Lead & Copper Rule Revisions Rule Adoption

November 30, 2022

Stakeholder & Public Meeting

ADEQ
Arizona Department of Environmental Quality

Welcome

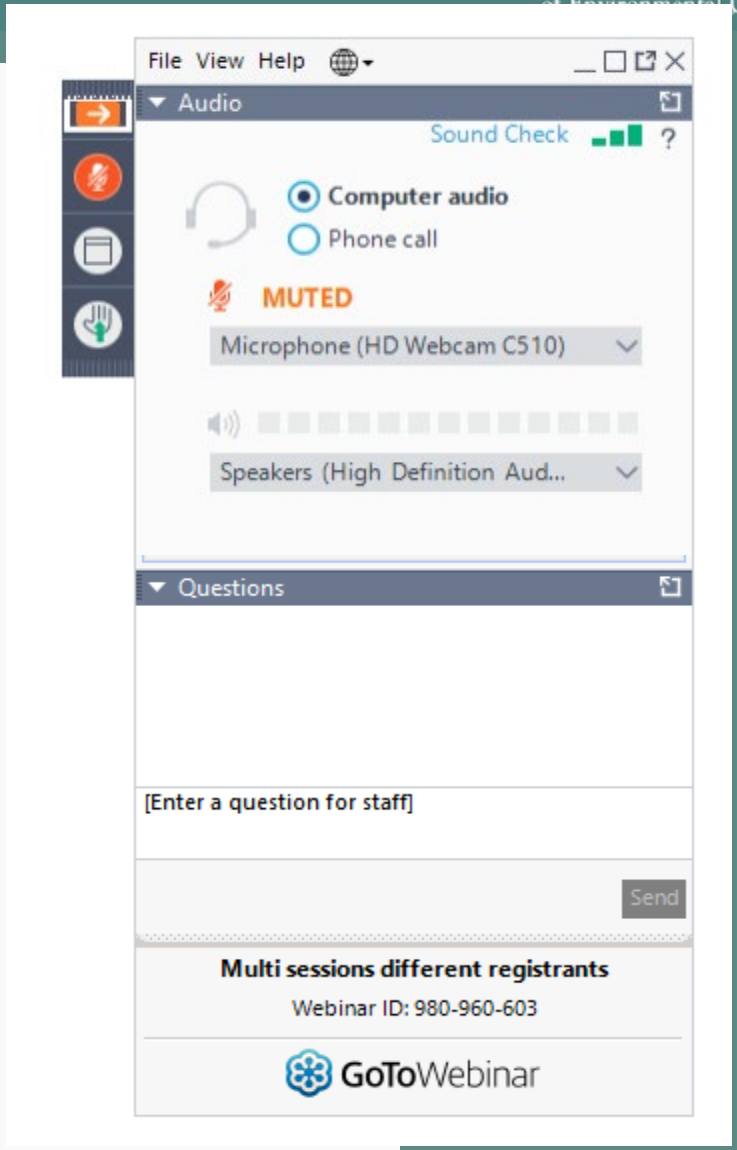
Housekeeping Rule

Online Tools

Muted

Recording

Using polleverywhere.com for Input



Feedback During Webinar

Computer:

Open a tab in your browser or phone to:
pollev.com/ocicoach1909

Answers are anonymous

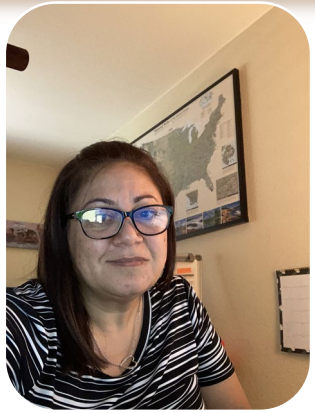
Today's Agenda & Objectives

1:00 – 1:05 PM	• Welcome / Housekeeping
1:05 – 1:40 PM	• Rule Adoption & Resource Review
1:40 – 2:55 PM	• Stakeholder Open Comment & Discussion
2:55 – 3:00 PM	• Closing Remarks

ADEQ Introduction's for Today's Meeting

Karen Shanafelt

- Inspections and Compliance Unit Manager



Laura Carusona

- Environmental Program Manager Senior

Jason Bobko

- Programs and Engineering Unit Manager

Chelsey Vega

- Senior Scientist

Scott Geiger

- Legal Specialist

Zach Sibberson

Compliance Assistance Coordinator

Lead and Copper Rule Revisions Federal Register Publication

4198 Federal Register / Vol. 86, No. 10 / Friday, January 15, 2021 / Rules and Regulations

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 141 and 142

[EPA–HQ–OW–2017–0300; FRL–10019–23–OW]

RIN 2040–AF15

National Primary Drinking Water Regulations: Lead and Copper Rule Revisions

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final rule.

SUMMARY: The Environmental Protection Agency (EPA) is publishing final regulatory revisions to the National Primary Drinking Water Regulation (NPDWR) for lead and copper under the authority of the Safe Drinking Water Act (SDWA). These revised requirements provide greater and more effective protection of public health by reducing exposure to lead and copper in drinking water. The rule will better identify high levels of lead, improve the reliability of lead tap sampling results, strengthen corrosion control treatment requirements, expand consumer awareness and improve risk

e.g., Confidential Business Information or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is not placed on the internet and will be publicly available only in hard copy form.

FOR FURTHER INFORMATION CONTACT: Jeffrey Kempic, Standards and Risk Management Division, Office of Ground Water and Drinking Water, U.S. Environmental Protection Agency, 1200 Pennsylvania Ave. NW, Mail Code 4607M, Washington, DC 20460; telephone number: (202) 564–4880 (TTY 800–877–8339); email address: *Kempic.Jeffrey@EPA.gov*. For more information visit *https://www.epa.gov/dwreginfo/lead-and-copper-rule*.

SUPPLEMENTARY INFORMATION:

I. General Information
A. What are EPA's final revisions?
B. Does this action apply to me?
II. Background
A. Health Effects of Lead and Copper
B. Statutory Authority
C. Regulatory History
III. Revisions to 40 CFR Part 141, Subpart I, Control of Lead and Copper
A. Lead Trigger Level
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
K. Find-and-Fix
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
L. Water System Reporting Requirements
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
IV. Other Revisions to 40 CFR Part 141
A. Consumer Confidence Report
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
B. Public Notification
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
C. Definitions
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
V. Rule Implementation and Enforcement
A. What are State recordkeeping and reporting requirements?
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
B. What are the special primacy requirements?
1. Proposed Revisions
2. Public Comment and EPA's Response
3. Final Rule Requirements
VI. Economic Analysis
A. Public Comments on the Economic Analysis of the Proposed Rule and EPA

- https://www.regulations.gov/document/EPA-HQ-OW-2017-0300-1550

APPLICABILITY – PWS Types and Size

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THESE RULE REVISIONS APPLIES TO:

Non-Transient, Non-Community (NTNC) Water System

- 15 or more connections used by same people for more than 6 months/yr, or
- Serves the same 25 or more people for at least 6 months/yr.

Community Water System (CWS)

- 15 or more connections used by same people year round, or
- Serves the same 25 or more people year round

Large: Greater than 50,000 people

Medium: 3,301 to 50,000 people

Small: Less than or equal to 3,300 people

Goal and Objectives for LCRR

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Lead Service Line (LSL) Materials Inventory

-LSLR Planning	-LSLR Actions

Strengthened Corrosion Control Treatment Requirements

-10 ppb Lead Trigger Level, corrosion study requirements	-Installation and optimization of corrosion control (source/treatment change)

Lead and Copper Tap Monitoring

State approved sampling plan	Changes to samples required to be included in the 90th percentile calculation

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Increased Public Education & Consumer Awareness

Find and Fix Requirements	Proactive and reactive communication to consumers, elementary schools, and licensed childcare facilities

Lead in School Sampling Requirements

Elementary Schools and Licensed Childcare facilities	3T method sampling is required

Small Water System Flexibility Compliance Options

LSLR	OCCT vs. POU designation

LCRR Adoption, Implementation, & Compliance Timeline

2021

LCRR Final Rule

EPA determined 12/17/2021 as the LCRR effective date. PWS's should begin:

1. Completing materials inventory for all service lines
2. Develop LSLR Plan
3. Tap Monitoring Plan
4. Identify elementary schools and licensed child care facilities for lead in school's sampling requirements

2023

LCRR Adoption for States Due

States have until 10/16/2023 to adopt the LCRR or request extension from EPA.

2024

Compliance Due Date

By 10/16/2024, PWS's must be in compliance with all requirements for:

1. LSL Materials Inventory
2. LSL Replacement Plan
3. Tap Monitoring Plan (Regulatory agency must approve locations prior to sampling)
4. Identify universe of schools to be sampled and begin conducting lead in schools sampling

2025

Begin Initial Monitoring

PWSs will return to initial monitoring, per the LCRR's tap monitoring changes, *unless* PWS has sampled according to the new rule prior to October 16, 2024.

LCRR Resources & Updates from ADEQ

- Soon to be made available:
  - LCRR FAQs related to LSL Materials Inventory
  - Final LSL Material Inventory Template
  - Post stakeholder FAQ, recording, and PowerPoint presentation

Draft Templates for Feedback

The draft templates are for feedback purposes only and not for regulatory use at this time. The drafts reflect the current state of knowledge of LCRR and will be updated as EPA provides more information.

- Materials Inventory Template | Download (Excel) >
- Distribution System Materials Inventory Summary | View/Download >
- No Lead Service Line Verification Form | View/Download >

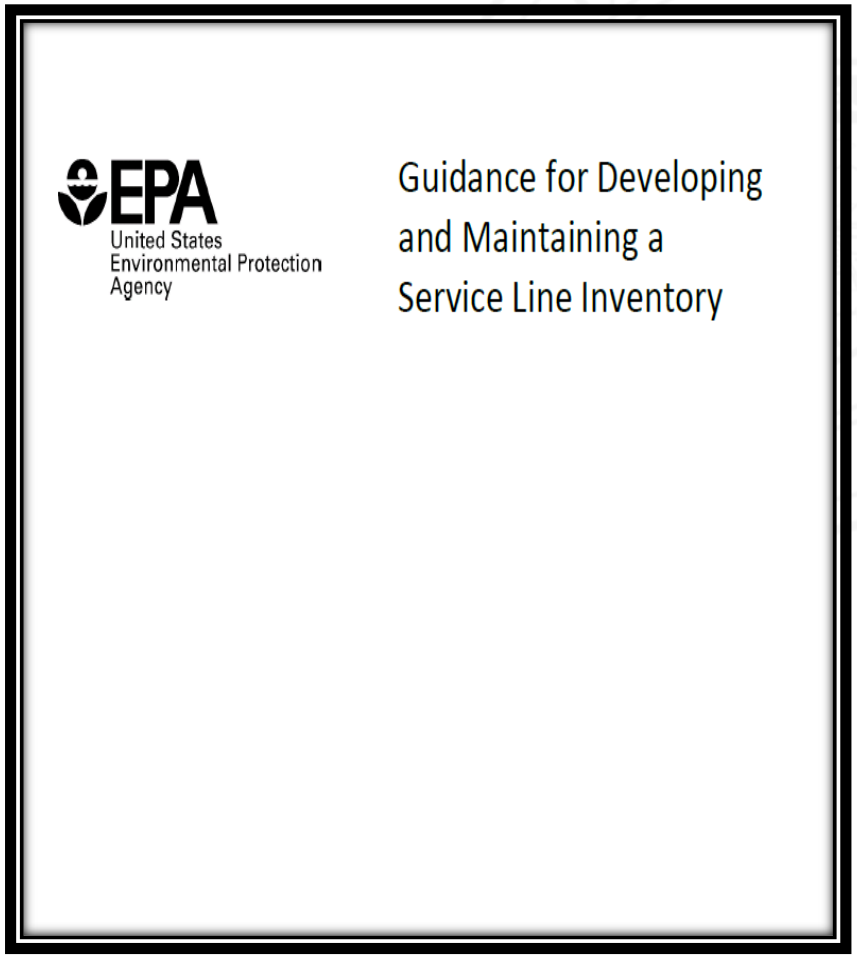
Meeting Information

Group 1 | July 28, 2021
Presentation | View/Download >
Q&A | View/Download >
Meeting Recording | Watch Video >

Group 2 | Sept. 30, 2021
Presentation | View/Download >
Q&A | View/Download >
Meeting Recording | Watch Video >

Group 3 | March 8, 2022
Presentation | View/Download >
Q&A | View/Download >
Meeting Recording | Watch Video >

- August 2022 EPA released "Guidance for Developing and Maintaining a Service Line Inventory"
- Training planned for Feb/March 2023 on ***"How to Utilize the guidance from EPA for Small Public Water Systems"***
  - Targeting small/medium public water systems
  - Open for anyone to attend


EPA
United States Environmental Protection Agency

Guidance for Developing and Maintaining a Service Line Inventory

Final: ADEQ LSL Inventory Template

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SERVICE LINE INVENTORY

What is the purpose of this template?

The purpose of this template is to help small water systems (serving less than 10,000 people) in Arizona comply with the service line inventory requirements of the January 15, 2021 Lead and Copper Rule Revisions (LCRR).

This template supplements the EPA document, ***Guidance for Developing and Maintaining a Service Line Inventory*** (Aug 2022). The template provides fillable forms and tables that small water systems can use to:

- document their methods,
- organize their inventory,
- submit the initial inventory and inventory updates to ADEQ, and
- document how they are making the inventory publicly available

Note that EPA does **NOT** require systems use this template for their inventory. Refer to EPA's 2022 Inventory Guidance for minimum LCRR inventory requirements, recommendations, and disclaimers.

What is a Service Line?

Service line is the pipe connecting the water main to the interior plumbing in a building [1]. The service line may be owned wholly by the water system or customer, or in some cases, ownership may be split between the water system and the customer. Exhibit 1 below shows a possible division in service line ownership between the water system and customer.

While the LCRR requires the inventory to categorize each service line or portions of the service line where ownership is split, a single classification per service line is also needed. Table 1 below indicates how to classify the material for the entire service line when ownership is split between the water system and customer.

(1) Source: "Glossary" of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).

Exhibit 1. Example of Service Line Ownership Distinction between the Water System and Customer

- Utilized EPA's published template and customized to Arizona's environment
- Simplified and peer reviewed among small, medium, and large public water systems
- Available soon on AZDEQ.gov LCRR webpage

Inventory Methodology: EPA Template vs. ADEQ Template

Inventory Methodology

PWS Name:	
PWSID:	
Enter Date Last Updated:	

Purpose of this worksheet: *For water systems to document the methods and resources they used to develop and update their inventory.*

Part 1: Historical Records Review

Type of Record	Describe the Records Reviewed for Your Inventory and Indicate Your Level of Confidence (*e.g.*, Low, Medium, or High)
1. Previous Materials Evaluation *Example: Locations of Tier 1 lead tap sampling locations that are served by a lead service line.*	
2. Construction Records and Plumbing Codes *Examples: Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.*	
3. Water System Records *Examples: Capital improvement plans. Standard operating procedures. Engineering*	
4. Distribution System Inspections and Records Examples: *Distribution system maps. Tap cards. Service line repair/replacement records. Inspection records. Meter installation records.*	
5. Additional Records Required by Your State	
6. Other Records	

SERVICE LINE INVENTORY

Inventory Methodology

PWS Name:	0
PWSID:	0
Enter Date Last Updated:	

Part 1: Methodology Used for LSL Inventory

Provide a brief narrative of the service inventory method used:

"Paint a Picture…What are you thinking…How are you making determinations"

Part 2: Historical Records Review

Type of Record	Describe the Records Reviewed for Your Inventory	List Specific Findings that can Assist with LSL Determination	Indicate Your Level of Confidence
1. Previous Materials Evaluation *Example: Locations of Tier 1 lead tap sampling locations that are served by a LSL.*			
2. Construction Records and Plumbing Codes *Examples: Local ordinance adopting an international plumbing code. Permits for replacing*			
3. Water System Records *Examples: Capital improvement plans. Standard operating procedures. Engineering standards.*			
4. Distribution System Inspections and Records Examples: *Distribution system maps. Tap cards. Service line repair/replacement records. Inspection*			
5. Institutional Knowledge *Examples: Discussion with current and retired system operators/managers/owners, local plumbers, community members, etc.*			
6. Other Records			

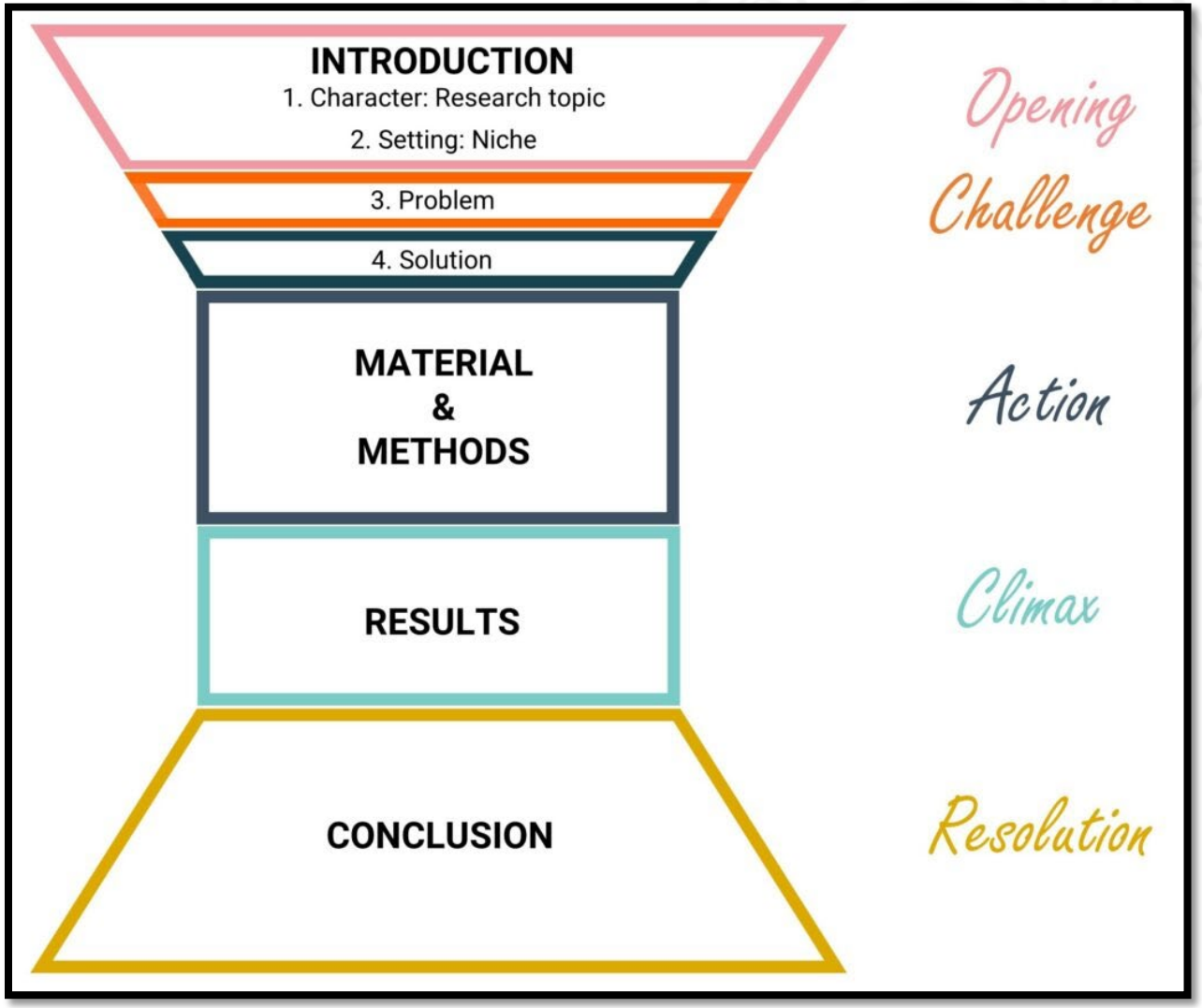
Part 3: Identifying Service Line Material During Normal Operations

Important: Document Method of Approach to LSL Inventory & Decisions

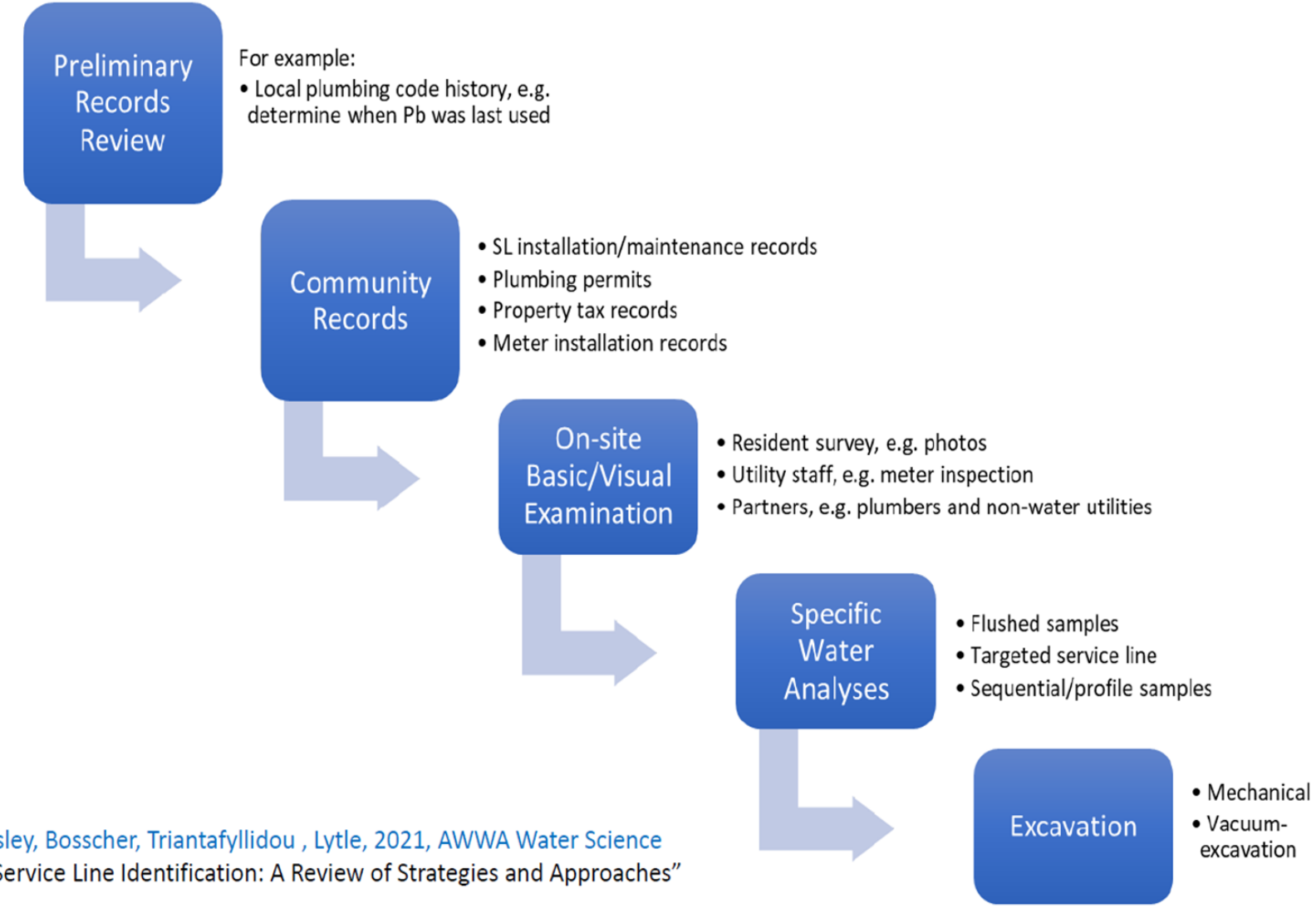
- ADEQ **HIGHLY** Recommends detailed documentation on your methods of approach when collecting a LSL materials inventory
- Why????
  - Audits by the State can be triggered or warranted due to other compliance aspects with LCRR
  - Protects the system from re-work
  - Information sharing
  - Creates opportunity for cross-collaboration and technical support
- Documentation of Methods should follow one of the recommended approaches:
  - Scientific based approach, such as a similar framework to a research paper or thesis; or
  - Standard work or Standard Operating Procedure
    - Clearly identifies the approaches, decisions to follow, and outcomes to the method of approaches

Recommended Key Elements for Abstracts:

1. Reason for writing
2. Problem: What problem does this work attempt to solve?
3. Methodology: may include specific models or approaches or describe the types of evidence used in the researching service line materials
4. Results: may include specific data that indicates the results of the project or discusses findings in a more general way
5. Implications: Were there any theoretical or practical applications from your findings? (may or may not be applicable)



When explaining approach to Methods. Recommended to follow "Step-wise approach" outline



Hensley, Bosscher, Triantafyllidou , Lytle, 2021, AWWA Water Science
"Lead Service Line Identification: A Review of Strategies and Approaches"

Relative Pros/Cons of LSL Identification Tools

	Utility Cost			Disturbance		Impact to Homeowner			Utility Skills Required		Overall	
LSL ID Method	Financial	Onsite time	Pre-/Post-time	Service line	Traffic flow	Water service disruption	Property damage	Homeowner involvement (includes pre-/post-time)	Technical interpretation	Labor	Time	Accuracy
Community Records Review	L or M (if digitized)	NA	M to H (L if digitized)	None	None	None	None	None	L to M	None	M	L to H
Basic/Visual Observations (on private-side)	L	L	L to M	None	None	None	None	L	L	L	L	M to H
Water Quality Sampling-Flushed	L	L	M to H	None	None	None	None	L	M	L	M	L to M
Water Quality Sampling-Sequential	M	L	M to H	None	None	M	None	M to H	M	L to M	M	L to H
Water Quality Sampling-Targeted	L	L	M to H	None	None	M	None	M to H	M	L to M	M	M
Excavation-Mechanical	H	H	M to H	H	M to H	H	H	L	L to M	H	H	H
Excavation-Vacuum	M to H	L to M	M to H	M	L to M	M to H	M to H	L	M	M to H	M	M to H

Hensley, Bosscher, Triantafyllidou , Lytle, 2021, AWWA Water Science
"Lead Service Line Identification: A Review of Strategies and Approaches"

What are obstacles your public water is facing in order to START the LSL Materials Inventory requirements?

Top

Start the presentation to see live content. For screen share software, share the entire screen. Get help at **pollev.com/app**

For PWSs who have began collecting LSL Materials Inventory: What obstacles are you facing in order to complete the LSL inventory requirements?

Top

Start the presentation to see live content. For screen share software, share the entire screen. Get help at **pollev.com/app**

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No changes to Part 3 through Part 4 for Inventory Methodology

Part 3: Identifying Service Line Material During Normal Operations

1. During which normal operating activities are you collecting information on service line material? Check all that apply.

- ☐ Water meter reading
- ☐ Water meter repair or replacement
- ☐ Service line repair or replacement
- ☐ Water main repair or replacement
- ☐ Backflow prevention device
- ☐ Other

If "Other", please explain:

2. Did you develop or revise standard operating procedures to collect service line material information during normal operation?

If "Yes", please describe:

Part 4: Service Line Investigations

1. Identify the service line investigation methods your system used to prepare the inventory (check all that apply). If a water system chooses an investigation method not specified by the state under 40 CFR §141.84(a)(3)(iv), state approval is required. ***Note that investigations are not required by the LCRR but can be used by systems to assess accuracy of historical records and gather information when service***

- ☐ Visual Inspection at the Meter Pit
- ☐ Customer Self-Identification
- ☐ CCTV Inspection at Curb Box - External
- ☐ CCTV Inspection at Curb Box - Internal
- ☐ Water Quality Sampling - Targeted
- ☐ Water Quality Sampling - Flushed
- ☐ Water Quality sampling - Sequential
- ☐ Water Quality Sampling - Other
- ☐ Mechanical Excavation
- ☐ Vacuum Excavation
- ☐ Predictive Modeling
- ☐ Other

If "Other", please explain:

2. If "Predictive Modeling", please briefly describe the model and inputs used:

3. How did you prioritize locations for service line materials investigations? For example, did you consider environmental justice and/or sensitive populations, did you use predictive modeling, and/or did you target areas with high number of unknowns?

ADEQ added Part 5 to Inventory Methodology

Part 5: Background Information

1. Was your entire community built after **1987**?		
2 Percentage of service lines installed in each year:	Before	
	1950s	
	1960s	
	1970s	
	1980-1987	
	After 1987	
	TOTAL:	**0%**
3. Was lead service lines ever installed in your system?		
4. If lead service line was installed:		
- Which years were they typically installed in:		
- What size were the lead service line		
5. Do you have lead goosenecks, pigtails or connectors in your system?		

Inventory Summary Worksheet: EPA vs. ADEQ Template

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Inventory Summary

PWS Name:	
PWSID:	
Enter Date Last Updated:	

Purpose of this worksheet: *For water systems to provide a summary of their service line inventory, including information on ownership, inventory format, and the number of service lines for each of the four required materials classifications.*

Part 1. General Information	
1. Is this the **Initial Inventory** or an **Inventory Update**?	*Select One*
2a. Who **owns the service lines** in your system? *If other, please explain below.*	*Select Ownership Type*
2b. Is there documentation that defines service line ownership in your system, such as a local ordinance? *If yes, please describe below and explain where ownership is split (e.g., property line, curb stop).*	*Select "Yes" or "No"*
3a. Describe when lead service lines were generally installed in your system.	
3b. When were lead service lines banned in your system? Reference the state or local ordinance that banned the use of lead in your system.	
4. Do you have lead goosenecks, pigtails or connectors in your system?	*Select "Yes" or "No" or "Don't Know"*
5. What is your overall level of confidence in the inventory (*i.e.*, "Low", "Medium", or "High.") Please explain your rationale below.	

Part 2. Inventory Format

Describe your inventory format in the space provided below (*e.g.*, the **Detailed Inventory** worksheet, custom spreadsheet, GIS map). Provide the filename and/or web address if applicable. ***Note that the state may require you to submit your detailed inventory of each service line in your distribution system.***

Part 3. Inventory Summary Table [1]

If you are using the ***Detailed Inventory*** *worksheet, the classifications you select in the Column "Entire Service Line Material Classification" (Column X) will be used to calculate the total number of service lines for each of the four material classifications below. Otherwise, enter the number of service lines in the aqua-colored cells.* ***Remember this is the classification for the entire service line.***

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR)
Lead	Any portion of the service line is known to be made of lead.[2]	1
Galvanized Requiring	The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never	3

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SERVICE LINE INVENTORY

Inventory Summary

PWS Information:	**0**
PWSID:	**0**
Enter Date Last Updated:	

Part 1. General Information

1. Is this the **Initial Inventory** or an **Inventory Update**?	
2. Who owns the service lines in your system?	
3. What is your overall level of confidence in the inventory (*i.e.*, "Low", "Medium", or "High.") Please explain your rationale below.	

Part 2. Inventory Summary Table [1]

The classifications you select in the Column "Entire Service Line Material Classification" (Column X) will be used to calculate the total number of service lines for each of the four material classifications below.

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR)
Lead	Any portion of the service line is known to be made of lead.[2]	0
Galvanized Requiring Replacement (GRR)	The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.	0
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.	0
Lead Status Unknown	The service line material is not known to be lead or GRR. For the entire service line or a portion of it (in cases of split ownership), there is not enough evidence to support material classification.	0
	TOTAL	0

Notes

[1] This summary table is for reporting material for the entire service line connecting the water main to the customer's plumbing. See the **Classifying SLs** worksheet for additional guidance on assigning a materials classification to the entire service line when ownership is split. Remember that systems must track the system-owned and customer-owned portions separately in their inventory.

[2] A lead-lined galvanized service line is consistent with the definition of an LSL under the LCRR ("a portion of pipe that is made of lead, which connects the water main to the building inlet") (40 CFR §141.2) and must therefore be classified in the inventory as an LSL. Do NOT, however, count non-lead service lines with a lead gooseneck or pigtail as lead service lines.

EPA Detailed Inventory Template: Recommended for Large and Medium Systems

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Detailed Inventory

PWS Name:
PWSID:
Date Last Updated:

Purpose of this worksheet: To provide a customizable format water systems can use to track materials for each service line in their distribution system.

General Instructions: Each row in this worksheet represents one service line connecting the water main to the customer's plumbing. The worksheet includes required and recommended elements; the columns with the aqua shading are required by the LCRR. Systems can customize by adding or deleting columns. Important notes for each column are in Row 12; also see the **Template Instructions** worksheet for detailed instructions. Note that users can freeze panes to enable them to see the headings and notes when entering data. The worksheet includes examples in rows 13 – 20 and is formatted for approximately 10,000 entries.

Location Information					System-Owned Portion									Customer-			
Unique Service Line ID	Location Identifier: Street Address	Location Identifier: Other Location Identifier	Sensitive Population? (Yes/No)	Disadvantaged Neighborhood? (Yes/No)	System-Owned Portion Service Line Material Classification	If Non-Lead in Column G, Was Material Ever Previously Lead?	Service Line Installation Date	Service Line Size	Basis of Material Classification	Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified: Describe the Field Verification Method	If "Yes" Service Line Material Was Field Verified: Enter the Date of Field Verification	Notes	Customer-Owned Portion Service Line Material Classification	Service Line Installation Date	Service Line Size	Basis of Material Classification
A Unique ID is recommended for each service line.	*Water systems must track addresses of all service lines in their internal inventory. For the publicly accessible version, location identifiers are required for lead and galvanized requiring replacement. If the system does not use addresses for their location identifier, other options could include GPS coordinates, landmark, intersection, block, or other details to specify service line locations.*		*Select Yes if sensitive subpopulation, e.g., day care, school, multifamily home. If Yes–Other, describe in the Notes field.*	*Does location meet state affordability guidelines or other measures?*	*Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field*	*Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement*	*Date, year, or estimated date range when the service line was installed or replaced*	*Diameter in inches*	*Select option from drop down list. If "Other," describe in the Notes field*	*Select Yes or No*	*Select option from drop down list. If "Other," describe in the Notes field*	*Enter approximate date of field verification or date that the record was updated*	*Can use this field for documenting additional relevant information, including when classification changes.*	*Dropdown list includes recommended subclassifications. If non-lead other, describe in Notes field.*	*Date, year, or estimated date range when the service line was installed or replaced*	*Diameter in inches*	*Select option from drop down list. If "Other," describe in the Notes field*
Example 1	*1234 Test St., City, State, Zip Code*	*Intersection of Test and Elm St.*	*No*	*No*	*Non-Lead - Plastic*	*Yes*	*1997*	*2*	*Installation date after lead ban*	*Yes*	*Visual inspection at the meter pit*	*5/11/2019*		*Non-Lead - Plastic*	*2012*	*2*	*Installation date after lead ban*
Example 2	*4321 Test St., City, State, Zip Code*	*Intersection of Test and Main St.*	*No*	*No*	*Non-Lead - Plastic*	*No*	*Fall 1960*	*2*	*Installation record (e.g., tap card)*	*Yes*	*Mechanical excavation at one location*	*9/10/2020*		*Galvanized*	*Fall 1960*	*2*	*Installation record (e.g., tap card)*
Example 3	*16 Capital St., City, State, Zip Code*		*No*	*No*	*Non-Lead - Copper*	*Don't know*	*1985*	*1 1/2*	*Service line repair or replacement record*	*No*				*Galvanized*	*1908*	*1 1/2*	*Installation record (e.g., tap card)*
Example 4	*1 Water Avenue, City, State, Zip*		*No*	*No*	*Unknown - Likely Lead*		*1940's*	*2*		*No*				*Galvanized*	*1940's*	*2*	
Example 5	*67 Children's Place, City, State*		*Yes - Day Care*	*No*	*Unknown - Material Unknown*		*1950-1960*	*3/4*		*No*				*Unknown - Material Unknown*	*1950-1960*	*3/4*	
Example 6	*30 Price Street, City, State, Zip*		*No*	*No*	*Lead-lined galvanized*		*1955*	*2*	*Installation record (e.g., tap card)*	*Yes*	*CCTV investigation at curb stop - internal*	*6/8/2020*		*Lead-lined galvanized*	*1955*	*2*	*Installation record (e.g., tap card)*
Example 7	*123 System Ave., City, State, Zip Code*	*Building A*	*No*	*Yes*	*Non-Lead - Copper*	*Yes*	*2015*	*2*	*Service line repair or replacement record*	*No*				*Galvanized*	*1950 - 1955*	*2*	*Installation record (e.g., tap card)*
Example 8	*123 System Ave., City, State, Zip*	*Building B*	*No*	*No*	*Non-Lead - Copper*	*Don't know*	*2015*	*2*	*Service line repair or replacement record*	*No*				*Unknown - Material Unknown*	*1940's*	*2*	

ADEQ Detailed Inventory Template: Target Audience Small Systems

SERVICE LINE INVENTORY

Detailed Inventory

PWS Name:	0
PWSID:	0
Date Last Updated:	

Purpose of this worksheet:
- To provide a customizable format water systems can use to track materials for each service line in their distribution system
- Each row in this worksheet represents one service line connecting the water main to the customer's plumbing

Service Address					System-Owned Portion									Customer-Owned				
											Verified:							
Property No/Street	**Town**	**State**	**Zip Code**	**Alternate Customer ID**	**Service Line Material Classification**	**If Non-Lead in Column B, Was Material Ever Previously Lead?**	**Service Line Installation Date**	**Service Line Size**	**Basis of Material Classification**	**Was the Service Line Material Field Verified?**	**Describe the Field Verification Method**	**Enter the Date of Field Verification**	**Notes**	**Service Line Material Classification**	**Service Line Installation Date**	**Service Line Size**	**Basis of Material Classification**	**Se Ma**
Water systems must track service addresses of all service lines in their internal inventory. For the publicly accessible version, addresses are required for lead and galvanized requiring replacement.				*Parcel No, Meter No, GPS coordinates, etc.*	*Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field*	*Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement*	*Date, year, or estimated date range when the service line was installed or replaced*	*Diameter in inches*	*Select option from drop down list. If "Other," describe in the Notes field*	*Select Yes or No*	*Select option from drop down list. If "Other," describe in the Notes field*	*Enter approximate date of field verification or date that the record was updated*	*Can use this field for documenting additional relevant information, including when classification changes.*	*Dropdown list includes recommended subclassifications. If non-lead other, describe in Notes field.*	*Date, year, or estimated date range when the service line was installed or replaced*	*Diameter in inches*	*Select option from drop down list. If "Other," describe in the Notes field*	*Se*

Top Commonly Asked Questions

Lead and Copper Rule Revisions Implementation

Top Commonly Asked Questions Regarding LSL Materials Inventory Methods

- Q. Does ADEQ anticipate providing extensions to the compliance requirements due by October 16, 2024?
- A. At this time ADEQ will not be granting any extensions to water systems for LCRR requirements. All water systems are required to submit an initial LSL inventory, LSLR plan, tap monitoring plan, and if they are a CWS a list of all schools and licensed childcare facilities subject to the lead in school sampling requirements.

What obstacles do you foresee in meeting compliance with LSL Inventory, LSLR Planning, Tap Sampling, and Lead in Schools rule requirements by October 16, 2024?

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- Q. Can the utility use internal standard operating procedures, policy, etc. as verification for service line materials? For example, the utility adopted a policy to no longer use lead service line materials in 1950. Therefore any service lines installed after 1950 would not contain lead materials.

- Yes, using internal standard operating procedures, policy, etc. can be used by the public water system to confirm the service line materials on the public water system side of the meter. Customer service lines will need to be verified or evaluated through other methods if this policy did not extend to the local plumbing code requirements.

- Q. Are public water systems required to inventory or track connector pieces (i.e. curb stops, meters, fittings, etc.) and lead solder in customer service lines or premise plumbing?
- A.
  - 1. Public water systems must capture lead connector pieces (i.e. curb stops, meters, fittings, etc.) and lead solder in the service lines and/or premise plumbing as part of their inventory. This information will determine the sample site tier category (i.e. tier 1, tier 2, tier 3, etc.) in accordance with 40 CFR 141.86(a)(3).
  - 2. Assists in solution to the “Find and Fix” rule requirements

Poll Everywhere: Rule Comments

Lead and Copper Rule Revisions 40 CFR Parts 141 and 142

What are comments you have regarding Lead Service Line Inventory rule requirements?

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What are comments you have regarding Lead Service Line Replacement rule requirements?

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What are comments you have regarding Corrosion Control Treatment rule requirements?

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What are comments you have regarding Lead and Copper Tap Monitoring rule requirements?

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What comments do you have regarding Lead in Schools Sampling rule requirements?

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