



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

# LCRR Service Line Inventory Tools To Stay In Compliance

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**GRWA 2023 Fall Conference**  
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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)
- Other changes:
  - Lead and Copper Tap Monitoring\*
  - Lead Service Line Replacement (LSLR)\*
  - Testing in Elementary Schools and Licensed Childcare Facilities\*

\* 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



# LEAD AND COPPER RULE REVISIONS (LCRR)

## Lead and Copper Rule Improvements (LCRI)

- Expected proposed rulemaking:
  - Requirement to **replace all Lead Service Lines (LSLs)**
  - **New compliance tap monitoring requirements**
  - **New action and trigger levels**
- Initial Service Line Inventory requirements to remain the same

The screenshot shows the EPA website's navigation bar with the EPA logo and search bar. Below the navigation bar, the page title is "Ground Water and Drinking Water" with a "CONTACT US" link. A sidebar on the left lists various topics: "Ground Water and Drinking Water Home", "Basic Information", "Private Wells", "Consumer Confidence Reports", "Regulatory Requirements", "Standards and Regulations", and "All Drinking Water Topics". The main content area features the heading "Lead and Copper Rule Improvements" and a "Background" section. The background text states: "There is no safe level of lead exposure. In drinking water, the primary source of lead is from pipes, which can present a risk to the health of children and adults. The U.S. Environmental Protection Agency (EPA) is committed to using every tool available to protect all Americans from lead in drinking water. As part of a [whole of government plan](#) to deliver clean drinking water, and replace lead pipes, EPA is developing a new proposed rule, the **Lead and Copper Rule Improvements (LCRI)**, that will strengthen the [Lead and Copper Rule \(LCR\)](#). First promulgated in 1991, the LCR regulates lead and copper in public drinking water systems."

LCRI expected 4Q2023\*



# SERVICE LINE INVENTORY (SLI) OVERVIEW

## Who

- Community Water Systems (**CWSs**)
- Non-Transient Non-Community Water Systems (**NTNCWSs**)

## What

- Initial Service Line Inventory
- All service lines (SLs) regardless of classification

## When

- **October 16, 2024**
- Update due **July 1** each year



# SERVICE LINE INVENTORY (SLI) OVERVIEW

## Public Outreach Requirements

- All water systems must make their SLIs publicly available
  - Population  $\geq$  50,000 – available online
  - CCRs must indicate where customers can find their SLI or get a copy
- Service Line Consumer Notices
  - within 30 days of submitting the SLI
  - Proof/Certification due to the GA EPD each year on or before **July 1**

**WATER SERVICE LINE INVENTORY**

We're taking a look at our water service lines to get an inventory of lead, non-lead, galvanized and unknown service line types.

This inventory is part of the Environmental Protection Agency's Lead and Copper Rule. It will help us build a database and take action to maintain our high water quality, meet all guidelines and protect public health.

We're committed to the protection of public health and to the quality management of water and wastewater services.

We'll contact you if any action needs to be taken at your service address.

**CALL**  
254-299-2480

If you have questions about the water service line inventory:

**VISIT**  
[wacowater.com](http://wacowater.com)








Waco Water Utility Services  
PO Box 2570  
Waco, Texas 76702

**CONTACT US**  
on the MyWaco app

Scan the QR code to get more info or to let us know what kind of service line you have.



# 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 SL is recommended
  - Assist in **tracking** SLs, monitoring sites, and Consumer Notices
  - Numbering or sequential naming system

## Unique Location Identifier

- Each SL must be assigned a **Unique Location Identifier** on the SLI
  - **Service Line Address** or Secondary/Other Location Identifier
- **Publicly Available SLI** – Lead or GRR must have a Unique Location Identifier
  - Highly recommend 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

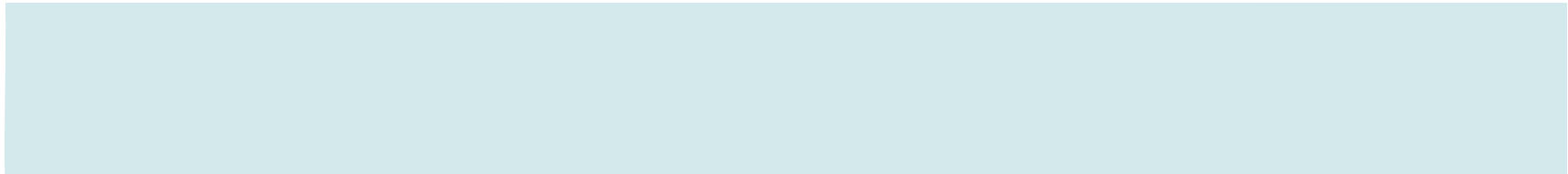
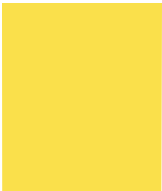
## Secondary/Other Location Identifier

- **Publicly Available SLI** may use a **Secondary/Other Location Identifier** in place of the exact Street Address
  - Must be reported along with the Street Address
  - Must be specific enough for public to adequately track general SL locations



# Location Information

Unique Service Line ID	Street Address 1 *Required*	Street Address 2	City *Required*	State *Required*	Zip *Required*	Other Location Identifier *Required if Street Address is not used for the publicly accessible inventory*
1	12 N. Example Road		City	GA	12345	
2	1136 Hwy 12		City	GA	12345	
3	16 Capital Street	Apartment A1	City	GA	12345	Water Ave- Main St, Intersection Apt A1
SL1	16 Capital Street	Suite 152	City	GA	12345	Water Ave- Main St, Intersection Suite 152
SL2	671 Main Street		City	GA	12345	600s Main St. 4
SL3	674 Main Street		City	GA	12345	600-700 main Street 2

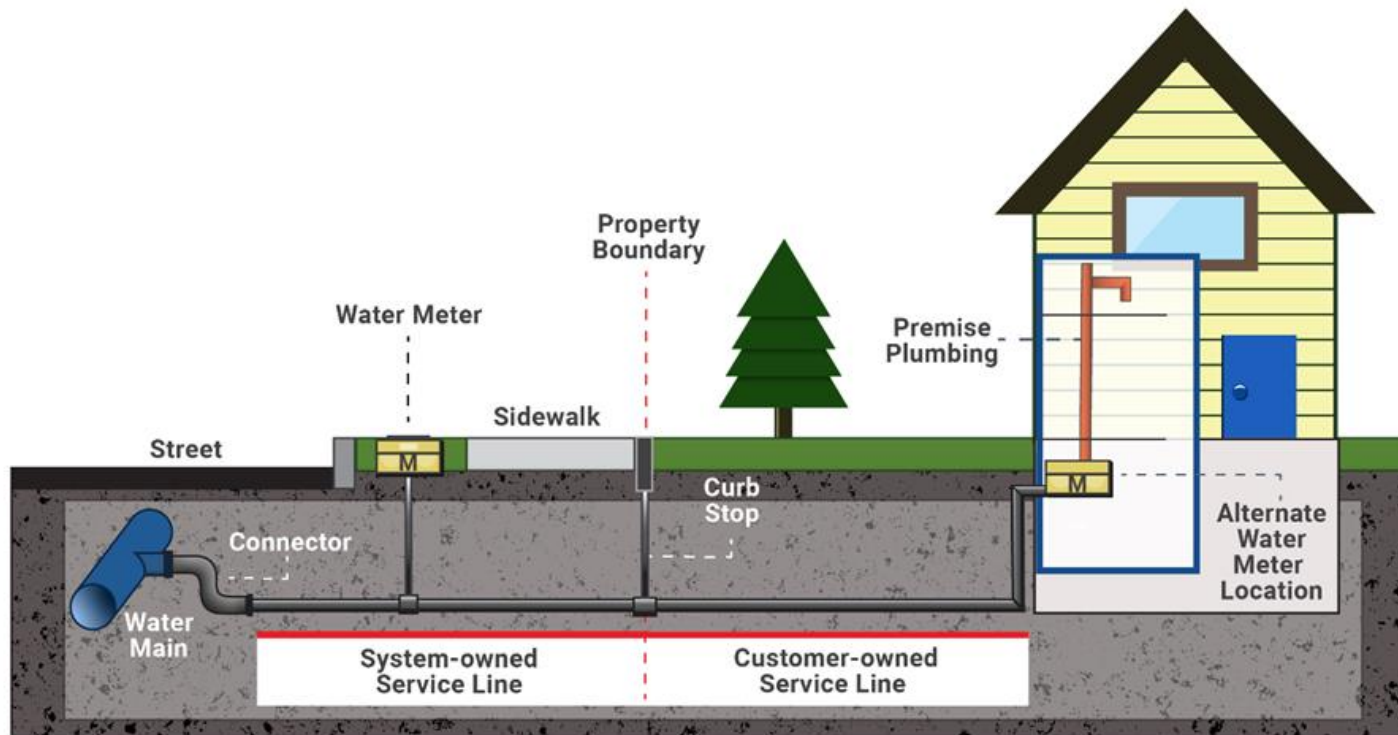




## 2. Water System-Owned Portion/ 3. Customer Owned Portion

### Service Line Ownership Type

- 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 SL 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
<b>Lead</b>	Any portion of the service line is known to be made of lead.
<b>Galvanized Requiring Replacement (GRR)</b>	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.
<b>Galvanized Not Requiring Replacement (GNRR)<sup>1</sup></b>	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.
<b>Non-Lead</b>	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.
<b>Lead Status Unknown</b>	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.

<sup>1</sup> Georgia specific material classification.



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

### Basis of Material Classification

- **Basis of Material Classification (Method of Investigation) must be identified** for each SL
- Highly recommend additional information be included on the method used **to classify** each SL

### 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

### Presence of Lead Connector

- Pigtails, goosenecks, and connectors **24 inches or less** are not considered to be part of the service line
- Any lead gooseneck, pigtail, or lead connector encountered during planned or unplanned water infrastructure work **must be replaced.**





# 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

- Tier Classification is based on the **Overall Service Line Classification**, the **Water System Type**, and the **Building Type**.
- Building Types:
  - Single Family Residence
  - Multi Family Residence
  - Non-Residential Building
- SLs classified as **Lead Status Unknown do not meet the criteria of a sample site tier and should NOT be used** for routine tap monitoring.
- Subject to change with the **Lead and Copper Rule Improvements (LCRI)**







**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
- **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

- Must provide notification to persons served by a SL 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**

**IMPORTANT  
NOTICE**

**WATER  
SERVICE LINE  
INVENTORY**

The City of Waco is conducting a Lead Service Line Inventory. Our inventory has determined that the city-owned portion of your water service line contains lead and needs to be replaced.

This replacement will involve a temporary interruption of your water service and will require that you flush your pipes.

**Please call us as soon as possible, so we can provide you with additional information and further instructions.**

We're committed to the protection of public health and to the quality management of water and wastewater services.

**CALL**  
254-299-2489

Waco Water  
Utility Services  
PO Box 2570  
Waco, Texas 76702





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

### 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

Must be submitted using the 120Water PWS Portal

- No additional cost to water systems
- Compatible with **GA EPD LCRR Service Line Inventory Spreadsheet**
  - Updated spreadsheet coming soon!!
- PWS Portal Registration and Training



## **Mandatory Virtual Training for your Lead Service Line Inventory**

Service line inventories must be submitted to GA EPD utilizing your PWS Portal account from 120Water. Register and attend one of the trainings to gain access to your account to prepare for your submission.

### **Instructions for Water Utilities:**

Scan the QR code below to register for an upcoming 120Water virtual training. Once you have scanned the code, you will see a form to fill out on the website. Please fill this out with your information, so that we can ensure you are enrolled in the training that's best for you.

Scan me



or visit:

[120water.com/ga-state-training-registration-qr](https://120water.com/ga-state-training-registration-qr)



## *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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*Scan me*



*or visit:*

[120water.com/ga-state-training-registration-qr](https://120water.com/ga-state-training-registration-qr)