

Lead Service Line Materials Inventory Focus Group Meeting 2 Q&A

- 1. Could ADEQ help with the language for schools/daycares since ADEQ has already had previous engagement with schools?**

ADEQ will provide language and/or a template for public water systems to provide to their schools about the new monitoring requirements under the Lead and Copper Rule Revisions (LCRR).

- 2. Can ADEQ verify the effective date of the lead ban in Arizona?**

The rule was passed in 1986 but may not have been effective until January of 1988.

- 3. The lead ban rule passed in 1986 became effective in January 1988. Can you please explain and define the term "connector parts" for clarity?**

A gooseneck, pigtail, or connector is a short section of piping, typically less than 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 definition, but may be required to be replaced pursuant to [40 CFR 141.84\(c\)](#).

- 4. Are these forms required or can utilities draft their own?**

ADEQ is assisting public water systems by providing guidance and templates for how to get requested information from their customers. Use of these forms is voluntary, and intended to be a helpful tool to obtain the required service connection information from the customer side.

- 5. Can ADEQ indicate what information is required versus recommended in reporting materials inventory?**

ADEQ will include this feedback as part of the instructions and guidance with this template.

- 6. Can ADEQ verify the Jan. 16, 2024, reporting date for submitting a materials inventory? From the EPA's website, this action also extends the revised LCR's compliance deadline to Oct. 16, 2024, to ensure that drinking water systems and primacy states continue to have the full three years provided by the Safe Drinking Water Act to take actions needed for regulatory compliance.**

U.S. EPA delayed the Jan. 16, 2024, compliance date to Oct. 16, 2024, for all community (CWS) and non-transient non community (NTNC) public water systems. See Federal Register on the National Primary Drinking Water Regulations: LCRR 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)).

- 7. Can ADEQ explain why galvanized lines need to be replaced? Replaced with what?**

Corrosion inside galvanized steel pipes can trap small pieces of lead and release lead occasionally. These have the same impact as a lead service line if the galvanized lines are downstream of a lead service line. The lines would be replaced with a non-lead service line.

- 8. Will the homeowner be required to provide this information or can the tenant do it?**

The water system will determine whether the homeowner or tenant is required to provide this information.

9. How will it be determined that customer survey letters were sent to the homeowner, but no response was given back to the water system?

The water system will be able to mark on their inventory that this private side has an unknown service line until it is verified. The purpose of the letters is to get the service line information.

Additionally, homeowners will receive an annual notification from their public water system that indicates that the service line is unknown, what the health risks are, and how to have this service line verified. Registered mail is not required as proof, but can be used if needed.

10. Is the material installation date a required field? Why does it matter if we can identify the material?

ADEQ is creating templates to assist our public water systems in maintaining updated, accurate, and holistic information on their service line materials. Installation date has been a means for public water systems to cross reference records of the date installed and the date of materials purchased in their inventory.

11. Our community is growing very quickly. Do we have to update our inventory with every new home that gets built?

Your service connection and population count would be updated with the inspectors at the time of your sanitary survey or as the system reports to their delegated agency. Because of these being new builds, your overall service connection count would increase in the non-lead service line category. Also, if you have updated service connections you would just want to include this information reflected in your inventory during the monitoring period for your lead and copper tap samples.

12. What is ADEQ's requirement going to be for verification of information?

At a minimum there are specific resources EPA has put in rule that the systems must use to verify. We will provide additional resources required as we build our guidance documents.

13. Can we provide the option to scratch the hose bib riser that tees into the service line?

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 public water system and customer side of the service connections. Additionally, ADEQ is currently drafting guidance and templates for the regulated community to use to put together its service line material inventory.

ADEQ has identified the following resources, tools, and methods in collecting 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](https://www.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](https://www.lslr-collaborative.org/identifying-service-line-material.html)
- [news.awwa.org/LeadCommunicationsGuide](https://www.news.awwa.org/LeadCommunicationsGuide)
- [asdwa.org/2020/09/25/asdwa-blueconduit-release-white-paper-on-lsl-data-methods](https://www.asdwa.org/2020/09/25/asdwa-blueconduit-release-white-paper-on-lsl-data-methods)

14. Are we required to use this form when reaching out to the customers? (in reference to plumbing material survey: azdeq.gov/events/virtual-meeting-lcrr-focus-group-ii-lead-service-line-materials-inventories-cont)

ADEQ is assisting public water systems by providing guidance and templates for how to get requested information from their customers. Use of these forms is voluntary, and intended to be a helpful tool to obtain the required service connection information from the customer side.

15. Would there be a place for assistance in replacing the lines or is this just for initial recognition?

ADEQ created a funding matrix to assist small water systems (static.azdeq.gov/dw/resource_matrix.pdf). There is also additional AZWIFA funding (applicant.azwifa.gov) available for other eligible water systems.

16. Many galvanized lines come pre wrapped in protective material. Could this be used as an indicator of galvanized pipe?

Galvanized service line means iron or steel piping that has been dipped in zinc to prevent corrosion and rusting. Commonly used in homes prior to 1960s.

17. Is this form going to be required to use? Or can utilities craft their own message? Are we required to use this form when reaching out to the customers? Are we required to send this out?

ADEQ is assisting public water systems by providing guidance and templates for how to get requested information from their customers. Use of these forms is voluntary, and intended to be a helpful tool to obtain the required service connection information from the customer side.

18. Could there be a link to the city's webpage for them to enter the data from their survey?

Yes, that could be an easier way to collect and store data.

19. Are homeowners expected to fill out the 3rd page (static.azdeq.gov/dw/lcrr/dsmi_customer.pdf)?

No. Per the feedback from the Focus Group 2 Meeting, ADEQ has taken the 3rd page out of the Customer Survey template to make it less intimidating and lengthy.

20. Will the water systems be required to get the state's approval before sending out the customer survey form (static.azdeq.gov/dw/lcrr/dsmi_customer.pdf)?

As long as the water systems' template has the same information as the ADEQ-drafted templates, it is not required to have ADEQ approval.

21. How many languages will ADEQ translate information into?

ADEQ provides translated templates and forms in different languages, upon request.

22. Does this need to be sent to every resident or just those which might be a candidate for having a LSL?

If the water system knows the service line of both the public and private side, it is not necessary to send out a customer survey.

23. Do we need to survey the customer or can we gather this information in another way?

ADEQ is assisting public water systems by providing guidance and templates for how to get requested information from their customers. Use of these forms is voluntary, and intended to be a helpful tool to obtain the required service connection information from the customer side.

24. Any guidance on how to get the customers to participate?

There is not guidance on how to get customers to provide information or volunteer to have their homes sampled. Providing the homeowner information on health risks and accessibility would promote that it would be in the best interest of public health.

25. Can we come up with our own format or is this going to be required to be submitted for every service line?

ADEQ is assisting public water systems by providing guidance and templates for how to get requested information from their customers. Use of these forms is voluntary, and intended to be a helpful tool to obtain the required service connection information from the customer side.

26. Can build date <1986 be exempt from completing the rest of the cells?

To qualify for the No Lead Service Line verification form, there would need to be a narrative of verification efforts, and complete sample history of lead and copper monitoring. These requirements will help show there are no service lines made of lead.

Even after the lead ban, service lines could still have lead solder, fittings, and other lead connectors that join the piping together.

27. When is ADEQ expecting guidance from the EPA?

EPA has not provided ADEQ with an estimated timeframe for its publication of LCRR implementation guidance.

28. What are your next steps going forward and what are the next steps for water systems? Are you going to have a few more of these focus groups again?

ADEQ will host focus groups based on different topics. Our next Focus Group will provide the final Materials Inventory templates and introduce the next topic of Sampling at Schools and Daycares.

29. Since the new rule, 5th liter sampling is going to be required to test the water from the service line, can we use 5th liter sampling now to verify service line material?

The 5th liter sampling is only for public water systems that have a known lead service line at the tap location. It can be a secondary verification method to inform ADEQ of the service line material.

30. Do you have any guidance on private property issues with determining/replacing private service lines?

Not at this time.