

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!

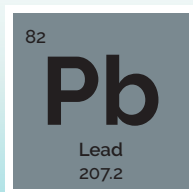


HORNER SHIFRIN

An Employee-Owned Company

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?

On December 16, 2021, the US Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions went into effect. Over the next five years, \$15 billion will be provided to communities solely for the replacement of lead service lines. \$11.7 billion of additional funding will be available for use in identifying, documenting and removing lead service lines.



All water systems are required to submit an inventory of service lines to their state by the compliance date of October 16, 2024 (based on federal guidelines; state-specific requirements may vary based on state law). All water systems which identify lead service lines and/or galvanized lines downstream of lead service lines, must provide a lead service line replacement plan.

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?

As of June 2022, only three states (Illinois, Michigan, and New Jersey) have passed legislation codifying their lead service line replacement efforts. Deadlines for submitting lead service line inventory and potential funding sources are listed by state below.

ARKANSAS

Deadlines:

- Initial inventory developed: October 16, 2024

Funding Sources:

- American Rescue Plan Act (ARPA) - 100% grant (funding application window to be determined)
- 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

Funding Sources:

American Rescue Plan Act (ARPA) - 100% grant (funding application window is May 15 - July 15, 2022)

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@hornershifrin.com

Visit: www.hornershifrin.com/leadlines



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