

# Lead Service Line Inventory Frequently Asked Questions

## General Questions

### G1. Why did I get a Lead Service Line Inventory memo from the DNR?

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).

### G2. Why do we need to do a LSL Inventory?

There are four main reasons to complete a Lead Service Line Inventory:

- Assess the extent of LSLs within a system
- Identify better sampling locations
- Begin planning for LSL replacements, including applying for state and federal grants and loans (i.e., Bipartisan Infrastructure Law (BIL) providing \$15 Billion for lead service line replacement)
- It's REQUIRED by the EPA

### G3. Do I have to use the Iowa DNR Lead Service Line Inventory Template?

Yes - all systems are required to use the Iowa DNR Lead Service Line Inventory Excel Template. The Iowa DNR will be receiving approximately 1,200 templates from systems and we are required to upload the data from those templates to the EPA in a standardized format. We will only accept electronic submissions of the template and no hard/physical copies.

### G4. Where can I download the Iowa DNR Lead Service Line Inventory Template and find more information?

You can find the Iowa DNR Lead Service Line Inventory Template, general information & contacts, and recorded training at: <https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Drinking-Water-Compliance/Lead-Service-Line-Inventories>

### G5. Can fields be mass-edited if the response will be the same for all addresses, e.g., ownership of service line?

You can copy and paste your service addresses and system specific IDs from Excel or another similar spreadsheet into the Lead Service Line Inventory Template free text columns B & C. Avoid copy and paste into other columns with dropdowns - it will override formulas contained in the IDNR spreadsheet. For columns with dropdowns such as Column A Ownership of Service Line or Column F PWS-Owned Service Line Material, you can populate one cell, click on the cell, hover your cursor near the bottom right of the cell until it turns into a plus sign, then hold and drag down to quickly populate other cells beneath. You can then go back and change the few cells that may be different to make data entry more efficient. You can also pre-sort the order of your lines in another spreadsheet to group them in blocks by material type in order to take advantage of the click and drag function to quickly populate many cells. Find and replace doesn't work in the DNR template because it is protected.

### G6. I had to delete a row of data in the template and now I have a blank row. Can I delete that row? Can I add a row?

No - you can put a different row of data in that line or you can leave it blank. You can't add to or delete rows of the template.

**G7. I already completed my own lead service line inventory. Can I submit what I have previously done?**

All water systems will need to use the Iowa DNR Lead Service Line Inventory Template. You can put the information that you have into the required template.

**G8. When is the completed Lead Service Line Inventory Template due to the Iowa DNR?**

October 16, 2024

**G9. What do I do when I have completed my Lead Service Line Inventory?**

Please email the Lead Service Line Inventory Template to [LCRR@dnr.iowa.gov](mailto:LCRR@dnr.iowa.gov). We are developing an online inventory submission portal that may be ready in spring of 2024. We will update systems when the portal is live.

**G10. Who can I contact about Bipartisan Infrastructure Law (BIL) money for Lead Service Line Replacement (LSLR)?**

[Water-infrastructure@dnr.iowa.gov](mailto:Water-infrastructure@dnr.iowa.gov)

**G11. Who can I contact for assistance?**

The following resources are available:

- Technical Assistance: [leadserviceline@IAMU.org](mailto:leadserviceline@IAMU.org) or call (515) 289-5203
- General Questions: [LCRR@dnr.iowa.gov](mailto:LCRR@dnr.iowa.gov)
- [Iowa DNR Lead Service Line Inventories webpage](#)
- [United States EPA Lead and Copper Rule webpage](#)

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**Required Inventory Boxes**

**R1. Can you explain the ownership definitions?**

Public-PWS means that the public water supply owns the service line. Private means that the homeowner or customer owns the service line. Public and Private means that part of the service line is owned by the water supply and part of the service line is owned by the homeowner/customer.

**R2. What are examples that we can use for a system specific ID?**

You can use an address, customer number, part of an account number, or any other identifier that your system gives to a service line or customer.

**R3. Are there any legal concerns using the customer number or account number for the system specific ID?**

We are not aware of any legal concerns, but please check with your attorney.

**R4. How would we enter the following situations into the spreadsheet?**

The Iowa DNR is most concerned about ensuring we accurately capture all of the service lines in the distribution system, the materials of the service lines, and especially the most concerning materials to make sure we are not missing any lead or GRR lines. However, we also want to make this a useful document for the water system. There are likely many ways to enter information into the inventory. Below are recommendations:

- Two addresses that are metered separately but share a common service line into the building and are metered in the basement:

*Recommendation:* Enter each address separately into the spreadsheet along with the service line information. Use the comments section to note the scenario.

- One address that has more than one service to the property. There are several different scenarios where “party lines” exist, such as:
  - One utility service line that goes to a master meter, then branches into several residences such as separate homes, condos or apartments
  - A utility service that splits and carries up to and beyond two or more private services
  - One utility tap that serves a home, then continues through and on to another home
  - A fire line with a large service diameter that is not lead, with the domestic line tapped from that

*Recommendation:* You could list this with one spreadsheet inventory line per service line. If you do this and enter the same address, the column will turn red because of the duplicate address. You could add another piece of the address such as lot #, apt #, or other identifier to prevent that from happening. This method would ensure that all lines and all materials are captured.

Alternatively, you could list one address and capture the oldest installation date and the most concerning material. Using this method, you should then list the rest of the materials in the General Notes section under Column W.

- The service line ownership is all public or all private, but two separate materials are found for different portions of the line.

*Recommendation:* List the ownership of service line as the correct ownership (public OR private), and then list the most concerning material (lead >GRR>unknown) in the appropriate Column F or I. In the “General Notes” Column W, make a note about the different materials found in each portion.

- Different verification methods were used for different portions of the service line.

*Recommendation:* The “Verification Source” Column K is a free text column where you may explain both methods and which portions they were used for.

- One portion of the service line has a known material, but the other portion is unknown.

*Recommendation:* If the line ownership is split, enter the verified material under the appropriate column and unknown under the other column. If line ownership is all public or all private, you must enter unknown into the appropriate column. In the “General Notes” Column W, specify which portion is known & its material and which portion is unknown.

#### **R5. Does the service address, which is defined as the exact address, include zip code?**

Yes - the service address should be street, city, state, and zip code.

#### **R6. I am looking for a picture to help me visualize “Lead Connector Currently Present?” Column D & “Was Lead Ever Upstream of This Service Line” Column E. Do you know where I can find one?**

<https://www.lslr-collaborative.org/intro-to-lsl-replacement.html> Scroll halfway down the page.

#### **R7. What does “upstream” mean? What does “downstream” mean?**

Both terms refer to being on the same service line, not to the distribution system. If the service line is material A from the main to the curb stop, and material B is from the curb stop to the home, then material A is considered to be upstream from material B and material B is considered to be downstream from material A.

**R8. Does “Was Lead Ever Upstream of this Service Line” Column E include lead in the main?**

No - upstream refers to the service line only. At this time, we are not concerned about lead or lead solder that may be in the main. Please note that “Lead Connector Currently Present?” Column D & “Was Lead Ever Upstream of this Service line” Column E are separate. Column D is asking about the Connector and Column E is asking about the Service Line, **excluding** the connector.

**R9. In “Was PWS-Owned Service Line Ever Lead?” Column G, how would you answer if the main has been replaced with all of the service taps?**

Column G only applies to service line material and it does not apply to the main and/or connector.

**R10. Does the size of the line determine if it is put on the inventory - e.g. fire lines, businesses, etc.?**

All service lines must be inventoried. If there are service lines that are currently not in use but could be brought back online to serve water in the future or in an emergency, they also need to be inventoried. It would be unusual or rare that any service line larger than 2 inches would be lead.

**R11. Our utility does not own the service line after the meter pit or the curb stop. We have no record for these private service lines since we do not facilitate the private hookup. How would we handle this situation?**

You may want to consider distributing a customer survey to gather information. Please contact [LCRR@dnr.iowa.gov](mailto:LCRR@dnr.iowa.gov) for examples. It is possible that customers may not return those surveys and if there is no other documentation, it is acceptable to put “Unknown” for the material at this time. Please document the attempt that you made to contact the customer and that they were non-responsive in the “General Notes” Column W.

**R12. If I don’t have the tap install dates on any of my service lines, can the home built date be good enough to fulfill the private side install date?**

Please use all resources you have available to determine the date. A home built date would be acceptable as a solid estimate.

**R13. How would we enter a private water service that has a combination of materials, but there is no lead?**

You can put "Other" or a material that is one part of the combination, but in the “General Notes” Column W, you may want to note what "other" means or that there is a combination.

**R14. What year would you select as the service line installation date; Can the year the stub was installed or the year the property was connected to the water system be used?**

This can be up to you, but we would recommend potentially putting 2 dates in that column with the stub and the connection and explaining in the “General Notes” Column W.

**R15. Water Service from the main to stop box was installed during the construction of the subdivision in 1997, but the building was not constructed until 2022. The materials are the same, but what year would I enter as the year installed?**

We would recommend entering both dates and explaining in “General Notes” Column W.

**R16. The homeowner owns the service line from the water main to the house. When filling out the field for the year of the service line installation, what do I put when the city installed a new water main and replaced the service**

## line to and including the curb stop?

Our recommendation is to use the oldest date, but you can use “General Notes” Column W to explain that a certain section was replaced and what year that occurred. This will ensure you have all of your documentation in one spot.

### **R17. Do we need to include buildings/homes that are built after 1988 on the inventory?**

Yes, all service lines, regardless of age, need to be included on the inventory.

### **R18. Does the 1988 lead ban prohibit reconnections to existing lead service lines?**

No.

### **R19. If a previous lead service line was removed and replaced with copper, do we still need to treat galvanized as a potential risk if the copper is replaced again with galvanized material? We have areas where lead was previously replaced with ¾ inch copper, but as we do another CIP now several years later, we will update to 1-inch copper line per current city code. Would the downstream galvanized material still potentially slough off lead particulate?**

If galvanized material currently is or ever was downstream from lead, it will be considered GRR.

### **R20. I have my own data sheet that I am copying and pasting into the DNR template. My data sheet lists a material as copper, but the material notation in the DNR template is “C”. Find and replace isn’t working in the DNR template. How can I update my data most efficiently?**

The find and replace function doesn’t work in the DNR template because it is a protected spreadsheet. You should use the find and replace function in your own spreadsheet first to make the data match the format of the DNR template, then copy and paste the information.

### **R21. Some community water supplies may not have an extensive distribution system, such as those with a direct connection from a well to a single building. Is that classified as a service line?**

This type of system must report the material from the well to the building inlet for their inventory. A small entity compliance guide with more information can be found on the [EPA’s Lead and Copper Rule website](#).

## **Optional Inventory Boxes**

### **Auto Populated Inventory Boxes**

#### **A1. What determines that a line is Galvanized Requiring Replacement (GRR)?**

Galvanized Requiring Replacement (GRR) are galvanized service lines that are or ever were downstream from a lead service line or are currently downstream of a lead status unknown service line. Under the initial inventory requirements of the LCRR, a galvanized line that was never downstream of a lead service line, but is previously or currently downstream of a lead gooseneck, pigtail, or connector is not considered GRR.

#### **A2. On “Requires Risk Mitigation” Column V, can you elaborate on when a filter or lead mitigation must be supplied to a customer?**

This decision will be based upon what comes out from EPA in the upcoming Lead and Copper Rule Improvement (LCRI).

**A3. Is the provision of pitcher filters in effect now if lines are disturbed?**

No - the LCRR does include provisions for pitcher filters, but the LCRR is not yet enforceable. Pitcher filters and other mitigation measures included in the LCRR would be considered a best practice. Refer to AWWA C810 for the standard for replacement and flushing of lead service lines.

**A4. What is required for the notification to people served by LSL, GRR, or lead status unknown service lines? What happens if notices are returned undeliverable, which can happen often in rental situations with changing tenant information?**

We understand your concern with the question. We are waiting until the LCRI comes out to ask further questions of EPA and their expectations.

**A5. Along with providing pitchers filters, would the utility need to find a way to track if the residents changed within the six-month period? Quite a few rentals exist in areas where lead replacements take place and there can be turnover of residency.**

This decision will be based upon what comes out from EPA in the upcoming Lead and Copper Rule Improvement (LCRI).

**A6. Does the 30-day notification period begin upon completion of the entire inventory, or any individual line?**

Notification must be made within 30 days after completing the initial inventory. However, we are waiting for more guidance and documentation from the EPA regarding this requirement and will have more information in the future.