Lead and Copper Rule Revision: Inventory, Sampling & Replacement Plan FAQs

Maine CDC Drinking Water Program

Updated May 2023

1. Who must complete a Service Line Inventory (SLI)?

All community and non-transient noncommunity public water systems (PWS) must develop an inventory to identify service line materials connected to the PWS distribution system.

2. When is the Service Line Inventory due?

October 16, 2024

3. What must be included in the SLI?

The SLI must include a list of all service line addresses in the PWS's distribution system and a characterization of the materials on both the private and public portion of each service line, as well as a characterization of the whole service line as either lead, non-lead, galvanized requiring replacement (GRR) or unknown.

4. Which service lines are included?

The LCRR service line inventory must include all service lines, regardless of the actual or intended use. These include 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.

5. What are "unknown" service lines?

A PWS 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.

6. 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.

7. What are 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. These 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.

8. Do goosenecks/pigtails need to be included in the inventory?

No, but it is recommended that the location of goosenecks be documented, and that lead goosenecks be removed when encountered.

9. 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.

10. 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.

11. Does the inventory include documenting lead fittings at the curb stop and the main?

No, fittings aren't considered lead service lines, so they don't need to be inventoried. When possible, these should be removed from the distribution system.

12. What format does the SLI need to be submitted in?

In Maine, the EPA's <u>Service Line Inventory Template</u> must be used to submit the SLI. EPA's <u>Lead and Copper Rule Revisions Service Line Inventory Guidance</u> can be used to determine how to complete the spreadsheet.

13. How do I submit my inventory?

All community and NTNC waterworks must submit a service line inventory to the Drinking Water Program by the compliance date of 10/16/24. Submittal instructions will be provided in the future.

14. Do I need to tell my customers about my inventory?

All systems must make their SLI's available to the public. In addition, all systems serving greater than 50,000 people must post their SLI on the internet.

15. What methods are available for determining the materials for unknown service lines?

Use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal

operations, visual inspection of service line material, including at meter setting and inside home/building, customer self-identification, TV inspection, use of lead swabs or surface test kits, and excavation, including vacuum and mechanical excavation. Other methods will be reviewed on a case-by-case basis.

16. Can a PWS 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.

17. What if a PWS has no lead service lines and no galvanized service lines requiring replacement?

PWSs that can demonstrate that they have only non-lead service lines must submit an initial inventory by the compliance date but are not required to provide inventory updates to the State or the Public.

18. Is there funding available to develop the SLI?

Yes, funding is available. Click here for more information.

19. Is there funding available to replace lead service lines?

Yes, funding is available. Click here for more information.

20. What is the LCRR definition of a lead service line?

21. "...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. For purposes of § 141.86(a) only, a galvanized service line is not considered a lead service line."

22. What is the LCRR definition of a gooseneck or pigtail?

"...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 \S 141.84(c)."

23. If a galvanized line is located downstream of a lead gooseneck, must it be classified as a "Galvanized Requiring Replacement" (GRR)?

If a PWS can document that their galvanized line was never downstream from an LSL, but the galvanized line <u>was</u> downstream of a lead gooseneck, they do not need to call their galvanized line a GRR.

24. Are Community Water Systems responsible for determining service line material past the master meter in manufactured housing facilities, school campuses, hospitals, etc.?

All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs) must prepare an inventory of all service lines connected to the public water distribution system, regardless of ownership status (40 CFR 141.84(a)(2)). This means that any service line connected to the public water system, even where the water system owns no portion of the service line, must be included in the inventory. Systems must include all service lines (40 CFR 141.84(a)(2)), regardless of the actual or intended use. These include, for example, service lines with non-potable applications such as fire suppression or those designated for emergency.

25. Can employees who've worked on the construction project of installing a main or service line verify now, from memory, the material that was put in or that they saw?

Employees can document what they know in writing, and this information can be added to the inventory. Include a description of this in the documentation. If this is the only information available, this area should be prioritized for verification through investigation.

26. Are tie cards adequate for identifying service line materials?

Tie card information can be used in the inventory, and this source of information can be documented. If there is a history of inaccurate tie cards in an area, they should be prioritized for verification through investigation.

27. Is a PWS required to verify its information is correct?

The PWS must document the source of the information. Some of this information may be more reliable than other information – for instance, documentation of a curb stop excavation where both sides of the service line were physically viewed recently may be more reliable than a decades-old tie card. The PWS can continue to update the inventory as more information is gathered, prioritizing areas with minimal or unreliable data.

28. Can statistical modeling be used and if so, how?

Statistical modeling is most appropriate in instances where both lead service lines and service lines of unknown material are known to be located within the distribution system. It can then be used to predict which of the unknown service lines may be likely to be lead. In PWS where few/no lead service lines have been identified but limited inventory information is available, it is possible to use statistical methods to identify a certain percentage of

unknown lines for investigation and demonstrate with a degree of accuracy that there are no lead service lines present.

29. What type of identification methods are allowed?

There are various methods allowed. Please see EPA guidance for more information. All identification methods must be documented.

30. Can a PWS use funding to hire an intern or pay existing staff to go through data or our programmer to upgrade our database?

Yes.

31. Will there be a simple process to access those funding resources instead of formal loan/SRF/Capacity grant process?

The DWP is working on creating a streamlined process for smaller systems (<200 service connections) to access funding resources. Larger systems will need to apply through the DWSRF process.

32. What year does the DWP find acceptable to help filter/classify service line in regard to lead ban of 1986?

Service lines installed after 1986 are unlikely to be lead and should be documented as such.

33. The Maine Plumbing Code from 1926 shows a lead ban for all service lines starting at that time. Does that mean that a PWS can automatically character all service lines from homes built after that date as non-lead?

There is evidence that this lead ban was in place starting in 1926, and that is a good starting place for prioritizing further investigation at homes built before that date. However, additional documentation, such as tie card contents and local ordinances, should also be used to document service line materials.

34. How should brass service lines be categorized?

Brass lines can be characterized as non-lead, with a comment identifying them as brass, since brass lines are not included in the definition of lead service lines. However, brass can be a source of lead leaching into drinking water, so the PWS should document the location of brass in the distribution system and work toward removing it.

35. How should lead-lined service lines be categorized?

Categorize as Lead and put a comment in the spreadsheet about lead lining.

36. What level of documentation is sufficient to call a service line "Non-Lead?"

There is a range of potential documentation levels and the PWS will need to make this determination based on the weight of available evidence. Service lines with limited

information should be prioritized for additional investigation. Consult with the Drinking Water Program on specific circumstances.

37. If a PWS has a well serving a single building, what should be reported?

Report the pipe material from the well to the building inlet for the inventory.

38. Is there a requirement to collect new information and update the inventory?

Systems must identify and track information on service line material as they encounter the service lines during 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.

39. Where can I find more information about the LCRR?

The DWP will post guidance materials on our website as they become available. During the interim, we 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.

This FAQ document does not replace or supersede the requirements of the Lead and Copper Rule or guidance published by the EPA. You may find more information on the requirements at 40 CFR § 141.84.