



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

LCRR Service Line Inventory Tools To Stay In Compliance

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LEAD AND COPPER RULE REVISIONS (LCRR)

What is the LCRR?

- Published by EPA on January 15, 2021 (40 CFR §141.80-93)
- Establishes **Service Line Inventory (SLI)** Requirements for:
 - **Community Water Systems (CWS)**
 - **Non-Transient Non-Community Water Systems (NTNC)**
- Establishes other changes to:
 - Lead and Copper Tap Monitoring*
 - Lead Service Line Replacement (LSLR)*
 - Testing in Elementary Schools and Lessened Childcare Facilities*

Lead and Copper Rule Improvements (LCRI)

- EPA is expected to propose rulemaking to **replace all Lead Service Lines (LSLs)**, establish **new compliance tap monitoring requirements**, establish **new action and trigger levels**, and **prioritize underserved communities**
 - LCRI is expected in late 2023 or early 2024, but will be proposed prior to October 16, 2024
- **Most of the LCRR is subject to change, except the Initial Service Line Inventory requirements**

* Subject to change under the LCRI



Disclaimer

This document provides recommendations to public water systems in developing and maintaining a service line inventory. The guidance within this document can be used to comply with the requirements under the Lead and Copper Rule Revisions (LCRR) that are in effect at the time of document publication. **As described in the Environmental Protection Agency's (EPA's) *Federal Register* notice of December 17, 2021 ("Notification of conclusion of review"), EPA intends to publish a proposal to revise the LCRR and take final action on the proposal by October 16, 2024, but EPA does not expect to propose changes to the requirements for information to be submitted in the initial service line inventory. However, the rulemaking could include changes to the requirements for inventory updates (USEPA, 2021a).** This guidance



SERVICE LINE INVENTORY (SLI) OVERVIEW

SLI - Who, What, and When?

- All **CWS** and **NTNCWS** must develop and submit a SLI to the GA EPD on or before **October 16, 2024**
 - SLI Updates are due each year by **July 1**
- Must be **completed** using the **GA EPD Service Line Inventory Spreadsheet** format
- Includes **all service lines** regardless of classification
- An Initial SLI must be completed even if all service lines have been classified as Non-Lead
- Water systems that have identified all their service lines as Non-Lead in either their initial inventory or an inventory update, are not required to submit inventory updates to the GA EPD





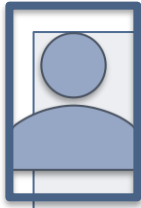

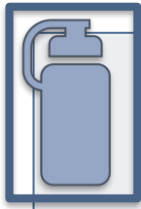


SERVICE LINE INVENTORY (SLI) OVERVIEW

Public Outreach Requirements

- All water systems must make their SLIs publicly available
 - Water systems with a **population $\geq 50,000$ must make their inventory available online**
- CCRs must indicate where customers can find their SLI or get a copy
- **Service Line Consumer Notices** must be completed **within 30 days of submitting the SLI** and proof/certification is due to the GA EPD each year on or before **July 1**



7 ELEMENTS OF THE GA EPD LCRR SERVICE LINE INVENTORY

-  1. Location Information
-  2. Water System-Owned Portion
-  3. Customer-Owned Portion
-  4. Overall Service Line Material Classification
-  5. Lead and Copper Tap Monitoring Classification
-  6. Elementary School/Childcare Facility
-  7. Service Line Consumer Notice and Lead Service Line Replacement (LSLR)



Location Information

Unique Service Line ID

- **Unique Service Line ID** for each service line is recommended to track service lines
 - Assist in **tracking** service lines, lead and copper monitoring sites, results, and Consumer Notices
 - Numbering or sequential naming system

Unique Location Identifier

- Each service line must be assigned a **Unique Location Identifier** on the SLI
 - **Service Line Address** or **Secondary/Other Location Identifier**
 - Publicly available SLI – each service line classified as Lead or GRR must have a Unique Location Identifier
 - Highly recommend water systems include a Unique Location Identifier for all service lines on the publicly available SLI
 - Additional descriptors for multiple service lines at the same address (e.g., apartment buildings)



Location Information

Street Address

- A complete **Service Line Address** must be submitted to the **GA EPD** for each service line on the **Service Line Inventory**, no matter the material classification

Secondary/Other Location Identifier

- On the publicly available SLI, water systems may select to use a **Secondary/Other Location Identifier** in place of the exact Street Address
 - If used, must be reported to the GA EPD along with the Street Address
 - If a secondary location identifier is used, it must not be so overly broad that the public could not adequately track general service line locations or where the system is making progress in replacing lead service lines



Unique Service Line ID	Street Address <i>*Required*</i>	Other Location Identifier <i>*Required if Street Address is not used for the publicly accessible inventory*</i>
1	12 N. Example Rd., City, State, ZIP	
2	1136 Hwy 12, City, State, Zip	
3	16 Capital St., City, State, Zip	Water Ave- Main St, Intersection Apt A1
SL1	16 Capital St., City, State, Zip	Water Ave- Main St, Intersection Apt A2
SL2	671 Main St, City, State, Zip	600s Main St. 4
SL3	674 Main St, City, State, Zip	600-700 main Street 2
A1	768 South Road, City, State, Zip	760s South Road
A2	232 System Blvd., City, State, Zip	System Blvd. Office Park 1
A3	8675 Song Rd., City, State, Zip	Tommy Tutone Office Park 1
Aa	309 Song Rd., City State, Zip	Tommy Tutone Office Park 2
Ab	123 System Ave., City, State, Zip	
Ac	1234 Test St., City, State, Zip	Intersection of Test and Main St.
Ad	4321 Test St., City, State, Zip	Intersection of Test and Elm St.-B
100-1	987 Water Road, City, State, ZIP	Water Lab Building
100-2	346 Services Park, City, State, Zip	

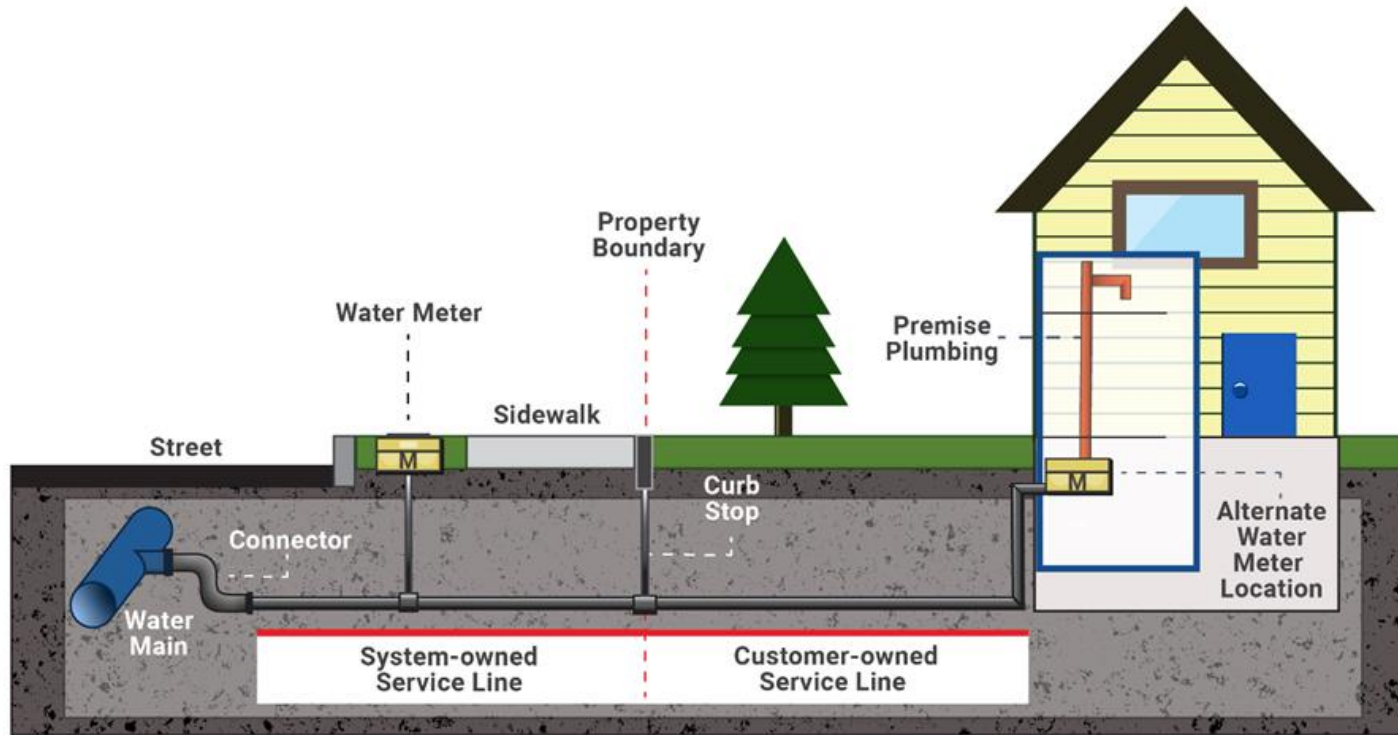
Figure 1. GA EPD LCRR Service Line Inventory Spreadsheet – Location Information



2. Water System-Owned Portion/ 3. Customer Owned Portion

Service Line Ownership Split

- Where ownership of a service line is split, each portion must have its own material classification on the SLI.



Source: Exhibit 2-2 of *Guidance for Developing and Maintaining a Service Line Inventory* (USEPA, 2022).



2. Water System-Owned Portion/ 3. Customer Owned Portion

Service Line Material Classification

- Each service line must be classified as one of five service line classifications
- For service line classified as Non-Lead, it is highly recommended water systems include additional information such as specific service line material (e.g., copper, plastic)

Table 2: Defining Service Line Material Classifications

Service Line Material Classification	Definition
Lead	Any portion of the service line is known to be made of lead.
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.
Galvanized Not Requiring Replacement (GNRR)¹	The service line is not made of lead and the system is able to demonstrate that the galvanized line was never downstream of a lead service line.
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.
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.

¹ Georgia specific material classification.



2. Water System-Owned Portion/ 3. Customer Owned Portion

Basis of Material Classification

- Water systems must identify the **Basis of Material Classification (Method of Investigation)** for each service line and make supporting documentation available to the GA EPD
- Highly recommends water systems include additional information on the method used **to classify** each service line including specific notes and details that may support classification.

Service Line Installation Date

- Service lines installed on or after **January 1, 1990**, can be classified as Non-Lead
- If there are local laws or ordinances that were in effect before January 1, 1990, documentation can be submitted to the GA EPD to justify an earlier date in which the water system may classify service lines as Non-Lead.



2. Water System-Owned Portion/ 3. Customer Owned Portion

Service Line Diameter

- Lead Service Lines are typically 2 inches or less in diameter
- If known, service line diameter can be used as a tool to classify service lines

Presence of Lead Connector

- **Pigtails, goosenecks, and connectors 24 inches or less are not considered to be part of the service line**
- **Water systems must replace any lead gooseneck, pigtail, or lead connector it owns when encountered during planned or unplanned water infrastructure work.**



4. Overall Service Line Material Classification

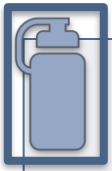
Overall Service Line Material Classification

- An **Overall Service Line Material Classification** for each service line must be included on the SLI
- If service line ownership is split, the Overall Classification is determined by both portions of the service line
- Lead Service Line Replacement (LSLR) will be based on each service line's Overall Classification

Table 1: Classification of Entire Service Line When Ownership is Split

Water System-Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Galvanized Not Requiring Replacement	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead	Lead Status Unknown	Lead Status Unknown
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Lead	Lead
Lead Status Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Non-lead	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown

Source: Taken and modified from Exhibit 2-3 of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).



5. Lead and Copper Tap Monitoring Tier Classification

Lead and Copper Tap Monitoring

- Final Lead and Copper Tap Monitoring requirements are still being discussed and are subject to change with the **Lead and Copper Rule Improvements (LCRI)**
- Required Lead and Copper Tap Monitoring under the LCRR is based on a tiering system for prioritizing sample sites
- Tier Classification is based on the **Overall Service Line Classification**, the **Water System Type**, and the **Building Type** connected to the service line.
- Building Types:
 - Single Family Residence
 - Multi Family Residence
 - Non-Residential Building
- Service lines classified as **Lead Status Unknown do not meet the criteria of a sample site tier and should NOT be used** for routine tap monitoring.



Table 3: Lead and Copper Tap Monitoring Tier Classification

Overall Service Line Material Classification	Building Type	CWS	NTNCWS
		Tier	
Lead	Single Family Residence	Tier 1	
Lead	Multi Family Residence	Tier 2	
Lead	Non-Residential Building	Tier 2	Tier 1
Lead Status Unknown	Single Family Residence	N/A	
Lead Status Unknown	Multi Family Residence	N/A	
Lead Status Unknown	Non-Residential Building	N/A	N/A
Galvanized Requiring Replacement	Single Family Residence	Tier 3	
Galvanized Requiring Replacement	Multi Family Residence	Tier 3	
Galvanized Requiring Replacement	Non-Residential Building	Tier 3	Tier 3
Non-Lead	Single Family Residence	Tier 4 or 5	
Non-Lead	Multi Family Residence	Tier 4 or 5	
Non-Lead	Non-Residential Building	Tier 4 or 5	Tier 5

*Service lines classified as Lead Status Unknown do not meet the criteria of a sample site tier and should **NOT** be used for routine tap monitoring.



6.Elementary School/Childcare Facility

Lead and Copper Special Testing

- All **Community Water Systems (CWS)** must conduct directed public education and lead monitoring at the **elementary schools** and **licensed childcare facilities** they serve (**sampling should be done following EPA's "3Ts" protocol**)
 - **Applies to schools and facilities** constructed prior to **January 1, 2014**
- List of elementary schools and licensed childcare facilities must be compiled by **October 16, 2024**

3Ts Toolkit

<https://epa.gov/safewater/3Ts>

Build a team and make a plan! Protecting school and child care facility drinking water is a group effort and you will need to have a plan for who you will work with, how you will test, and how you will address elevated lead that may be found. Make sure you are transparent in your communications with your community. The 3Ts toolkit includes modules and helpful resources you can use to implement a successful program!



Module 1
Communicating the 3Ts



Module 2
Learning About Lead in Drinking Water



Module 3
Planning Your 3Ts Program



Module 4
Developing a Sampling Plan



Module 5
Conducting Sampling & Interpreting Results



Module 6
Remediation & Establishing Routine Practices



Module 7
Recordkeeping



7. Service Line Consumer Notice and Lead Service Line Replacement (LSLR)

Service Line Consumer Notice

- Water Systems must provide notification to persons served by a service line classified as Lead, GRR, or Lead Status Unknown within **30 days of submitting their Service Line Inventory**
 - New customers must be provided notice at the time of service initiation
- If a **Secondary/Other Location Identifier** is used on the publicly available SLI, the consumer notice must contain the location identifier.
- Proof/Certification of completed Service Line Consumer Notice and **copy of information materials is due to the GA EPD by July 1** each year

Lead Service Line Replacement (LSLR)

- The **Lead and Copper Rule Improvements (LCRI)** is expected to propose rulemaking to **replace all lead service lines** and extend the due date of the Lead Service Line Replacement Plans from October 16, 2024 to a later date.



SERVICE LINE INVENTORY SUBMISSION

- GA EPD is finalizing the procurement process for a cloud-based software
- The goal of the SLI software is to **act as a tool** for water systems to **track Service Line Inventories, LSLRs, and Consumer Notices**
- Further guidance on the SLI submission process to be released **Summer 2023**

Proposed Draft Amendments to Chapter 391-3-5-.25 GA Rules for Safe Drinking Water

Rule 391-3-5-.25 Treatment Techniques, Lead and Copper Requirements

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(13) All water systems must develop an initial lead service line inventory by October 16, 2024 in accordance with 40 CFR 141.84(a), and submit it to the Division in accordance with 40 CFR Part 141.90 (e) in an electronic format prescribed by the Director.



Helpful SLI Resources

- *LCRR- 40 CFR §141.80-93*
- *GA EPD LCRR Service Line Inventory Spreadsheet*
- *GA EPD LCRR SLI Guidance*
- *EPA's Guidance for Developing and Maintaining a Service Line Inventory*
- *EPA LCRI*



QUESTIONS?

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