

## **Lead Service Line (LSL) Materials Inventory Focus Group Meeting 3 Q&A**

- 1. Will the school sampling be separate from the routine lead and copper tap sampling?**
  - a. Yes, the lead in schools sampling will not be a part of the tap sampling requirements used for calculating the 90th percentile.
  
- 2. How many samples are taken in a school building?**
  - a. For elementary schools, a sample must be collected at five specific locations: two drinking water fountains, one kitchen faucet used for food prep or drinking, one classroom sink, and one nurse station sink. For licensed childcare facilities, a sample must be collected at two specific locations: one drinking water fountain and one of either a kitchen faucet used for preparation of food or drink or one classroom faucet or other outlet used for drinking.
  
- 3. When will AZ officially adopt the rule?**
  - a. ADEQ is working through the [rule writing process](#) to incorporate the Lead and Copper Rule Revisions (LCRR) into the State's drinking water rules. We will provide updates as we reach each milestone throughout the process.
  
- 4. What if the Public Water System (PWS) cannot get consent from the homeowner/property owner to view their (private-side) service line?**
  - a. The PWS should have a conversation with the property owner to let them know the benefits of having their service line identified for their health and the health of everyone receiving water from that line. Until such time as the details about the service line are known and documented as required, the homeowner/property owner will receive annual notifications regarding the unknown service line, applicable health effects, and actions to conduct.
  
- 5. If we have to do a service line replacement as the City, do they have to do theirs? Is it considered partial? Are we responsible to be the notifiers?**
  - a. If the PWS is conducting a service line replacement, it will be required to notify the private service line owner/water users to replace their service line. The PWS is not required to pay for replacement of the private service line. If the private service line owner/water user refuses to replace their line, it will be considered a partial replacement and will not be counted as a full service line replacement nor your towards any mandatory or goal-based LSLR. The PWS is responsible to notify the private service line owner of the replacement, and routinely until their service line has been replaced as well.
  
- 6. Schools built after 2016 can be exempt from sampling. What is the reasoning for this? The question may come up from schools and parents.**
  - a. The 2016 Lead Reduction Act most likely supports EPA's reasoning to exempt schools built after 2016 (<https://www.congress.gov/bill/114th-congress/senate-bill/1987/text>).

- 7. How can specific water analyses, e.g., sequential sampling, support an LSL inventory? Can these results be used to support a "non lead" material determination?**
- a. Sequential, targeted, and flushed sampling is an approach to identify lead sources in plumbing and service lines. The samples typically collect stagnant water within segments of the premise plumbing, service line, and up to the water main. These samples are then analyzed to profile various metals at each of those segments. The cumulative lead concentration of the service line sampled, could support the presence or absence of a LSL. Additional resources on this technique can be found following this link:  
[https://cfpub.epa.gov/si/si\\_public\\_record\\_report.cfm?Lab=CESER&dirEntryId=347275](https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=CESER&dirEntryId=347275)
- 8. Do you recommend utilities with many galvanized service lines and no historical records to consider them all (public and private) galvanized requiring replacement or is there a different recommended approach?**
- a. The PWS would need to do thorough research to ensure no LSLs were ever upstream of a galvanized line for that service line to not be considered galvanized requiring replacement.
- 9. What is the extent of the service line; is it the service line from the water main to the connection before the facility/home?**
- a. Yes, the extent of the service line is from the water main to the exterior of the building/home.
- 10. Will the handouts/templates be available?**
- a. Yes, ADEQ's handouts and templates are available on this page of the ADEQ website: <http://azdeq.gov/lcrr>.
- 11. Is there funding available to conduct the inventory?**
- a. Under the Bipartisan Infrastructure Law, Arizona's public water systems have the opportunity to seek funding for Lead Service Line Replacement projects and activities. For a project or activity to be eligible for funding under this appropriation, it must be otherwise Drinking Water State Revolving Fund (DWSRF) eligible and be a lead service line replacement (LSLR) project or associated activity directly connected to the identification, planning, design, and replacement of lead service lines.

Arizona's Drinking Water State Revolving Fund is managed by Arizona's Water Infrastructure Financing Authority (WIFA) Utilities should submit the preliminary Project Priority List (PPL) application with WIFA as soon as possible, but no later than May 16, 2022 if they are interested in receiving a loan from the Drinking Water State Revolving Fund Lead Service Line Replacement fund. Applicants must own the public water system and are planning a full lead service line replacement (no partial replacements are allowed). Utilities can also apply for loans for planning, identification, design, and inventory projects related to lead

service lines. If the community qualifies as disadvantaged within WIFA's scoring criteria, then a portion of the loan will be eligible for grant-like principal forgiveness. Applicants can access the PPL by clicking the "Apply Now" on WIFA's website ([www.azwifa.gov](http://www.azwifa.gov)). For additional information please email [PbCu@azdeq.gov](mailto:PbCu@azdeq.gov).

**12. Is the information on funding available on your webpage?**

- a. Not at the moment. ADEQ is compiling information about financial assistance resources that we will make available on our Technical Assistance Program page (<http://azdeq.gov/TechnicalAssistanceProgram>).

**13. Will you make this presentation available afterwards so we can use the reference links?**

- a. Yes, this presentation will be available on this page of the ADEQ website: <http://azdeq.gov/lcrr>.

**14. If a school already has documentation it's been tested, are we required to do it anyway or can we document that it's been tested. At this point I'm presuming we will try to test at points that weren't previously tested at every school.**

- a. All elementary schools will be required to monitor and report results from sampling conducted after the effective date of December 16, 2021 from the specific sampling locations designated by LCRR.

**15. Do copper lines installed prior to 1988 with lead solder need to be replaced?**

- a. This is a great question. ADEQ will review this matter and provide clarification.

**16. If there is some lead solder in the system, can annual Lead and Copper results be evidence of no problem?**

- a. ADEQ is developing additional guidance to assist PWS with confirmation of service lines for potential scenarios not specified in the LCRR.

**17. When can the utility begin to apply for the "Drinking Water State Revolving Fund Lead Service Line Replacement" for our distribution system's Galvanized Requiring Replacement service lines? Will all utilities be qualified or eligible for this fund? or there are criteria to be eligible?**

- a. The Drinking Water State Revolving Fund is managed by Arizona's Water Infrastructure Financing Authority (WIFA). WIFA will be able to assist Arizona water systems with fund accessibility. PWS must reach out to WIFA if they are in need of LSL Replacement funds in order for WIFA to obtain those funds.

PWS should submit the preliminary Project Priority List (PPL) application to WIFA as soon as possible, but no later than May 16, 2022, if they are interested in obtaining a loan from the Drinking Water State Revolving Fund LSLR Replacement fund. Applicants must own the PWS and be planning a full LSR replacement (no partial replacements are allowed). PWS can also apply for loans for planning, identification, design, and inventory projects related to LSLRs. If the community qualifies as disadvantaged within WIFA's scoring criteria, then a

portion of the loan will be eligible for grant-like principal forgiveness. Applicants can access the PPL by clicking the “Apply Now” on WIFA’s website ([www.azwifa.gov](http://www.azwifa.gov)).

**18. Do you have the procedure for using the sequential sampling to prove the absence of upstream lead service line?**

- a. ADEQ is working on guidance for all Arizona water systems to use if the PWS chooses to conduct sequential sampling. ADEQ is seeking clarification from EPA for situations where a PWS does not have historical records of possible upstream LSLRs.

**19. The excel template shows a column to capture the verification method for each service line. Is this a requirement or a recommended information? Will the summary as indicated on the page 2 of the "Distribution System Material Inventory" be sufficient?**

- a. Public water systems will be required to submit the LSL Materials Inventory summary to the state by the October 16, 2024 deadline. The water system’s representative, owner, or responsible party will certify the materials inventory was evaluated by reviewing all required records, documents, or alternative methods. Additionally, the public water systems will need to keep a record of the methods used to verify the materials of the service line in case the state determines an audit of the inventory is necessary.

**20. What happens if the State needs an extension to adopt the rule?**

- a. ADEQ does not anticipate a need to request an extension from EPA. If the State chooses to request an extension, ADEQ will inform PWS on what this means and any effects the extension may have. PWS compliance dates with the federal LCRR would not be affected.

**21. Inventory is service line only?**

- a. The service line inventory is for service lines only, but ADEQ and EPA recommend including any lead connectors (goosenecks, pigtails, etc.).

**22. Are these templates in final form or is ADEQ still reviewing and revising?**

- a. These templates are final and available for PWSs to use now. To better assist PWS in collecting the required information, these templates may be updated as new information becomes available from EPA..

**23. Will any flexibility be given for very small NTNC water systems?**

- a. All Community and Non-Transient Non-Community (NTNC) PWSs must comply with the LSL inventory, LSL Replacement plan, new tap monitoring requirements, and related public education/outreach. Small water systems, including NTNC systems, will have options when it comes to implementing corrosion control treatment.

**24. Doesn’t ADEQ already have some of this information which is provided through the ATC program?**

- a. During the Approval to Construct (ATC) review, ADEQ's engineers do check for appropriate materials. The engineering review does not go into details of previously installed material or materials that may have been replaced afterwards. It is the PWS's responsibility to keep track of and update the materials inventory to reflect new installations and exchanges of parts.

**25. For elementary school sampling (20%/year) - if a school is sampled in year 1 and wants continued monitoring for lead and copper, is the PWS required to sample that school again in year 2? Or does the recurring sampling start after the 5-year period?**

- a. The way the rule reads for sampling upon request or reoccurring sampling would be after the required sampling locations have been sampled (i.e., elementary schools and licensed child care facilities). We will have further clarification on this specific question once we receive guidance from EPA.

**26. Once an elementary school is tested and all copper, brass and other lines containing lead or possible lead have been replaced, will the testing still be required?**

- a. Lead in Schools sampling, under LCRR, will be conducted for one sampling cycle. Sampling must be completed within 5 years from October 16, 2024. After the 5 year cycle, the system must sample schools and licensed childcare facilities upon the request of those facilities. Please contact ADEQ if there are any questions related to a site being exempt from the Lead in Schools testing requirements.

**27. Will anything more than lead be getting looked at during the testing? Items such as TDS that can cause or accelerate corrosion.**

- a. ADEQ may request public water systems to monitor additional water quality parameters such as pH, alkalinity, dissolved inorganic carbon (DIC), total dissolved solids (TDS), conductivity, corrosion control inhibitors (i.e., orthophosphate or silicates, if used) chlorine residuals, ORP, etc., to assist in the evaluation for corrosion control treatment and optimization.

**28. Do the old schedule 40 PVC lines which may contain lead be required to be replaced even though the test may show no lead at all in the water?**

- a. The LCRR only calls for replacement of lead service lines and service lines that are defined to be 'galvanized requiring replacement'. PVC lines that may contain lead are not required to be replaced.

**29. When did the State adopt the ban in the 1996 SDWA Amendments? Do homes built after this date need to be included in the inventory? If so can the service lines be classified as non-lead because of the lead ban.**

- a. ADEQ believes this question would fall under the state discretion aspect of the materials inventory requirements, which will be addressed as part of the LCRR adoption process. We will reserve this question for consideration and further research once the rule writing process begins.

**30. Using GIS, a PWS we can see neighborhoods that were likely built by the same builder. In the case that neighborhoods built by different builders don't tend to tie into each other's water lines, can PWSs make assumptions based on verifying one or two houses on each street to determine the service line materials?**

- a. Because private-side service lines may have been replaced since the neighborhood was built, it is possible that not all service lines are all the same. ADEQ is awaiting EPA guidance on alternative verification methods states can accept to meet the rule requirements.