



Lead and Copper Rule Revisions (LCRR) Service Line Inventories

TCEQ Environmental Trade Fair Presented on 5/15/24:

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Presentation Outline:

- Introduction and Purpose
- LSLI Definitions
- LSLI Requirements
- LSLI Walk-Through
- Next Steps
- Q&A

Introduction and Purpose

- Define and describe LCRI terms
- Highlight LCRR LSLI requirements
- Walk through and discuss LSLI components

Key Events

- Compliance date for the LCRR - October 16, 2024
- Proposed LCRI announced - November 30, 2023
- Final LCRI - expected before October 16, 2024
- Compliance date for LCRI - 3 years after promulgation date

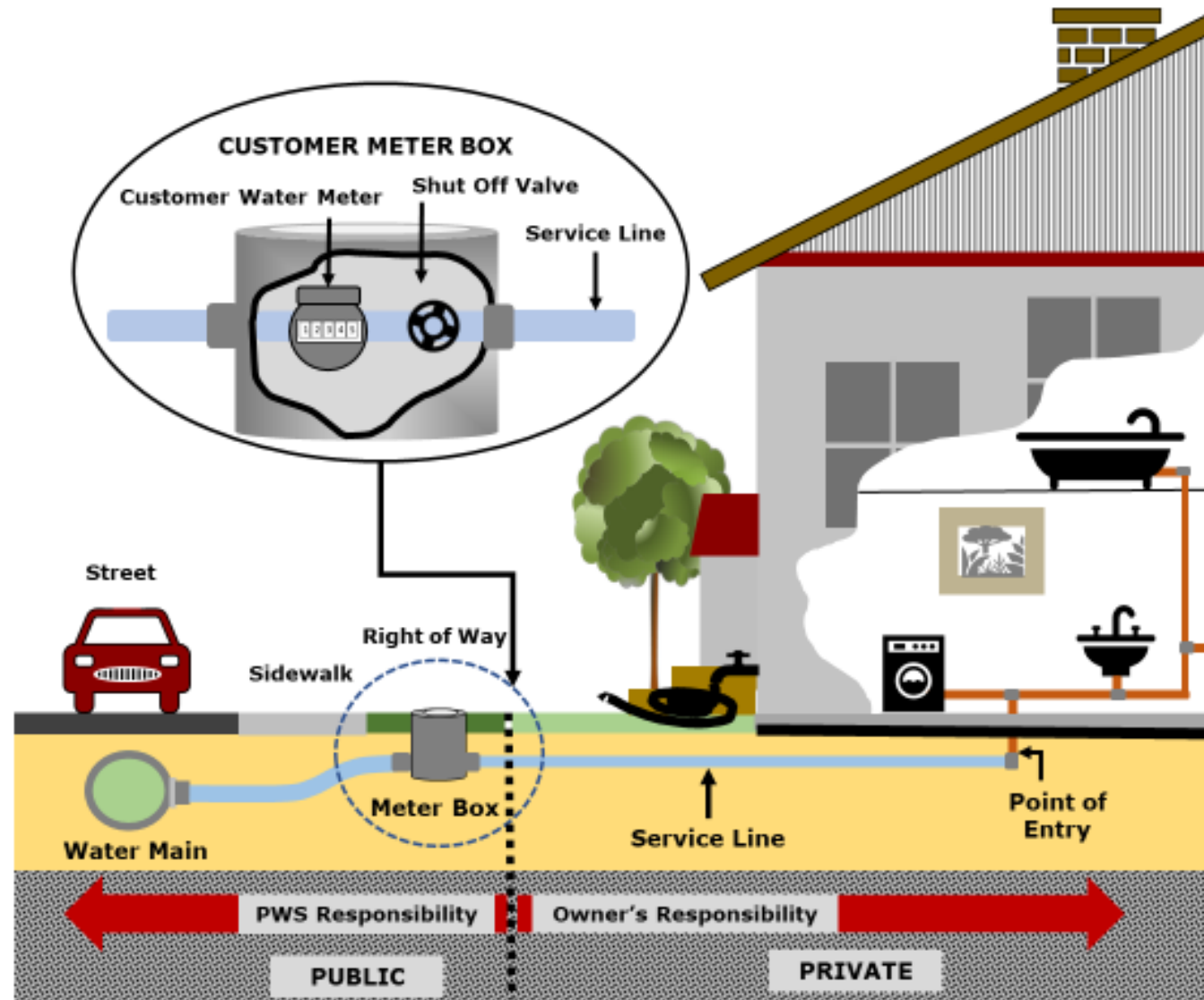
Important Definitions

- ***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.

Important Definitions Continued

- ***Gooseneck, pigtail, or connector*** - Short section of piping used for connections between rigid service piping.
- ***Lead status unknown service line*** - Service line that has not been demonstrated to meet or not meet the definition of lead free.
- ***Non-lead service line*** - Service line that has been determined through evidence-based record, method, or technique not to be lead or galvanized requiring replacement.

PWS Service Line Graphic



LCRR Service Line Inventory

- 40 CFR §141.84 – All PWS must identify material of service lines connected to distribution system. Service lines must be categorized in the following manner:
 - Lead
 - Galvanized Requiring Replacement
 - Lead Status Unknown
 - Non-Lead

Service Line Inventory Form 20943

- WHO: Required for all community and non-transient non-community water systems
- WHEN: Submitted to TCEQ by **October 16, 2024**

DON'T WAIT!



TCEQ Form 20943

TCEQ Inventory Template Includes:

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

Background and Introduction



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?

◀ ▶	Introduction	Template Instructions	Classifying SLs	PWS Information	Inventory Methods	Inventory Summary
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Required Worksheets

PWS Information							
<i>Purpose of this worksheet: For water systems to document basic system information. All information on this page is required.</i>							
Facility Information*							
Water System Name:							
PWSID:	Population Served (number of people):	Number of Service Connections:	PWS Type:				
			CWS				
If a CWS, do multi-family residences comprise at least 20% of the structures you serve?			Yes				
System Contact Person*							
Name:		Title:					
FirstName Last Name							
Telephone:		Email:					
Person Who Prepared Inventory (if different from above)*							
Name:		Title/Affiliation:					
...	Classifying SLs	PWS Information	Inventory Methods	Inventory Summary	Detailed Inventory	Public Accessibility	Certification

Inventory Methods

Inventory Methodology		
PWS Name:		
PWSID:		
<p><i>Purpose of this worksheet: For systems to document the methods and resources they used to develop and update the inventory.</i></p> <p><i>Note: Cells that have a superscript * are required fields.</i></p>		
Part 1: Historical Records Review		
Type of Record	Describe the Records Reviewed for Your Inventory*	Indicate if record was reviewed as required by 40 § CFR 141.84(a)(3).*
1. Previous Materials Evaluation <i>Example: Locations of Tier 1 lead tap sampling locations that are served by a lead service line.</i>		Select "Yes" or "No"
2. Construction Records and Plumbing Codes <i>Examples: Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.</i>		Select "Yes" or "No"
3. Water System Records <i>Examples: Capital improvement plans. Standard operating procedures. Engineering standards.</i>		Select "Yes" or "No"
4. Distribution System Inspections and Records <i>Examples: Distribution system maps. Tap cards. Service line repair/replacement records. Inspection records. Meter installation records.</i>		Select "Yes" or "No"
5. Other Records		Select "Yes" or "No"
<div> <div>...</div> <div>Classifying SLs</div> <div>PWS Information</div> <div>Inventory Methods</div> <div>Inventory Summary</div> <div>Detailed Inventory</div> <div>Public Access</div> </div>		

Inventory Methods Continued

Part 2: Identifying Service Line Material During Normal Operations			
1. During which normal operating activities are you collecting information on service line material? Check all that apply. Note that under 40 § CFR 141.84(a)(5) water systems must identify and track service line materials in the inventory as they are encountered in the course of its normal operations.			
Water meter reading	Select "Yes" or "No"	Water main repair or replacement	Select "Yes" or "No"
Water meter repair or replacement	Select "Yes" or "No"	Water main repair or replacement	Select "Yes" or "No"
Service line repair or replacement	Select "Yes" or "No"	Backflow prevention device inspection	Select "Yes" or "No"
Other	Select "Yes" or "No"		
If "Other", please explain below:			
2. Did you develop or revise standard operating procedures to collect service line material information during normal operation? If "Yes", please explain below.			Select "Yes" or "No"
Part 3: Service Line Investigations			
1. Identify the service line investigation methods your system used to prepare the inventory (check all that apply). If a water system chooses an investigation method not specified by the state under 40 CFR §141.84(a)(3)(iv), state approval is required. Note that investigations are not required by the LCRR but can be used by systems to assess accuracy of historical records and gather information when service line material is unknown.			
Visual inspection at the Meter Pit	Select "Yes" or "No"	Water Quality Sampling - Sequential	Select "Yes" or "No"
Customer Self-Identification	Select "Yes" or "No"	Water Quality Sampling - Other	Select "Yes" or "No"
CCTV Inspection at Curb Box - External	Select "Yes" or "No"	Mechanical Excavation	Select "Yes" or "No"
CCTV Inspection at Curb Box - Internal	Select "Yes" or "No"	Vacuum Excavation	Select "Yes" or "No"
Water Quality Sampling - Targeted	Select "Yes" or "No"	Predictive Modeling	Select "Yes" or "No"
Water Quality Sampling - Flushed	Select "Yes" or "No"	Other	Select "Yes" or "No"
If "Other", please explain below:			
2. If "Predictive Modeling", please briefly describe the model and inputs used:			

▶
Introduction
Template Instructions
Classifying SLs
PWS Information
Inventory Methods
Inventory Summary

Inventory Summary

Inventory Summary	
PWS Name:	
PWSID:	
<i>Purpose of this worksheet: For water systems to provide a summary of the service line inventory, including information on ownership, inventory format, and the number of service lines for each of the four required materials classifications.</i>	
<i>Note: Cells that have a superscript * are required fields.</i>	
Part 1. General Information	
1. Is this the Initial Inventory or an Inventory Update? *	Select One
2a. Who owns the service lines in your system? If other, please explain below. *	Select Ownership Type
2b. Is there documentation that defines service line ownership in your system, such as a local ordinance? If yes, please describe below and explain where ownership is split (e.g., property line, curb stop).	Select "Yes" or "No"
3a. Describe when lead service lines were generally installed in your system below.	
3b. When were lead service lines banned for the system? Reference the state or local ordinance that banned the use of lead in your system.	
4. Are there lead goosenecks, pigtails or connectors in the system?	Select "Yes" or "No" or "Don't Know"
Part 2. Inventory Summary Table ¹	

Introduction	Template Instructions	Classifying SLs	PWS Information	Inventory Methods	Inventory Summary
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Inventory Summary Continued

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR) ¹
Lead	Any portion of the service line is known to be made of lead. ²	4
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.	2
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.	3
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.	0
TOTAL		9
<p>Notes</p> <p>¹This summary table is for reporting material for the entire service line connecting the water main to the customer's plumbing. See the Classifying SLs worksheet for additional guidance on assigning a materials classification to the entire service line when ownership is split. Remember that systems must track the system-owned and customer-owned portions separately in their inventory.</p> <p>²A lead-lined galvanized service line is consistent with the definition of Lead SL under the LCRR (a portion of a line that is made of lead, which connects the</p>		

Detailed Inventory

Detailed Inventory

PWS Name:

PWSID:

Purpose of this worksheet: To provide a format water systems can use to track materials for each service line in the distribution system.

General Instructions: Each row in this worksheet represents one service line connecting the water main to the customer's plumbing. The worksheet includes required and recommended elements; the columns with the aqua shading are required by the LCRR. The worksheet includes examples in rows 12 - 20 and is formatted for approximately 10,000 entries.

Note: Cells that have a superscript * are required fields; Cells that have a superscript † are conditionally required fields and can impact formulas throughout document.

TCEQ-20943 (Rev. 1/2/2022)

Location Information								System-Owned Portion		
Unique Service Line ID	Location Identifier*							System-Owned Portion Service Line Material Classification*	If Non-Lead in Column J, Was Material Ever Previously Lead?†	Service Line Installation Date†
	Street Number*	Street Name*	City*	Zip Code*	Other Location Identifier†	GPS Coordinate - Latitude (decimal degrees)	GPS Coordinate - Longitude (decimal degrees)			
<i>A Unique ID is recommended for each service line.</i>	<i>Water systems must track addresses of all service lines in their internal inventory. For the publicly accessible version, location identifiers are required for lead and galvanized requiring replacement. If the system does not use addresses for their location identifier, other options could include a landmark, intersection, block, or other details to specify service line locations. If using GPS coordinates, utilize the GPS Coordinate - Latitude/Longitude fields and include 5 decimal places.</i>							<i>Dropdown list includes recommended subclassifications. If "Non-Lead/Other", describe in Notes field</i>	<i>Select Yes, No, or Don't know. Important for determining if downstream/customer-owned galvanized service line requires</i>	<i>Dropdown list when the service line was installed or replaced</i>
Example 1	1234	Test St.	City	Zip Code	Intersection of Test and Elm St.	30.2711286	-97.7436995	Lead	Yes	Before 1989
Example 2	4321	Test St.	City	Zip Code	Intersection of Test and Main St.			Non-Lead	Yes	Between 1989 and 2014
<div> <div>Introduction</div> <div>Template Instructions</div> <div>Classifying SLs</div> <div>PWS Information</div> <div>Inventory Methods</div> <div>Inventory Summary</div> <div>Detailed Inventory</div> <div>Public</div> <div>...</div> <div>+</div> </div>										



Things to Keep in Mind

- Get creative with records!
 - Tax codes, appraisals
 - Affidavit of senior personnel
 - Maintenance and plumbing records
- Service lines installed after July 1, 1988 are likely non-lead

Public Accessibility

Public Accessibility Documentation			
PWS Name:			
PWSID:			
<p>Purpose of this worksheet: For systems to provide documentation to states on how public accessibility requirements of the LCRR were met. <i>All information on this page is required.</i></p> <p>Remember that the LCRR requires systems to use a location identifier for service lines that are lead and galvanized requiring replacement. Water systems may, but are not required to, include a locational identifier for lead status unknown service lines or list the exact address of each service line (40 CFR §141.84(a)(8)(i)).</p>			
1. Select the location identifiers that you use for your service line inventory. Check all that apply.*			
Address	Select "Yes" or "No"	GPS Coordinates	Select "Yes" or "No"
Street	Select "Yes" or "No"	Other	Select "Yes" or "No"
If "Other" is Yes, please describe below:			
2. Does every service line have a location identifier? If "No", explain below.*			Select "Yes" or "No"
3. How is the inventory made publicly accessible? Check all that apply. Remember that if your system serves > 50,000 people, you must provide the inventory online.*			
Interactive online map	Select "Yes" or "No"	Printed tabular data	Select "Yes" or "No"
Static online map	Select "Yes" or "No"	Information on water utility mailings or newsletter	Select "Yes" or "No"
Online spreadsheet	Select "Yes" or "No"	Hard copy information available in water system	Select "Yes" or "No"
Printed service line map	Select "Yes" or "No"	Other	Select "Yes" or "No"
...	Inventory Summary	Detailed Inventory	Public Accessibility
			Certification



Certification

PWS Certification	
PWS Name:	
PWSID:	
<p>Certify completion of your lead service line inventory by checking the appropriate boxes below, entering your water system information, and signing the certification. All information on this page is required.</p>	
Select acknowledgment	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.
Select acknowledgment	As the PWS Representative, I understand that if any additional service lines are subsequently identified as Lead, Galvanized Requiring Replacement, or Lead Status Unknown, the PWS is required to notify the State within 30 days of identifying the service line(s) and must prepare an updated inventory using Lead Service Line
Select acknowledgment	As the PWS Representative, I understand that the PWS should maintain for review any resource, information, or identification method used for the development of this initial inventory. These records do not need to be submitted to TCEQ but should be available for review.
Select acknowledgment	As the PWS representative, I understand that customers with a lead, galvanized requiring replacement, or lead status unknown service lines should be informed within 30 days of completion of initial LSLI and annually thereafter until the service line is
Select acknowledgment	As the PWS representative, I understand that the PWS should provide an updated LSLI in accordance with its tap sampling monitoring period schedule, but no more frequently than annually. The updated LSLI must be submitted within 30 days of the end of each tap sampling period.
[Enter Name Here]	The individual providing certification and acknowledgment to the above statements.

...
Inventory Summary
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Next Steps

- Water systems must comply with current LCR until the LCRR Compliance Date
 - **LSL Inventories are due October 16, 2024**
- EPA released the proposed LCRI November 30, 2023
 - Intends to finalize LCRI prior to October 16, 2024

Other LCRR Steps to Remember

- 30-day public notice required for all affected customers identified in the LSI
 - At locations with lead, GRR, or unknown SLs
- 24-hour public notification for ALE
 - LCRR public notification to begin October 16, 2024

What to work on NOW

- Comply with the current LCR
- Read the LCRR and EPA guidance
- Historical record review
- Inventory development
- Proactive replacement
- Corrosion control

Additional Resources

For more information, please see the links below:

- TCEQ Lead and Copper Rule Revisions and Lead and Copper Rule Improvements webpage:
 - <https://www.tceq.texas.gov/drinkingwater/chemicals/lcrr>
- EPA webpage:
 - www.epa.gov/ground-water-and-drinking-water/review-national-primary-drinking-water-regulation-lead-and-copper
- EPA Funding Resources:
 - www.epa.gov/ground-water-and-drinking-water/funding-lead-service-line-replacement
- EPA Guidance for Developing and Maintaining a Service Line Inventory:
 - www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf

Questions?



Contact Us

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