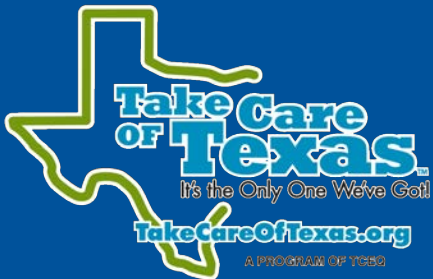




Lead and Copper Rule Revision – Lead Service Line Inventory Form



Small Business & Local Government Assistance
1-800-447-2827 www.TexasEnviroHelp.org



Background - EPA's Intent to Strengthen LCR

- Lead and Copper Rule Revision
 - Goal is to proactively remove lead service lines and protect public health
 - Effective date: December 2021
 - 40 Code of Federal Regulation (CFR) Part 141 Subpart I
 - TCEQ will need to adopt new rules by 2024
 - Compliance due date is **October 16, 2024**

Lead and Copper Rule Revision (LCRR) Timeline

- LCRR Effective Date: December 16, 2021
 - Compliance Date: **October 16, 2024**
 - Lead Service Line Inventory and Replacement Plan due to state
- Lead and Copper Rule Improvements (LCRI) regulations are under development

LCRR Overview

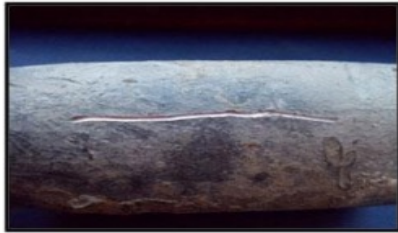
- **Lead Service Line Inventory**
- Lead Service Line Replacement
- Tiering Structure Changes
 - Target sampling lead service lines
- Sampling Changes
 - New tap sampling procedures (i.e., 5th liter)
- Lead Trigger Level Added
 - Systems with higher levels will sample more frequently
- Public Notice and Education
- Find and Fix
 - Triggering Actions to Reduce Lead Exposure Earlier
 - Flexibility for small systems
- Schools and Childcare Facility Testing

Important Dates

- Beginning in June 1986, the Safe Drinking Water Act prohibited the use of any pipe, pipe or plumbing fitting or fixture, any solder, or any flux in the installation or repair of a PWS that was not “lead free”.
- Texas adopted the lead reduction on July 1, 1988.
- Effective January 4, 2014, lead free was amended.

What Do Lead Lines Look Like?

What Do Lead Service Lines Look Like?⁹



Lead service lines are generally a dull gray color and are very soft. You can identify them easily by carefully scratching with a key. If the pipe is made of lead, the area you've scratched will turn a bright silver color.

Do not use a knife or other sharp instrument and take care not to puncture a hole in the pipe.

Note: Galvanized piping can also be dull gray in color. A strong magnet will typically cling to galvanized pipes, but will not cling to lead pipes.



Lead service lines can be connected to the residential plumbing using solder and have a characteristic solder "bulb" at the end, a compression fitting, or other connector made of galvanized iron or brass/bronze.

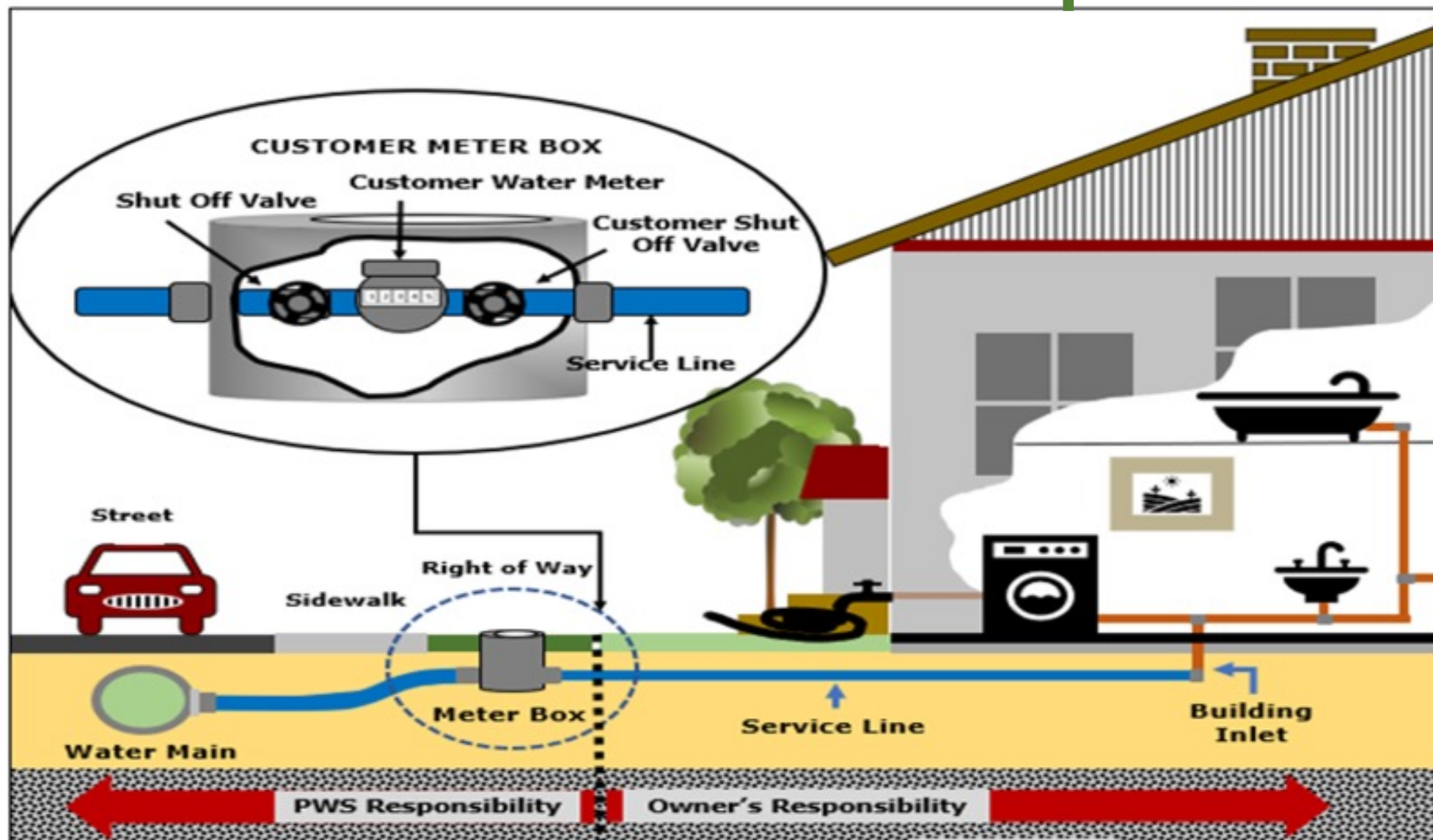
Important Definitions

- **Lead service line** - Portion of pipe that is made of lead, which connects the water main to the building inlet.
- **Galvanized service line** - Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.
- **Galvanized requiring replacement** - Galvanized service line that is or was ever downstream of a lead service line or is currently downstream of lead status unknown.
- **Non-lead** – a service line that has been determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement.
- **Lead status unknown** - Service line that has not been demonstrated to meet or not meet the definition of lead free.
- **Gooseneck, pigtail or connector** - Short section of piping used for connections between rigid service piping.

Lead Service Lines

- The LCRR defines a lead service line as:
“ a portion of pipe that is made of lead, which connects the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner or both. For the purposes of this subpart, a galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material. If the only lead piping serving the home is lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, the service line is not considered a lead service line. For purposes of §141.86(a) only, a galvanized service line is not considered a lead service line.”

PWS Service Line Graphic



Lead Service Line Inventory

- 40 CFR §141.84 Lead Service Lines Replacement Requirements
 - All water systems must develop an inventory to identify the materials of service lines by **October 16, 2024**, and submit it to the primacy agency.
 - The inventory must include all service lines regardless of ownership status.
 - The system must review all available sources of information to identify service line materials for the initial inventory.

Lead Service Line Inventory Continued

- Water systems shall identify and track service line materials as they are encountered and update the inventory based on all applicable sources.
- System must submit updated inventory in accordance with its tap sampling monitoring period schedule (annually or triennially).

Identifying Lead Service Lines

- Identify service lines that were installed before July 1, 1988.
- Identify any goosenecks or pigtails used to connect water mains and service lines.
- Identify service lines that are 2-inches or less in diameter.
- Physically inspect the piping. Lead is a dull gray color and very soft. If scraped with a key or coin, it will turn a bright silver color.

Lead Service Line Inventory Sources of Information

- Construction and plumbing codes, permits, engineering plans, survey and inspection records.
- Distribution system maps, meter installation and service connection records.
- Capital improvement projects, masterplans, standard operating procedures.

Lead Service Line Inventory Other Sources of Information

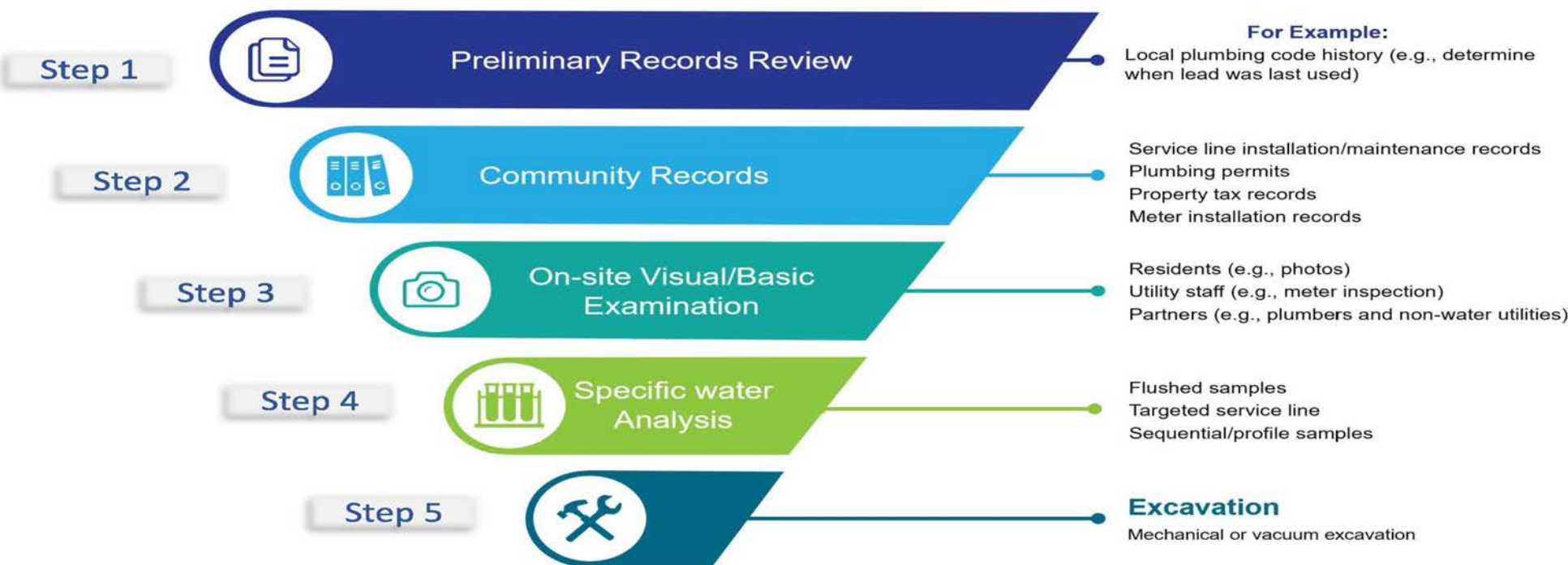
- Interview senior personnel or retirees.
- Contact your County Clerk's office to obtain construction dates of buildings.
- Review encroachment permits which can show information on transportation right of ways.
- Conduct physical surveys and investigations.

Potholing



Lead Service Line Inventory Sources of Material Identification

Materials Identification – Stepwise Approach



Reporting Lead Service Line Inventory to the Public

- Inventory must be made publicly accessible.
- Water systems serving more than 50,000 persons must provide the inventory online.
- Instructions to access the service line inventory must be included in the Consumer Confidence Report.

LSLs Replacement Plan

- All water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must, by **October 16, 2024**, submit a lead service line replacement plan to the State. The lead service line replacement plan must be sufficiently detailed to ensure a system is able to comply with the lead service line replacement requirements (if required to implement).

Lead Service Line Inventory – WHO, WHAT, and WHEN

- **WHO**: Applies to all **community and non transient, non community** PWS
- **WHAT**: Service Line Material
 - Lead service lines
 - Galvanized requiring replacement (i.e. are/were downstream of a lead service line)
 - Lead status unknown
 - Non-lead
- **WHEN**: Every public water system must compile and submit by October 16, 2024
- The inventory must be made publicly available

DON'T WAIT!



Getting Help

Lead and Copper Rule Program

- PWSLCR@tceq.texas.gov
- LCRR@tceq.texas.gov

Financial Managerial and Technical (FMT) Assistance

- FMT@tceq.texas.gov

TexasEnviroHelp

- (800) 447-2827
- TexasEnviroHelp@tceq.texas.gov
- www.texasenvirohelp.org

Funding

Significant funds have been made available to assist public water systems with Service Line Inventories through the Bipartisan Infrastructure Law (BIL)/Infrastructure Investment and Jobs Act (IIJA).

- Texas Water Development Board (TWDB)
 - <https://www.twdb.texas.gov/financial/programs/Lead-SLR/index.asp>
- EPA Funding Resources
 - <https://www.epa.gov/ground-water-and-drinking-water/funding-lead-service-line-replacement>

Service Line Inventory

TCEQ Inventory Template (TCEQ- 20943) Includes:


- Introduction
- Template Instructions
- Classifying Service Lines (SLs)
- PWS Information
- Inventory Methods
- Inventory Summary
- Detailed Inventory
- Public Accessibility
- Certification

TCEQ Inventory Template

File Home Insert Page Layout Formulas Data Review View Help Acrobat

Clipboard Font Alignment Number Styles Cells

A1

 Service Line Inventory Form for Public Water Systems

What is the purpose of this template?

This template is required for community and non-transient non-community public water systems to comply with the service line inventory requirements of the January 15, 2021, Lead and Copper Rule Revisions (LCRR). This template provides fillable forms and tables for public water systems (systems) to document their methods, organize their inventory, submit the initial inventory and inventory updates electronically to the TCEQ, and document how they are making the inventory publicly available. Refer to the Lead and Copper Rule Revisions rule language in 40 CFR § 141 Subpart I and the EPA's Guidance for Developing and Maintaining a Service Line Inventory for minimum LCRR requirements and recommendations.

For questions, please contact LCRR@tceq.texas.gov or call (512) 239-4691. The financial, managerial, and technical (FMT) assistance program can provide additional assistance and can be reached (512) 239-4691 or FMT@tceq.texas.gov.

Submit the completed lead service line inventory electronically. For file sizes larger than 25 megabytes (MB), the TCEQ File Transfer Protocol Secure (FTPS) site is available at <https://ftps.tceq.texas.gov/index.php>.

How is the template organized?

The worksheets in this template are color coded:

- Yellow worksheets are instructions and background.
- Dark blue worksheets are templates for systems.

The cells in this template are also color coded:

- Gray cells are background or instructions.
- Light blue cells are fillable cells for systems.
- Aqua cells are required.

* Required cells are further denoted using a superscript *.

+ Conditionally required are denoted using a superscript +.

See the table below for a description of each worksheet.

Template Organization		
Worksheet Type	Worksheet Name	Description
Background	Template Instructions	Contains detailed instructions for systems.
	Classifying SLs	Summarizes requirements for classifying the entire service line (SL) when ownership is split (i.e., when the system owns a portion and the customer owns a portion).
	PWS Information	For systems to document basic system information.

Introduction Template Instructions Classifying SLs PWS Information Inventory Methods Inventory Summary Detailed Inventory Public Accessibility Certification





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