

FAQs Initial Lead Service Line Inventory

Office of Drinking Water

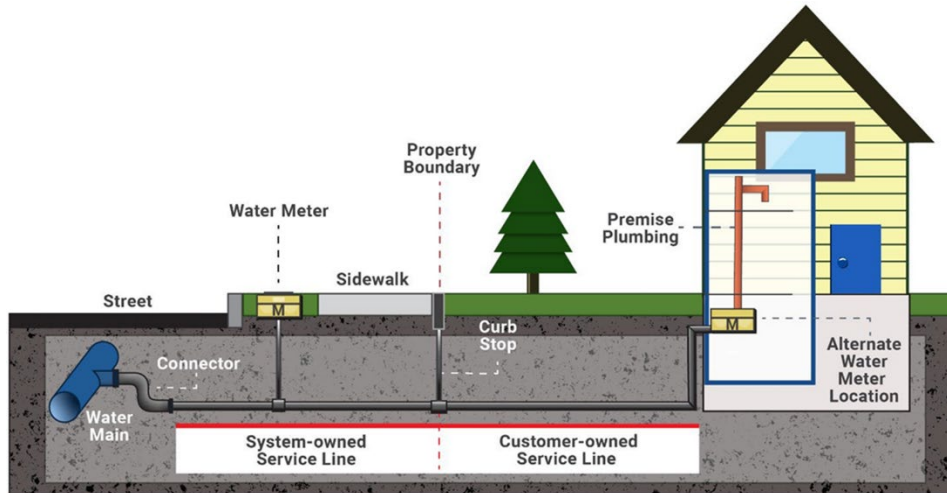
On August 4, 2022, EPA published *Guidance for Developing and Maintaining a Service Line Inventory*, along with a service line template. These documents can be found here: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>

- 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](#) 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. Galvanized 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. 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. For more information, see the [ODW Small NTNC SL Inventory Instructions](#).
- 10. 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.
- 11. 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/>
- 12. 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.
- 13. What methods are available for determining the materials for unknown service lines?** Please refer to the [Lead Service Line Inventory Methods](#) document for a list of approved methods.
- 14. 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.
- 15. What do I do with the LSL inventory?** All community and NTNC waterworks must submit a lead service line inventory to ODW through the SWIFT Submittals portal. For more information, see the [SWIFT Submittals Quick Start Guide](#).
- 16. 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 October 16, 2024, 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.
- 17. 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.
- 18. Do I have to submit an inventory even if there is 100% verification of non-lead service lines?** Yes. You must still submit inventory data into the SWIFT Submittals Portal.
- 19. Does the inventory have to be 100% complete by the October 16, 2024, due date?** The inventory, due October 16, 2024, must include each service line connected to the waterworks; however, it can still have lead status unknown service lines. The inventory is a "living document" and waterworks are required to continue to collect information on service line materials and maintain an updated copy of the inventory in their files.
- 20. When are inventory updates due?** The Lead and Copper Rule Improvements (LCRI) proposes to require submittal of an update of the inventory, called a "baseline inventory" on the compliance

date of the LCRI and annual updates to the State thereafter. The Compliance Date is anticipated to be in October 2027. Stay tuned for updates.

- 21. What is considered a service line?** For a community waterworks, the service line is the pipe connecting the water main to the interior plumbing in a building. The service line may be owned wholly by the water system or customer, or in many cases, ownership may be split between the water system and the customer.



- 22. What service lines should be included in the inventory?** All service lines connected to the waterworks regardless of actual or intended use. This includes 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. Inventories must include service lines that connect to the water main, including those that run to meter crock for an undeveloped lot.
- 23. Are there any regulations that require customers to comply with the inventory requirements?** There are no federal or Virginia state laws that require customers of a PWS to comply with inventory requirements. There may be local ordinances or laws or terms of service that require customers of a PWS to comply with the requirements.
- 24. How should the customer side section of the template be completed if the utility owns the entire service line?** Report the same information on the customer side that was recorded on the utility-owned section of the template.
- 25. How do wholesaler systems report the connection to their consecutive PWS in the inventory?** Wholesaler systems should report each connection to a consecutive PWS as a service line and report the pipe material immediately downstream of the service connection.
- 26. What is the requirement for reporting the service lines downstream of a master meter with multiple downstream in the inventory?** Waterworks serving facilities through a master meter should work with the property owner to the extent possible to document the materials of each customer side service line.
- 27. What is field verification of a service line and when is it used?** Field verification is the physical verification of service line materials to evaluate the accuracy of service line records, identify unknowns, or evaluate accuracy of prediction methods. This includes visual and physical testing (e.g., magnet test).

- 28. What documentation may be used to confirm that a building was constructed after the lead ban date?** Building records, including but not limited to permit documents, inspection documents and occupancy permits may be used to confirm the date of construction of a building. The date the water main was constructed, and the building was connected to the waterworks may be considered.
- 29. What should be used for the unique identifier for each service line?** This is up to the waterworks. Some waterworks are using customer account numbers as the unique identifier. If an account or building has multiple service lines, the waterworks can add a suffix such as “a” or “-1” to the end of the account number.
- 30. Who is responsible for the inventory completion and/or submission for a consecutive system?** The owner of the consecutive system is responsible for completion and submission of the LSLI to ODW.
- 31. Who is the primary contact at ODW for funding or financial assistance for the lead service line inventories?** Contact Tamara Anderson, Lead Program Manager, at 804-370-2439 or tamara.anderson@vdh.virginia.gov
- 32. Who is responsible for replacing identified Lead or GRR services lines owned by the customer?** The owner of the property is responsible for replacing the portion of identified Lead or GRR service line they own. However, the best prospect for obtaining full LSL or GRR replacement is where the waterworks owner partners with customers to facilitate replacement of both the utility and customer portions of the service line at the same time. If a customer refuses to replace the portion of the Lead or GRR service line they own, the waterworks must document the refusal.
- 33. When is consumer notification due to those customers who have Lead, GRR or Unknown service lines?** Consumer notification is due within 30 days after completion of the initial inventory. The notification should include the classification of the service line material, the health effects of lead, and steps to minimize lead exposure in drinking water. This information should also be provided to new customers at the time-of-service initiation.

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.