

## **Office of Drinking Water Initial Lead Service Line Inventory**

### **Frequently Asked Questions**

On January 15, 2021, the United States Environmental Protection Agency (EPA) published the Lead and Copper Rule Revisions (LCRR) in the Federal Register. The revised rule makes significant changes to the existing lead and copper rule. The intent of the LCRR is to further protect public health and get the lead out of our public drinking water supply.

The Office of Drinking Water (ODW), as the primacy agency in the Commonwealth of Virginia, will be implementing the LCRR requirements. We will release guidance documents to help waterworks understand and implement the revisions. Please check our website <https://www.vdh.virginia.gov/drinking-water/lead-and-copper-information/> periodically for updated guidance and more information.

#### **Who is impacted by the LCR Revisions and the lead service line (LSL) inventory requirements?**

All community and nontransient noncommunity (NTNC) waterworks.

#### **When must the LSL inventory be submitted?**

The waterworks must submit the LSL inventory to ODW by the compliance date. The original compliance date, published in the Federal Register, was January 16, 2024. However, the EPA proposed to extend that compliance date to September 16, 2024. We will communicate any changes in this date to waterworks and on our website.

#### **What is included in the inventory?**

- For all service lines (regardless of ownership status):
  - Location identifier
    - Street address, customer number, block, or some other marker or landmark
  - Service line material identifier
    - Waterworks side: Unknown, lead, galvanized requiring replacement, non-lead. ODW encourages the inclusion of specific material type if known.
    - Customer side: Unknown, lead, galvanized requiring replacement, non-lead. ODW encourages the inclusion of specific material type if known.

- Justification/Basis of inventory material
  - For each portion of the service line, ODW expects waterworks to specify the information source or basis for material classification, citing federal laws, local building codes, construction records etc.

### **What are “unknown” service lines?**

A waterworks may classify service line materials as “lead status unknown” or “unknown” where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification. The LCRR does not require the LSL inventory to identify the material of every service line by the compliance date. However, the EPA has dis-incentivized having large numbers of unknown service lines by requiring annual public education and other requirements for all service connections listed as unknown. Please see 40 CFR 141.85 for more information.

### **What are non-lead service lines?**

The EPA defines non-lead service lines as those with evidence-based record, method, or techniques that they are not lead or galvanized service lines requiring replacement. The water system may classify the actual material of the service line (i.e., plastic or copper) as an alternative to classifying it as “non-lead”.

### **What is galvanized service lines requiring replacement?**

A galvanized service line requiring replacement is any galvanized service main that has ever been downstream of a lead service line, or of an unknown material service line. These lines are included in the lead service line replacement program because they have demonstrated the ability to absorb lead from a lead service line, and release it in the future. Replacing these lines will reduce a source of lead to the customers.

### **What do I do with the LSL inventory?**

All community and NTNC waterworks must submit a lead service line inventory to ODW. The LSL inventory must be submitted to ODW by the compliance date. Further information including templates and submittal instructions will be provided to waterworks in the future.

All systems must make their LSL inventories available to the public. In addition, all systems serving greater than 50,000 people must post their LSL inventory on the internet.

### **What if I have no lead service lines and no galvanized service lines requiring replacement?**

Waterworks that can demonstrate that they have only non-lead service lines must submit an initial inventory by the compliance date but are not required to provide inventory updates to the State or the Public. Waterworks with only non-lead service lines may comply with the requirement for a publicly accessible inventory using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines.

### **What other requirements are part of the LCRR?**

The LCRR is a comprehensive and complex re-write of the Lead and Copper Rule. The Office of Drinking Water will be creating guidance documents and providing training on the rule in the future. The Lead Service Line inventory is one of two requirements due by the compliance date of January 16, 2024. More information on the other requirement, the Lead Service Line Replacement Plans, will be available soon.

### **Where can I find more information about the LCRR?**

ODW will post guidance materials on our website <https://www.vdh.virginia.gov/drinking-water/lead-and-copper-information/> as they become available. We also encourage all waterworks to visit the EPA's website (<https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule>) for more information.