

Lead and Copper Rule Revisions (LCRR) Service Line Inventory and Replacement Plans

TEXAS COMMISION ON ENVIRONMENTAL QUALITY WATER SUPPLY DIVISION

Outline

- Overview of the LCRR
- Service Line Inventory
- Replacement Plans
- Next Steps What to do NOW



EPA's Intent to Strengthen LCR

- Goal: to proactively remove lead service lines, empower communities, and equitably protect public health.
- EPA announced two-prong approach:
 - LCRR effective now
 - LCRI (Lead and Copper Rule Improvements) under development



LCRR Timeline

- LCR originally published in 1991
- LCRR effective date: Dec 16, 2021
- LCRR compliance date: Oct 16, 2024
- LCRI published prior to Oct 16, 2024



LCRR Service Line Inventory





Service Line Inventory Requirements

- 40 CFR §141.84 All PWS must identify material of service lines connected to distribution system. Service lines must be categorized in the following manner:
 - Lead
 - Galvanized Requiring Replacement
 - Lead Status Unknown
 - Non-Lead



Service Line Inventory Form 20943

- WHO: Required for all community and nontransient, non-community water systems
- WHEN: Submitted to TCEQ by

October 16, 2024

 Submit updated inventory annually or triennially (in coordination with the water system's sampling schedule)



DON'T WAIT!





Background and Introduction



Service Line Inventory Form for Public Water Systems

What is the purpose of this template?

This template is required for community and non-transient non-community public water systems to comply with the service line inventory requirements of the January 15, 2021, Lead and Copper Rule Revisions (LCRR). This template provides fillable forms and tables for public water systems (systems) to document their methods, organize their inventory, submit the initial inventory and inventory updates electronically to the TCEQ, and document how they are making the inventory publicly available. Refer to the Lead and Copper Rule Revisions rule language in 40 CFR § 141 Subpart I and the EPA's Guidance for Developing and Maintaining a Service Line Inventory for minimum LCRR requirements and recommendations.

For questions, please contact LCRR@tceq.texas.gov or call (512) 239-4691. The financial, managerial, and technical (FMT) assistance program can provide additional assistance and can be reached (512) 239-4691 or FMT@tceq.texas.gov.

Submit the completed lead service line inventory electronically. For file sizes larger than 25 megabytes (MB), the TCEQ File Transfer Protocol Secure (FTPS) site is available at https://ftps.tceq.texas.gov/index.php.

How is the template organized?

-

Introduction

Template Instructions

Classifying SLs

PWS Information

Inventory Methods

Inventory Summary

Required Worksheets

	PWS Information							
Purpose of this worksheet: For water systems to document basic system information. All information on this page is required.								
Facility Information*								
Water System Name:								
PWSID:	Number of Service Co	onnections:	PWS Type:					
	cws							
	es comprise at least 20% of the str	uctures you serve?		Yes				
System Contact Person [*]								
Name:		Title:						
FirstName Last Name								
Telephone:		Email:						
Person Who Prepared Inventory (if different from above)*							
Name:		Title/Affiliation:						
Classifying SLs PWS Info	ormation Inventory Methods	Inventory Summary	Detailed Inv	entory	Public Accessibility	C		

Inventory Methods

Inventory Methodology							
PWS Name: PWSID:							
Purpose of this worksheet: For systems to document the methods and resources they under the contract of the	sed to de	velop and update the inventory.					
Part 1: Historical Records Review Type of Record	Describ	e the Records Reviewed for Your	Indicate if record was reviewed by 40 § CFR 141.8				
Previous Materials Evaluation Example: Locations of Tier 1 lead tap sampling locations that are served by a lead service line.			Select "Yes" or "N	0"			
Construction Records and Plumbing Codes Examples: Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.			Select "Yes" or "N	0"			
Water System Records Examples: Capital improvement plans. Standard operating procedures. Engineering standards.			Select "Yes" or "N	0"			
Distribution System Inspections and Records Examples: Distribution system maps. Tap cards. Service line repair/replacement records. Inspection records. Meter installation records.			Select "Yes" or "N	0"			
5. Other Records			Select "Yes" or "N	o"			
Classifying SLs PWS Information Inventory Met	nods	Inventory Summary	Detailed Inventory	Public A			



Things to Keep in Mind

- Get creative with records!
 - Tax codes, appraisals
- Affidavit of senior personnel
- Maintenance and plumbing records
- Service lines installed after July 1, 1988 are likely nonlead



Inventory Methods Continued

Part 2: Identifying Service Line Materi	al During Normal Operations						
1. During which normal operating activit	ties are you collecting information on sen	vice line material? Check all that apply. Note tha	t under 40 § CFR 141.84(a)(5) water				
systems must identify and track service li	ne materials in the inventory as they are e	ncountered in the course of its normal operation	5.				
Water meter reading	Select "Yes" or "No"	Water main repair or replacement	Select "Yes" or "No"				
Water meter repair or replacement	Select "Yes" or "No"	Water main repair or replacement	Select "Yes" or "No"				
Service line repair or replacement	Select "Yes" or "No"	Backflow prevention device inspection	Select "Yes" or "No"				
Other Select "Yes" or "No"							
If "Other", please explain below:							
2. Did you develop or revise standard operating procedures to collect service line material information Select "Yes" or "No"							
during normal operation? If "Yes", plea	sse explain below.		Select les of No				
			_				
Part 3: Service Line Investigations							
1. Identify the service line investigation		e inventory (check all that apply). If a water syste					
 Identify the service line investigation method not specified by the state under 	r 40 CFR §141.84(a)(3)(iv), state approval i	s required. Note that investigations are not requi					
 Identify the service line investigation method not specified by the state under systems to assess accuracy of historical re- 	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when service	s required. Note that investigations are not requi	ired by the LCRR but can be used by				
Identify the service line investigation method not specified by the state under systems to assess accuracy of historical re Visual inspection at the Meter Pit	r 40 CFR §141.84(a)(3)(iv), state approval i	s required. Note that investigations are not requi	red by the LCRR but can be used by Select "Yes" or "No"				
Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when servic Select "Yes" or "No" Select "Yes" or "No"	is required. Note that investigations are not require line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other	Select "Yes" or "No" Select "Yes" or "No"				
Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when servic Select "Yes" or "No" Select "Yes" or "No" Select "Yes" or "No"	is required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation	Select "Yes" or "No" Select "Yes" or "No" Select "Yes" or "No"				
Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External CCTV Inspection at Curb Box - Internal	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when servic Select "Yes" or "No" Select "Yes" or "No"	s required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation Vacuum Excavation	Select "Yes" or "No" Select "Yes" or "No"				
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Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External CCTV Inspection at Curb Box - Internal Water Quality Sampling - Targeted Water Quality Sampling - Flushed	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when service Select "Yes" or "No" Select "Yes" or "No" Select "Yes" or "No" Select "Yes" or "No"	s required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation Vacuum Excavation	Select "Yes" or "No"				
Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External CCTV Inspection at Curb Box - Internal Water Quality Sampling - Targeted Water Quality Sampling - Flushed	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when service Select "Yes" or "No"	s required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation Vacuum Excavation Predictive Modeling	Select "Yes" or "No"				
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1. Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External CCTV Inspection at Curb Box - Internal Water Quality Sampling - Targeted Water Quality Sampling - Flushed If "Other", please explain below:	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when service Select "Yes" or "No"	s required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation Vacuum Excavation Predictive Modeling	Select "Yes" or "No"				
I. Identify the service line investigation method not specified by the state under systems to assess accuracy of historical revisual inspection at the Meter Pit Customer Self-Identification CCTV Inspection at Curb Box - External CCTV Inspection at Curb Box - Internal Water Quality Sampling - Targeted Water Quality Sampling - Flushed	r 40 CFR §141.84(a)(3)(iv), state approval i ecords and gather information when service Select "Yes" or "No"	s required. Note that investigations are not required line material is unknown. Water Quality Sampling - Sequential Water Quality Sampling - Other Mechanical Excavation Vacuum Excavation Predictive Modeling	Select "Yes" or "No"				

Inventory Summary

Inventory Summary PWS Name: PWSID: Purpose of this worksheet: For water systems to provide a summary of the service line inventory, including information on ownership, inventory format, and the number of service lines for each of the four required materials classifications. Note: Cells that have a superscript * are required fields. Part 1. General Information Is this the Initial Inventory or an Inventory Update? Select One Select Ownership Type 2a. Who owns the service lines in your system? If other, please explain below. * 2b. Is there documentation that defines service line ownership in your system, such as a local ordinance? If Select "Yes" or "No" yes, please describe below and explain where ownership is split (e.g., property line, curb stop). 3a. Describe when lead service lines were generally installed in your system below. 3b. When were lead service lines banned for the system? Reference the state or local ordinance that banned the use of lead in your system. 4. Are there lead goosenecks, pigtails or connectors in the system? Select "Yes" or "No" or "Don't Know" Part 2. Inventory Summary Table 1 **PWS Information** Inventory Methods Introduction Template Instructions Classifying SLs Inventory Summary



Inventory Summary Continued

Part 2. Inventory Summary Table 1

When using the Detailed Inventory worksheet, the classifications in the Column "Entire Service Line Material Classification" (Column Q) will be used to calculate the total number of service lines for each of the four material classifications below. Remember this is the classification for the entire service line.

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR) ^x
Lead	Any portion of the service line is known to be made of lead. ²	4
Galvanized Requiring Replacement (GRR)	The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.	2
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.	3
Lead Status Unknown	The service line material is not known to be lead or GRR. For the entire service line or a portion of it (in cases of split ownership), there is not enough evidence to support material classification.	0
	TOTAL	9

Notes

TCEQ-20943 (Rev. 12/16/2022) Page 1

Introduction

Template Instructions

Classifying SLs

PWS Information

Inventory Methods

Inventory Summary



¹This summary table is for reporting material for the entire service line connecting the water main to the customer's plumbing. See the **Classifying SLs** worksheet for additional guidance on assigning a materials classification to the entire service line when ownership is split. Remember that systems must track the system-owned and customer-owned portions separately in their inventory.

² A lead-lined galvanized service line is consistent with the definition of an LSL under the LCRR (*a portion of pipe that is made of lead, which connects the water main to the building inlet*) (40 CFR §141.2) and must therefore be classified in the inventory as an LSL. Do not, however, count non-lead service lines with a lead gooseneck or pigtail as lead service lines.

Detailed Inventory

Detailed Inventory

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Maigar Service Line 18	Sleed Beaker	Steert		Eip Cade		CPS Coordinale - Lalilade [desimal degrees]	CPS Coordinate Longitude Identical degrees	Squire-Penned Parlian Service Line Halorial Classification	If Hoo-lead in Colomn J, Was Halovial Euro Presidently Lead?	Section	Hales	Castaner-Based Parties Service Line Halorial Classification	Servier Lier Installation Bate	Balva	Eulipe Speaine Line Halocial Classification	la lheer a krad Casaralar?	la lkeer Lead Salder in Ike Servine Live7	Drawite Olker	Bailding Type Casseeled In Secutor Line	Paint-of- Enley or Paint-of- En- Treatment Person12	Para the Interior Building Planking Contain Copper Piper with Lead Sulder Installed Defore July 1,		Sauple Sile Seleulian Ceileeia [Sile Tiee]		Dale of Contage
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Enople S	55	Prinstonel	6304	Dip Code				Har-Soud-Capper		Arlama 1585 and ARTS		Herbook			Hee-trad	***	**			<i>M</i> -	Y~+	***			
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Encepte 5		Awa	L536g				ļ								livad										
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E		Intro	ductio	n	Templa	te Instru	ctions	Classifyin	g SLs	PWS Ir	formatio	n Inver	itory Met	hods	Inventory Sur	nmary	Detai	iled Inve	ntory	Public	(+)	4			



Detailed Inventory-Location Information

Location Information										
	Location Identifier ^x									
Unique Service Line ID	Street Number*	Street Name*	City ^x	Zip Code ^x	Other Location Identifier [‡]	GPS Coordinate - Latitude (decimal degrees)	GPS Coordinate - Longitude (decimal degrees)			
A Unique ID is recommended for each service line.	Water systems must track addresses of all service lines in their internal inventory. For the publicly accessible version, location identifiers are required for lead and galvanized requiring replacement. If the system does not use addresses for their location identifier, other options could include a landmark, intersection, block, or other details to specify service line locations. If using GFS coordinates, utilize the GFS Coordinate - Latitude/Longitude fields and include 5 decimal places.									
Example 1	1234	Test St.	City	Zip Code	Intersection of Test and Elm St.	30.2711286	-97.7436995			
Example 2	4321	Test St.	City	Zip Code	Intersection of Test and Main St.					



Detailed Inventory-System/Customer Owned Portion

		System-Owned P	ortion		Cust	comer-Owned Porti	on		
ite - : ees)	System-Owned Portion Service Line Material Classification ^x	If Non-Lead in Column J, Was Material Ever Previously Lead? [‡]	Service Line Installation Date [‡]	Notes	Customer Owned Portion Service Line Material Classification	Sester Unit Institution face	and the second	Entire Service Line Material Classification ^x	
are ould ate -	Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field	Select Yes, No, or Don't know. Important for determining if downstream/ customer- owned galvanized service line requires replacement	Dropdown list when the service line was installed or replaced	Use this field for documenting additional relevant information, including when classification changes.	Dreasown Het Hectores Necommenses subclassifications (Francisco ather sescribers Notes field	Charte, verse, an estimated date congressione was installed or ceptaces	Can use stuzībela for decumenting policiliosal relevant information including when classification changes	Dropdown list includes four required service line classifications of Lead, Non- lead, Galvanized Requiring Replacement, or Unknown	ge whe
5	Lead	Yes	Before 1989		Lead			Lead	
	Non-Lead	Yes	Between 1989 and 2014		Lead			Lead	
	Lead	No	Before 1989		Non-Lead - Plastic			Lead	
	Unknown - Likely Lead	No	Between 1989 and 2014		Galvanized			Galvanized Requiring Replacement	5
	Non-Lead		Before 1989		Non-Lead - Copper	Before 1989		Non-Lead	
	Non-Lead - Copper		Between 1989 and 2014		Non-Lead			Non-Lead	
	Non-Load Conner	Don't Know	Potosa 1000		Alan Load	After 2014		Needead	
Inti	roduction Template Instr	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1	nformation Inven	The state of the s		etailed Inventory	Public (+)	



Detailed Inventory- Other Lead Sources

	Other Pot	ential Sources	of Lead						
)	Is there a Lead Connector?‡	Is there Lead Solder in the Service Line? [‡]	Describe Other Fittings and Equipment Connected to the Service Line that Contain Lead						
	For example, lead gooseneck or pigtail where the water main is connected to the service line	Select Yes, No, or Don't Know	For example, backflow preventer or meter containing lead						
	No	No							
3	No	No							
1	Don't Know	Don't Know							
5	Yes	Don't Know							

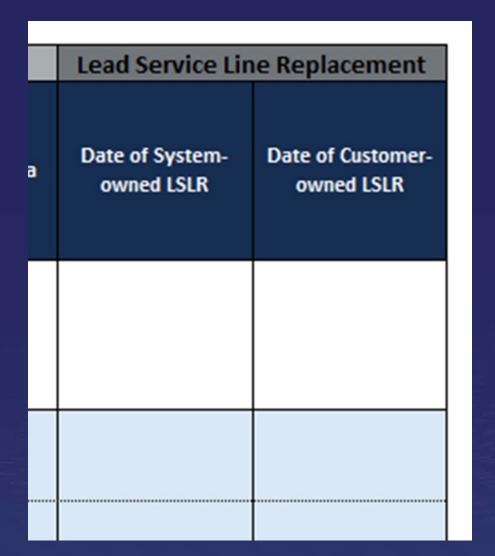


Detailed Inventory- Tiering Information

		Additional Infor	mation to Assign Tan Monito	oring Tiering				
	Building Type Connected to Service Line Additional Information to Assign Tap Monitoring Tiering Does the Interior Building Plumbing Contain Copper Pipes with Lead Solder Installed Before July 1, 1988? Sample Site Selection Criteria (Site Tier)							
Note: This information may be helpful for identifying lead tap monitoring locations.								
	Single Family Residence	Yes	No	No				
	Multiple Family Residence	No	No	No				
	Other	Unknown	Unknown	No				
	Single Family Residence	No	Unknown	Yes				
	Single Family Residence	No	Yes	No				



Detailed Inventory- LSLR





Public Accessibility

	Public Accessibility Documentation						
PWS Name: PWSID:							
T WOID.							
Purpose of this worksheet: F	or systems to provide	documentation to states on how public accessibility requiren	nents of the LCRR				
were met. All information of							
,	, ,						
Remember that the LCRR red	quires systems to use a l	ocation identifier for service lines that are lead and galvanized	requiring				
replacement. Water systems	s may, but are not requi	red to, include a locational identifier for lead status unknown s	service lines or list				
the exact address of each se	rvice line (40 CFR §141.8	84(a)(8)(i))).					
1. Select the location ident	ifiers that you use for y	our service line inventory. Check all that apply.*					
Address	Select "Yes" or "No"	GPS Coordinates	Select "Yes" or "No"				
Street	Select "Yes" or "No" Other Select "Yes" or						
If "Other" is Yes, please descr	ibe below:						
2. Does every service line ha	ave a location identifie	r? If "No", explain below. *	Select "Yes" or "No"				
3. How is the inventory may	de nublicly accessible?	Check all that apply. Remember that if your system serves > 50,	000 neonle vou				
must provide the inventory		oneck an anat approx. Nemember that if your system serves i so,	000 people, you				
Interactive online map	Select "Yes" or "No"	Printed tabular data	Select "Yes" or "No"				
Static online map	Select "Yes" or "No"	Information on water utility mailings or newsletter	Select "Yes" or "No"				
Online spreadsheet	Select "Yes" or "No"	Hard copy information available in water system	Select "Yes" or "No"				
Printed service line map							
► Inventory S		iled Inventory Public Accessibility Certifi	cation (+)				



Certification

PWS Certification								
PWSName: PWSID:								
Certify completion of your lead service line inventory by checking the appropriate boxes below, entering your water system information, and signing the certification. All information on this page is required.								
Select acknowledgment	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.							
Select acknowledgment	As the PWS Representative, I understand that if any additional service lines are subsequently identified as Lead, Galvanized Requiring Replacement, or Lead Status Unknown, the PWS is required to notify the State within 30 days of identifying the service line(s) and must prepare an updated inventory using Lead Service Line							
Select acknowledgment	As the PWS Representative, I understand that the PWS should maintain for review any resource, information, or identification method used for the development of this initial inventory. These records do not need to be submitted to TCEQ but should be available for review.							
Select acknowledgment	As the PWS representative, I understand that customers with a lead, galvanized requiring replacement, or lead status unknown service lines should be informed within 30 days of completion of initial LSLI and annually thereafter until the service line is							
As the PWS representative, I understand that the PWS should provide an updated LSLI in accordance with its tap sampling monitoring period schedule, but no more frequently than annually. The updated LSLI must be submitted within 30 days of the end of each tap sampling period.								
	The talk of a large transfer of the same and a large transfer of t							
[Enter Name Here]	The individual providing certification and acknowledgment to the above statements.							
Inventory Summary Detailed Inventory Public Accessibility Certification								



LCRR Service Line Replacement Plans





Replacement Plan- Who, What, When

40 CFR §141.84(b) – <u>All PWS</u> with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must submit a lead service line replacement plan to the State by <u>October 16, 2024</u>



Replacement Plan Content - Part 1

Strategy for determining composition of unknown service lines

- Procedure for conducting full lead service line replacement
- For systems with >10,000 persons, a lead service line replacement goal rate recommended by the system in the event of a lead trigger level exceedance.



Replacement Plans Content – Part 2

- Strategy for informing customers before service line replacement
- Procedure for informing customers to flush lines and premise plumbing of particulate lead



Replacement Plans Content – Part 3

- A service line replacement prioritization strategy
- A funding strategy which considers ways to accommodate customers that are unable to pay to replace the portion of the service line they own



Goosenecks, Pigtails, and Connectors

 Systems must also replace any lead gooseneck, pigtail or connector it owns when encountered during planned or unplanned water infrastructure work.

 Systems must also offer to replace any customer owned lead gooseneck, pigtail, or connector but will not be required to bear the cost of replacement of the customer owned parts.



TCEQ Replacement Plan Form in Development





Next Steps

- Water systems must comply with previous LCR (as codified in the July 1, 2020 CFR) until the LCRR Compliance Date: October 16, 2024
 - LSL Inventories are due by this date

- EPA is developing the LCRI
 - Intends to promulgate prior to October 16, 2024



Timeline



15 Jan. 2021

Final LCRR Published



Spring – Fall 2021

EPA executive order review of LCRR and extensive public engagement



16 Dec. 2021

EPA announces no changes to LCRR and new LCRI



Fall 2023

LCRI

EPA is expected

to provide more

information on



16 Oct. 2024

Compliance date of LCRR

Presidential Executive Order 13990 to review rules (including LCRR)

20 Jan. 2021



16 June 2021

Final LCRR

republished

with effective

16, 2021

without changes

date December



EPA published its Guidance for Developing and Maintaining a Service Line Inventory



4 Aug. 2022



Summer 2024



What to work on NOW

- Comply with the current LCR
- Read the LCRR and EPA guidance
- Historical record review
- Inventory development
- Proactive replacement
- Corrosion control



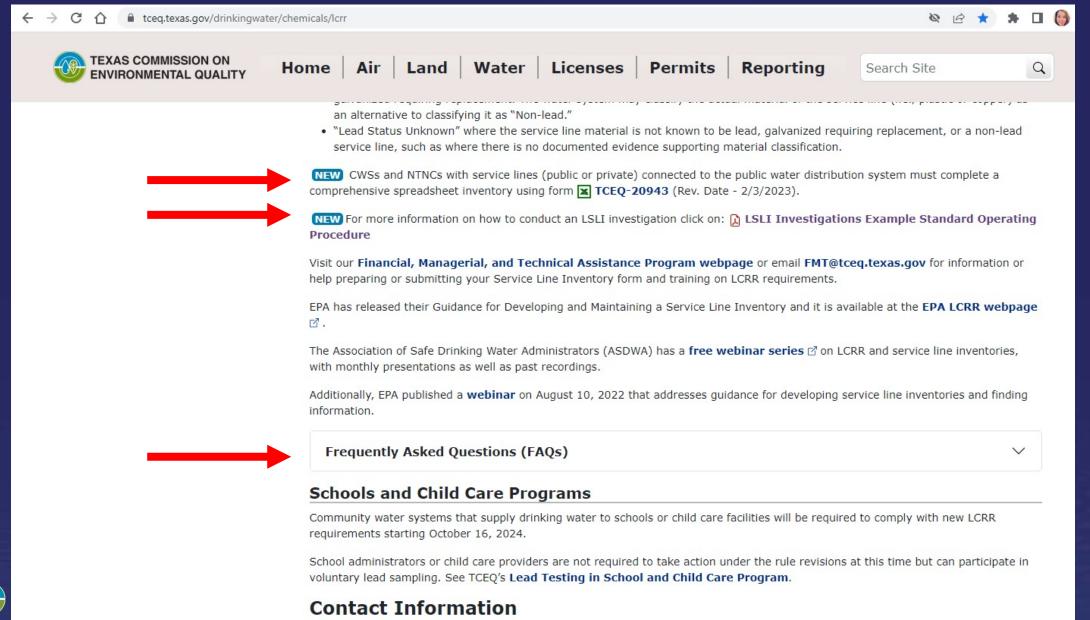
Additional Resources

For more information, please see the links below:

- EPA website:
 - <u>www.epa.gov/ground-water-and-drinking-water/review-national-primary-drinking-water-regulation-lead-and-copper</u>
- Next Steps for the Lead and Copper Rule:
 - www.epa.gov/system/files/documents/2021-12/lcrr-review-fact-sheet_0.pdf
- EPA Press Release:
 - <u>www.epa.gov/newsreleases/epa-announces-intent-strengthen-lead-and-copper-regulations-support-proactive-lead</u>
- EPA Funding Resources:
 - <u>www.epa.gov/ground-water-and-drinking-water/funding-lead-service-line-replacement</u>
- EPA Guidance for Developing and Maintaining a Service Line Inventory:
 - <u>www.epa.gov/system/files/documents/2022-</u> 08/Inventory%20Guidance_August%202022_508%20compliant.pdf



TCEQ LCRR Website



Instructional YouTube Video



SOP Template

Lead Service Line Inventory Investigation Example Standard Operating Procedure

[NOTE: This is an SOP template meant to be altered and customized to suit the specific needs of a public water system. Properly written and effective SOPs contain elements that provide comprehensive information, other than what is provided here, such as personnel qualifications and record keeping procedures. To prepare SOPs, use the <u>EPA Guidance for Preparing Standard Operating Procedures</u>¹ QA/G-6 located on the EPA webpage. In adapting this SOP to your personal needs, highlighted sections are meant to be filled with appropriate information, and instructions colored in red should be removed.]

Scope and Applicability

The Lead and Copper Rule Revisions (LCRR) requires public water systems (PWS) to inventory all service lines within their distribution system, regardless of ownership. The information in this SOP provides the primary steps for determining service line material. It includes the minimum requirements to ensure all required records are reviewed and guidelines to assess the accuracy of historical records and gather additional information when a line is classified as "unknown." Texas Commission on Environmental Quality (TCEQ) requirements are also included.

Procedure

Record Review



Printable Worksheets

Appendix B: LSLI Field Investigation Template-Single Site

The following template is a tool for collecting service line information from individual sites during field investigations. This information is used to complete your Lead Service Line Inventory (TCEQ Form 20943).

Lead/Copper Rule Revision Field Investigation Template

Date	of Inspection:						
Add	ress/Location of Service Line:						
Met	er #:						
Des	cription of Meter and/or Locati	on:					
Ma	terial for PWS Service Line:	Mat	Material for Customer Service Line:				
()	Lead	()	Lead				
()	Lead-line Galvanized	()	Lead-line Galvanized				
()	Galvanized	()	Galvanized				
()	Non-Lead - Copper	()	Non-Lead - Copper				
()	Non-Lead - Plastic	()	Non-Lead - Plastic				
()	Non-Lead - Other	()	Non-Lead - Other				
()	Unknown – Likely Lead	()	Unknown - Likely Lead				



Frequently Asked Questions

Frequently Asked Questions (FAQs)

- ^
- Question: Who needs to create a Service Line Inventory?
 Answer: All community water systems and all non-transient non community water systems must create a service line inventory using TCEQ form 20943 and submit it to TCEQ by October 16, 2024.
- Question: Our water system does not have lead/copper service lines. All material used is PVC or a similar material. Would we still be required to complete a service line inventory spreadsheet? Also, are we going to be required to take inventory of the piping material from the meter to the place of residency?

Answer: Yes, all community water systems and all non-transient non community water systems are required to submit a service line inventory to TCEQ by October 16, 2024. The Lead and Copper Rule Revisions (LCRR) further outlines that this inventory must include all service lines connected to the distribution system regardless of ownership status. So, where service line ownership is shared, the inventory would need to include both the portion of the service line owned by the water system and the customer-owned portion of the service line. TCEQ understands that this is no small task, so keep in mind that of the four service line material categories, "unknown" is an allowed option under the rule.

Contact Us

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