



# LEAD SERVICE LINE INVENTORY GUIDANCE SUMMARY

## INVENTORY REQUIREMENTS

### CLASSIFICATION

- All CWSs and NTNCs must develop an inventory of service lines that meets the LCRR requirements (40 CFR § 141.84(a)).
- Initial inventories are due by **October 16<sup>th</sup>, 2024** (40 CFR § 141.84(a)(1)) and 141.90(e)(1)).
- The inventory must include all service lines connected to the distribution system regardless of ownership status (40 CFR §141.84(a)).
- Classifications must be lead, Galvanized Requiring Replacement (GRR), non-lead, or lead status unknown (40 CFR § 141.84(a)(4)).

### METHODOLOGY & TRACKING

- Water systems must use any information on lead and galvanized iron or steel that it has identified pursuant to 40 CFR § 141.42(d) (40 CFR § 141.84(a)(3)). To download a copy of the construction materials report, click [here](#).
- Water systems must review the records explicitly identified in the LCRR (40 CFR § 141.84(a)(3)).
- Water systems should be aware of the identification methods. Systems may use additional resources, information, or identification methods when developing their inventory (40 CFR § 141.84(a)(3)).
- Water systems must begin tracking materials as they are encountered during normal operations before the rule compliance date (40 CFR § 141.84(a)(5)).
- The inventory must include a location identifier associated with each service line in their distribution system (40 CFR § 141.84(a)(8)).

### PUBLIC ACCESSIBILITY

- Water systems must notify all persons served by a lead, GRR, or lead status unknown service line within 30 days of completing the inventory (40 CFR § 141.85(e)).
- Water systems must make an inventory of the lead and GRR service lines publicly accessible. The publicly accessible inventory must include a location identifier associated with each lead or GRR service line. The identifier does not have to be a street address (40 CFR § 141.84(a)(8)(i)).
- Water systems serving more than 50,000 people must provide their inventory online (40 CFR § 141.84(a)(8)(ii)).
- Water systems with only non-lead service lines can fulfill the requirement to make the inventory publicly accessible by providing a written statement that they have no lead service lines, including a general description of how they made that determination (40 CFR § 141.84(a)(9)).
- Community water systems must indicate in their CCR how to access service line inventory information. CWSs with no lead service lines must include a statement that they have no LSLs in their CCR (40 CFR § 141.84(a)(10)).



## INVENTORY RECOMMENDATIONS

### CLASSIFICATION

- Water systems are encouraged to fill out the columns on the required template that include service line subclassifications, other plumbing components such as lead connectors, and other details such as source of information, pipe diameter, and installation date.
- Water systems should continue to gather information on service line materials after they have been classified and assess the accuracy of historical records.
- If systems find certain records to be unreliable or conflicting, they should consider classifying the service line materials as “unknown.”
- Non-lead classification could be based on lead ban date and pipe diameter or visual confirmation.

### METHODOLOGY & TRACKING

- The inventory is a living document that should be continually improved as more information becomes available.
- Water systems should incorporate previous reviews into their initial inventory.
- Water systems should digitize any paper records.
- Service line investigation methods can be used to verify historical records and gather information if line material is unknown.
- Water systems should select the material identification method(s) that are best suited to their needs.
- Investigative methods could include visual observation, water quality sampling, and excavation.
- Many systems have enlisted the public’s help in visually identifying service line material where the service line enters the building.
- Water systems should consider developing or modifying SOPs to document how they will collect service line material information.

### PUBLIC ACCESSIBILITY

- Water systems should consider their data sharing ability, customer demographics, and staff limitations when selecting the best method for sharing data with the public.
- An interactive online map can be effective for displaying service line information.
- If using a map, accessibility and inclusivity considerations should be taken into account.
- Other online data sharing options can also be used by water systems, such as a cloud-based application, an online spreadsheet, or a website hosted download.
- Non-web-based data sharing options include printed service line/tabular data, or information on the water utility mailings or newsletters.
- Water systems are encouraged to update their inventories in real-time or as close as possible.