,691) (1)	1,287,016
Other Operating Revenue	78,837	88,005	-	88,005
SB 234 Annual Working Cash Collections	-	-	93,691 (2)	93,691
Interest Income & Other Misc.	184	184	-	184
Total Cash Available	1,205,170	1,468,896	-	1,468,896
<u>OPERATING DEDUCTIONS</u>				
Operating Expenses	721,226	749,526	-	749,526
Taxes	32,751	32,751	-	32,751
Total Cash Requirements Before Debt Service	753,977	782,277	-	782,277
Cash Available for Debt Service (A)	451,193	686,619	-	686,619
<u>DEBT SERVICE REQUIREMENTS</u>				
Principal & Interest (B)	275,817	484,821	(798) (3)	484,023
Other Debt	8,518	8,518	-	8,518
Reserve Account @ 10%	7,151	28,051	(79) (4)	27,972
Renewal & Replacement Fund (2.5%)	30,129	36,722	(2,346) (5)	34,376
Total Debt Service Requirement	321,615	558,112	(3,223)	554,888
SB 234 Cash Working Capital	90,153	93,691	-	93,691
Remaining Cash	39,425	34,816	3,223	38,039
Percent Coverage (A) / (B)	163.58%	141.62%		141.86%
Average rate for 3,400 gallons	\$ 53.63	\$ 63.82	\$ -	\$ 63.82
Average rate for 4,000 gallons	\$ 61.59	\$ 73.29	\$ -	\$ 73.29

Staff Adjustments

<u>Adjustment Description</u>		\$	Increase <Decrease>
(1) Operating Revenues	Per Staff Analysis	1,287,016	(93,691)
	Per Application with Project	1,380,707	
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(2) SB 234 Annual Working Cash Collections	Per Staff Analysis	93,691	93,691
	Per Application with Project	-	
Account for SB 234 (2015) funding pursuant to PSC General Order 183.11.			
(3) Principal & Interest	Per Staff Analysis	484,023	(798)
	Per Application with Project	484,821	
The difference in P&I is related to Staff's calculation of a typical loan of \$3,512,000 at 5% for 40 years (paid back over 38 years).			
(4) Reserve Account @ 10%	Per Staff Analysis	27,972	(79)
	Per Application with Project	28,051	
Staff assumed a 10% reserve on the new debt.			
(5) Renewal & Replacement Fund (2.5%)	Per Staff Analysis	34,376	(2,346)
	Per Application with Project	36,722	
Staff used 2.5% of the projection of "Operating & Other Revenues" as the basis of the renewal & replacement fund.			

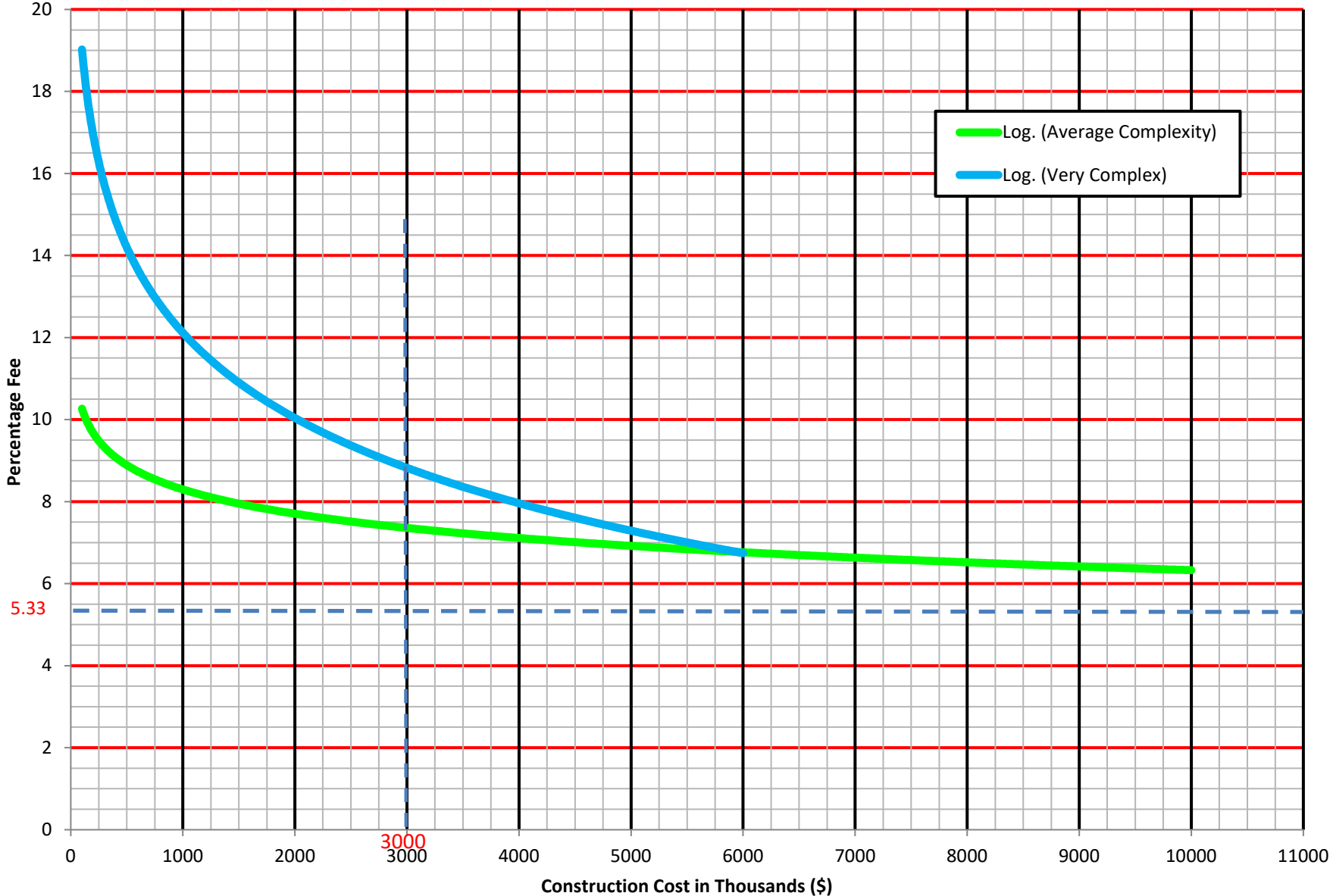
Graph 1. Design Fee vs. Construction Cost for New Construction

RMS PSD
2022W-2086



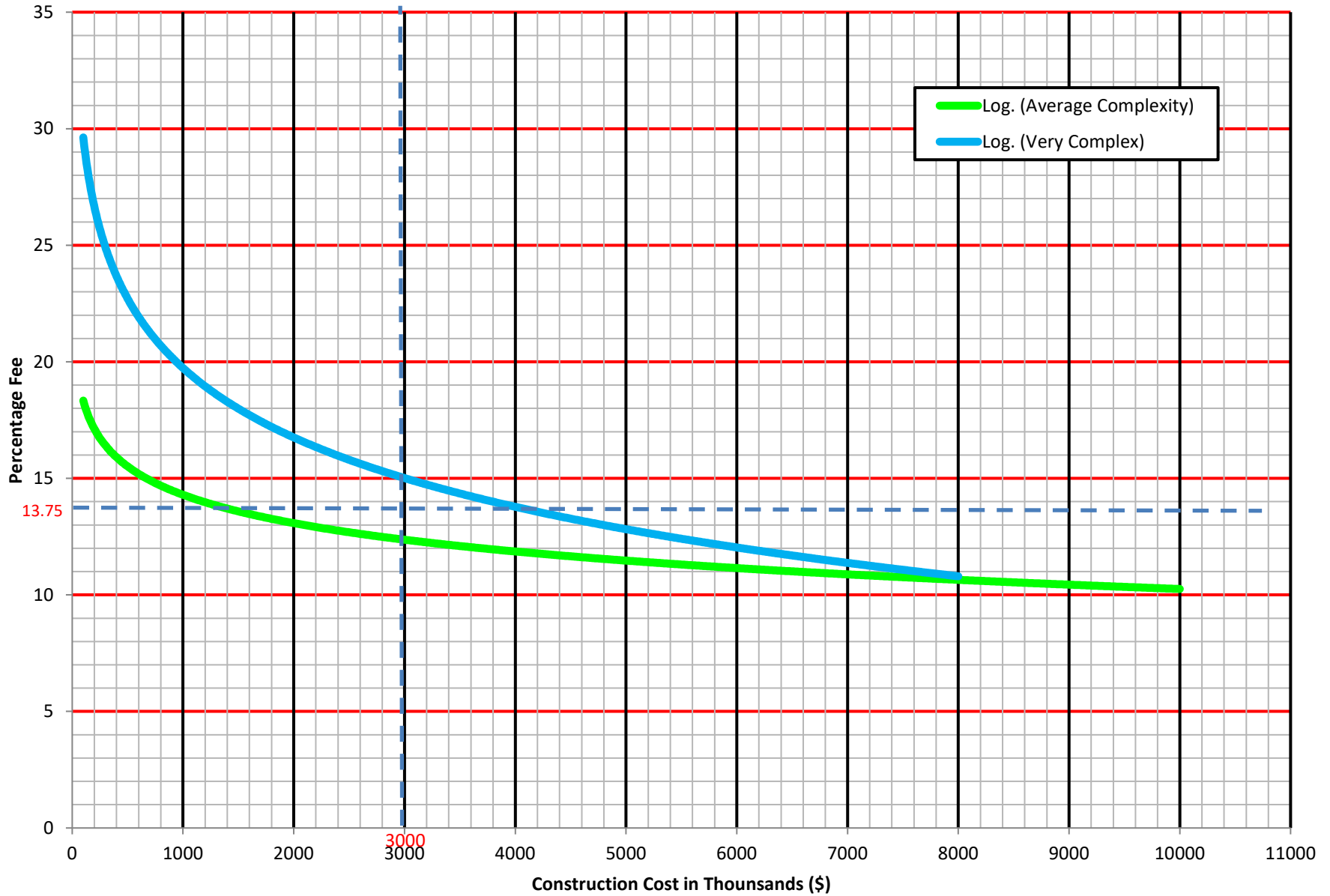
Graph 2. Design Fee vs. Construction Costs for Modifications

RMS PSD
2022W-2086



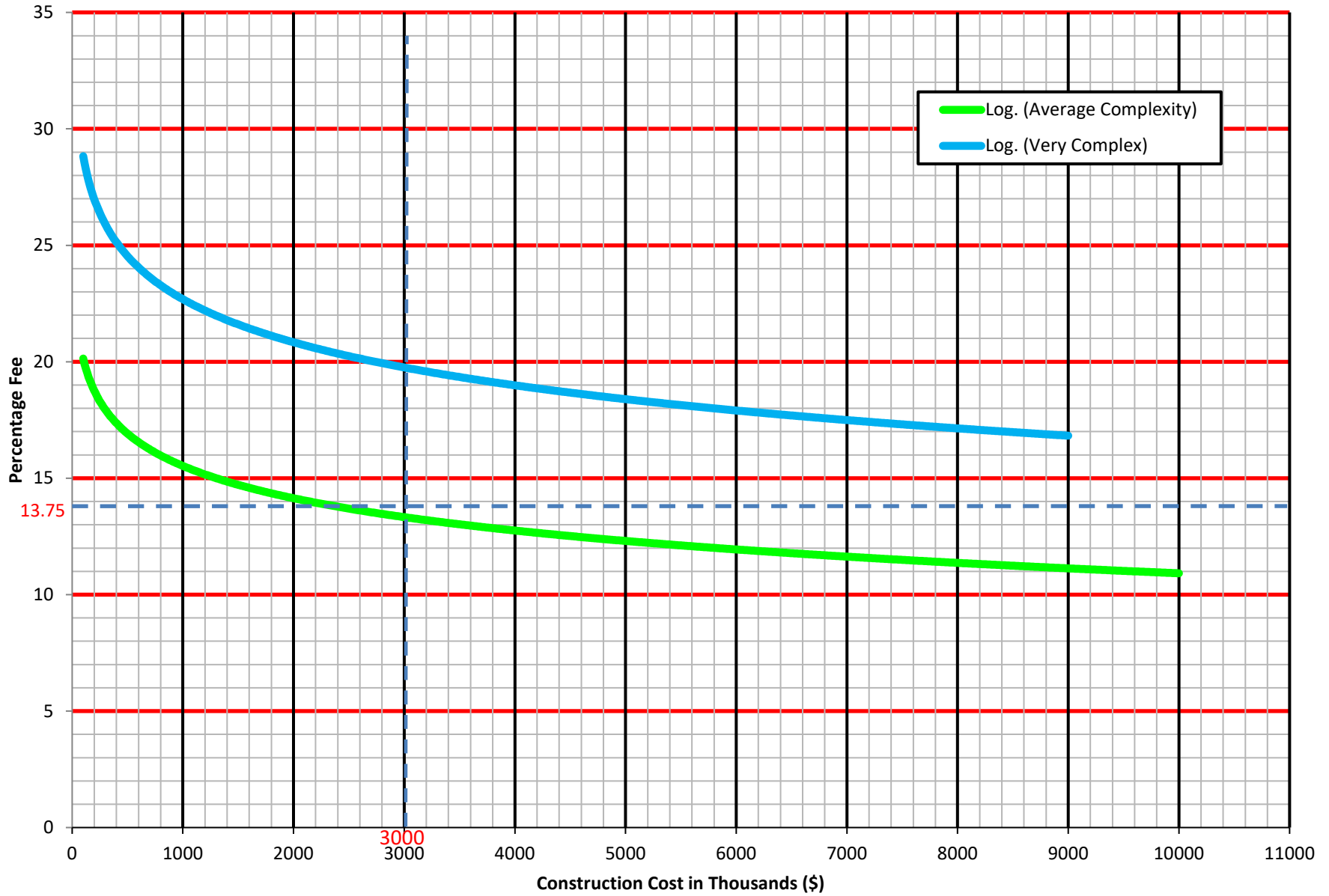
Graph 3. Total Fee vs. Construction Cost for New Construction

RMS PSD
2022W-2086



Graph 4. Total Fee vs. Construction Cost for Modifications

RMS County PSD
2022W-2086






west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304-2345
Telephone: 304-926-0495
Fax: 304-926-0496

Harold D. Ward, Cabinet Secretary
www.dep.wv.gov

MEMORANDUM

MEMO TO: Stephanie D Hickerson, P. E.
Office of Environmental Health Services
Bureau for Public Health

FROM: John M. Perkins 
Supervisor
General Permits & Support Team

DATE: March 29, 2022

SUBJECT: Infrastructure Preliminary Application for the Ravencliff-McGraw-Saulsville
PSD: (2022W-2086) CN Extension in Marshall County, WV.

We have reviewed the above referenced project application information. The Ravencliff-McGraw-Saulsville PSD discharges its backwash to its site, which is covered under WV/NPDES Site Registration No. WVG640056 and expires July 18, 2023.

If the Ravencliff-McGraw-Saulsville PSD is considering repairing and painting an existing water treatment plant or storage tanks, then the scope of this project requires precautions to prevent contamination of the waters of the state. Prior to beginning any removal of old paint, the Ravencliff-McGraw-Saulsville PSD should contact Mr. Jeremy Bandy or a member of his staff at (304)-926-0499, extension 43894 for guidance in determining whether the paint to be removed is considered a hazardous waste. If so, proper containment and disposal procedures must be followed for the paint and any material associated with the sandblasting. If it is determined that the paint is not hazardous, the Ravencliff-McGraw-Saulsville PSD should contact Yogesh Patel or a member of his staff at (304)-926-0499, extension 43877 for proper disposal options.

Construction activities with a disturbed area of one (1) acre or greater are now required to register for the NPDES Storm Water Construction General Permit No. WV0115924 that became effective on March 9, 2019. Projects registered under the previous General Permit No. WV0115100 were automatically provided coverage under WV/NPDES General Permit

No. WV0115924. For more information, they may contact Larry Board at (304)-926-0499, extension 43883.

In light of the above, we have no objection to this project as long as the appropriate provisions are taken to assure compliance with Chapter 22, Article 11, of the Code of West Virginia and any associated regulations. The responsible party may contact Mylinda Maddox (304) 926-0499 ext. 43825, should additional information be required.

JMP:mam

cc: Katheryn Emery



west virginia department of environmental protection

Office of Abandoned Mine Lands & Reclamation
601 57th Street SE
Charleston, WV 25304

Harold D. Ward, Cabinet Secretary
dep.wv.gov

MEMORANDUM

To: Stephanie Hickerson, P.E., Manager
Infrastructure and Capacity Development

From: Roger A. Earle, P.E., Waterline Coordinator *RAE*
Office of Abandoned Mine Lands & Reclamation

Date: April 14, 2022

Subject: RMS PSD – Route 97 Extension
IJDC Preliminary Application: 2022W-2086

This application would most likely not be eligible for AML funds because there are no known AML sites in this project area.

OEHS District Review for Infrastructure Council Water Projects

Water System:	Ravencliff McGraws Saulsville PSD	IJDC Number:	2022W-2086
Project Description:	Rt. 97 Waterline Extension and Upgrade	Review by:	John P.B. Stafford, P.E.
County:	Wyoming	Date:	April 14, 2022

<u>No.</u>	<u>Review Criteria</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Comments (Especially if No is indicated or providing a DWTRF score)</u>
1.	Does the district agree that the project scope seems to be the most feasible solution?	X			The project as proposed appears to be the most feasible solution to the problem stated.
2.	Is this the most practical project to correct the problem stated in the application?	X			The selected project appears to be the most practical.
3.	Does the project solve the major operation maintenance problems in the water system?			X	As the project will extend service into an area that does not currently have public water, it will have no impact on current operation and maintenance.
4.	Does the project eliminate deficiencies noted in the sanitary survey?			X	The project as described is an extension into a currently unserved area. As such, it is not intended to resolve any deficiencies within the current system.
5.	Should these improvements be made to this system versus another system that could serve the same area?	X			Pineville is nearby and could potentially serve the area; however, the area is closer to RMS and adjacent to areas they already serve. The project as proposed will likely be the most economical approach to providing service to the specified area.
6.	The application has an alternative in it evaluating the most likely consolidation option?			X	The project will provide an interconnection with RMS and Pineville, but consolidation of the two utilities is not the intent of this extension.

<u>No.</u>	<u>Review Criteria</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Comments (Especially if No is indicated or providing a DWTRF score)</u>
7.	Do you agree with the need statement for the project?	X			
8.	Has the engineer included all justification (that you are aware of) in the project application?	X			
9.	Is the management of the water system capable of completing this project?	X			RMS has successfully completed several projects of this size and complexity in the past.
10.	Other comments				
11.	For new projects or projects with revised scope provide DWTRF Priority Ranking Public Health Score (Indicate score in the comments section with explanation)?				20 – This score was selected because the proposed project will extend service to currently unserved areas with poor water quality.
12.	For new projects or projects with revised scope provide DWTRF Priority Ranking Compliance Score (Indicate score in the comments section with explanation)?				0 – This score was selected because the proposed project is an extension into a currently unserved area and will not have an impact on any existing compliance issues.
13.					
14.					



STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES
Bureau for Public Health
Office of Environmental Health Service

Bill J. Crouch
Cabinet Secretary

Ayne Amjad, MD, MPH
Commissioner & State Health Officer

MEMORANDUM

TO: Stephanie Hickerson, P.E., Manager
Infrastructure and Capacity Development Unit

FROM: Valerie A. Plance, ERS III
Capacity Development Program

DATE: April 13, 2022

RE: Ravencliff McGraws Saulsville
PSD (PWSID# 3305518)
IJDC Application No.: 2022W-2086
Wyoming County

The Ravencliff McGraws Saulsville PSD preliminary infrastructure application indicates that they are not seeking DWTRF monies. The system marked the question in the application concerning an asset management plan as “no.” There is no approved Asset Management Program on file with the BPH.

The question about having had a capacity development assessment (CDA) within the last 5 years was marked as “yes.” There is no record of a CDA being performed at the Ravencliff McGraws Saulsville PSD.

Additional information that may be helpful to the IJDC in their decisions regarding approval of this project relates to the system’s overall compliance. The Ravencliff McGraws Saulsville PSD has a score of 17 on the January 2022 quarter of the EPA’s Compliance Tracking Tool (ETT.) The score was attained through various violations for:

- Monitoring Violation 2019
- Multiple Public Notice Violations dating back to 2015

Based upon information from the Municipal Bond Commission, as of March 2022, the Ravencliff McGraws Saulsville PSD is current on their water reserve funding requirements.

If you require further information from the capacity development program, please contact me.

VAP