

# Developing Lead Service Line Inventories

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EPA United States Environmental Protection Agency

### **Today's Presentation**

- Health Impacts and Sources of Lead
- LCR, LCRR and LCRI Overview
- What is a Service Line Inventory
- Key EPA Guidance and References
- Benefits of a Complete and Accurate Inventory
- Inventory Elements
- Inventory Planning
- Historical Records Review
- Service Line Investigations
- Submitting, Sharing and Updating the Inventory





#### Disclaimer

The views expressed in this presentation are those of the author and do not necessarily reflect the views or policies of the U.S. Environmental Protection Agency.

EPA documents in this presentation are not regulations themselves, nor do they change or substitute for those provisions and regulations nor impose legally binding requirements on EPA, states, or the regulated community.



### **Health Impacts of Lead**

- There is no safe level of lead
- Young children, infants, and fetuses
  - Vulnerable at lower exposures
  - Learning and behavior problems. Lower IQ.
  - Slowed growth and development. Hearing and speech problems.
- Pregnant women
  - Lead in women's body can be passed to fetus during pregnancy
  - Risks include reduced growth and premature birth
- Adults
  - Cardiovascular effects increased blood pressure
  - Decreased kidney function
  - Reproductive problems in both men and women

#### **Sources of Lead**

- Lead-based paint chips and dust in homes. Lead-based paints banned in 1987.
- Soil and yard around homes.
- Dissolved and particulate lead in drinking water. Federal lead ban in 1986.
- Lead dust from mining activity.
- Hunting ammunition. Fishing tackle.
- Stained glass. Dyes and glazes used in pottery.
- Old children's toys. Toy jewelry.

More information about lead testing and prevention recommendations in Wyoming can be found at <u>https://health.wyo.gov/children-can-be-harmed-by-lead-exposure/</u>.





Infographic available at <u>https://www.epa.gov/ground-water-and-drinking-water/infographic-lead-drinking-water</u>

## Sources of Lead in Drinking Water

- Lead Service Lines
- Copper Pipes with Lead Solder
- Galvanized Pipes Lead can attach to surface
- Lead connectors, goosenecks and pigtails
  Faucets/Fixtures in home may contain lead
- Lead can enter drinking water when pipes corrode.
- Lead can be dissolved and/or particulate.
- Lead service lines, when present, are a significant source of lead in drinking water.



## Lead and Copper Rule (LCR) Overview

- The Lead and Copper Rule (LCR) was originally promulgated in 1991
- Applies to Community Water Systems (CWS) & Non-transient Non-community Water Systems (NTNCWS)
- Transient Water Systems are not required to comply with LCR
- Current enforceable rule
- https://www.epa.gov/dwreginfo/lead-and-copper-rule



## Lead and Copper Rule Revisions (LCRR)

- Lead and Copper Rule Revisions (LCRR), finalized in 2021.
- LCRR require all CWSs and NTNCWs to develop a service line inventory.
- *Initial* Service Line Inventory DUE October 16, 2024.
- Concurrently, development of Lead and Copper Rule Improvements (LCRI). Proposed later in 2023 and finalized no later than October 16, 2024.
- The LCRR requirements for the <u>initial</u> service line inventory will remain.
- <u>https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule</u>

## **Historic Opportunity**

- Top priority of Administration to replace all lead service lines in the next decade.
- Nationally, the Infrastructure Investment and Jobs Act (IIJA) (also called Bipartisan Infrastructure Law (BIL)) provides \$15B for developing inventories and removing lead pipes.
- Funds awarded to States via DWSRF Program.
- Many, but not all, communities and water systems will benefit from BIL DWSRF funding.
- *First step* Preparing a service line inventory and identifying any lead service lines.
- EPA Guidance and documents to help with this requirement. EPA Region 8 LSLI webpage, documents, additional staff.



#### WY DWSRF Contacts & Websites

#### Wyoming Office of State Lands and Investments

Beth Blackwell, Grants & Loans Manager, <u>elizabeth.blackwell@wyo.gov</u>, 307-777-6373

• WY OSLI DWSRF website - <u>https://lands.wyo.gov/grants-loans/loans/drinking-water-state-revolving-funds</u>

#### Wyoming DEQ Water & Wastewater Program

Keenan Hendon, Water & Wastewater Manager, <u>keenan.hendon2@wyo.gov</u>, 307-777-7781 Stan Miller, SRF Principal Engineer, <u>stanley.miller@wyo.gov</u>, 307-777-6371

• WY DEQ DWSRF website - <u>https://deq.wyoming.gov/water-quality/water-</u> wastewater/state-revolving-loan-fund/



### What is a Service Line?

- A *service line* is the pipe connecting the water main to the interior plumbing in a building.
- May be owned by the water system or customer or split.





#### What is a Service Line Inventory?

A *service line inventory* is a spreadsheet where every service line in a public water system has a row with data.

Service line data include the service line material(s), an address or location identifier, and other relevant information.





#### **Key Reference: EPA Inventory Guidance**

#### Who is it for?

- Drinking water systems of all sizes
- Primacy agencies

#### What does it contain?

- LCRR inventory-related requirements
- Recommendations/best practices
- Case studies and example materials
- Inventory template
- 164 pages

Guidance available at <u>https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule</u> and at <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8</u>



**Disclaimer:** This document is not a regulation itself, nor does it change or substitute for those provisions and regulations nor impose legally binding requirements on EPA, states, or the regulated community.

### **Guidance Document Topics**

- Ch 1: Benefits of a Service Line Inventory
- Ch 2: Elements of the Inventory
- Ch 3: Inventory Planning
- Ch 4: Historical Records Review
- Ch 5: Service Line Investigation Methods
- Ch 6: Developing and Updating the Inventory
- Ch 7: Public Accessibility
- Ch 8: References
- Appendices featuring case studies
- National EPA Inventory Template



## Key Reference: EPA Small Systems Guidance

#### Who is it for ?

- Small CWSs and NTNCWSs
- For small towns, rural water districts, MHPs, HOAs, small private systems, schools with their own water supply

#### What does it contain?

- LCRR inventory-related requirements
- Additional service line configuration examples
- Summary of recommendations/best practices
- NTNCWS configurations
- Example of completed inventory template and forms for a hypothetical system
- ~50 pages

Available online: <u>https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-</u> <u>copper-rule</u> or at <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-</u> <u>and-tribal-lands-epa-region-8</u>



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### **Small Entity Guide Organization**

- 1. Introduction
- 2. Who Should Use this Guide?
- 3. How Do I Use This Guide
- 4. What Are the Benefits of a Comprehensive and Accurate Inventory?
- 4. What are the Initial Inventory Requirements of the LCRR?
- 5. How do Service Line Inventory Requirements Relate to Other Requirements?
- 6. Which Service Lines Must I Include in My Initial Inventory?
- 7. What Information Must be Included in My Initial Inventory?
- 8. Is there Additional Information I Should Consider for My Inventory?
- 9. How Do I Develop My Service Line Inventory?
- 10. What If I Only Have Non-Lead Service Lines?
- 11. What Information Must I Report to EPA and When?
- 12. What Information Must I Provide to the Public?

Appendix A: Additional Useful References

Appendix C: Completed Inventory Template Forms for Hypothetical System

#### Examples of a Non-transient Non-community Water System (NTNCWS) Service Configurations (Profile View)



#### KEY

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TNCWS=Non-translent on-community water system	Meter	±.
=System-owned	Pressure Tank	0
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### **Key Reference: EPA Inventory Fact Sheet**

#### Who is it for?

- Drinking water systems of all sizes
- Primacy agencies

#### What does it contain?

- LCRR inventory-related requirements
- Recommendations/best practices
- Key graphics from inventory guidance
- 8 pages total

Available online: <u>https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-</u> <u>copper-rule</u> or at <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-</u> <u>and-tribal-lands-epa-region-8</u>

#### **€PA**

#### FACT SHEET FOR DEVELOPING AND MAINTAINING A SERVICE LINE INVENTORY

There is no safe level of lead exposure. EPA will continue to strengthen actions to protect communities from lead in drinking water. This guidance alongside regulatory improvements, infrastructure investments like the \$15 billion provided by the Bipartisan Infrastructure Law for identifying and replacing lead service lines (LSLs), and other actions, are significant steps towards replacing 100% of LSLs across the country.

Service line inventories are the foundation from which water systems can take action to address LSLs. Establishing an inventory of service line materials and identifying the location of LSLs are key steps in getting them replaced. A comprehensive and accurate inventory allows you to publicly track progress on LSL identification and replacement, engaging the community and enhancing transparency. In addition, a comprehensive and accurate inventory can help all systems by supporting asset management programs and customer communications.

#### WHO CAN BENEFIT FROM THIS FACT SHEET

All community water systems (CWSc) and non-transient non-community water systems (NTNCWSs) must submit an initial inventory to their state or primacy agency by **October 16, 2024**. If you are a CWS or NTNCWS, this fact sheet can help you understand your requirements and prepare your invertory.

#### WHAT INFORMATION DOES IT CONTAIN?

This fact sheet provides an overview of EPA's requirements for developing an initial inventory. It also contains a summary of EPA recommendations. For more details, refer to the full guidance for developing and maintaining a service line inventory, available online here: <a href="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</a>.



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#### **Key Reference: Region 8 Template & Instructions**

- Region 8 Inventory Template spreadsheet created specifically for public water systems in Wyoming and on Tribal Lands in Region 8.
- Based on EPA's National Template.
- Enhanced with autofill and calculations to help your water system succeed in meeting the requirements.
- •
- Separate instructions document supports the Region 8 Service Line Inventory Template and General Information Form.
- Instructions document contains guidance on how to properly use the template and tips on how to complete a service line inventory.

R8 LSLI Reporting Forms: <u>https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#lsli</u> R8 LSLI Webpage: <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8</u>



#### **Region 8 Inventory Template & Instructions**

#### Second hour of training will be on Region 8 Inventory Template

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### Key Reference: EPA R8 LSLI website

**Region 8 Drinking Water Online** 

## Lead Service Line Inventories in Wyoming and on Tribal Lands in EPA Region 8

Go to the EPA Region 8 Waterops website at <u>https://www.epa.gov/region8-waterops</u>. Then, under Regulations and Compliance, click on Lead Service Line Inventories (LSLI), Or go directly to <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8</u>.



#### **Benefits of a Complete and Accurate Inventory**

#### Facilitates lead service line replacement (LSLR) programs

- Can be used in LSLR funding applications
- Increases LSLR program efficiency, stretching the value of funding
- Enables prioritization for LSLR

#### **Improve public health**

- Allows for notification to customers about lead sources in drinking water so they can take action to reduce their risk of exposure
- Allows for mitigation of exposure risk after disturbance of known or potential lead or GRR service line



#### **Benefits of a Complete and Accurate Inventory**

#### **Engages the community**

- Builds customer transparency
- Opportunity to educate and involve customers, which can create opportunities for LSLR
- Showcase progress of LSLR program

#### **Improves asset management**





#### **Inventory Elements - <u>Required</u>**

- Include all service lines, regardless of actual or intended use.
- Include information on both system- and customer-side where ownership is split.
- Required service line material classifications:

Lead Service Line (LSL)

Galvanized Requiring Replacement (GRR) Non-Lead (supported with evidence)

Lead status unknown or Unknown

• Address or location identifier.





#### **Inventory Elements -** *<u>Recommended</u>***</u>**

#### **Subclassifications**

- Likelihood that an unknown is lead
- Actual material of non-lead lines (copper, plastic)

#### Include other drinking water infrastructure potentially containing lead

- Lead goosenecks, pigtails, connectors
- Lead solder

#### **Recommended service line characteristics**

- Pipe diameter
- Installation date
- Source of information for each service line identification



### Lead Service Lines (LSLs)

- LSL: any portion of a pipe that is made of lead, which connects the water main to the building inlet.
- Lead goosenecks or connectors are not a required inventory element under the LCRR, but EPA strongly recommends tracking them.







### **Galvanized Requiring Replacement (GRR)**

- Galvanized pipes are iron or steel piping dipped in zinc to prevent corrosion and rusting
- These can adsorb lead (legacy lead) and continue to contribute lead in drinking water.
- Classify service lines as GRR if:
- It <u>is</u> or <u>ever was at any time</u> downstream of an LSL.
- It is currently downstream of a lead status unknown service line.
- The water system is unable to demonstrate that it was never downstream of an LSL.





### **Non-Lead Service Lines**

- The service line is determined through an evidence-based record, method or technique that it is not lead or GRR.
- Some examples include copper and plastic.







#### Lead Status Unknown or Unknown

- The service line material is not known to be lead, GRR, or non-lead.
- This is used when there is no documented evidence supporting material classification.



### **Regulatory Definitions**

• Definitions are in the LCRR

https://www.federalregister.gov/documents/2021/01/15/20 20-28691/national-primary-drinking-water-regulations-leadand-copper-rule-revisions

 Definitions with regulatory citations can also be found in the Glossary of EPA's Guidance for Developing and Maintaining a Service Line Inventory (pp ix-x)

Galvanized requiring replacement	A galvanized service line that is or was at any time downstream of a lead service line or is currently downstream of a lead status unknown service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line (40 CFR §141.84(a)(4)(ii)).
Galvanized service line	Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting (40 CFR $\S141.2$ ).
Gooseneck, pigtail, or connector	A short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping. For purposes of this subpart, lead goosenecks, pigtails, and connectors are not considered to be part of the lead service line but may be required to be replaced pursuant to §141.84(c) <sup>4</sup> (40 CFR §141.2).
Lead service line	A portion of pipe that is made of lead, which connects the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner, or both. For the purposes of this subpart, a galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material. If the only lead piping serving the home is a lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, the service line is not a lead service line (40 CFR §141.2).
Lead status unknown service line	A service line where the 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. It is not necessary to physically verify the material composition ( <i>e.g.</i> , copper or plastic) of a service line for its lead status to be identified ( <i>e.g.</i> , records demonstrating the service line was installed after a municipal, state, or federal lead ban <sup>3</sup> ) (40 CFR §141.2).
Non-lead	A service line that is determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement (40 CFR § 141.84(a)(4)(iii)).

### **Both System- and Customer-Owned Portions**

- The dividing line for ownership can vary.
- The system or the customer may be the sole owner.
- One overall classification for the entire service line is also needed.





#### **Classifying Entire Service Line with Split Ownership**

System-Owned Portion	Customer-Owned Portion	Classification for the Entire Service Line
Lead	Lead	Lead
Lead	GRR	Lead
Lead	Non-lead	Lead
Lead	Unknown	Lead
Non-lead	Lead	Lead
Unknown	Lead	Lead



#### **Classifying Entire Service Line with Split Ownership (Cont)**

System-Owned Portion	Customer-Owned Portion	Classification for the Entire Service Line
Unknown	GRR	GRR
Non-lead, but system is unable to demonstrate it was not previously Lead	GRR	GRR
Unknown	Unknown	Unknown
Unknown	Non-lead	Unknown
Non-lead	Unknown	Unknown
Non-lead	Non-lead	Non-Lead





### **Recommended Inventory Planning Steps**

- Inventory efforts will depend on:
  - Size of the system
  - Availability, format, and condition of records
  - o Investigation methods
- Identify staff and resources
- Select an inventory format spreadsheet template, GIS
- Develop partnerships
- Develop procedures for collecting inventory information during normal operations
- Gather required records and review

### **Select an Inventory Format**

- Possible formats include spreadsheets and GIS.
- EPA does not require a specific format but offers two spreadsheet templates:
   National Template
  - o Region 8 Template
- The format you choose should be:
  - Flexible enough to accommodate updates. Living document.
  - o Include location identifiers
  - Be in a format that can be made publicly accessible
- Submit inventory as spreadsheet to EPA Region 8



### **Establish Partnerships with Third Parties**

- Identify and build partnerships with third parties:
  - o Plumbers
  - o Building inspectors
  - Community-based organizations
  - o Others
- Third party partnerships can:
  - Help determine service line material
  - Facilitate outreach and engagement for inventory efforts and LSLR





### Develop Procedures for Gathering Service Line Information During Normal Operations

- Identifying service line material should be built into normal operations such as:
  - Water meter reading, repair, or replacement;
  - Service line repair or replacement;
  - o Water main repair or replacement; and
  - Backflow prevention inspections.
- Consider adding standard operating procedures (SOPs) to document how the information will be collected and used.



**Example of Meter Pit** Source LSLR Collaborative 2018

### **Initial Records Review**

- Age: Most LSLs are old!
  - LSLs were primarily installed from the late 1800s thru the 1940s
  - Some were installed thru the 1980s
  - $\circ$  Banned at the federal level in 1986
- Size: Most LSLs are ≤ 2 inches in diameter.
- Use: Primarily for single-family homes or small multi-family residences.
- **Note**: Federal SDWA lead ban in 1986. Effective date – late 1988.

For WY and R8 Tribal water systems, service lines installed in 1989 or later can be considered non-lead.





### Historical Records that must be reviewed

The LCRR specifies the types of historical records that water systems <u>must review</u> to develop their service line inventory:

1. Previous Materials Evaluations
2. Construction and Plumbing Codes
3. Water System Records
4. Distribution Systems Inspections and Records

Caution: Available? Legible? Complete? Accurate? Up-to-Date?

Note: See *Region 8 Inventory Template Instructions* for guidance and tips on Historical Records Review.



### **Previous Materials Evaluations**

- Any previous materials evaluations must be reviewed as part of the historical records review.
- The 1991 Lead and Copper Rule (LCR) required water systems to conduct a materials evaluation of their distribution system to identify pool of targeted sampling sites that met the sample site requirements.
- The LCR also required water systems to review other records comparable to LCRR historical records review.
- In the 1980s, in order to address corrosion-related contaminants, systems were required to identify materials present in their distribution system.



### **Construction and Plumbing Codes**

#### Places to look for documents:

- Municipal building permit/code enforcement department
- Agency overseeing state plumbing code
- Local governing body (*e.g.*, city or town council)
- City archives, which are often in city public libraries
- Online databases with historical city codes

#### **O**Things to look for:

- When LSLs were allowed/specified or banned from use
- Service areas most likely to have LSLs by home/building construction date and service line size
- o Service line and plumbing materials in construction and plumbing permits

### Water System Records

- Distribution system maps and drawings
- Service line installation records or property tax records
- Historical records on each service connection
  - o e.g., Tap cards or drill records
- Meter installation records
- Historical capital improvement plans or maps
- Standard operating procedures

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### **Distribution System Inspections**

- All inspections and records of the distribution system that indicate material composition of the service connections
- Types of inspection records could include:
  - Responses to customer complaints
  - o Inspections to locate leaks
  - o Inspections to investigate meter issues
  - Cross connection inspections



#### **Recommended Best Practices**

- Document the records you review and use to identify service lines in your inventory.
- Document confidence of the accuracy of records (e.g., low, medium, high)
- Continue to gather information on service line materials after they have been classified to assess the accuracy of historical records
  - If a certain record source is found to be unreliable, consider reclassifying service lines based on that source as "unknown"
- Records that systems have already reviewed for service line material information do not need to be reviewed again
  - Document the scope and date of previous reviews







### **Service Line Investigations**

- Used to determine the service line material when:

   Information is not available from historical records
   (*i.e.*, the material is unknown) or
  - To confirm historical records
- Are NOT required under the LCRR for the *initial* inventory.
- The LCRR requires state [EPA R8] approval for a service line investigative method to be used for material classification as part of the submitted inventory.
- Methods range in level of effort, cost, disturbance, and customer participation.



### **Consider Service Line Investigations**

- Incomplete historical records.
- Low confidence in the accuracy of historical records.
- In coordination with other water system field work.
- Focus on areas with:
  - o High likelihood of finding lead
  - High number of unknowns
  - Areas with vulnerable populations
  - Environmental justice populations



### **Visual Inspection**



Plastic

Scratched Lead

Copper

Galvanized Steel & valve



#### Visual Inspection (Cont'd)

A "wiped" joint can indicate an LSL.





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## Customer Visual Inspection – Finding the Service Line

- Where the service line comes into the building:
  - e.g., in the basement where it connects to the water meter and/or premise plumbing.
- Free online resources available to help customers find their service line:
  - o EPA Protect Your Tap
  - DC Water How to Locate Your DC Water
     Service Line Coming Into Your Home Video
  - NPR Find Lead Pipes in Your Home





### **On-site Visual Inspection**

- Easiest and low cost
- Used by operators and residents
- Prepared visual guides
- Scratch test
- Magnet Test
- EPA's "Protect Your Tap"
- Lead paint swab test kits can also be used. Be sure to use surface swab kits approved by EPA for lead paint -<u>www.epa.gov/lead/lead-test-kits</u>.





https://www.epa.gov/ground-water-and-drinkingwater/protect-your-tap-quick-check-lead



### **Specific Water Analyses**

#### **Targeted Service Line Sampling:**

 Flushing out the water in premise plumbing and collecting a sample from the service line.

#### Flushed Sampling:

• Collecting sample from tap after set flushing time. Sample influenced by LSL.

#### **Sequential Sampling:**

 Collecting series of consecutive samples that capture water from tap to main including service line.



**Note:** The number of bottles for each part of the plumbing system and service line is site-specific based on water system or even individual residence.

Source: EPA Guidance for Developing and Maintaining a Service Line Inventory, August 2022



#### Water Quality Sampling: Recommended Best Practices

- Can use a combination of sampling techniques.
  - A study by Schock et al. (2021) recommends using a combination of flushed and sequential sampling to establish a community-specific threshold.
- Establish a community-specific threshold.
  - Base the threshold on sample results from sites with known service line material.
  - $\,\circ\,$  Thresholds between 1 and 5  $\mu g/L$  are common.
  - o Samples above the threshold could indicate the presence of an LSL.
- Use as a screen for the presence of LSLs.
  - o Low and non-detect lead levels may not reliably indicate the absence of LSLs.
  - o If effective corrosion control, LSL sites harder to differentiate.

#### **Excavation**

- Can be expensive.
- Requires coordination with the property owners and/or the community.
- May need to request permission. Permission may be denied.
- Possible pipe disturbance can elevate lead levels.
- Two kinds:
  - Mechanical
  - Vacuum



### **Vacuum Excavation**

A hydro-vacuum truck consists of

- high-pressure water jet that loosens soil, and
- industrial vacuum that removes it into a holding tank until the SL is exposed for visual observation

#### Reliable:

- Higher accuracy rate than other indirect methods because the SL is exposed for observation
- Less expensive, less disturbance: smaller hole(s) than mechanical excavation

Caution:

- Cost, Time, Disturbance
- Not standardized (1, 2, or 3 holes?)
- Heterogeneous SL may have lead segments that could be missed by single hole
- Can identify solid lead service lines but not lead-lined iron or lead-lined steel



### **Mechanical Excavation**

Backhoe or another mechanical excavator to dig a test pit down to the SL to expose it for visual identification.

Considered the gold standard for LSL ID:

 Most reliable, since higher accuracy rate than other (excavation) methods because a longer length of SL is exposed for observation, up to 10 ft in some instances

Caution:

- Cost, Time
- Disturbance (especially to dig SLs that are not lead) due to removal of topsoil, sidewalk, or other obstacles
- Can identify solid lead service lines but not lead-lined iron or lead-lined steel

#### **Stepwise SL Identification Approach**



#### **Submitting the Initial Inventory**

#### Submit initial inventory spreadsheet and forms

• Initial inventory must be submitted to EPA by October 16<sup>th</sup>, 2024.

#### Systems with only non-lead lines

- Required to develop and submit initial inventory.
- Provide documentation and certification that all service lines non-lead.

#### **EPA review and reporting**

- Checklist for review of initial inventory.
- EPA reports number of lead, GRR, non-lead and unknown service lines for each water system.

#### **Requirement for customer notification**

• Notification to customers with LSL, GRR, or unknown services lines within 30 days of submittal.

#### **Public Accessibility Requirements**

**Consumer Confidence Report Requirements** – beginning 2025



#### **Customer Notification Requirements**

Required to notify individual customers served by an LSL, GRR or unknown service line within 30 days of submitting initial inventory. Notification must be repeated annually.

LSL	GRR	Unknown
<ul> <li>A statement that the service line material is lead</li> <li>Mandatory health effects language</li> <li>Steps consumers can take to reduce exposure to lead in drinking water</li> <li>Opportunities for LSL replacement</li> <li>Information about any available financing</li> <li>A statement that the water system must replace its portion if the property owners notify the system they are replacing their portion</li> </ul>	<ul> <li>A statement that the service line material is GRR</li> <li>Mandatory health effects language</li> <li>Steps consumers can take to reduce exposure to lead in drinking water</li> <li>Opportunities for service line replacement</li> </ul>	<ul> <li>A statement that the service line material is lead status unknown</li> <li>Mandatory health effects language</li> <li>Steps consumers can take to reduce exposure to lead in drinking water</li> <li>Opportunities to verify the material of the service line</li> </ul>



### **Publicly Accessible Requirements**

- Inventory must be publicly accessible.
  - Posting to the system website,
  - o By mail, or
  - Making it available in your office.
- Statement in Consumer Confidence Report (CCR):
  - Beginning in 2025, CWSs must include a statement in annual CCR that they have prepared a service line inventory and information on how to access the inventory.





### **EPA Contacts & Websites**

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- R8 Drinking Water System Operations <u>https://www.epa.gov/region8-waterops</u>
- R8 LSLI Webpage <u>https://www.epa.gov/region8-waterops/lead-service-line-inventories-</u> wyoming-and-tribal-lands-epa-region-8
- R8 LSLI Reporting Forms <u>https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#lsli</u>
- EPA Revised Lead and Copper Rule <u>https://www.epa.gov/ground-water-and-drinking-</u> <u>water/revised-lead-and-copper-rule</u>

# Questions?