

Keeping up With Compliance and Lead Service Line Inventory

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Whats New, Whats Old?

01

LSLI - Old but active

The Lead Service Line Inventory was due in October of 2024. Over 200 water systems across the state have still not completed this.

02

LSLI on Annual CCR - New

Your LSLI must be submitted annually alongside your CCR to meet EPA compliance requirements.

03

.015 mg/L > 0.10 mg/L - New

The action level exceedance has been lowered to 0.015 mg/L and will drop to 0.10 mg/L by Nov 2027

04

Lead Testing in Schools - New

Water systems will be required to annually test at least 20% of the schools served by their water by Nov 1st 2027

Why is LSLI Required?

01

Lead harms children and adults irreparably

Lead exposure increases blood pressure, raises the risk of heart disease, and has been linked to certain cancers. There is no known safe level of lead in the bloodstream.

02

Lead decreases kidney function

Chronic lead exposure damages the kidneys over time, reducing their ability to filter waste and increasing the risk of long-term renal disease.

03

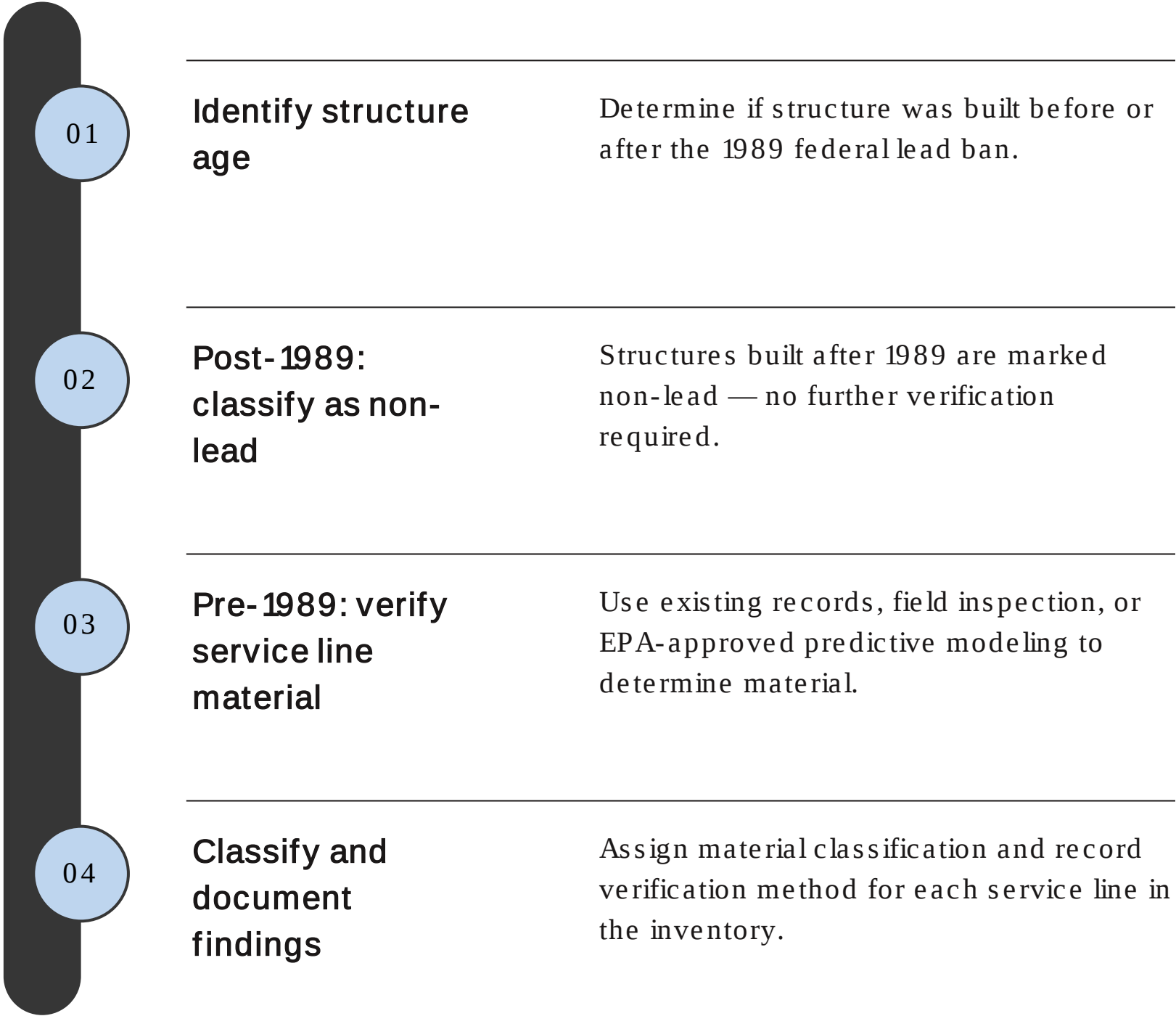
Lead slows brain development and learning

In children, lead interferes with neurological development, leading to reduced IQ, learning disabilities, behavioral issues, and lifelong cognitive impacts.

1. Lead exposure has no safe level. Even low concentrations cause permanent, irreversible damage to the human body — particularly in children, whose developing systems are far more vulnerable than those of adults.
2. Lead pipes were ban in 1989 Nationwide, but there was no requirements on removing existing lead piping. Any water system that was construscted before 1989 has a risk of lead water pipes, goosenecks, or connectors in their distribution system. The lead servcie line ensures you have no lead in your distribution system.

The LSLI Process Overview

- The LSLI process follows a structured approach based on the age of each structure and the availability of existing material records.
- Structures built after 1989 are automatically classified as non-lead, but for pre-1989 structures, utilities must verify service line material through field inspection or EPA-approved predictive modeling.



Different ways to complete your LSLI

There are 3 approved ways to verify the connections installed before 1989 for your Lead Service Line Inventory.

01

Basic Field Verification

Field verify every connection. Take a picture of the service line and report required information for each service line.

02

Previous Material Evaluation

Provide paperwork from previous evaluation of service line materials. Must be accepted and approved.

03

Predictive Modeling

Generally an AI-driven statistical method used to identify unverified Lead Service Lines

Predictive Modeling for Lead Service Lines

What is predictive modeling?

*An FDEP-approved alternative method when direct field
verification isn't feasible for all pre-1989 service lines*

How it works

- Uses historical records, construction data, permit information, and statistical methods
- Estimates the likelihood that a service line contains lead

01

Benefits

- Helps utilities efficiently prioritize resources
- Enables meeting compliance deadlines

02

Key Requirement

- All modeling efforts must be thoroughly documented and defensible to regulatory reviewers

03

Field Verification Requirements

- Field teams must collect specific documentation during onsite inspections
- Must verify BOTH customer side AND system side of the service line

Purpose:

- Properly classify each service line
- Ensure EPA compliance
- Support ongoing accuracy of the living LSLI document

01

Photo Documentation

Capture a photo showing at least 3+ inches of service line past the connector or elbow for clear material identification.

02

Location Identifiers

Record address, lot number, and GPS coordinates for each inspected service line to ensure accurate mapping and traceability.

03

Customer & System Side Data

Collect photos and material data for both the customer-owned side and the water system side of each service line.

04

Inspection Date & Classification

Log the date of each inspection and assign the correct material classification: Unknown, Non-Lead, Lead, or GRR.

Material Classification Categories

The EPA mandates that water systems categorize each service line into one of four material types. Proper classification is crucial for ensuring compliance, informing customers, and planning for replacements. Each category is characterized by the extent of documentation and verification available, which in turn dictates the responsibilities that the water system must meet under the federal Lead and Copper Rule requirements.

Lead

A pipe portion made of lead connecting the water main to the building. Mandatory notification and replacement planning required.

GRR

Galvanized Requiring Replacement: galvanized pipe located downstream of or directly after a lead or unknown service line.

Unknown

No documented evidence of the pipe material is available. Customer notification is required for unknown lines per EPA § 141.84(a).

Non-Lead

Verified not lead by an approved method such as record evaluation, field inspection, or predictive modeling.

Handling Unknown Service Lines

When a service line material cannot be verified through documentation, field checks, or predictive modeling, it should be labeled as "Unknown." These classifications hold the same regulatory significance as confirmed lead lines and activate specific customer notification requirements in accordance with EPA regulations.

Water systems must proactively inform affected customers regarding the existence of unknown, lead, or GRR service lines. This notification obligation, as outlined in EPA § 141.84(a), ensures that customers are aware of potential hazards and the measures being implemented to mitigate them. Effective and timely communication is essential for compliance with LSLI.

EPA § 141.84(a) Notification Requirement

Water systems must notify customers served by lead, GRR, or unknown service lines. Notification is mandatory — not optional — once these classifications are identified in the inventory.

01

Approved Communication Methods

Acceptable methods include direct customer letters, public newsletters, bill inserts, and other forms of public communication. Notifications must clearly explain the line classification and any associated health risks.

02

What Notifications Must Include

Customer notices should identify the service line classification, explain potential health impacts of lead exposure, describe the system's replacement plan timeline, and provide guidance on protective measures such as flushing or using certified filters.

03

Annual Reporting and Replacement Timeline

01

Annual LSLI Submission Required

The Lead Service Line Inventory must be submitted every year alongside the Consumer Confidence Report (CCR).

02

10-Year Replacement Window

Water systems have 10 years after their final LSLI submission to replace all lead or unknown service lines.

03

Continuous Updates Until Completion

The LSLI remains a living document — updated annually to reflect replacements, new verifications, and material reclassifications.

LSLI reporting is a continuous obligation. Each year, water systems must update their inventory in the Consumer Confidence Report, noting changes in service line materials, new verifications, or replacements.

After filing the final comprehensive LSLI, a ****10-year countdown**** starts. All lead and unknown service lines must be replaced within this period. Falling behind may lead to regulatory action, and customers must be informed of delays.

Proactive planning is crucial, including:

- Annual progress tracking
- Prioritizing high-risk lines
- Accurate record-keeping

How We Can Help

Sensible Water Solutions, LSLI.US, and Sensible Municipal Water Systems work together to guide water utilities through every step of compliance from initial inventory setup to final EPA submission and beyond.

01

Complete LSLI Services

Field verification, documentation, and full inventory compilation meeting EPA and FDEP requirements.

02

Manhole Mapping alongside Water Meter Mapping

Any manhole or water meter mapping for any reason

03

Technology & Data Management

Diamond Maps implementation, EPA-compliant data exports, and ongoing living document maintenance.

04

Compliance & Reporting

Annual submissions, customer notifications, replacement plans, and guidance on new EPA rules.

Questions?

We welcome your questions about Lead Service Line Inventory requirements, the verification process, material classification, or any other aspect of LSLI compliance.

For follow-up inquiries, please reach out to Lillian Guimond, Vice President, Sensible Water Solutions. Visit [LSLI.US](https://www.lsl.us) for additional resources and guidance on meeting EPA compliance requirements.



Thank You for Your Attention

