



Lead Service Line Inventory

EPA LCRR Regulatory Compliance Training

WARWS Mini Conference

October 1, 2024

**EPA Region 8 Safe Drinking Water Branch
Lead Service Line Inventory Team:**

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LCRR – Initial Lead Service Line Inventory

*All CWS and NTNCWS must develop an initial inventory to identify the materials of service lines connected to the public water distribution system and submit to the primacy agency by **October 16, 2024**.*

Today's Presentation

- Service line inventory reporting requirements
- Demonstrating compliance with requirements
- Submitting the service line inventory to EPA Region 8
- Service Line Inventory Online Submittal Repository
- Public accessibility
- Service line material notification and templates

Lead service line inventory reporting requirements.

Per CFR 141.90(e), No later than **October 16, 2024**, the water system must submit an inventory of service lines as required in 141.84(a) that demonstrates compliance with the requirements of [§§ 141.84](#) (a) and must include:

Required Elements

- All service lines connected to the distribution system, regardless of ownership, or intended use.
- Service line material classifications for both the system-owned and customer owned portions of service line where ownership is split.
- All service lines classified as either lead, galvanized requiring replacement (GRR), non-lead, or lead status unknown.
- A service location identifier for all service lines for the water systems and EPA reporting copy of the service line inventory.

Lead service line inventory reporting requirements.

Information Sources (Methodology)

- Describe all historical records you used to prepare the initial inventory: previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records.
- Describe activities in which you are collecting service line material information during normal operations.

Inventory Summary

- Disclose who owns the service lines in your water system (water system owns the entire service line, the customer owns the entire service line, or there is split ownership where the water system owns a portion and the customer owns apportion)
- Provide a summary of your detailed inventory: Count service lines with overall material classification of: Lead, GRR, Non-Lead, Unknown.

Public Accessibility Documentation

- Documentation: How the water system made the inventory publicly accessible (if water system serves a population of > 50,000, the inventory must be available online), verify that location identifiers (e.g., street address) were used for lead and GRR service lines.

Demonstrating compliance with these requirements can be done by:

If you are using an EPA Service Line Inventory Template:

- Complete the required fields in the ***Detailed Inventory*** spreadsheet (teal-colored columns).
- Document the additional required information in the ***PWS Information, Methodology, Inventory Summary, and Public Accessibility Documentation*** forms (found in the additional tabs in the workbook)

If you are using HDR WYRISKIT Template:

- Complete all required fields in the HDR spreadsheet (Yellow spreadsheet)
- Turn in your inventory to <https://www.WYRISKIT.com>: Document the required information in the WYRISKIT Service Line Inventory Upload Submittal (Jot) form.

If you are not using one of EPAs Service Line Inventory Templates:

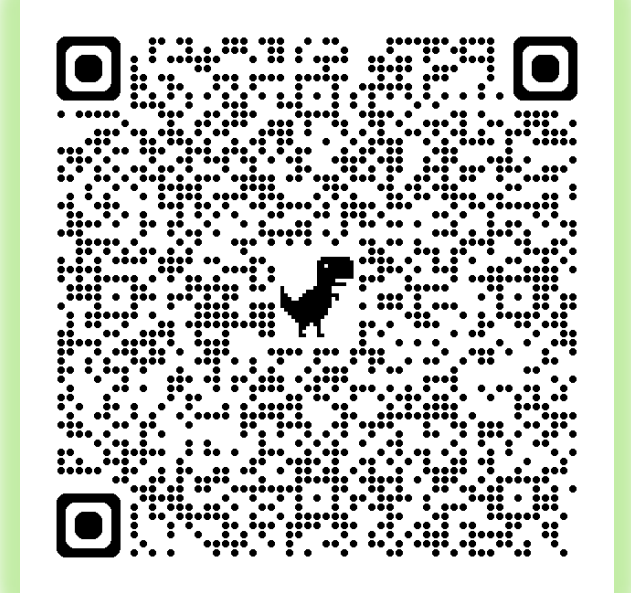
If you are submitting an inventory to EPA and your inventory and need a form to report the additional information:

- Make sure your inventory of service line has all the basic elements included
- Complete the ***Service Line Inventory Compliance Documentation form*** (fillable PDF) available on the **EPA Region 8 Water Ops LSLI Website.**

Submitting the Service Line Inventory to EPA Region 8

EPA Region 8 Service Line Inventory Online Submittal Repository

- Access the LSLI Repository on the EPA Region 8 Lead Service Line Inventory Website. www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8
- Complete and attach inventory files to the EPA Service Line Inventory Upload Submittal Form and click submit to deliver to EPA Region 8.
- Recommended file formats for the Service Line Inventory: Spreadsheet, Shapefile, File Geodatabase (FGDB).
- *If you are using the EPA Service Line Inventory GeoSolution (GIS Inventory on EPA GeoPlatform: Complete the GeoSolution Submittal form in your GeoSolution Content folder.*
- *If you are working with the state of Wyoming's Technical Assistance provider HDR and using their yellow template, submit to their website WYRISKIT. You do not need to submit to both EPA and WYRISKIT, HDR will transfer your inventory to EPA.*



EPA Region 8 Service Line Inventory Online Submittal Repository

EPA United States Environmental Protection Agency

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

Submitting the Service Line Inventory to EPA Region 8

Water systems in Wyoming and on Tribal Lands in EPA Region 8 can submit their Initial Service Line Inventories to EPA Region 8 by either (1) through the [EPA Region 8 Service Line Inventory Online Submittal Repository](#), or (2) opt-ing into our new GIS version of the Service Line Inventory, [The EPA Service Line Inventory GeoSolution](#), brought to you for free by EPA's GIS Online Platform.

EPA Region 8 Service Line Inventory Online Submittal Repository

Water systems that do not use the EPA Service Line Inventory GeoSolution can submit their Service Line Inventory files to EPA Region 8 using the **EPA Service Line Inventory Upload Submittal Form**. This form provides water systems an online repository to submit their service line inventories to EPA Region 8. Only use this form if you are turning in your completed service line inventory to EPA. No partial or draft copies please. Recommended file formats for the Service Line Inventory: Spreadsheet, Shapefile, File Geodatabase (FGDB).

- [EPA Service Line Inventory Upload Submittal Form](#)

EPA Service Line Inventory Upload Submittal

Purpose: The purpose of this form is for water systems where EPA is the Primacy Agency to submit their service line inventory.

* Denotes a required field

Water System Info

Primacy Agency*

☐ EPA Region 7 (Tribal) ☐ EPA Region 8 (Tribal) ☒ Wyoming

Water System Name*

Use the drop-down list to select the water system name. Alternatively, search by entering the name into the field and select it from the filtered results.

Not on List

☐ Water System Name is not on the Drop-Down List

PWSID (Water System No.)*

Select Wyoming as the Primacy Agency

Use drop down menu or begin typing in your water system's name to narrow search, then select.

If you cannot find your water system in the search: Select Water System Name not in the drop-down list. Then enter manually in field provided.

Water System Number (PWSID) will auto populate if you choose from list. Manually enter PWS if you select not on list. PWS ID is 9 characters, "WY" followed by 7 numbers, no special characters or letters. Ex: WY5699999

EPA Region 8 Service Line Inventory Online Submittal Repository

Water System Contact Person

Job Function*

Name*
(First and Last Name)

Phone*

Email*

Is the person who prepared the inventory or who is submitting this form different than Water System Contact Person?

Different Person

☐ Yes ☐ No

Contact information for the water system

Water system contact person's Job function of the

Water system contact person's first and last name

Water system contact person's Business Phone Number and Email address

If the person who prepared the inventory is different than water system contact person, select "yes" and add their contact info.

This info will be used to contact you if needed and the E-mail addresses given will receive a notification verifying your LSLI submittal from EPA Region 8.

EPA Region 8 Service Line Inventory Online Submittal Repository

Upload your Service Line Inventory File(s)

What are you Submitting to EPA Today?*

Service Line Inventory

The Service Line Inventory you report to EPA must include the following basic elements:

1. All service lines, regardless of the actual or intended use
2. Service line material classification (i.e., lead, galvanized requiring replacement (GRR), non-lead, or lead status unknown)
3. Material classifications for both the system- and customer-side where ownership is split
4. Location identifiers for all service lines (e.g., street address)

Service Line Inventory Compliance Documentation

In addition to the basic inventory elements, water systems must also report the following Compliance Documentation to EPA to demonstrate compliance with the requirements for developing a service line inventory:

1. How the inventory public accessibility requirements were met
2. Methodologies and resources used to develop and update the inventory
3. Service line ownership type
4. Number of service lines for each of the four required material classifications from inventory

If this compliance documentation is not already included in your inventory, complete this [EPA Service Line Inventory - Compliance Documentation Template](#) and attach to this submittal form below.

Acceptance*

☐ I have verified that all the above information is correct.

Submit

Upload your service line inventory files. Select files to attach.

Review the reporting requirement information

Use the dropdown menu to select what you are attaching and submitting to EPA, then drag and drop or select files in the respective boxes.

- **Service Line Inventory and Compliance Documentation in Single File:** Your inventory of service lines and the LSLI compliance documentation is in the same file (ex the EPA Service line Inventory spreadsheet with the detailed inventory spreadsheet and the additional forms in tabs filled out).
- **Service Line Inventory and Compliance Documentation in Separate Files:** Your Inventory spreadsheet is in a separate document then your compliance documentation.
- **Inventory Only:** You are Only submitting your service line inventory (without the compliance documentation). You might choose this option if you have already previously submitted the compliance documentation.
- **Compliance Documentation Only:** You are only submitting the compliance documentation information (without the inventory). You might choose this if you previously submitted your inventory but need to turning your compliance documentation or make corrections to the compliance documentation only.

Accept: Acknowledge, you understand what you are responsible for report and verify you have entered the correct information into the form.
Submit: Click submit to finish the form and submit your LSLI to EPA.

Public Information and Education Requirements

The public information requirements of the LCRR are intended to help customers understand the sources of lead in their drinking water, so that they can take steps to reduce their exposure.

These requirements include:

1. Public accessibility of the service line inventory
2. Service line material notification
3. Revised Consumer Confidence Report (CCR) requirements

Public Accessibility

Under LCRR all water systems must make their initial service line inventory publicly accessible.

Required Information to include:

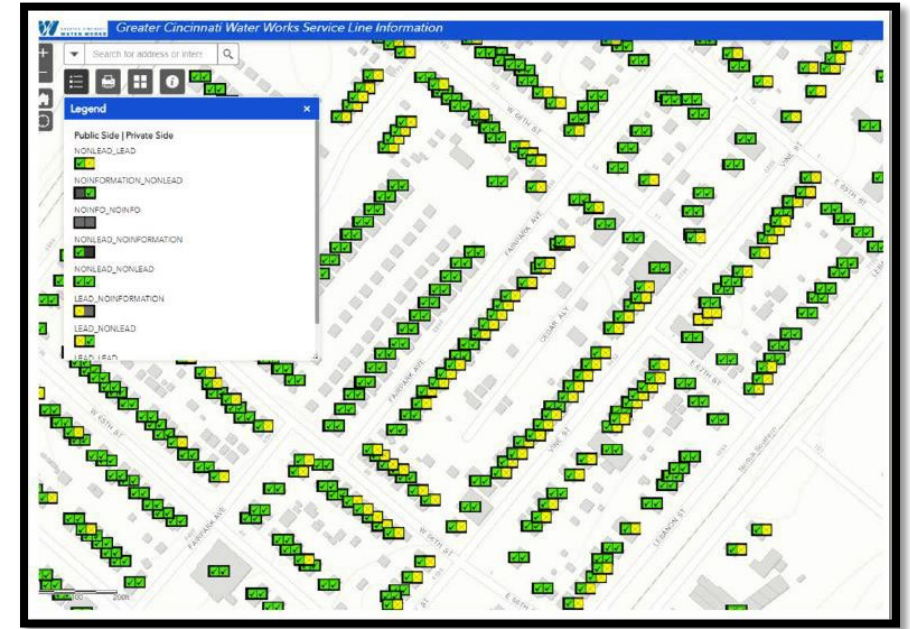
- Must include a location identifier for each LSL and GRR.
 - Can be a street address, block, intersection, emergency 911 address, or other easily understood physical location identifying marker.
- If you serve more than **50,000 people**, you must provide your inventory **online**.
- *The exception is if your system has **all non-lead service lines**.* In this situation, you have the option to provide (1) a written statement that your system has no LSLs, GRRs, or unknowns and (2) a general description of the methods you used to make this determination.



Public Accessibility

How to Make the Data Publicly Available

- On the water system's website,
- By mail or hand delivery
- In-person at the water system's office
- NTNCWSs could consider using email, posting the information in frequented locations (e.g., breakroom or notice board), or include the information in a newsletter.



Greater Cincinnati Water Works Service Line Information Map

Options for displaying the information in the publicly available inventory include:

- Printed service line maps
- Printed tables of data
- Online static maps
- Online interactive maps (i.e., GIS web maps)
- Online tables of data

Service Line Material Notifications

Water systems must inform all persons served at service connections with **lead, galvanized requiring replacement, or lead status unknown service lines.**

Timing: A water system must provide the initial notification within **30 days** of completion of their initial service line inventory.

- EPA will treat the compliance date of October 16, 2024, as the start date for calculating the 30-day deadline for water systems that complete the initial inventory on time.
- Water systems must also provide the notice at the initiation of service for new customers. This requirement applies beginning October 16, 2024.
- Water systems must repeat notification on an annual basis until the entire service connection is no longer lead, galvanized requirement replacement, or unknown.

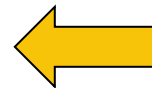
Delivery: Delivery must be by mail or hand delivery.

Service Line Material Notifications

Content:

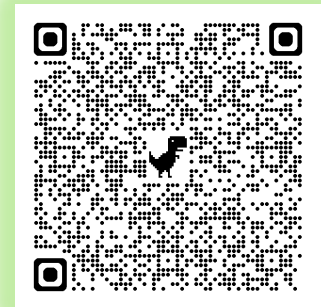
For LSLs, the notice must include:	For GRR service lines, the notice must include:	For lead status unknown service lines, the notice must include:
<ul style="list-style-type: none">• A statement that the service line material is lead• Mandatory health effects language• Steps that consumers can take to reduce exposure to lead in drinking water• Opportunities for LSL replacement opportunities• Information about any available financing• A statement that the water system must replace its portion if the property owners notify the system they are replacing their portion	<ul style="list-style-type: none">• A statement that the service line material is GRR• Mandatory health effects language• Steps that consumers can take to reduce exposure to lead in drinking water• Opportunities for service line replacement	<ul style="list-style-type: none">• A statement that the service line material is lead status unknown• Mandatory health effects language• Steps that consumers can take to reduce exposure to lead in drinking water• Opportunities to verify the material of the service line

The mandatory health effects language is specified in §141.85(a)(ii) of the LCRR.



Notice of known or potential lead service line templates will be available soon for water systems to use to notify persons served by each of these service line material classification types.

Visit the EPA Region 8 Lead Service Line Webpage, to access these templates:



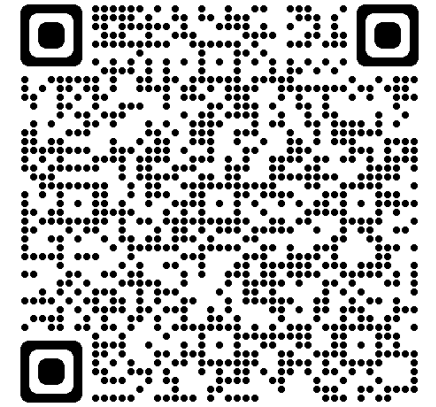
www.epa.gov/region8-waterops/lead-service-line-inventories-wyoming-and-tribal-lands-epa-region-8

Region 8 LSL Inventory Webpage

On this page:

- Federal Service Line Inventory Requirements
- Submitting your Service Line Inventory to EPA Region 8
- Service Line Inventory Guidance, Template, Fact Sheets, and FAQs
- Service Line Inventory Technical Assistance Resources for WY water systems.
- Lead and Copper Rule Implementation Tools
 - ❖ **NEW!** Templates for the Notification of Known or Potential Service Line Containing Lead
 - ❖ **NEW!** Notification of Known or Potential Service Line Containing Lead Fact Sheet
- EPA Region 8 Service Line Inventory Contacts

NEW
UPDATES!



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

Getting Started

Service line inventories are the foundation from which water systems take action to address a significant source of lead in drinking water – lead service lines (LSLs). Establishing an inventory of service line materials and identifying the location of LSLs is a key step in getting them replaced and protecting public health.

On this page:

- [Federal Service Line Inventory Requirements](#)
- [Service Line Inventory Guidance, Template, Fact Sheets, and FAQs](#)
- [Service Line Inventory Technical Assistance](#)

Related Information

- [Reporting Forms](#)
- [Lead and Copper Rule Implementation Tools](#)
- [Training Presentation](#)
- [Funding Sources for Wyoming and Tribal Water Systems](#)
- [Water Technical Assistance \(Water TA\)](#)

Violations

- Violations of the LCRR for the lead service line inventory include a treatment technique (TT) violation and a reporting (RPT) violation.
- The rule requires the development of an initial lead service line inventory and the submittal of that initial lead service line inventory to the Primacy Agency by the compliance date of the rule, October 16, 2024.

Example Violations	Violation Category	Public Notice Tier
A system fails to develop and submit an initial service line inventory by October 16, 2024.	TT- LSL Inventory RPT – LSL Reporting	2 3
A system submits an incomplete service line inventory (e.g., Does not include all service lines, Does not use appropriate sources of information that are available, Does not appropriately classify service line materials, Does not include a location identifier for each LSL and GRR).	TT- LSL Inventory	2
A system does not make their inventory publicly accessible.	TT- LSL Inventory	2
A system with no LSL, GRR or Unknown service lines does not provide a general description of all applicable sources used to make a determination of all Non-lead.	TT- LSL Inventory	2

Wyoming Lead Service Line Inventory TA Program

WY RISK IT? The Wyoming Lead Service Line Project



- Provided by Wyoming Office of State Lands and Investments (OSLI) and the Wyoming Department of Environmental Quality to eligible Wyoming public water systems to help protect public health by assisting Wyoming communities in identifying service line materials in drinking water provider distribution systems.
- Visit the WYRISKIT? Website to access resources to help your water system and your community to help identify the service line materials in your water system's distribution system.

- www.leadfreewyoming.com
- www.wyristit.com



Bartlett & West
Driving Community and Industry Forward Together

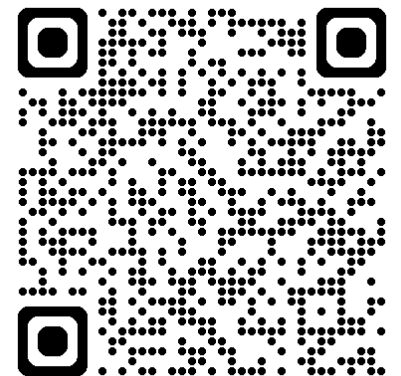


The Water
Guy, LLC

- Water systems will need to sign up at the website to access the following resources (check back regularly for new resources and updates):

- **Inventory template and inventory instructions**
- **Provider FAQs**
- **Key information and training materials for providers**
- **Content to assist in messaging for customers**

WY RISK IT? LSLI TA
Water Provider Sign up



For more information about the program, visit the website or contact wyomingLSL@hdrinc.com

**Do you have any
questions?**

Thank you for attending today's training on the:

**Lead Service Line Inventory
EPA LCRR Regulatory Compliance Training**

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**Please visit our EPA
Region 8 Lead Service Line
Inventory Webpage!**

