

Lead Service Line Materials Inventory Focus Group Meeting Q&A

1. Is the utility responsible for sampling for schools and daycare?

In accordance with the [40 CFR 141.80\(l\)](#),¹ if there are schools and daycares served by the water system, the utility is responsible for ensuring sampling is being done by the school/daycare. The utility should ensure the school/daycare is properly trained in collecting and submitting samples. The water system is not responsible for schools and daycares they do not serve.

2. Does this apply to NTNC water systems?

All community (CWS) and non-transient non community (NTNC) public water systems are subject to the Lead and Copper Rule (LCR), as well as the Lead and Copper Rule Revisions (LCRR) [40 CFR 141.80\(a\)\(1\)](#).¹

3. What should the inventory look like? A map? An excel? Will there be a template?

ADEQ is currently developing guidance, forms, and templates, including materials inventories, to assist CWS and NTNC public water systems. ADEQ also is seeking feedback on these materials from public water systems during Focus Group events.

4. Will ADEQ be preparing education/outreach material that water systems can use?

ADEQ is currently developing guidance, forms, and templates, including education and outreach material, to assist CWS and NTNC public water systems. ADEQ also is seeking feedback on these materials from public water systems during Focus Group events.

5. Is the compliance date for inventory and plan now October 2024?

U.S. EPA delayed the Jan. 16, 2024, compliance date to Oct. 16, 2024, for all CWS and NTNC public water systems. See Federal Register on the National Primary Drinking Water Regulations: LCRR ([govinfo.gov/content/pkg/FR-2021-06-16/pdf/2021-12600.pdf](https://www.govinfo.gov/content/pkg/FR-2021-06-16/pdf/2021-12600.pdf)).

6. What information qualifies as evidence of a service line's material?

At this time, the EPA has not provided an implementation guide for demonstrating service line materials in accordance with [40 CFR 141.84\(a\)\(3\)](#).¹

7. Will ADEQ provide guidance on where in the schools the 5 samples should be taken?

Yes, ADEQ will provide guidance on school and day care sampling instructions and locations. In accordance with [40 CFR 141.92 \(b\)\(i\)](#),¹ schools should be sampling at two drinking water fountains, one kitchen faucet used for food or drink preparation, one classroom faucet or other outlet used for drinking, and one nurse's office faucet, if available.

ADEQ also will seek input on implementing the lead in schools sampling for CWS serving licensed childcare facilities and schools as ADEQ proactively addresses the LCRR's anticipated regulatory requirements. See EPA 3T Toolkit:

[epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water](https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water)

¹See [86 CFR 4198 - National Primary Drinking Water Regulations: Lead and Copper Rule Revisions \(January 15, 2021\)](#)

8. How does ADEQ expect a small system with a majority of unknown lines to go door to door and find out what the service lines are?

ADEQ understands there are various tools and techniques in order to collect service line material information. Utilizing customer surveys, meter inspections, and in-person inspections are effective methods to collect materials information about both the water system and customer side of the service connections. Additionally, ADEQ is currently seeking input on customer survey templates that the water system can provide to their customers with detailed instructions.

ADEQ has identified the following resources, tools, and methods to collect a materials inventory:

- [youtube.com/watch?v=PhUCEeZdUxE](https://www.youtube.com/watch?v=PhUCEeZdUxE)
- nrdc.org/experts/erik-d-olson/how-can-i-find-out-if-i-have-lead-service-line
- lslr-collaborative.org/identifying-service-line-material.html
- news.awwa.org/LeadCommunicationsGuide
- asdwa.org/2020/09/25/asdwa-blueconduit-release-white-paper-on-lsl-data-methods

9. What if we can't get documentation/information or unknown lines?

Public water systems subject to LCRR must use any information on lead and galvanized iron or steel that has been identified when conducting its service line inventory. See [40 CFR 141.84\(a\)\(3\)](#)¹ for sources of information.

If a public water system, subject to LCRR, cannot identify the materials of a service line, the system must provide an annual notice to the water user(s) of the unknown lines until the line has been verified in accordance with [40 CFR 141.85\(e\)](#).¹

If the line is from the private side of the service line and the owner refuses to assist, then a written narrative must be provided to ADEQ per [40 CFR 141.90\(e\)\(8\)](#).¹

10. Will there be a dedicated team at ADEQ that will respond to questions by water systems as we get closer to implementation?

ADEQ has compliance assistance coordinators to help respond to questions for water systems (static.azdeq.gov/comp/dw/coordinator_contact_list.pdf)

11. Rule is effective on Dec. 16, 2021, but the plan is required by 2024?

U.S. EPA delayed the Jan. 16, 2024, compliance date to Oct. 16, 2024, for all CWS and NTNC public water systems. See Federal Register on the National Primary Drinking Water Regulations: Lead and Copper Rule Revisions ([govinfo.gov/content/pkg/FR-2021-06-16/pdf/2021-12600.pdf](https://www.govinfo.gov/content/pkg/FR-2021-06-16/pdf/2021-12600.pdf)).

12. Will there be another educational webinar in regards to preparation for this rule?

As with all rules, ADEQ will work side-by-side with partners, stakeholders, the regulated community, and the public in implementing the LCRR. ADEQ will develop and provide public water systems with access to recorded educational and training webinars related to the Lead and Copper Rule Revisions.

¹[See 86 CFR 4198 - National Primary Drinking Water Regulations: Lead and Copper Rule Revisions \(January 15, 2021\)](#)

13. Does the materials inventory replace the materials evaluation for determining Tier 1 homes?

The materials evaluation and materials inventory intent remains the same between the LCR and its Revisions. Public water systems are to review the materials of the service lines and take samples at the highest risk locations. The main difference between the LCR and its Revisions is changes to the tiering criteria [40 CFR 141.86\(a\)](#).¹

14. How far must investigations go if it's expected there are no lead service lines?

Public water systems subject to LCRR must use any information on lead and galvanized iron or steel that has been identified when conducting its service line inventory. See [40 CFR 141.84\(a\)\(3\)](#)¹ for sources of information.

15. Will ADEQ come up with a list of acceptable means of identifying unknowns that meet the evidence-based requirement?

ADEQ will provide this answer when EPA implementation guidance becomes available.

16. Is the utility responsible for service lines after the meter?

The public water system is responsible for the service line after the meter if it is owned by the public water system. If the service line after the meter is owned by the homeowner, it is not responsible for the service line if they are unwilling to work with the public water system. If the homeowner is replacing their portion of the service line, the public water system must also replace theirs in accordance with [40 CFR 141.84\(d\)\(4\)](#).¹ The utility or public water system is responsible for identifying the material type on the customer's side of the meter.

17. What if can't get a customer to comply to replace their service line, what recourse would the PWS have?

The public water system will have to send a written narrative to ADEQ stating the customer is unwilling per [40 CFR 141.90\(8\)](#)¹ and to send an annual notice to the customer.

18. Based on the principles of galvanic corrosion, copper should not be used as a "gooseneck" for galvanized or lead lines. Therefore, if we find copper at the meter and the hose bib, can we assume for our inventory that the line is not galvanized or lead?

ADEQ will provide this answer when EPA implementation guidance becomes available.

19. What format does ADEQ want for the inventory? Will there be a template available?

ADEQ is currently developing guidance, forms, and templates, including materials inventories, to assist CWS and NTNC public water systems. ADEQ also is seeking feedback on these materials from public water systems during Focus Group events.

20. If we encourage homeowners to use the "scratch and magnet" test to determine their material on their private line, what documentation should we require they provide to us for our inventory?

ADEQ is currently developing guidance, forms, and templates, including a private side verification survey, to assist CWS and NTNC public water systems. ADEQ also is seeking feedback on these materials from public water systems during Focus Group events.

¹[See 86 CFR 4198 - National Primary Drinking Water Regulations: Lead and Copper Rule Revisions \(January 15, 2021\)](#)

21. We have the material of all public lines in our GIS map system and/or electronic work order system. As a line is replaced the information is entered into both. When both systems were originally created the documents used to populate them were destroyed. For purposes of our inventory, will the information contained in these two systems be sufficient documentation?

ADEQ will provide this answer when EPA implementation guidance becomes available.

22. Will the date of the lead ban in 1986 be allowed to be used in our inventory to document that homes or businesses built after 1986 do not contain lead?

ADEQ will provide this answer when EPA implementation guidance becomes available.

¹[See 86 CFR 4198 - National Primary Drinking Water Regulations: Lead and Copper Rule Revisions \(January 15, 2021\)](#)