



Frequently Asked Questions About EPA's Proposed Lead and Copper Rule Revisions Service Line Inventory Requirements Oct 2023

EPA and DWS adopted revisions to the Lead and Copper Rule that include a requirement for public water systems to conduct inventories of service lines and to identify service line material types. The intent of the service line inventory requirement is to identify those service lines made of lead so that they can be removed and replaced.

What are the basic requirements for the service line inventory?

Public water systems must conduct an inventory of all service lines, on both the water system side and the homeowner side of the meter, and to submit the results to OHA–Drinking Water Services (DWS) by October 16, 2024. Service line materials must, at a minimum, be classified as one of the following:

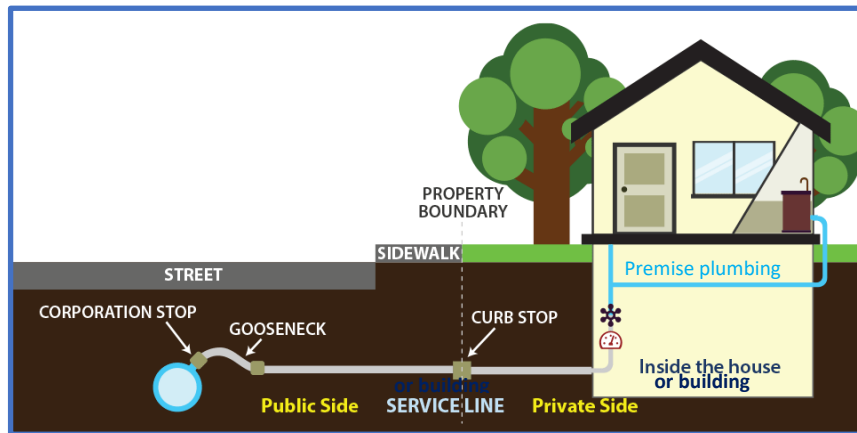
- **Lead**, where the service line is made of lead;
- **Non-lead**, where there is evidence to support this determination;
- **Galvanized requiring replacement**, where a galvanized service line is downstream of a current or former lead service line; or
- **Lead status unknown**, where there is no documentation or evidence to classify the material type.

Which public water systems (PWSs) need a service line inventory?

The service line inventory and annual update applies to all Community (C) and Non-Transient Non-Community (NTNC) water systems. Transient Non-Community (TNC) and Oregon Very Small (OVS) PWSs are not required to provide inventories.

What is a *service line*?

A *service line* is defined as the pipe(s), fittings, and meter located between the discharge of the corporation fitting (aka corp stop) adjacent to a water main and a customer's building inlet. The service line may be owned by the water system, the property owner, or both. The diagram below shows an example.



What is a *lead service line*?

A *lead service line* is a service line with any portion of pipe that is made of lead, which connects the water main to the building inlet.

What is a *non-lead service line*?

A *non-lead service line* is any service line that is determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement. Examples include plastic, copper, or galvanized lines that are not downstream of a known lead service line. In Oregon, service lines installed after 1985 are considered non-lead because this is when the lead ban was enacted in the state.

What is a *galvanized requiring replacement service line*?

A galvanized service line is considered *galvanized requiring replacement* if it ever was, or is currently, downstream of any lead service line (not including lead goosenecks or pigtails) or service line of unknown material.

What is a *lead status unknown service line*?

Any service line where there is no documented evidence supporting material classification is considered a *lead status unknown service line*.

What methodologies are acceptable to categorize service lines?

The following sources of information (methodologies) can be used for classification of service lines in the initial inventory.

- Records. All construction and plumbing codes, permits, and existing records and other documentation that indicate the service line materials used to connect structures to the distribution system such as distribution system maps and drawings, historical records on each service connection, and meter installation records.
- Installation date. Any piping installed after January 1, 1986, can be categorized as non-lead. If the water supplier has a documented construction standard established prior to that date that did not allow lead to be used for service lines, any service installed after that date can be categorized as non-lead.
- Service line size. Any service line with a diameter of 2 inches or greater can be categorized as non-lead.
- Customer data. The water supplier may choose to have customers submit documentation as to the lead status of their service line, from a location just inside their building. The water supplier must provide instructions to the building owner and must receive photo documentation clearly showing the service line material. If material cannot be visually confirmed, a scratch test on the pipe material can be performed and documented.
- Statistical analysis. If no lead service lines have been identified using the above methodologies (with customer supplied data being optional), a random sampling of a portion of the remaining unknown service lines that provides a 95% confidence level can be physically inspected. If no lead service lines are found in the randomized pool, all remaining unknown service lines can be categorized as non-lead. The statistical approach guidance document can be found here: www.oregon.gov/lcrr Statistical analysis allowed for community water systems only (CWS).

Can my water system use lead sampling results to determine the lead status of a service line?

No, lead sampling results for a home (or connection) cannot be used in the determination of a lead service line for reporting on the inventory.

If our system previously certified that there was no lead in the distribution system, is an inventory still required?

While previous investigations of service lines are valuable, every system needs to conduct an inventory of service lines under the rule and submit the results by the deadline of October 16, 2024. Previous certification allowed methods not evidence-based and did not include privately-owned portions of the services lines.

Do I have to inventory every connection from a water main (including irrigation and fire suppression lines)?

Yes, every active and non-active line must be considered for the inventory. Non-active lines can include new housing plots and uninhabited homes. The type of service connection can be documented on the spreadsheet in column H. Irrigation and fire-suppression lines are considered non-potable. Non-potable lines are not considered in the number of service connections, however, for a water system.

Do I have to identify the material type of every service line by October 16, 2024?

A system can use all available documentation to categorize service lines and consider those without documentation as *lead status unknown* in the initial inventory. However, unknowns must eventually be categorized. A public notice must be sent to customers of those service lines designated as lead, GRR, or unknown 30 days after inventory submission then annually after that or until the service line has been replaced or determined to be non-lead. The water system must supply filter pitchers to the customer if the service line is disturbed or in the event of a partial or full lead service line replacement.

What if lead pigtails or gooseneck connections are identified?

Since 1985, if a repair or inspection is conducted and a lead pigtail or gooseneck is discovered, the PWS is required to replace it at the time of repair. These types of connectors are not considered lead service lines under the EPA Lead and Copper Rule Revisions.

What if the service line branches on the customer property?

A line that branches after the meter and before multiple structures is considered one line for the purposes of counting service lines. If a customer-owned portion of the service line splits, each branch must be included in the inventory up to each building inlet.

After the statistical method is used, should we eventually go back and physically determine each service line material that was previously noted as unknown (now non-lead-not specified)?

Yes, DWS recommends that all systems create a complete inventory with all piping materials. This will only help the water system in the future.

What needs to be submitted to DWS?

Oregon has developed a spreadsheet (MS Excel) and reporting instructions. The spreadsheet or approved alternate submission format are the required forms for submission of the inventory. Check the DWS LCRR inventory website for updates to the submission resources available. Information can be found on the drinking water lead and copper rule revisions webpage located here: <https://www.oregon.gov/lcrr>

Our water system has submitted the initial inventory, but some records need to be corrected or updated. What should we do?

If an error was found the corrected inventory can be resubmitted to DWS anytime. An updated inventory spreadsheet must be submitted either annually or every 3 years based on the consumer tap monitoring schedule.

What are future requirements associated with the service line inventories?

Additional guidance and Lead and Copper Rule Improvements (LCRI) from EPA are coming out later in 2023 or 2024. DWS will know more when this has been released. This may include changes to the Lead service line replacement plans.