

STANDARD OPERATING PROCEDURE

LEAD SERVICE LINE INVENTORY

[UTILITY NAME AND LOGO HERE]

[date here]

All Community Water Systems and Non-Transient Non-Community Water Systems are required to complete an Initial Lead Service Line Inventory (LSLI) using the inventory format approved by DEP and submit it to the appropriate DEP District Office on or before October 16, 2024. Any pipes that connect the water main to the interior plumbing of a building will be included in the inventory.

This Standard Operating Procedure is recommended by EPA for the LSLI for documentation on how the water system met the requirement to complete the Lead Service Line Inventory. In addition, this SOP documents how the water system staff and contractors will collect the Inventory information and use it in the future to update the inventory. This provides a consistent methodology for tracking, updating and reporting the inventory information.

There are five primary steps to be conducted for the LSLI requirements:

1. Records Search
2. Visual Inspection
3. Inventory Template Completion
4. Public Notification
5. Lead Service Line Replacement Plan

These steps will be conducted for the initial inventory, due October 16, 2024, and then again for any subsequent inventories.

The Inventory includes both the portion of the service line owned by the water system and the customer owned portion of the service line. Service line material classifications in the Inventory are defined as lead, Galvanized Requiring Replacement (GRR), non-lead and lead status unknown. A GRR is a galvanized service line that is or was at any time downstream of a lead service line or is currently downstream of a lead service line. For service lines classified as non-lead, specific service line material (e.g. copper, plastic, or galvanized) will be included, as recommended by DEP.

Records Search

For the Records Search, service line records will be reviewed for documentation of service line materials. The following sources of information, when available, will to be used (40 CFR 141.84):

1. Construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system.
2. Water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.
3. Inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.

The following additional FDEP approved the method will be used:

4. Documentation for service lines installed after the use of pipe, solder, and flux that were not “lead free” was banned or otherwise prohibited from use in the construction of service lines within a system’s distribution system. For this system, this will include documentation of construction development of a property after January 18, 1989, as provided by the county Property Appraiser.

All documentation from the Records Search will be maintained for at least 12 years (40 CFR 141.91).

Visual Inspection

Service line materials that could not be documented to be in the Records Search will be determined by Visual Inspection. Visual Inspection will include both the portion of the service line owned by the water system and the customer-owned portion of the service line. This verification will be conducted at the meter box whenever possible to determine the service line material coming into the meter box and the service line material exiting the meter box. If the service line material is unable to be determined at the meter box, excavation to expose the line will be done as close to the meter box as possible.

With the Visual Inspection, physical verification will be done by checking the pipe diameter and physical testing of metal pipes. For the pipe diameter, service lines greater than 2 inches will be identified as non-lead, as described in EPA’s Service Line Inventory Guidance.

Physical testing will be conducted on metal lines by scratching the surface of the pipe. Lead lines are indicated by being soft and scratching easily, revealing a shiny silver color. Magnet testing will also be conducted to assess metal pipe material, a magnet will stick to galvanized steel pipe but it will not stick to copper or lead pipe.

Pictures will be taken of each portion of the service line, the water system portion and the customer-owned portion as verification of the Visual Inspection. These records will be maintained for at least 12 years (40 CFR 141.91).

Inventory Template Completion

The documented data on each service line will be entered in the EPA Service Line Inventory spreadsheet template, along with all other data required for the spreadsheet. This spreadsheet, which can be accessed at <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>, will be submitted to the DEP District Office in an electronic format as the required LSLI submission.

Any classification of non-Lead on the Inventory spreadsheet will be supported by evidence-based records, methods or techniques to prove it is not lead or GRR. Supporting documentation used to classify service line material will be maintained by the water system and made available to the DEP upon request.

Public Notification

If lead, GRR, or unknown lines are identified in the inventory, customers will be notified within 30 days of submitting the LSLI. In addition, the Consumer Confidence Report (CCR) will include a statement that the LSLI has been prepared and instructions on how to access it.

This notification to customers must include Mandatory Health Effects language, steps that can be taken to reduce lead in drinking water and opportunities to verify the material of the service line. This notification will have to be repeated annually until the service lines are replaced or lead service line material can be documented as a material other than lead or GRR.

The following information will be provided in the Notice:

For LSLs, the notice must include:	For GRR service lines, the notice must include:	For lead status unknown service lines, the notice must include:
<ul style="list-style-type: none"> • A statement that the service line material is lead • Mandatory health effects language • Steps that consumers can take to reduce exposure to lead in drinking water • Opportunities for LSL replacement opportunities • Information about any available financing • A statement that the water system must replace its portion if the property owners notify the system they are replacing their portion 	<ul style="list-style-type: none"> • A statement that the service line material is GRR • Mandatory health effects language • Steps that consumers can take to reduce exposure to lead in drinking water • Opportunities for service line replacement 	<ul style="list-style-type: none"> • A statement that the service line material is lead status unknown • Mandatory health effects language • Steps that consumers can take to reduce exposure to lead in drinking water • Opportunities to verify the material of the service line

The required Mandatory Health Effects language is in 40CFR 141.85(a)(ii) as follows:

***Health effects of lead.** Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.*

The Inventory will be made publicly available and include a location identifier for Lead Service Lines and Galvanized Requiring Replacement (GRR) service lines.

Lead Service Line Replacement Plan

If the inventory indicates the presence of lead, GRR, or unknown service connection, a Lead Service Line Replacement Plan (LSLRP) will be developed in accordance with the requirements of 40 CFR 141.82(b) and submitted by October 16, 2024. If the inventory indicates there are no lead, GRR or unknown service connections, a LSLRP will not be developed or submitted.

The Lead and Copper Rule Improvements, published on Dec. 6, 2023, and currently in revision, is expected to address and revise EPA’s requirements for the LSLRPs. The most recent LSLRP requirements will be used for preparation of the LSLRP.

If a customer replaces a lead or GRR service line and the Utility service line is also lead or GRR, the Utility will replace their service line within 45 days of customer replacement. As an option, the Utility can provide a water filter or Point of Use device with replacement cartridges until the Utility service line is fully replaced.

The Utility is not required to bear the cost of replacing the portion of the service line that is not owned by the Utility.