



# CONNECTICUT DEPARTMENT OF PUBLIC HEALTH



# Overview of Lead and Copper Rule Revisions Initial Service Line Inventory and Classification Requirements

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Environmental Health and Drinking Water Branch

# AGENDA

1. **LCRR Material Inventory Requirements**
2. **Classification of Entire Service Line**
3. **Example Distribution System Service Connections and Configurations**
4. **Tier 1 Public Notification Requirement**

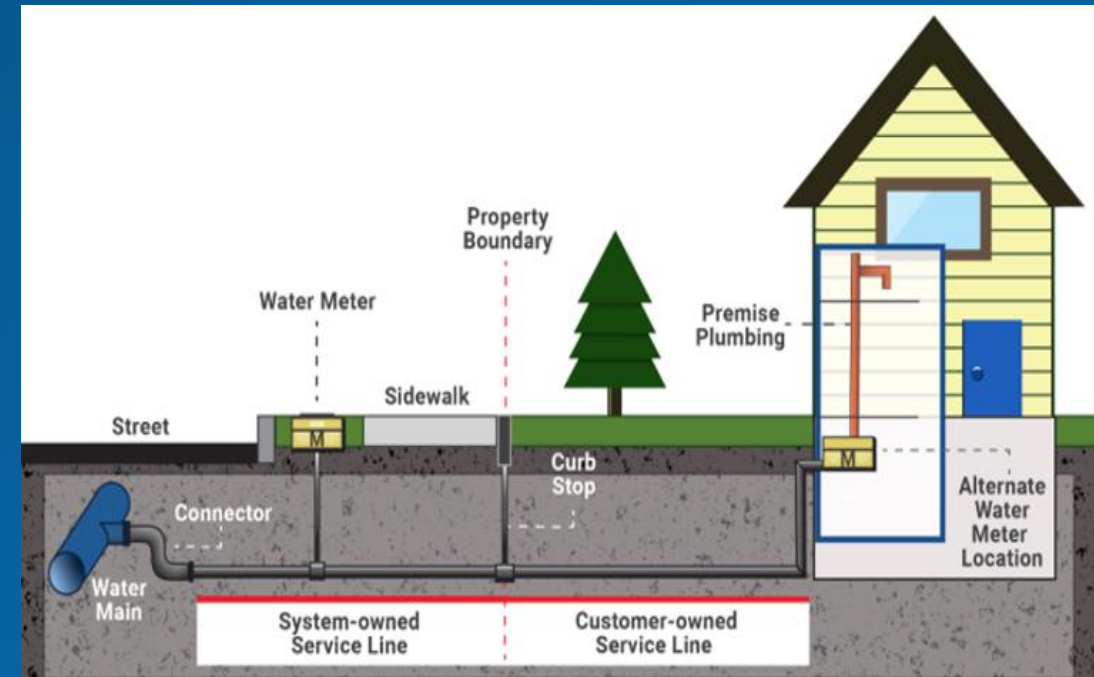
# LCRR Initial Inventory Requirements

## 1. Develop a Service Line (SL) Inventory if you are a Community or NTNC PWS

- ❖ Include system-owned and/or customer-owned portions of all SLs
- ❖ Include all SLs to interior plumbing, regardless of actual or intended use:

### *Including:*

- SLs with non-potable applications such as fire suppression or emergency use.
- SLs to vacant, abandoned buildings, even if water is off
- SLs connecting multiple units/buildings on a property.
- SLs connecting a well to a single building



[Guidance for Developing and Maintaining a Service Line Inventory \(epa.gov\)](https://www.epa.gov/guidance-for-developing-and-maintaining-a-service-line-inventory)

# LCRR Initial Inventory Requirements

2) Classify a SL, pursuant to 40 CFR § 141.84(a)(4), as:

- ✓ **Lead**, where any portion of the SL is made of lead
- ✓ **GRR**, where a galvanized SL is or was at anytime downstream of a Lead Service Line (LSL) or is currently downstream of a lead status unknown SL
- ✓ **Non-lead** (or the actual material e.g., plastic, copper)
- ✓ **Lead status unknown**, where the SL material is not known.



**Note**  
*A Lead-lined galvanized pipe is a LSL*

Source: <https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead-0>.

3) Submit Initial SL Inventory **by 10/16/2024** to **DPH.LeadandCopper@ct.gov**

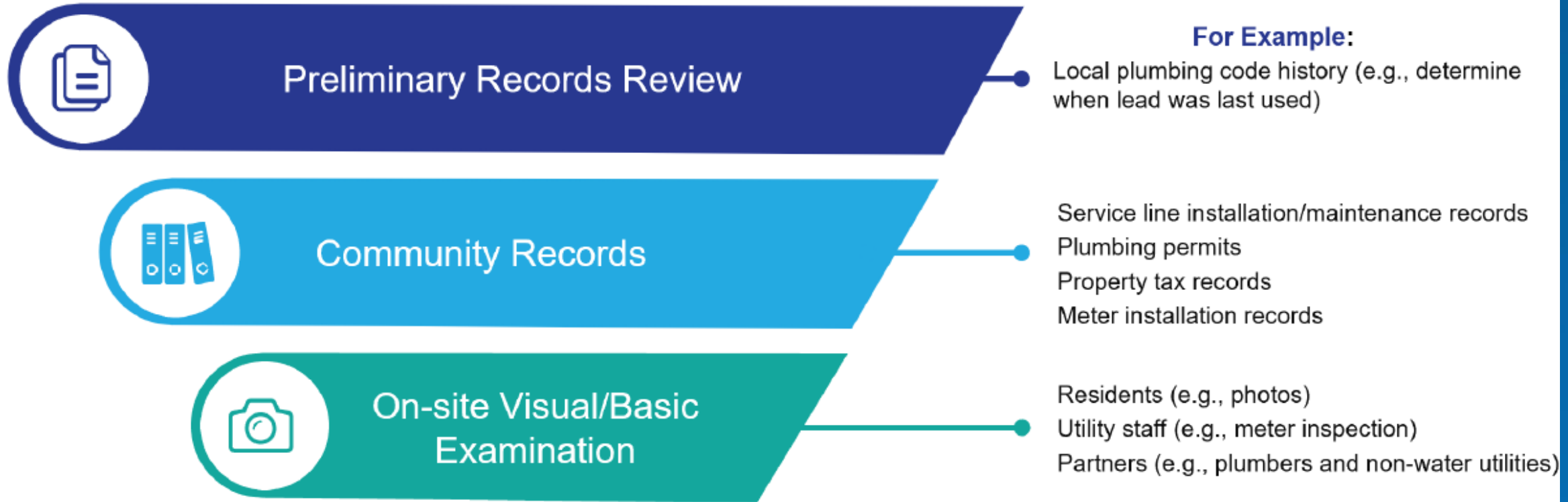
# LCRR Initial Inventory Requirements

## 4) Review these Records to Prepare the Initial Inventory:

- ✓ Previous material evaluation on lead and galvanized iron or steel
- ✓ All construction/plumbing codes, permits, and existing records or other documentation that indicates SL materials used
- ✓ System records, including distribution maps, drawings, historical records, meter installation records, historical capital improvement or master plans, and SOPs
- ✓ All inspections and records of the distribution that indicate the material composition of the service connections
- ✓ Additional records that the State may require

# LCRR Initial Inventory Requirements





## Materials Identification – Stepwise Approach



Source: [www.epa.gov](http://www.epa.gov)

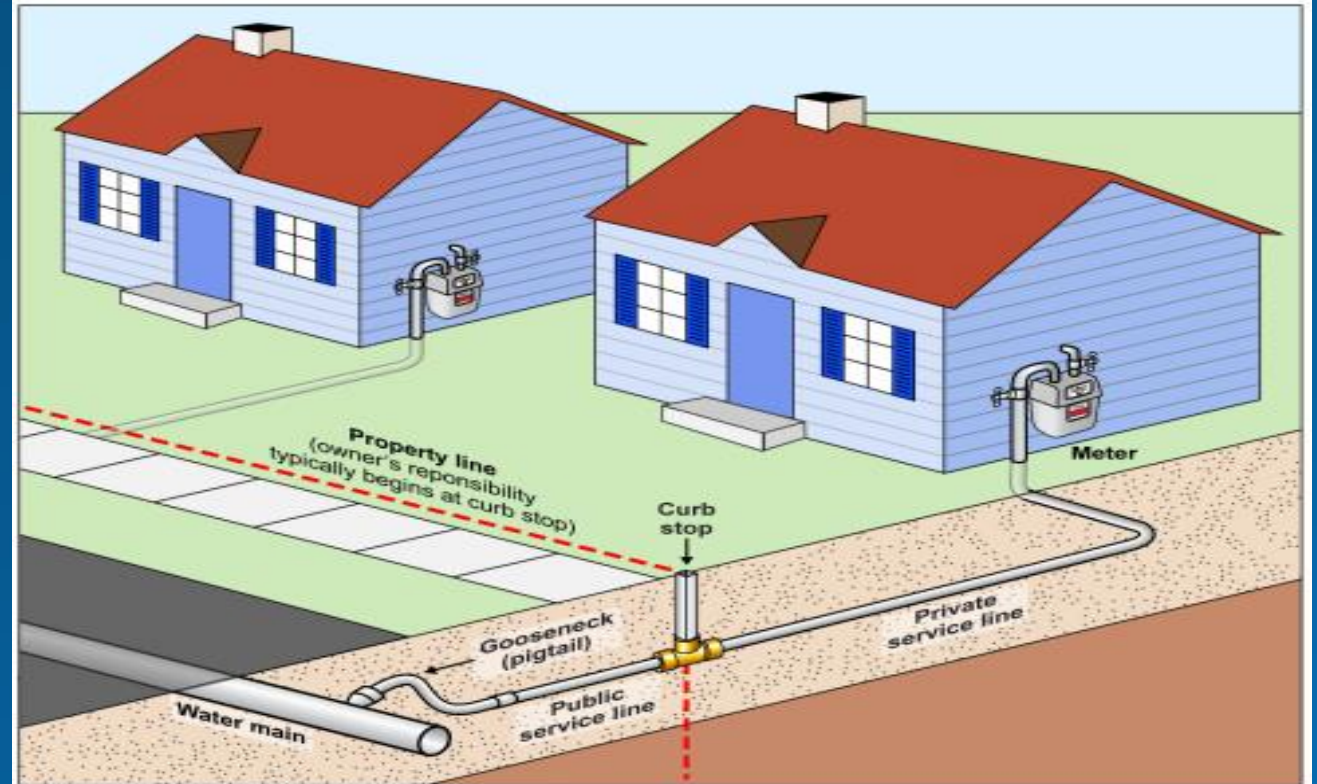
# LCRR Initial Inventory Requirements

- 5) Track SL materials in the inventory during normal operations (e.g., water meter or maintenance activities)<sup>5</sup>

<b>Lead</b>	
A dull, silver-gray color that is easily scratched with a coin. Use a magnet - strong magnets will <i>not</i> cling to lead pipes.	
<b>Galvanized</b>	
A dull, silver-gray color. Use a magnet - strong magnets will typically cling to galvanized pipes.	
<b>Copper</b>	
The color of a copper penny.	
<b>Plastic</b>	
White, rigid pipe that is joined to water supply piping with a clamp. Plastic is a smooth pipe of various colors (e.g., white, blue, black, and green)	

Source: DC Water

Figure 1: Typical Location of Water Main, Lead Service Line, and Other Pipes That Deliver Drinking Water to Homes



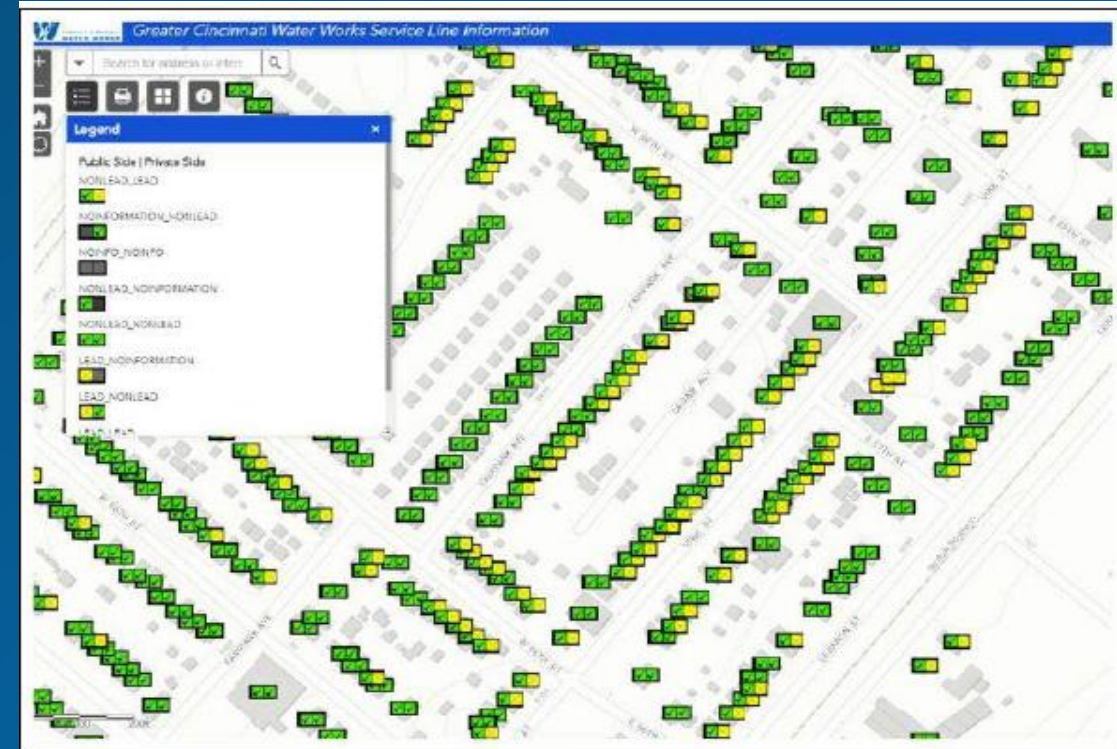
Note

- i) Investigative methods exposing the SL is **not required** for the initial inventory
- ii) The proposed LCRI **requires** potholing validation of non-lead SLs

# LCRR Initial Inventory Requirements

6) Make SL material inventory publicly accessible (on PWS's website, by mail, or in-person at PWS's office)

- ✓ Publish the public accessible SL inventories online if PWSs serves 50,000 people or more
- ✓ Include **locational identifier** for each LSL and GRR SL (CT recommends including for all SLs)
- ✓ Provide a written statement in lieu of the inventory **if there is no lead, GRR, or unknown SL**, stating **A) that PWS has no LSLs, GRRs, or unknowns** *and* **B) a description of methods used to make the determination**



Source: Greater Cincinnati Water Works Service Line Information map.  
<https://gcww.maps.arcgis.com/apps/webappviewer/index.html?id=0a170c268c694e46a8a4e394630df0bd>. Accessed December 16, 2021.



*Location identifiers examples: street address, GPS coordinates, a block, intersection, landmark, emergency 911 address for PWSs in rural areas, or an alternate indicator (e.g., water meter location)*



# LCRR Initial Inventory Requirements

## 7) Include in Consumer Confidence Report (starting 2025 for CWSs)

- A statement that the system has prepared a SL Inventory
- A statement on how the public can access the inventory
- If no LSL, GRR, or unknown SLs, provide such a statement, and **A)** a description of methods used to make such determination or **B)** how to access the inventory

## 8) Provide Public Notification

- To all Customers with SLs that are lead, GRR, or lead status unknown
  - **Within 30 days after completing the initial inventory**
- To new customers at the time-of-service initiation
- Include Health effects & steps to reduce lead exposure; other language(s)
- Include information about opportunities for Lead Service Line Replacement (LSLR), material verification, any program for financial assistance on LSLR
- Repeat annually; Submit a copy & Certification to the State and EPA by July 1 annually

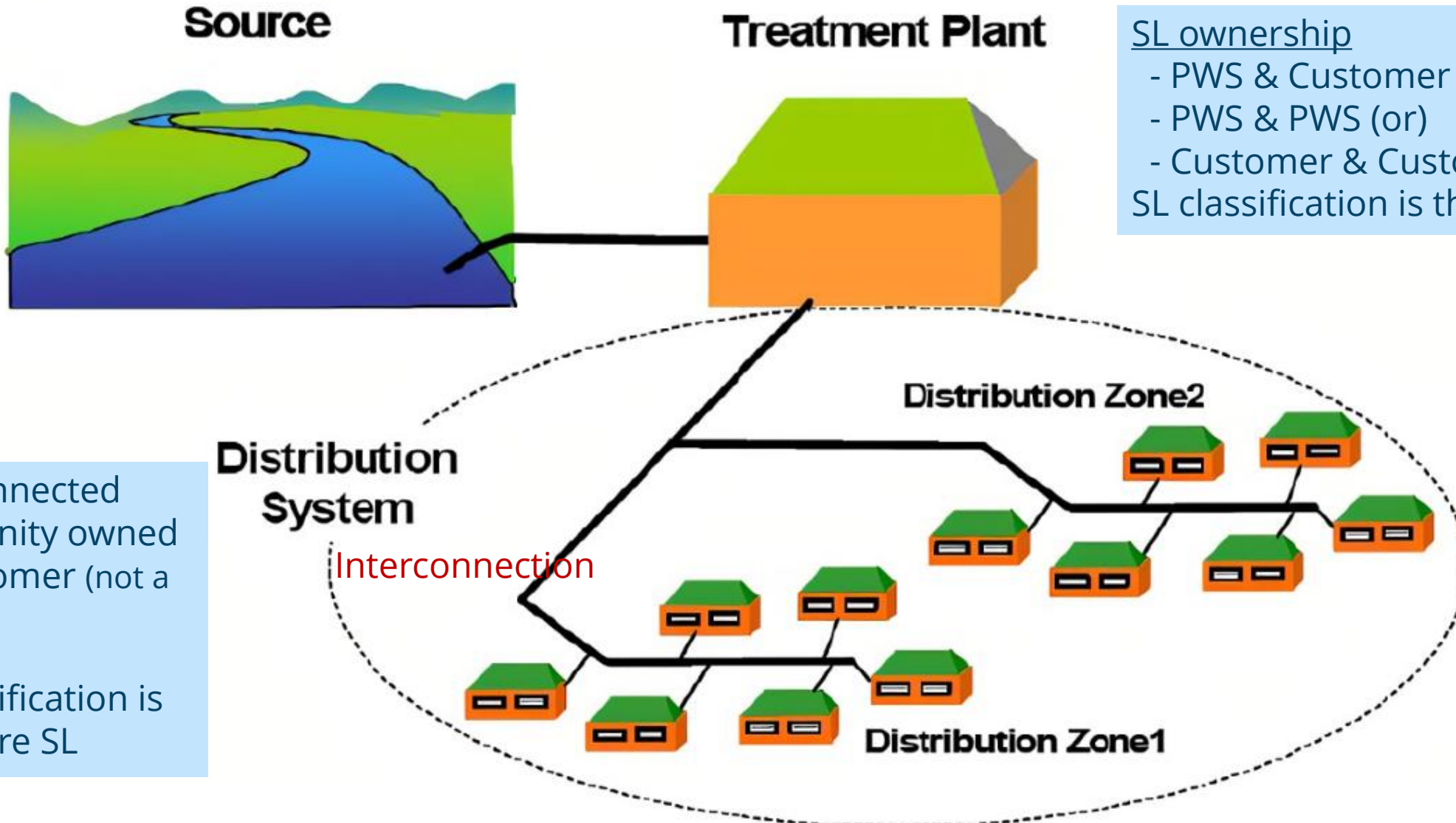
# Classification of the Entire Service Line

**Table 2: Classification of Entire Service Line When Ownership is Split**

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	Non-lead, specifically galvanized pipe material	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:** Exhibit 2-3 of *Guidance for Developing and Maintaining a Service Line Inventory* (USEPA, 2022).

# Example Distribution Service Connections



SL ownership

- PWS & Customer (or)
- PWS & PWS (or)
- Customer & Customer

SL classification is the entire SL

Interconnected community owned by customer (not a PWS)

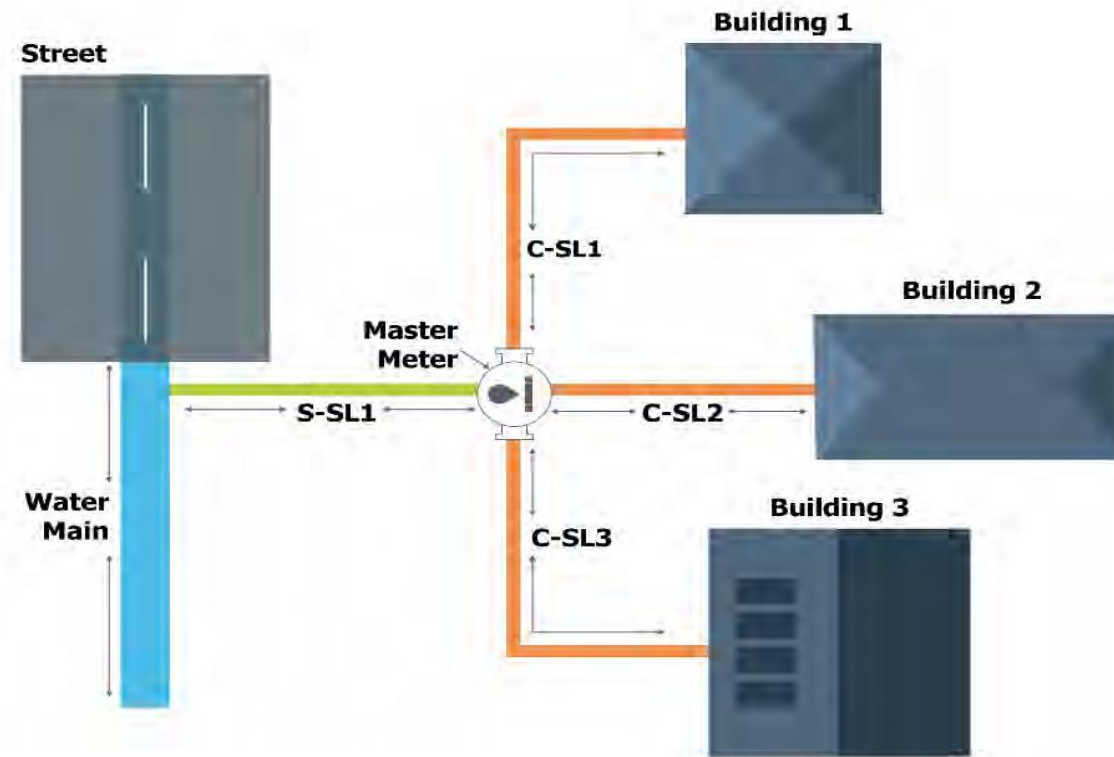
SL classification is the entire SL



# Example of Community PWS with Master Meter and Multiple SLs

Multiple customers split from the PWS SL

Entire SL classification is the system SL + each customer SL (this ex has 3 SLs)



## KEY

C=Customer-owned

S=System-owned

SL=Service Line

Customer-owned  
Service line=

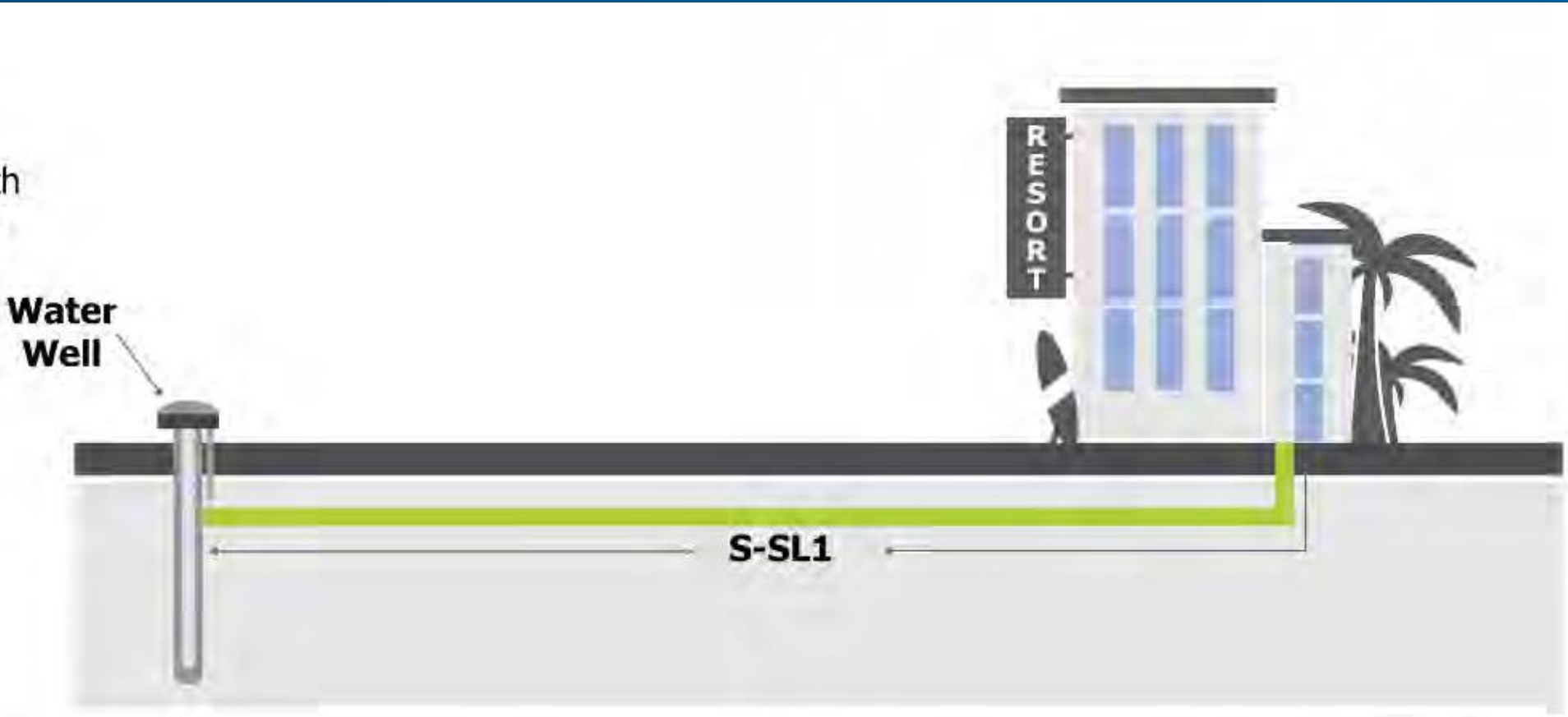
System-owned  
Service line=

Meter



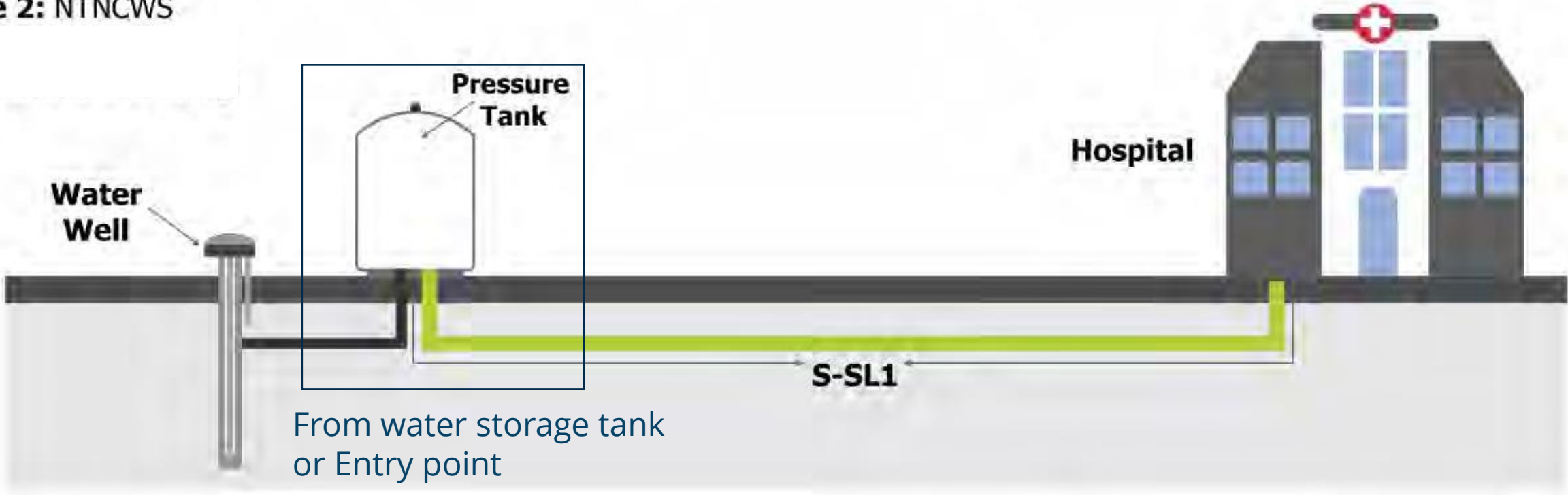
# Example of an NTNC Service Configuration (Profile View)

**Example 1:** NTNCWS with well pumped directly to a building



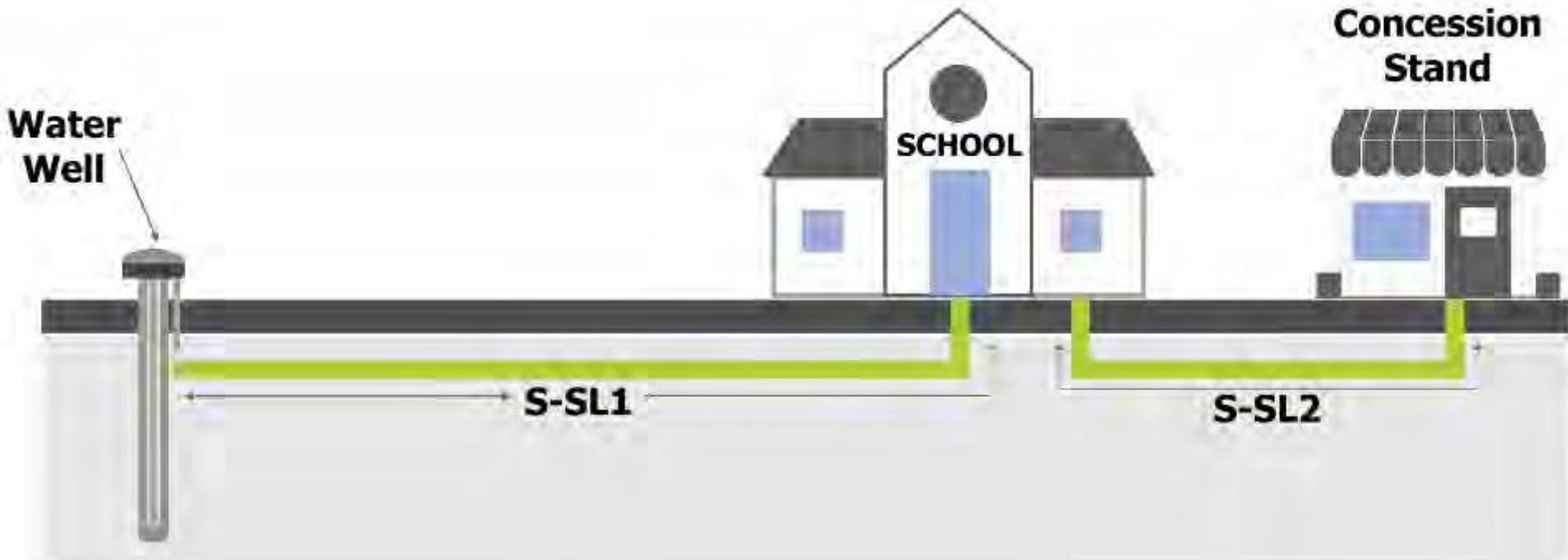
# Example of an NTNC Service Configuration (Profile View)

**Example 2:** NTNCWS  
with well



# Example of an NTNC Service Configuration (Profile View)

**Example 3:** NTNCWS with well connected to a building connected to another building



S = System-owned

Adopted from EPA (June 2023): Developing and Maintaining a Service Line Inventory -Small Entity Compliance Guidance.

# Additional Information on EPA Website

- *Guidance for Developing and Maintaining a Service Line Inventory (epa.gov)*
- *Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide*
- *Fact Sheet for Developing and Maintaining a Service Line Inventory*
- *Planning and Developing a Service Line Inventory | US EPA*
- *Step-by-step Guide to help Customer Identify LSLs in Homes*



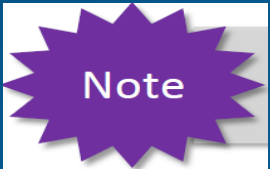
# Tier 1 Public Notification

**After October 16, 2024**

*(i.e., beginning with July 1, 2024 – December 31, 2024 monitoring period),*

Provide Tier 1 PN within 24 hours if your PWS exceed the lead 90<sup>th</sup> percentile action level to:

- All customers
- CT DPH DWS
- EPA (EPA will be providing an email for this)



Lead Action Level is at 0.015 mg/L (15 ppb) before the LCRI compliance date

Lead action level exceedance will trigger LCR requirements

# Thank You!

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