**FAQs Initial Lead Service Line Inventory**

**Office of Drinking Water**

On August 4, 2022, EPA published *Guidance for Developing and Maintaining a Service Line Inventory*, along with a service line template. These documents can be found here: [https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule](https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule)

1. **Who is impacted by the LCR Revisions and the lead service line (LSL) inventory requirements?** All community and nontransient noncommunity (NTNC) waterworks.

2. **When must the LSL inventory be submitted?** The waterworks must submit the LSL inventory to ODW by the compliance date, October 16, 2024.

3. **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.

4. **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](https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule) for more information.

5. **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”.

6. **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.

7. **Do lead goosenecks, pigtails, or connectors cause a service line to be classified as a lead service line under the LCRR?** No, the presence of lead goosenecks, pigtails or connectors do not by themselves cause a service line to be classified as a lead service line.

8. **Do lead goosenecks, pigtails, or connectors cause a service line to be classified as a galvanized requiring replacement service line under the LCRR?** No, the presence of lead goosenecks, pigtails or connectors do not by themselves cause a service line to be classified as a galvanized requiring replacement service line.
9. **Which service lines are included?** The LCRR service line inventory must include all service lines, regardless of the actual or intended use. These include non-potable applications such as fire suppression, irrigation, and industrial water connections. Inventories must include service lines to vacant or abandoned buildings, even if they are unoccupied and the water service is turned off.

10. **My waterworks has a well serving a single building. What do I report?** Report the pipe material from the well to the building inlet for the inventory.

11. **What records must my waterworks use to prepare the service line inventory?** Use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal operations, and state-specified information.

12. **What state-specified information is required?** Virginia waterworks must use the most recent approved LCR material survey and the Lead Ban Guidance and Chronology (posted on ODW’s website): [https://www.vdh.virginia.gov/drinking-water/lcrr-guidance/](https://www.vdh.virginia.gov/drinking-water/lcrr-guidance/).

13. **Is there a requirement to collect new information and update the inventory?** Systems must identify and track information on service line material as they are encountered in the course of normal operations (e.g., checking service line materials when reading water meters or performing maintenance activities). Systems must update the inventory based on all applicable sources and any lead service line replacements or service line material inspections that may have been conducted.

14. **What methods are available for determining the materials for unknown service lines?** ODW is accepting visual inspection of service line material, including at meter setting and inside home/building, customer self-identification, Closed-Circuit Television (CCTV) inspection, and use of lead swabs or surface test kits. ODW is accepting excavation, including vacuum and mechanical excavation. ODW will review and accept water quality sampling, predictive modeling, emerging methods and other methods on a case by case basis.

15. **Can a waterworks submit a statement that there are no lead service lines in lieu of an inventory?** The LCRR calls for all community and NTNC water systems to develop the inventory and submit it to the state. There is no provision in the LCRR for a statement in lieu of developing and submitting the inventory.

16. **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. An example LSL inventory template is available on our website at [https://www.vdh.virginia.gov/drinking-water/lead-and-copper-information/](https://www.vdh.virginia.gov/drinking-water/lead-and-copper-information/). Links to EPA’s guidance and service line inventory template are also available on our website. 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.

17. **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.
18. 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 at https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule for more information.

This FAQ document does not replace or supersede the requirements of the EPA Lead and Copper Rule or guidance published by the EPA. You may find more information on the requirements at 40 CFR § 141.84.