



NORTH CAROLINA  
Environmental Quality

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## **ACTION REQUIRED: LEAD SERVICE LINE INVENTORY**

As part of the Lead and Copper Rule Revisions (LCRR) published December 16, 2021, the Environmental Protection Agency (EPA) requires that all community water systems (CWS) and non-transient non-community (NTNC) water systems develop an inventory of all service line connections, both system-owned and customer-owned. The inventory must identify the potential presence of lead within each service line connection.

### **INVENTORY REQUIREMENTS**

The required service line inventory must meet the following LCRR requirements (40 CFR 141.84(a)):

1. The initial inventory must be completed and submitted to the North Carolina Public Water Supply (PWS) Section by **October 16, 2024**.
2. The inventory must include all service lines connected to the distribution system regardless of ownership status.
3. Each service line, or portion of the service line where ownership is split, must be categorized as “Lead”, “Galvanized Requiring Replacement”, “Non-lead”, or “Unknown.”
4. A water system must use any information on lead and galvanized iron or steel when conducting the inventory. The water system must review historical records to develop the initial inventory. Records include, but are not limited to:
  - a. Construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials.
  - b. Water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.
  - c. Inspections and other distribution system records that indicate the material composition of the service connections.
  - d. Previous materials evaluation. Systems can download a copy of their Construction Materials Report previously submitted to the state at <https://www.ncwater.org/?page=679>.

Other methods can be used to verify or supplement historical records. Recommended methods of verification are visual inspection of service line material, water quality sampling, and excavation. Additional information regarding these methods is available in EPA’s Lead Service Line Inventory guidance linked below. If your system is considering an alternative inventory approach, such as predictive modeling, contact the PWS Section using the contact information at the end of this correspondence.

### **UPDATING THE INVENTORY**

1. Water systems must update the inventory annually or every three years, based on their lead and copper sampling schedule. Water systems must submit the updated inventory to the Section.
2. Water systems shall identify and track service line materials to revise the inventory as materials are identified during normal operations.

### **PUBLIC ACCESSIBILITY REQUIREMENTS**

1. The lead service line inventory must be made publicly accessible. The public inventory must include a location identifier associated with each lead service line and galvanized requiring replacement service line. Water systems serving greater than 50,000 people must make the inventory available online.



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2. Water systems with only non-lead service lines may fulfill the public accessibility requirement by providing a written statement declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines.
3. CWSs must include instructions to access the service line inventory in the Consumer Confidence Report.
4. Inventory updates must be reflected in the publicly accessible inventory must be updated no less frequently than when required to be submitted to the state.

Note: Water systems with only non-lead service lines are not required to provide updates to the State or the public. However, if the water system finds a lead service line within its system, it must prepare an updated inventory.

### **LEAD SERVICE LINE INVENTORY TEMPLATE**

The template for the lead service line inventory can be found at <https://deq.nc.gov/lead-service-line-inventory>. Water systems are required to use the template provided by the Section. Please contact the Section if you need assistance accessing the template.

The template includes five tabs that will need to be completed for each water system, as well as instructions for filling out each tab. DO NOT change the name of any tabs on the inventory. The fillable tabs are as follows:

1. PWS Information. General information about the water system.
2. Inventory Methods. Information about how the water system conducted their materials evaluation and level of confidence.
3. Inventory Summary. General information about the inventory. Note that “Part 3. Inventory Summary Table” will update automatically as the Detailed Inventory tab is completed.
4. Detailed Inventory. Data for every service line connection in the water system. Service lines with split ownership should be entered on the same row, with the system-owned service line information in Columns G-O (“System-Owned Portion”) and the customer-owned service line information in Columns P-W (“Customer-Owned Portion”). If ownership is not split, use the same material classification for both columns. Systems are required to fill out the following columns for each service line:
  - a. Column C: Location Identifier-Street Address
  - b. Column G: System-Owned Portion Service Line Material Classification
  - c. Column P: Customer-Owned Portion Service Line Material Classification
  - d. Column X: Entire Service Line Material Classification. This column will automatically update based on the data entered in columns G and P.

Water systems are strongly encouraged to fill out all of the columns in the Detailed Inventory tab.

5. Public Accessibility Doc. Information about the publicly accessible inventory.

Instructions on submitting the inventory will be provided at a later date.

### **AVAILABLE RESOURCES**

Additional information on developing an initial lead service line inventory can be found at:

- North Carolina Department of Environmental Quality, Public Water Supply Section: <https://deq.nc.gov/about/divisions/water-resources/drinking-water/compliance-services>.
- U.S. Environmental Protection Agency Lead Service Line Inventory Guidance: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>.
- Lead and Copper Rule Revisions: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I>.

### **CONTACT INFORMATION**

If you require additional information or assistance, contact Hannah Mendez, Lead and Copper Rule Manager, at (919) 707-9090 or the Lead and Copper compliance team at [pwss.lcr@ncdenr.gov](mailto:pwss.lcr@ncdenr.gov).