



# IOWA DEPARTMENT OF NATURAL RESOURCES

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LEADING IOWANS IN CARING FOR OUR NATURAL RESOURCES

## Lead Service Line Inventory Update

# LCRR & LSLi Update

- Timeline of LCRR
  - January 15, 2021 – LCRR promulgated
  - December 16, 2021 – LCRR effective date
  - **October 16, 2024 – Lead Service Line Inventory (LSL Inventory) due date**

# LCRR & LSLi Update

- Why do LSL Inventory?
  - As per the most recent Environmental Protection Agency (EPA) Lead and Copper Rule Revision (LCRR) all Community Water Supplies (CWS) and Non-Transient Non-Community Water Supplies (NTNC) must develop a Lead Service Line Inventory (LSL Inventory) by **October 16, 2024** and submit it to the Iowa Department of Natural Resources (Iowa DNR).

# LCRR & LSLi Update

- Why do LSL Inventory?
  - Assess the extent of the LSLs within their systems,
  - Identify better sampling locations, and
  - Begin planning for LSL replacements, including applying for state and federal grants and loans (i.e., Bipartisan Infrastructure Law (BIL) provides \$15 Billion for lead service line replacement)
  - It's REQUIRED

# LCRR & LSLi Update

- What is currently known that will need to be included in the LSL Inventory?
  - All service lines connected to the public water supply distribution system regardless of ownership status (e.g., where service line ownership is shared, the inventory would include both the portion of the service line owned by the water system and the customer-owned portion of the service line).
  - At a minimum, it is expected that service lines will need to be classified as lead, galvanized requiring replacement, non-lead, and unknown.
  - The inventory must be made available for public review. Systems with a population over 50,000 served shall make their inventory accessible by an online website.

# LCRR & LSLi Update

SL Category	Description
Lead	SL made of lead (confirmed lead)
Galvanized Requiring Replacement (GRR)	Is or was at anytime downstream of LSL or if no record of NOT being downstream of LSL
Non-Lead (NL)	Evidence-based record, method, or technique – may classify as actual material (i.e., copper, plastic) as an alternative to classifying as “Non-Lead”
Lead Status Unknown (LSU)	SL material is not known

# LCRR & LSLi Update

- Current Guidance from EPA continued
  - EPA recommends including connector (i.e., goosenecks, pigtails) where records exist but it is not required\*
  - EPA recommends site investigations for unknown lines but it is not required\*
  - Must include a location identifier associated with each lead service line and galvanized requiring replacement service line

# LCRR & LSLi Update

- Initial Action Items for Water Operators
  - Begin to gather and review all records documenting the materials used to construct and repair the distribution system and buildings connected to the distribution system, this includes:
    - All 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.
    - All 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.
    - All inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.
    - Any resource, information, or identification method provided or required by the State to assess service line materials.



# LCRR & LSLi Update

- Initial Action Items for Water Operators, cont.
  - Talk to former water operators and plumbers that may have historical knowledge about service line materials that were used and when lead service lines may have stopped being used in the community.
  - Leverage existing work-if lines are currently being replaced or exposed, gather that information now, rather than waiting until later
  - Determine when a home was constructed - If a home was constructed after 1988 in Iowa, it is expected that the service line for that home was constructed using material other than lead. Public water supply systems developing their lead service line inventories may designate homes built after 1988 as not having a lead service line in their inventory. Local ordinances or codes may also provide a time frame that can be used in service line material determinations.
  - Leverage existing work-if lines are being replaced or exposed, gather the information now, rather than waiting until later

# LCRR & LSLi Update

- Initial Action Items for DNR
  - Weekly Workgroup Meetings
  - Working on communication
    - Did you get the yellow memo?
  - Clarify any definitions, make decisions on any DNR requirements vs. EPA recommendations, determine methods of technical assistance, continue to send listservs with information and trainings

# LCRR & LSLi Update

- Initial Action Items for DNR, cont.
  - LSL Inventory Form is being developed
    - Goal #1-Have a draft developed by May 1 for internal committee to review
    - Goal #2-Have template to outside focus group by June
    - Goal #3-Have template out for use Summer 2022
  - Submission plan for LSL Inventory Form
    - Electronic submission on Excel

# LCRR & LSLi Update

- LSL Inventory Form
  - All Water Systems will use the same form
    - This is important because:
      - The Iowa DNR will be receiving over 1000 forms and will not have the resources to do data entry
      - Data integrity
      - EPA will require the Iowa DNR to upload data in certain format

# LSLI Template – Required Fields

Iowa Department of Natural Resources-Lead Service Line Inventory										
PWS ID	12345	PWS Name	Anytown	Date of Current Inventory	7/1/2022	Official Service Line Ownership Policy	Public-PWS			
<b><u>REQUIRED</u></b>										
OWNERSHIP OF SERVICE LINE	SYSTEM SPECIFIC ID	SERVICE ADDRESS	LEAD CONNECTOR CURRENTLY PRESENT? (E.G., GOOSENECK, PIGTAIL, OTHER)	WAS LEAD EVER UPSTREAM OF THIS SERVICE LINE?	PWS-OWNED SERVICE LINE MATERIAL	WAS PWS-OWNED SERVICE LINE EVER LEAD?	YEAR PWS-OWNED SERVICE LINE INSTALL DATE	PRIVATE SIDE SERVICE LINE MATERIAL	YEAR PRIVATE SIDE SERVICE LINE INSTALL DATE	VERIFICATION SOURCE
Public and Private	12345	101 2nd Ave	Y	N	L	N	1955	UN	1955	

# Optional & Auto Populated Fields

<u>OPTIONAL</u>						<u>FORMULA -AUTO POPULATED</u>				
BUILDING TYPE	POINT OF ENTRY OR POINT-OF USE TREATMENT PRESENT?	STRUCTURE-PRIMARY PLUMBING MATERIAL 1	STRUCTURE-PRIMARY PLUMBING MATERIAL 2	YEAR(RANGE)STRUCTURE PLUMBING MATERIAL INSTALLED	THIS LOCATION WILL BE USED FOR LEAD AND COPPER SAMPLE SITE PLAN?	LSL CATEGORY IN INVENTORY	SAMPLE SITE SELECTION CRITERIA (SITE TIER)	WOULD THIS COUNT AS FULL LEAD SEVICE LINE REPLACEMN	REQUIRES RESIDENT NOTIFICATION IF LSL DISTURBED	REQUIRES RISK MITIGATION (POU OR PITCHER FILTER)
Single Family	Y	C	C	Before 1989	N	Lead	Tier 1	Yes	Yes	Yes

# LCRR & LSLi Update



- **HOWEVER**
  - We are waiting on EPA Guidance to finalize decision making and the form
  - Maybe ~~April-May~~ June Summer?

# LCRi

- Lead and Copper Rule Improvement (LCRi)
  - The improvements on the Lead and Copper Rule Revision (LCRR) are the LCRi
  - We do not know what the improvements will be
  - Improvements might be ready for review Summer 2023
  - The final rule publication will be no later than October 16, 2024
  - **The only item from LCRR is the Lead Service Line Inventory. It is due by October 16, 2024.**



# LCRR, LSLi, & LCRI

- How can you stay up to date?
  - If you are not already a subscriber to the Water Supply Listserv, please send an email to [Carmily.Stone@dnr.iowa.gov](mailto:Carmily.Stone@dnr.iowa.gov) and she will sign you up.
  - If you have questions or suggestions for training and assistance related to Iowa's Lead Service Line Inventory Project, please call your field office, permit writer or email [LCRR@dnr.iowa.gov](mailto:LCRR@dnr.iowa.gov).
  - <https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Drinking-Water-Compliance/Lead-Service-Line-Inventories>

# Lead Service Line Inventories due OCTOBER 16, 2024