Service Line Inventory Fact Sheet

The service line inventory is meant to act as a living dataset that is continuously updated as new information is gathered and LSLs are replaced.

What must be included in the inventory?

- MATERIAL CLASSIFICATIONS of all service lines connected to a PWS distribution system (public and private-owned):
  - Lead
  - Galvanized Requiring Replacement (GRR)
  - Non-Lead
  - Unknown
- LOCATION IDENTIFIER for GRR and lead service lines (public-facing)
- EXACT STREET ADDRESS for GRR and lead service lines (internal-facing and reporting purposes)

How should service lines be classified?

- LEAD = A portion of pipe that is made of lead, which connects the water main to the building inlet
  - If a lead gooseneck, pigtail, or connector is the only portion of the service line that is lead, then the service line = Non-Lead
- GALVANIZED REQUIRING REPLACEMENT (GRR) = if it is or ever was downstream of a LSL
  - If it cannot be proven the galvanized line was never downstream of a LSL, the line must be presumed to be GRR
- NON-LEAD = If through evidence-based record, method, or technique a service line is classified as a material other than lead (i.e., copper, plastic, or galvanized never downstream of a LSL)
- UNKNOWN = if the line material is not known to be Lead, GRR, or Non-Lead

What records can be used to inform the inventory?

- Previous material evaluations
- Construction and plumbing codes/permits
- Water system records
- Distribution system inspection records
- Tax records
- Meter installation records
- Historical records on service line connections
- Standard operating procedures
- Historical capital improvement plans

What methods are acceptable to verify the records-based inventory? *

- Visual inspections
- Excavation
- Water quality sampling
- Predictive modeling

**check with your state regulatory agency for approved methods within your state*

Initial (non-verified) inventories must be submitted to your state primacy agency no later than October 16, 2024 along with an LSL replacement strategy/plan based on the service line inventory (if applicable).

What other requirements are important to know?

- Notifications must be sent to residents served by a LSL, GRR or unknown service line within 30 days of completing the initial inventory
- Notifications must be sent to the above residents annually until their service line is known as Non-Lead
- Inventories should be continuously updated and must be submitted based on your system's tap monitoring schedule (no more than once a year)
- Service line material must be identified and documented during normal operations:
  - Water meter reading, repair or replacement
  - Service line repair or replacement
  - Water main repair or replacement
  - Backflow prevention inspections
  - Other street repair or capital projects with excavation
- Sampling pools for tap monitoring must be updated with the information found from the service line inventory
- Sampling tier structures must be updated, prioritizing LSLs over copper pipes with lead solder
- Systems must be prepared to install or reoptimize CCT if a lead exceedance is discovered (considering the new lead trigger level of 10 ppb)

**some states have set earlier deadlines, check with your regulatory agency for a specific date in your state*

What other information should I be tracking?*

- Consider the source of information, pipe diameter and installation/replacement dates when gathering data, as these can help inform service line material:
  - LSLs are typically 2 inches or less in diameter
  - Lead pipe usage was banned at the federal level in 1986, and even earlier in some states and local municipalities
- Consider including the actual material of lines classified as Non-Lead and whether a GRR is known or unknown to be downstream of a LSL
- Although not a LSL, tracking the presence of lead solder is encouraged as that can also be a source of lead in drinking water
- Identifying the material of goosenecks, pigtails, connectors, meters and curb stops is also encouraged as these could contribute to lead exposure if they contain lead

**tracking additional data and material information beyond what is required during inventory development will benefit the PWS as this information could be required under LCRI or other future regulations.*

The Time To Start is Now

When planning for the LCRR, PWSs should consider key stakeholders, funding opportunities, and the staff and resources needed to achieve compliance with the LCRR. In 120Water's experience supporting the development of service line inventories, we have seen it take an average of 4-6 months to develop a preliminary inventory, and that is if the system has some data already compiled or at least an idea of where to find it. The USEPA highly advises PWSs to begin preparing, strategizing, and implementing the requirements of the LCRR now to ensure compliance is met.