



State Water Resources Control Board Division of Drinking Water

March 21, 2023

Lead and Copper Rule Service Line Material Inventory Requirements

Dear Utility Owner/Operator:

The Federal Lead and Copper Rule Revisions (LCRR) that are now in effect require all public water systems to develop and submit a service line material inventory to the California State Water Resources Control Board, Division of Drinking Water (DDW) by October 16, 2024. The DDW encourages your water system to prepare for this upcoming LCRR deadline by improving your current lead and copper materials inventory and completing the service line materials inventory template worksheet located at the link below. Also included on the webpage are inventory template instructions, a presentation describing the requirements, and Frequently Asked Questions (FAQ) which will help you complete your inventory. Service lines, defined by the LCRR, are the pipes that carry water from the water main to a building inlet.

https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/leadandcopperrule.html

In order for materials inventories to be compliant with the LCRR, the inventories shall include information for all service lines connected to the public water distribution system, including residential and non-residential customers. This means that inventories shall list both water-system-owned portion of the service line and customer-side service line materials and classify them as one of the following: lead; non-lead; lead status unknown or galvanized requiring replacement (GRR). Customer-side galvanized service lines must be assigned GRR category unless the public water system knows with certainty that the upstream utility service line material is not currently and was never previously lead. GRR and other related terms are defined in the FAQ and attached to this letter.

In addition to the material inventory requirements, public water systems must identify and track the source of the information used to classify each connection (e.g. construction records, visual inspection, etc.) and provide a locational identifier. Therefore, your system must review all relevant historical records for the water system prior to your initial 2024 inventory submittal. See the FAQ listed above for more detailed information about records review requirements.

After your initial 2024 inventory submittal, your system must continue to improve its LCRR materials inventory and submit annual updates to the DDW until all "lead status unknown" services are identified and all lead and GRR lines have been replaced.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

Please note that any “lead status unknown” service lines are considered lead until identified. The LCRR requires annual customer notification along with other requirements to residents served by lead, GRR or lead status unknown service lines. Additionally, your LCRR materials inventory must be made publicly accessible.

Also, the Association of State Drinking Water Administrators (ASDWA) has a series of webcasts to assist water systems with the material inventories. Recordings of the series is available here: <https://www.asdwa.org/lead-and-copper-rule-lcr/>

Please confirm receipt of this letter and provide a brief plan on how you will comply with the inventory requirements by email at dwpdist24@waterboards.ca.gov.

Sincerely,

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SOUTHERN CALIFORNIA BRANCH
DRINKING WATER FIELD OPERATIONS

Excerpt from the FAQ

2. What is the LCRR definition of a lead service line, gooseneck and galvanized line?

Lead service line means a portion of pipe that is made of lead, which connects the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner, or both. A galvanized service line is considered a lead service line, or a “galvanized requiring replacement” (GRR) (see additional explanation below and definition in Section 4), line if it ever was or is currently downstream of any lead service line or service line of unknown material. If the only lead piping serving the home is a lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, then the service line is not a lead service line.

Gooseneck, pigtail, or fitting, connector is a short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping. Lead goosenecks, pigtails, fittings, and connectors are not considered to be lead service lines but must be replaced when encountered during planned or unplanned infrastructure work pursuant to 40 Code of Federal Regulation (CFR) section 141.84, subdivision (c).

Galvanized service line means iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.

Note from the LCRR definitions above: A galvanized line that is connected downstream of a lead gooseneck, pigtail, fitting, or connector is not considered a GRR and does not require replacement

4. How is each portion of the service line material categorized in the LCRR?

DDW will be collecting material data on both the water-system-owned portion of the service line (water main to the meter) and the customer-owned portion of the service line (meter to the building inlet). Each portion of all service lines served by all water systems must be categorized in the following manner:

(i) “Lead” where the service line is made of lead.

(ii) “Galvanized Requiring Replacement” (GRR) where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a “Lead Status Unknown” service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.

(iii) “Non-lead” where the service line is determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement. Sampling for lead and copper in the LCRR in non-lead systems requires additional knowledge of service line material. DDW encourages the water system to classify the actual material of the service line (*i.e.*, plastic or copper) as often as possible as an alternative to classifying it as “Non-lead.”

(iv) “Lead Status Unknown” where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification.

The water system must identify all service lines, regardless of usage of the water (e.g., non-potable use such as fire suppression system), and active/emergency status of the service line. The service line could be repurposed in the future for a potable, active use.

The inventory is used in several parts of the LCRR, including to determine specific requirements on lead service line replacement which are triggered by tap sample results, to conduct customer and property owner notification, and to select compliance tap sampling sites.

All water systems must develop and submit to DDW an initial inventory **by October 16, 2024.**