

IF YOU HAVEN'T STARTED YOUR WATER SYSTEM'S **LEAD SERVICE LINE INVENTORY**

(as part of the EPA's
Lead and Copper Rule Revisions)



HORNER & SHIFRIN IS HERE TO ASSIST!

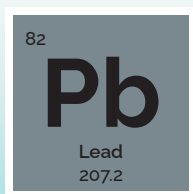


HORNER SHIFRIN

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What is a lead service line inventory?

A lead service line inventory is an accounting of the materials from which all service lines in a water system are made. Data is collected for every service line tied to the system.



Why is a lead service line inventory required now?

The US Environmental Protection Agency's (EPA) regulations on lead in drinking water have been updated. The new Lead and Copper Rule Improvements (LCRI) require water systems to proactively identify and replace all lead pipes. The Bipartisan Infrastructure Law provides more than \$15 billion for lead pipe replacement, with additional funding available to communities for identification, documentation, and removal.

All water systems were required to submit an initial service line inventory by the compliance date of October 16, 2024. Systems that identified lead or galvanized lines must now create a lead service line replacement plan to meet the new November 1, 2027 deadline.



What needs to be collected for inventory?

All service lines connected to the public main are subject to inventory. These include:

- **Public portion** – from main to water shutoff
- **Private portion** – from water shutoff to building (first shutoff, exterior wall or 18" inside building, depending on state-specific requirements)

How is an initial inventory developed?

There are a variety of methods for collecting data for the initial inventory, including:

- **Construction data and plumbing codes** at the time of construction
- **Water system records** – historical service connection data, meter installation records, etc.
- **Inspection/repair records** that indicate materials (with assistance from local plumbers)



Suggested steps for service line identification

- Preliminary records review – research of local plumbing code history, to determine when lead was last used
- Research community records – documents such as installation/maintenance records, plumbing permits, property tax records, and meter installation records
- On-site visual inspection – residential survey (with photos), meter inspection by utility staff and partners (plumbers, non-water utilities)
- Water analysis – water sampling of service lines
- Excavation – unearthing of lines through mechanical or vacuum excavation

How should the inventory be organized?

Initial inventories must be divided into service line categories. These categories are broken down into:

- Lead – service line made of lead
- Galvanized, requiring replacement (GRR) – service line made of galvanized steel, when located downstream of lead or if there is no record of upstream materials.
- Non-lead – service line verified as material other than lead or galvanized steel (i.e. copper, plastic)
- Lead status unknown – service line material not known

Note: EPA recommends including lead connectors (i.e. goosenecks, pigtails, etc.) and performing site investigations for unknown lines but neither are required.

Inventories must include location identifiers associated with each lead service line and galvanized line requiring replacement. These can be a street address, block, intersection or landmark to aid in identifying the location.

Note: EPA suggests publishing locations of all service lines as a best practice.

Does the inventory need to be accessible to the public?

Inventories are required to be publicly accessible. If the provider services more than 50,000 people, the inventory is required to be published online.

Are updates to the inventory required?

Updates are required to be performed until the following criteria have been met:

- All unknowns have been identified
- All lead and GRR lines have been replaced

What rules does the state have in place?

Across the country, a significant amount of federal funding is available to help communities comply with these new regulations. In addition to federal grants, states are developing their own funding programs and setting state-specific deadlines that may be more stringent than the federal requirements.

ARKANSAS

Deadlines:

- Initial inventory developed:
October 16, 2024
- Baseline inventory and service line replacement plan (LSLRP):
November 1, 2027



Funding Sources:

- Bipartisan Infrastructure Law (BIL)

ILLINOIS

Guided by the Illinois Lead Service Line Replacement and Notification Act

Deadlines:

- Initial inventory developed:
April 15, 2022
- Submit inventory to IEPA:
April 15, 2023
- Complete inventory and initial lead service line replacement plan (LSLRP):
April 15, 2024
- Final LSLRP:
April 15, 2027



Funding Sources:

- Water Infrastructure Fund Transfer Act (WIFTA)
- Bipartisan Infrastructure Law (BIL)

MISSOURI

Deadlines:

- Initial inventory developed:
October 16, 2024
- Baseline inventory and LSLRP:
November 1, 2027



Funding Sources:

- Bipartisan Infrastructure Law (BIL)

How can H&S assist with lead service line inventories?

Horner & Shifrin's expertise extends beyond the assessment and design of water systems. Our engineering staff have assisted communities across the Midwest in securing funding for their projects through federal and state grant programs. Our expert GIS staff are adept at creating customized geodatabase solutions that can be expanded to suit your needs. H&S can provide:

- Assistance identifying funding sources and applying for grant/loan funding
- Development of GIS system to track inventory
- Performance of preliminary records review
- Assistance with development of residential survey flyer, website for customers to upload in-house service line photos and request water sample kits
- Assistance with development of bid packages for meter investigations and excavation contracts

How can H&S assist after the lead service line inventory is complete?

The same quality of service we provide during the inventory stage can be extended into design and replacement of identified lead and galvanized steel requiring replacement service lines. H&S can assist with:

- Development of a lead service line replacement plan (LSLRP)
- Replacement funding, design, bidding and construction administration

What are the next steps to start your lead line inventory with Horner & Shifrin?

We're ready to assist you as soon as possible! A team will be assigned based on the specific needs and geographic location of your water system.

To get started:

Call: (314) 612-4840

Email: leadlines@hornersshifrin.com

Visit: www.hornersshifrin.com/leadlines



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