



OFFICE OF GROUND WATER AND DRINKING WATER

WASHINGTON, D.C. 20460

MEMORANDUM

SUBJECT: 2025 Update to the 7th DWINSA and Approach for Fiscal Years 2025 and 2026
Infrastructure Investment and Jobs Act Lead Service Line Replacement Allotments

FROM: Anita Thompkins, Director
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TO: Water Division Directors, Regions I-X

This memorandum announces the Environmental Protection Agency's (EPA) incorporation of Lead and Copper Rule Revision (LCRR) initial inventory data into the 7th Drinking Water Infrastructure Needs Survey and Assessment (DWINSA). This action impacts Fiscal Year (FY) 2025 and 2026 allotments of the Drinking Water State Revolving Fund (DWSRF) Infrastructure Investment and Jobs Act, P.L. 117-58 (Nov. 15, 2021), also known as the Bipartisan Infrastructure Law (BIL) Lead Service Line Replacement (LSLR) funds.

Background

The Safe Drinking Water Act (SDWA) Section 1452(h) requires the EPA to examine the needs for infrastructure improvements at public water systems across the country. Every four years, the EPA conducts the Drinking Water Infrastructure Needs Survey and Assessment (DWINSA). The DWINSA guides the EPA's distribution of annual funding to states through the DWSRF, as authorized by SDWA 1452(a)(1)(D)(ii). The EPA distributes BIL LSLR funds to the states through the DWSRF.

By law, the 7th DWINSA collected information on lead service lines. The data that the EPA collected via a service line material questionnaire was the best available information to estimate the nation's lead service line replacement needs at the time. The EPA used this information to develop an LSLR-specific allotment formula to distribute BIL LSLR funding starting in FY 2023. Recognizing that service line information was rapidly evolving, the EPA provided states and water systems an opportunity to update their 7th DWINSA service line material questionnaire responses. The EPA used the updated information to allot the BIL LSLR FY 2024 funding.

Now that water systems have submitted initial service line inventory data to states as required under the LCRR, states have nearly a census of water system information on service lines. The EPA considers these inventories to be the current best available information on lead service lines. In recent conversations, many state DWSRF program and Public Water System Supervision managers expressed greater confidence in the LCRR inventory data as the best available information on lead service lines to date, while noting there are still many service lines with unknown material.

EPA has continually updated its processes to collect and use the best available data for LSLR DWSRF allotments. In its effort to use the best available information to allot FY 2025 and 2026 BIL LSLR funds, and in part as a corrective action to the Office of Inspector General's report, 25-E-0002, *Inadequate Execution of the 7th DWINSA Lead Service Line Questionnaire Led to Flawed Data Being Used to Allot Lead Service Line Replacement Funds*, the EPA is updating its approach under the 7th DWINSA to estimate lead service line-specific need by incorporating the LCRR initial inventory state summary counts into the DWINSA.

Support and Quality Assurance for Inventory Data

EPA's 2021 Lead and Copper Rule Revisions required water systems to submit an initial lead service line inventory to their state by October 16, 2024. The quality of these LCRR initial inventory data is supported by EPA's *Guidance for Developing and Maintaining a Service Line Inventory* (August 2022). This guidance includes an optional inventory template for water systems, states, and Tribes to use or adapt to create their own inventory. Additionally, a QA-related checklist, "State Checklist for Initial Inventory Submittal." This worksheet helps states determine and document if water systems met all the January 15, 2021, LCRR requirements for their initial inventory including timely submission, required elements, use of information sources, public accessibility, and public notification of service line materials.

Methodology

The LCRR inventory data will be included in the DWINSA under this 2025 Update to the 7th DWINSA. The 2025 Update to the 7th DWINSA will inform the FY 2025 and FY 2026 BIL LSLR allotments. The EPA will use the LCRR initial inventory summary count information to calculate the reported number of lead service lines and galvanized service lines requiring replacement in each state as well as the unknowns. Consistent with the methodology used in the 7th DWINSA, which is outlined in detail in the 7th DWINSA Report to Congress Appendix A, the EPA will use state specific ratios of reported lead service lines to total known service line materials in order to determine how many of the unknown material service lines might be lead. This approach will be slightly modified since a census of all the inventory data in the state will be used, rather than a sampling of systems used in the 7th DWINSA.

If you have any questions, please contact the DWSRF Water Infrastructure Technical Support Branch Supervisor, Kiri Anderer at anderer.kirsten@epa.gov.

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