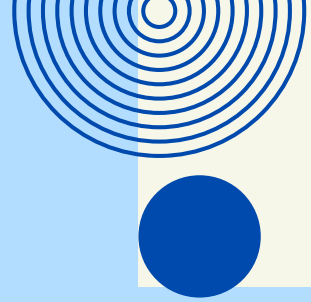




# LCRR LEAD SERVICE LINE INVENTORY

## IMPLEMENTATION IN ALASKA



### WHAT IS THE LCRR

The EPA's Lead and Copper Rule Revisions (LCRR) strengthened the initial Lead and Copper Rule to better protect consumers from lead and copper in drinking water. Systems are now required to develop a Lead Service Line Inventory (LSLI) to document all service line materials and make it publicly available.

### WHO IS IMPACTED



All Community & Non-Transient Non-Community (NTNC) public water systems must submit an LSLI for all service lines connected to the PWS, regardless of ownership status, whether the connection is occupied or not. Both potable and non-potable connections must be included.



### WHAT TO INCLUDE ON THE LSLI

1. **All service lines**, regardless of ownership status, current occupancy status, or potability. See FAQ 4.
2. **Locational identifier** to uniquely identify every building (street address, GPS coordinates, etc.)
3. **Building usage** (single-family, multi-family, school, childcare facility, other)
4. **Pipe material**
  - a. **Lead (LSL)**: A portion of pipe that is made of lead.
  - b. **Galvanized Requiring Replacement**: A galvanized line that has ever been or is currently downstream of an LSL or service line of unknown material.
  - c. **Non-Lead**: Determined through evidence-based record, method, or technique not to be lead or GRR. You must report the actual non-lead material, if known.
  - d. **Unknown**: No documented evidence of material.
5. **Total Number of Service Lines** in each of the above categories
6. **Source of information** (see list of approved sources on page 2)
7. **Other information**, if known, (i.e., premise plumbing, building usage, service line diameter, etc.) requested on the LSLI template provided by the State.

### WHEN THE DRAFT/INITIAL LSLI IS DUE



#### PWS serving over 10,000 people:

- Plan outlining how PWS plans to complete LSLI by June 1, 2023
- Draft inventory by July 24, 2024

#### PWS serving between 3,300-10,000 people:

- Draft inventory by April 24, 2024

#### PWS serving <3,300 people:

- PWS with single service connection\*: Draft inventory by Nov 1, 2023
- PWS between 2-25 service connections: Draft inventory by Jan 24, 2024
- PWS with >25 service connections: Draft inventory by April 24, 2024

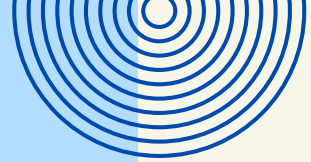
\*Single service connection: PWS with a direct connection from the source to a single building must report the material from the source to the building inlet for their inventory

All completed inventories are due by Oct 16, 2024.



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## IMPLEMENTATION IN ALASKA



### PUBLIC ACCESSIBILITY REQUIREMENTS

The LSLI results **must be publicly accessible**. The Drinking Water Program has set up an online portal (<https://ak-lsli-adec.hub.arcgis.com>) for inventory information to be collected and made available to the public to assist PWSs in meeting the following public accessibility requirements:

- The locational identifier of **each lead or GRR service line** must be publicly accessible.
- Water systems serving more than 50,000 people must make the LSLI available online.
- For consumers that do not have internet access, the PWS must have an additional method of providing LSLI information aside from the DW Program Map.
- Community water systems must include instructions in the Consumer Confidence Report (CCR) on how to access its LSLI.
- After a PWS has completed its LSLI and determined there are no lead, GRR, or unknown service lines, it may comply with the public accessibility requirements by providing consumers with a written statement declaring that the distribution system has no lead, GRR, or unknown service lines. The statement must include how the PWS determined that the distribution contains only non-lead service lines.

### PUBLIC NOTICES (PN)



PWSs are required to conduct PN to customers with service lines identified as **lead, galvanized requiring replacement, or unknown** within 30 days of completing the initial LSLI, annually thereafter, and to new customers upon hookup. The PN must:

- Be provided to all customers with LSL, GRR, or Unknown service lines via mail or other approved method
- Include service line material classification, lead health effects language, steps to reduce lead exposure and:
  - **If LSL:** include opportunities to replace the LSL, available funding programs, and a statement that the PWS must replace its portion of the LSL if property owners notify the PWS that they are replacing their portion for split ownership service lines
  - **If GRR:** include opportunities for service line replacement
  - **If Unknown:** include opportunities to verify service line material



### APPROVED SOURCES OF LSLI INFORMATION

- Accurate as-built drawings or master plans
- Documentation that the water service line was built after 1990
- Construction and plumbing codes, permits, and existing records which indicate the service line materials used to connect structures to the distribution system
- Customer provided information
  - Photographs/ description from customer
- Visual inspection by PWS
- Other methods, which **require Drinking Water Program approval prior to use:**
  - Potholing or digging a certain percentage of service lines to determine composition in an area
  - Discussions with previous water operators, local plumbers, and home inspectors
  - Water quality sampling
  - Predictive modeling
  - Emerging methods



# LCRR LEAD SERVICE LINE INVENTORY

## FREQUENTLY ASKED QUESTIONS

1

### I DON'T HAVE LEAD SERVICE LINES, WHY DO I HAVE TO DO THIS?

- Information gathered by LSLI is used in several aspects of the LCRR, including to determine specific requirements on LSL replacement, to conduct public notice, and to select correct compliance sampling sites.
- Opportunity for outreach with your customers
- Build better understanding/model of your distribution system
- Reduce components causing elevated lead/copper results in ongoing sampling

### HOW OFTEN DOES THE LSLI NEED TO BE UPDATED?

2

The LSLI is a living inventory, meaning that it should be updated **each time a new service connection is constructed/removed or the material of a service line is identified or changed**. This includes when a connection is made from a "fire hydrant service connection". It is important to note that the upcoming Lead and Copper Rule Improvements (LCRI) may change the requirements for LSLI updates.

3

### WHAT DO I DO IF A LEAD SERVICE LINE OR CONNECTOR IS FOUND?

**Contact DEC immediately. A PWS should not wait until they turn in their inventory.** A removal plan will need to be determined and DEC may be able to assist the PWS in obtaining funding. Removal of abandoned lines will be determined on a case-by-case basis.

### WHAT IS CONSIDERED A SERVICE LINE?

4

The water line connecting the water main to the building inlet/ interior plumbing is a service line. Every building that the water system serves must be accounted for on the inventory. This includes:

- Every connection, whether occupied or not
- Vacant or abandoned buildings, even if water is turned off
- Every trailer in a trailer court
- Lines to haul truck fill points
- Watering points, even if the watering point is located inside of, or on the exterior of, another building identified as a service connection
- Every service line in a "private connection" (i.e., school campus, shopping complex, etc.) that receives water from one larger connection owned by the PWS that splits to serve two or more buildings, even if those lines are owned by the customer
- If the water line serving the building is the pipe from the water source/well(s), then the water source line(s) must be included in the inventory. See FAQ #10.

5

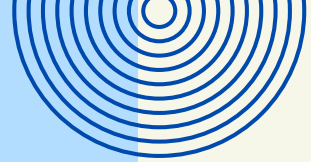
### IS THERE FUNDING AVAILABLE TO ASSIST WITH THE LSLI?

Low-interest loans with 58.3% subsidy and grants offering up to \$75K are available for lead service line inventory projects through the Alaska State Revolving Fund (SRF) Program. Lead service line, galvanized requiring replacement (GRR), or lead connector replacement projects can be funded through a SRF Lead Service Line Replacement loan. To obtain more information, visit the SRF Program website: <https://dec.alaska.gov/water/technical-assistance-and-financing/state-revolving-fund/>



# LCRR LEAD SERVICE LINE INVENTORY

## FREQUENTLY ASKED QUESTIONS CONT.



### ARE FIRE HYDRANTS INCLUDED?

6

Fire hydrant legs **do not** need to be included. LSLs are generally 2" or less; hydrant legs are 6" minimum. Additionally, hydrant legs are typically the same material as the water main.

7

### MY PWS HAS A WATERING POINT (WATER FILL POINT). WHAT SHOULD I INCLUDE IN THE INVENTORY?

If a PWS has a fill point, whether for a water haul vehicle or for individual use, it must include the hard pipe to the fill point as a service connection. Any flexible hosing attached at the watering point does not need to be included but can be listed in the notes section. If you have multiple watering points, each one should be listed separately.

### I OPERATE A WATER HAULING OPERATION. DO I NEED AN INVENTORY?

8

If the PWS meets the definition of a Water Hauler Public Water System, i.e., it has no piped distribution, and only owns water haul vehicles, then no LSL Inventory is required. Per 18 AAC 80, the definition of a "Water Hauler" is a public water system that consists of one or more vehicles that are owned by the same person and used to distribute potable water. "Water hauler" does not include vehicles owned or operated solely by a public water system as part of its collection or distribution system.

9

### MY PWS RECEIVES HAULED WATER. WHAT DO I NEED TO INCLUDE IN THE INVENTORY?

If the building receiving hauled water is a PWS, then that PWS will need to fill out an inventory.

- If this PWS has piped connections to other buildings, then the pipes to those buildings would be included.
- If it is a single building, then it should report the piping into the storage tank(s) in the "utility owned" section, and the pipe leaving the storage tank(s) as the "customer owned" portion.

### MY PWS IS A SINGLE BUILDING / FACILITY. WHAT SHOULD I INCLUDE IN THE INVENTORY?

10

- Any PWS that only serves a single building must report the material from the water source to the building inlet.
  - Be sure to include water lines from back-up and/or emergency courses, whether they are currently active or not.
- If your single building has a watering point, then also report the hard pipe to the fill point as a service connection.
- If your single facility also has a washeteria, list the washeteria piping in the premise/internal plumbing section of the inventory.

11

### MY SERVICE LINE HAS MULTIPLE TYPES OF PIPE OR MULTIPLE SIZES IN BETWEEN THE WATER MAIN AND THE BUILDING IT SERVES. WHAT SHOULD I REPORT?

If the pipe has any lead or galvanized sections, report that material in the inventory. If the entire pipe is non-lead and not galvanized, report the longest section. Please use the notes column to describe the other sections.

### HOW DO I SUBMIT MY LSLI

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For information on how to finalize your submission via the Lead-Safe Alaska portal, follow the portal instructions on our website. If you are using the AK Inventory Excel template, you can submit your inventory to [DEC.DW.LSLI@alaska.gov](mailto:DEC.DW.LSLI@alaska.gov).