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Environmental Health and Drinking Water Branch

EHDW Circular Letter #2022-35

TO: Community & Non-Transient Non-Community Public Water Systems

FROM: Lori Mathieu, Public Health Branch Chief, EHDW

DATE: June 28, 2022

SUBJECT: Lead and Copper Rule Revisions Material Inventory Template

The National Primary Drinking Water Regulations: Lead and Copper Rule Revisions (LCRR), which was effective on December 16, 2021 with a compliance date of October 16, 2024, requires that all community and non-transient non-community (NTNC) public water systems (PWS) to develop a lead service line (LSL) inventory that identifies materials used to construct and repair <u>all</u> service lines connected to the distribution system. The initial LSL inventory must be submitted to the Department of Public Health (DPH) Drinking Water Section (DWS) by the compliance date of October 16, 2024.

The LCRR specifies information that PWS must include in their LSL inventory and the requirements for PWS to make their information publicly accessible and to notify all persons served by the water system at the service connection with a lead, galvanized requiring replacement, or lead status unknown service line. DWS strongly recommends PWS to begin the development of the LSL inventory immediately, which includes the evaluation of various required resources on every service connection on the water system.

To help PWS comply with the LSL inventory requirements and other LCRR requirements, the DWS has developed a material inventory template with fillable forms and tables for PWS to document and organize their initial material inventory, service line material update, and LSL replacement update; and to determine specific requirements on LSLR, to conduct customer and property owner notification, to identify schools and childcare facilities on the water system, and to select compliance tap sampling sites.

PWS must use and submit the prescribed inventory template for compliance. This template is a final draft. It may be revised after EPA releases their final LSL inventory guidance document to be



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consistent with EPA's requirements. For the final draft LCRR material inventory template, , click on the document link below:

Final Draft LCRR Material Inventory Template

If you have any questions on the LCRR and LSL Inventory requirements, please contact Cindy Sek of my staff at cindy.sek@ct.gov.

C: Heather Aaron, Deputy Commissioner, DPH