

EPA’S LEAD AND COPPER RULE REVISIONS (LCRR) SERVICE LINE INVENTORY IMPLEMENTATION IN ALASKA

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OVERVIEW:

The United States Environmental Protection Agency’s (EPA) [Lead and Copper Rule Revisions](#) (LCRR) strengthened the [Lead and Copper Rule](#) to better protect consumers from lead and copper in drinking water. All Community and Non-Transient Non-Community (NTNC) public water systems (PWS) must develop and submit an initial Lead Service Line Inventory (LSLI) documenting all water service lines connected to the PWS’s distribution system, regardless of ownership status, whether the connection is occupied or not. Both potable and non-potable connections must be included.

In the LSLI, each service line must be identified as:

- a. Lead
- b. Galvanized Requiring Replacement
- c. Non-Lead (The PWS should provide the actual material of the service line)
- d. Unknown

We encourage systems to invest effort into their initial inventory to save time and money later.

DEFINITIONS:

Service line: The pipe connecting the water main to the interior plumbing in a building.

Lead Service Line (LSL): A portion of pipe that is made of lead, which connects the water main to the building inlet. An LSL may be owned by the water system, owned by the property owner, or both. If the only lead piping serving the home is a lead gooseneck, pigtail, or connector, the service line is not an LSL. [40 CFR 141.2](#) ([§ 141.2](#))

Lead gooseneck, pigtail, or connector: A short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping. For purposes of this subpart, lead goosenecks, pigtails, and connectors are not considered to be part of the lead service line but may be required to be replaced pursuant to [§ 141.84\(c\)](#); [§ 141.2](#)

Galvanized service line: Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting. [§ 141.2](#)

Galvanized Requiring Replacement (GRR): A galvanized service line is considered Galvanized Requiring Replacement if it ever was or is currently downstream of any lead service line or service line of unknown material. [§ 141.84\(a\)\(4\)\(ii\)](#); [§ 141.2 LSL](#)

Non-lead: Service line is determined through an evidence-based record, method, or technique that the entire line is not lead or GRR. The water system should list the actual material of the service line (*i.e.*, copper, HDPE or other plastics) when classifying it as “Non-lead.” [§ 141.84\(a\)\(4\)\(iii\)](#)

Unknown: The service line material is unknown and there is no documented evidence supporting material classification; therefore, the service line cannot be classified as lead, galvanized requiring replacement, or a non-lead service line. Unknown service lines will be subject to the same requirements as lead service lines as far as needing a replacement plan, public notification, etc. [§ 141.84\(a\)\(4\)\(iv\)](#); [§ 141.2](#)

DEADLINES:

No later than October 16, 2024, all Community and NTNC public water systems must:

- a. Submit to the State an initial inventory of service lines as required in [§ 141.84\(a\)](#),
- b. Have the above referenced inventory publicly available to their consumers, and
- c. Submit a lead service line replacement plan, as specified in [§ 141.84\(b\)](#), for all inventoried service lines classified as LSL, GRR, and Unknown.

The State of Alaska Drinking Water Program (DW Program) has instated additional deadlines for PWSs within the State to ensure all LSLIs are complete and meet all requirements. PWS owners are required to meet the following deadlines for LSLI submissions:

PWSs serving over 10,000 people:

- Plan outlining how PWS plans to complete LSLI due by June 1, 2023 (details on page 8)
- Draft inventory due by July 24, 2024

PWSs serving between 3,300-10,000 people:

- Draft inventory due by April 24, 2024

PWSs serving less than 3,300 people:

- PWSs with a single service connection*: Draft inventory due by November 1, 2023
- PWSs with 2-25 service connections: Draft inventory due by January 24, 2024
- PWSs with more than 25 service connections: Draft inventory due by April 24, 2024

* PWSs 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.

COMPONENTS OF THE LSLI INVENTORY:

There are two main components of the inventory submittal: background questions about the water system and how data was obtained, and a detailed list of each service's material type and related information.

The DW Program has set up the Lead-Safe Alaska Portal to aid in the submission of the information collected for the LSLI. Through the portal, PWS will be able to use a GIS mapping tool to efficiently document the progress made towards completing the inventory. Additionally, the portal contains online surveys that PWS staff can send to customers to obtain additional LSLI information.

As an alternative, the EPA LSLI Microsoft Excel template has been modified for use in Alaska. If the template is used to submit data, it will need to be e-mailed to the state upon completion of the LSLI. We highly recommend utilizing the data portal to submit the data; however, the Excel template may be useful to the water system in data collection to help ensure all required information is being gathered.

PWSs may use a different format for their inventory such as a list, custom spreadsheet, database, or map **if they first obtain prior approval from the Alaska DW Program.**

The following components must be included in the LSLI submission.

- 1. All Service Lines** must be documented in the LSLI, including:
 - a. Every connection, whether occupied or not
 - b. Every connection, regardless of ownership. Even if the PWS owns no portion of the service line, it must still be included in their inventory per [40 CFR 141.84\(a\)\(2\)](#).
 - c. Vacant or abandoned buildings, even if the water is turned off (EPA guidance 2.2.1)
 - d. Every mobile home in a mobile home park that is connected to the PWS for their primary source of water. If a mobile home park is a PWS and maintains a backup connection to a second PWS for emergencies, the second PWS is not responsible for including those services.
 - e. Every service line in a "private" service connection (i.e., school campus, shopping center, etc.) that receives water from one larger connection owned by the PWS that splits to serve two or more buildings on the property/campus, even if those lines are owned by the customer
 - f. Service lines to watering points and water haul truck fill points

- g. Potable and non-potable connections (i.e., if a service line from the main only feeds a fire suppression system or is designated for emergency use only, it does need to be included). For the initial inventory, PWSs should provide the most complete inventory possible; however, PWSs should prioritize identifying potable lines.
2. **A Locational Identifier** to uniquely identify every building connected to the PWS. A locational identifier can be:
 - a. Full street address. If there is more than one connection at the same address, include additional information to uniquely identify each service line.
 - b. GPS coordinates reported with a 5-digit decimal (i.e., 60.84072, -146.88001), using WGS84 datum, accurate to ~30ft or less. If the PWS is using the Lead-Safe Alaska Portal, a GPS coordinate is auto-populated.
 - c. Other method if first approved by DEC.
 3. **Pipe material** from connection to the water main all the way to the entry point to the building. Each portion of service line must be identified as either:
 - a. Lead
 - b. Galvanized Requiring Replacement
 - c. Non-Lead (Specify known pipe material)
 - d. Unknown (Specify if Unknown-Likely lead, Unknown-Unlikely lead, or Unknown)

Please note that if a service line has split ownership (i.e., one section owned by the PWS and one section owned by the customer) each section must be identified separately on the inventory, as each section may be different material or installed/replaced at different times.

Exhibits below are from EPA Guidance. See AK LCRR website for additional examples.

Exhibit 5-1: Examples of Commonly Found Pipe Materials



Exhibit 5-2: Example of Wiped Lead Joint



Source: <https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead-0> Source: <https://www.skokie.org/766/Lead-Water-Line-Information>

4. **An Overall Service Line Designation** must be made for each service line. If ownership of the service line is split, an EPA provided chart on how to determine the overall material category of a service line is included in the Alaska Inventory Template. In addition to reporting the overall service line designation, **the total number of service lines in each of the 4 material categories must be included on the LSLI.**
5. **Components (fittings, equipment)** on the service line, if known:
 - a. Lead connectors (i.e., pigtails, goosenecks, or swing joints)

- b. Corporation stop, curb stops, meters, valves, etc., that may be made of older brass that pre-date the Reduction of Lead in Drinking Water Act of January 4, 2014, that could potentially contribute to lead exposure.
 - c. For copper pipe, identify the type of joints, when possible (i.e., flare, lead solder, or non-lead solder).
- 6. Size of service line** (diameter), if known
- a. If the size of a service line changes between the water main and building, annotate the change in the 'Notes' section for the service line.
 - b. If service line is 3-inches or greater, then it is likely non-lead. EPA Guidance states "LSLs were generally not constructed with an interior diameter over two inches".
- 7. Date(s) of service line installation**, if known
- a. Be sure to include any repair/renovation dates that changed or may have changed the material of the pipe.
- 8. Source of the information** reported on the LSLI. Each PWS is responsible for the accuracy of its inventory. Approved sources are as follows:
- a. Accurate as-builts, record drawings or master plans
 - b. Documentation that the service line was built after Alaska adoption of the Lead Ban. If no other material documentation exists, AK DEC-DW is allowing construction after January 1, 1990, as a non-lead classification.
 - c. Construction, plumbing, and building codes, permits, inspections, or other existing records such as tax assessor information which indicate the timeframe when construction was completed and/or service line materials used to connect structures to the distribution.
 - d. Visual inspection by PWS
 - i. Standard Operating Procedures (SOPs) can be used to systematically verify service line material during routine calls or maintenance, if PWS staff is properly educated on identifying service line material.
 - ii. See "Identifying Service Line Material" in the Resources section at the end of this guidance for examples of identifying material types.
 - e. Customer provided information
 - i. Installation/replacement records
 - ii. Photographs/description
 - iii. PWS must ensure customer understands how to determine service line material, and must review and validate information provided by the customer. If using the State-provided online surveys, the customer data will appear in the PWS portal for PWS review prior to submission to the State.
 - f. Existing PWS records on file at DEC can be made available as necessary if requested. Email dec.dw.lsl@alaska.gov with your request.
 - g. Other methods, **which require DW Program approval prior to use:**
 - i. Potholing or digging a certain percentage of service lines to determine overall composition in an area
 - ii. Interpolation of records with a portion of services field verified.
 - iii. Discussions with previous water operators, local plumbers, and home inspectors

- iv. Water quality sampling (EPA Guidance 5.2)
- v. Predictive modeling (EPA Guidance 5.5)
- vi. Emerging methods (EPA Guidance 5.6)

The PWS is encouraged to submit copies of the source documents and maps used to build the inventory to the State DW Program.

9. Information to identify compliance tap monitoring locations under the LCR:

- a. Building usage information. A building can be classified as:
 - i. Single-family
 - ii. Multi-family/person
 - iii. School
 - iv. Childcare Facility
 - v. School/ Childcare Facility built after 2014
 - vi. Childcare (in-home)*
 - vii. Building
 - viii. Other

*If a single or multi-family home is used for in-home childcare, it should be categorized as “Child Care (in-home)”. PWSs are only responsible for knowing licensed childcare providers.

- b. Premise (Interior) Plumbing Material, if known
 - i. Type of pipe (i.e., copper, plastic, plastic-PEX, plastic-PVC, plastic-HDPE, galvanized, unknown, or other-specify)
 - ii. Lead solder in copper lines (i.e., yes, no, unknown-likely, unknown-unlikely)
- c. Approximate Date(s) of Premise Plumbing Installation
 - i. Include any repair/renovation dates if known
- d. Whether or not the building is a current or previous LCR sampling site
- e. Point of Entry (POE)/ Point of Use (POU) devices
 - i. Lead/copper sampling sites cannot have an upstream POE/POU device. The inventory provides space to document any known POE/POU treatment inside buildings for sampling purposes.
 - ii. POE Treatment Device is located where water enters a building and before the point of use for the purpose of reducing contaminants in the drinking water distributed throughout that building.
 - iii. POU Treatment Device is applied to a single tap and used for the purpose of reducing contaminants in drinking water at that one tap

10. Degree of confidence with the inventory overall. The template has space for the PWS to elaborate on their methods used and certainty with the overall inventory. Below is a general guide to help facilitate and standardize responses.

- a. “High”: Visual inspection by the PWS, recent construction with accurate as-built drawings, or records verify that the entire system was built after January 1, 1990.

- b. “Medium”: Interpolation of incomplete records in an area with 20% PWS field verification conducted. Water tap sampling that indicates presence or absence of lead confirming other available information.
- c. “Low”: Assumptions with no verification

11. Date last updated for the PWS LSLI data

PUBLIC ACCESSIBILITY REQUIREMENT:

The inventory must be publicly accessible. The Lead-Safe Alaska Portal has been set up for inventory information to be collected and made available to the public. This is intended to assist PWS's in meeting the following public accessibility requirements; however, if the PWS does not use the portal, they will need to have an alternate way for this information to be made accessible by the public.

1. Each lead and GRR service line must have the locational identifier be publicly accessible.
 - a. PWSs are required to report Unknown and Non-Lead service lines on the LSLI to the State, however they are not required to make these service connection types publicly available. However, it is recommended that Unknown and Non-Lead service lines still be made publicly available in the interest of PWS transparency.
2. Water systems serving more than 50,000 people must make the LSLI available online.
3. For consumers that do not have internet access, the PWS must have an additional method of providing LSLI information aside from the Lead-Safe Alaska Portal.
4. Community water systems (CWS) must include instructions in the Consumer Confidence Report (CCR) on how to access its LSLI. § [141.84\(a\)10](#)
 - a. If a CWS has determined there are no Lead, GRR, or Unknown service lines, the CCR must include a statement that they have no LSLs. § [141.153\(d\)\(4\)\(xi\)](#)

If 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 a general description of all applicable sources described in 141.84(a)(3), (5), and (6) used to make this determination. § [141.84\(a\)9](#)

Additionally, the PWS may use this opportunity to share required/relevant information such as:

- a. How consumers can protect themselves from lead exposure if they have LSL, GRR, or Unknown service connections.
- b. Statement that other lead sources may exist in drinking water plumbing or the building (i.e., copper pipes with solder installed before 1990; faucets purchased prior to 2014; and lead paint in homes built prior to 1978).
- c. Information on the PWS's actions to reduce lead in drinking water.
- d. Information on how customers can test their water for lead.
- e. System contact information (i.e., general contact for questions, how to submit inventory information, etc.)

PUBLIC NOTIFICATION (PN) REQUIREMENTS:

PWSs are required to conduct PN within 30 days of completing the initial LSLI, annually thereafter*, and to new customers upon hookup, until only non-lead service lines remain in system. The PN must:

- a. Be provided to all persons served by the water system at the service connection with LSL, GRR, or Unknown service lines via mail or other approved method
 - b. Include service line material classification, lead health effects language, steps to reduce lead exposure in drinking water, and:
 - i. If Lead: include opportunities to replace the LSL, available funding programs, and statement that the PWS must replace its portion if property owners notify the PWS that they are replacing their portion
 - ii. If GRR: must include opportunities for service line replacement
 - iii. If Unknown: include opportunities to verify service line material
- Details on required health effects language are available in 40 CFR §141.85(a)(1)(ii).

Additional public notices may be required as a result of failure to complete/submit LSLI requirements, related PN, and other applicable violations, which must also be reported in the CCR for Community water systems.

*The required annual public notice and certification of delivery must be submitted to DWP annually by July 1 for previous year. 40 CFR §141.90(f)(4)

LARGE PWS PLAN FOR COMPLETING INVENTORY:

Large systems serving more than 10,000 people must submit a plan to complete the LSLI, which is due no later than June 1, 2023. This plan should include information on the following:

1. Short narrative of how the PWS plans to complete their inventory.
2. Primary staff (name, phone number, and email) who will complete the inventory
3. Estimated number of service connections to be included on the LSLI
4. Answers to the following Questions:
 - i. What information does the system have readily available?
 - ii. What references will be used to build the inventory?
 - iii. What challenges have been identified?
 - iv. What Standard Operating Procedures (SOPs) can be written/implemented into routine field work by staff or contractors to collect data?
 - v. Does the PWS generally own the entire service line?
 - vi. How will the PWS ensure all service lines have been included?
 - vii. What milestones has the PWS set for itself?
 - viii. What questions or clarifications does the PWS need to be successful?

UPDATING THE LSLI:

The LSLI is a living inventory, meaning that it should be updated each time a new service connection is constructed, a service line is permanently removed/abandoned, or the material of a service line is identified or changed. This includes if a connection is made from a “fire hydrant leg.”

The PWS must provide updated versions of its LSLI to the State. Though some changes regarding when the PWS must provide an updated LSLI may occur with the upcoming Lead and Copper Rule Improvements (LCRI), it is likely that PWSs will need to provide an updated inventory to the State at least annually or triennially, depending on the lead tap sampling frequency. Additionally, the current LCRR states that a PWS must provide an updated LSLI within 30 days of identification of a service line requiring replacement (i.e., LSL or GRR).

FUNDING ASSISTANCE:

Information on funding assistance for the LSL inventory and pipe replacement can be found on the Alaska State Revolving Fund (SRF) Program website at <https://dec.alaska.gov/water/technical-assistance-and-financing/state-revolving-fund>. If you have any questions, please send them to dec.srfprogram@alaska.gov or contact Young Ha at 907-269-7544.

LEAD SERVICE LINE REPLACEMENT PLAN:

By October 16, 2024, systems must submit a lead service line replacement plan if their inventory includes any service lines classified as Lead, GRR, or Unknown.

Plans must comply with lead service line replacement plan requirements in [CFR 141.84\(b\)](#) including:

- A strategy for determining the composition of lead status unknown service lines in its inventory;
- A procedure for conducting full lead service line replacement;
- A strategy for informing customers before a full or partial lead service line replacement;
- A procedure for customers to flush service lines and premise plumbing of particulate lead;
- A lead service line replacement prioritization strategy based on factors including but not limited to the targeting of known lead service lines, lead service line replacement for disadvantaged consumers and populations most sensitive to the effects of lead;
- A funding strategy for conducting lead service line replacements which considers ways to accommodate customers that are unable to pay to replace the portion they own; and
- For systems that serve more than 10,000 persons, a lead service line replacement goal rate recommended by the system in the event of a lead trigger level exceedance (based on this not changing in the LCRI).

FREQUENTLY ASKED QUESTIONS:

I don't have lead service lines, why do I have to do this?

- a. The information gathered during the LSLI is used in several aspects of the LCRR, including to determine specific requirements on LSL replacement, to conduct customer and property owner notification, and to select correct compliance sampling sites.
- b. To have a current and accurate compliance sampling plan, information is requested about the specific site so that its classification in the site classification tier structure is known. Specific use of the building is requested so that the site can be put into the proper category for the sampling plan.
- c. Identifying schools and childcare facilities is required for Community water systems as part of CFR 141.92 to facilitate required monitoring and public education.
- d. The LSLI provides an opportunity for outreach with your customers.

- e. The LSLI will help build a better understanding/ model of your distribution system.
- f. Information provided on the LSLI will help you to reduce components causing elevated lead/copper results in ongoing compliance sampling.
- g. It is more efficient to capture all available information while completing initial inventory (even if not currently required by the existing EPA regulation) than having to reinvestigate again in the future.

What do I do if a lead service line or galvanized requiring replacement is found?

If any LSL or GRR pipes are found, contact DEC immediately, even if the LSL/GRR is not currently in use or abandoned. A PWS should not wait until they turn in their inventory before alerting DEC, as federally allocated funds for replacement may no longer be available. A removal plan will need to be determined for lines currently in use as soon as possible. Removal of abandoned lines will be determined on a case-by-case basis.

How do I know where to start?

The process of developing an accurate LSLI may be overwhelming for some PWSs. Though all service lines are required to be included on the LSLI, it is recommended that a PWS start by prioritizing service lines based on an initial review of documents already in the PWS's possession. For example, it may be helpful for a PWS to focus on service connections that are more likely to contain lead, including:

- a. Service connections constructed prior to January 1, 1990
- b. Service lines with a diameter of 2 inches or less

Additionally, a PWS may want to prioritize identifying service lines that hold potable water, as opposed to non-potable water.

My service lines were built after Alaska adopted the Lead Ban (June 5, 1998), do I still need to submit an inventory?

Yes. All Community and NTNC public water systems must submit a detailed LSLI. Though the Lead Ban was adopted into Alaska Plumbing Code on June 5, 1988, it is still possible that active construction projects contained lead piping. However, if a PWS can demonstrate via record drawings or other approved documentation that the service connection was constructed **on or after January 1, 1990**, then that is sufficient evidence that the line is not lead. For the purposes of having a complete inventory, as required by the LCRR, the PWS should determine the exact non-lead material that the service lines are made of.

How do I know if the service line classification I determined is accurate?

Checking multiple reliable sources of information before making a service line classification will help to ensure the LSLI is accurate. Per CFR 141.84(a)(3), a PWS must check:

- a. Any information on lead and galvanized iron or steel that it has previously identified in accordance with § 141.42(d), which required community water supply systems to identify if the following construction materials are present in their distribution system:
 - i. Lead from pipe, solder, caulk, interior lining of water mains, alloys and home plumbing.
 - ii. Copper from piping and alloys, service lines, and home plumbing.
 - iii. Galvanized piping, service lines, and home plumbing.
 - iv. Ferrous piping materials such as cast iron and steel.
 - v. Asbestos cement pipe.

- b. 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.
- c. 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.
- d. 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.
- e. Any resource, information, or identification method provided or required by the State to assess service line materials (i.e., paper or electronic records at the Alaska Department of Environmental Conservation may exist if they were previously submitted to the State).

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.

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?

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.

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?

Any PWS that only serves a single building must report the material from the water source to the building inlet for their inventory.

- 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.

How does the information from the lead service line inventories impact schools and child care facilities?

The existing LCRR has additional requirements for schools and child care facilities, however, these are subject to change with the Lead and Copper Rule Improvements (LCRI) currently under development. EPA's website states that they intend to promulgate the LCRI prior to October 16, 2024.

A few items to note from the current version of [CFR 141.92](#) *Monitoring for lead in schools and child care facilities*, that relate to the LSLI.

- All community PWS must conduct directed public education and lead monitoring at the schools and child care facilities they serve if they were constructed prior to January 1, 2014 (*or the date the State adopted standards that meet the definition of lead free in accordance with Section 1417 of the Safe Drinking Water Act, as amended by the Reduction of Lead in Drinking Water Act, whichever is earlier*).
- Water systems must conduct lead sampling at elementary schools and child care facilities they serve once and on request of the facility thereafter. Water systems shall also conduct lead sampling at secondary schools they serve on request.
- By October 16, 2024 (the compliance date specified in §141.80(a)(3)), each water system must compile a list of schools and child care facilities served by the system.

An elementary school for LCRR purposes is a school classified as elementary by state/local practice and composed of any span of grades (including pre-school) not above grade 8.

A secondary school includes both junior and senior high schools and means a school comprising any span of grades beginning with the next grade following an elementary or middle school (usually 7, 8, or 9) and ending with or below grade 12.

Do fire/flush hydrant legs need to be included?

A fire hydrant leg is a service connection from the PWS water main that supplies water solely to a fire hydrant. Fire hydrant legs do not need to be included on the LSLI since hydrant legs are a minimum of 6" in diameter (LSLs are generally 2" or less in diameter), and the fire hydrant leg is typically the same material as the water main. Additionally, fire hydrant legs identified as Galvanized would not require replacement since they would not have had an upstream lead segment.

My facility is comprised of multiple additions such as conex boxes attached to each other.

Any water line that provides water to a building or structure that is physically separated from other structures shall be considered a service line. If buildings or structures are conjoined, internal water lines or lines that connect through walls are not considered individual service lines, and instead would be internal plumbing.

When is a fire suppression water line a service line?

When a non-potable system (such as a fire suppression water system) extends from internal plumbing within a building with a backflow preventer or an air gap present, this would not constitute a separate service connection/service line. However, where a non-potable line or system connects to the potable main via a separate connection (i.e., the building has two connections to the main, one potable, one non-potable) this separate connection would be an individual service connection and service line for the purposes of the service line inventory.

RESOURCES:

AK Drinking Water Program LSL Website: <https://dec.alaska.gov/eh/dw/lcrr/>

GIS Lead-Safe Portal link

Outreach materials

Customer Material Surveys (online versions and paper versions for download) These are questionnaires that the PWS can send to customers to obtain LSLI information.

Online survey results will appear in the PWS's portal for review prior to submission to DEC.

Links to other guidance and trainings from EPA, ASDWA, LSLR Collaborative

Funding: AK SRF website:

<https://dec.alaska.gov/water/technical-assistance-and-financing/state-revolving-fund/>

Lead in Drinking Water:

EPA Website: <https://www.epa.gov/lead>

Alaska Health Department: <https://health.alaska.gov/dph/Epi/eph/Pages/lead/default.aspx>

CDC: <https://www.cdc.gov/nceh/lead/programs/ak.htm>

Preparing an LSL Inventory: <https://www.lslr-collaborative.org/preparing-an-inventory.html>

Identifying Service Line Material: Below are some examples, there are many others available online.

EPA Protect Your Tap: A Quick Check for Lead:

<https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead>

LSLR Collaborative: www.lslr-collaborative.org/identifying-service-line-material.html and

https://www.lslr-collaborative.org/uploads/9/2/0/2/92028126/howtocheck.servicelinelead_18.01.23.pdf

Green Bay Water Utility, LA: https://ldb.la.gov/assets/opb/Center-EH/engineering/LCR/Lead_Pipe_Identification.pdf

Cleveland, OH video: https://www.youtube.com/watch?v=AiU7GHzD_Ck

DC Water: <https://www.dcvater.com/sites/default/files/IdentifyingHouseholdPlumbing.pdf>

Example of a water system website with map and how to identify material:

Cincinnati, OH Water Works: <https://la.mygcwm.org/do-i-have-a-lead-service-line/>

Example of consumer submittal form: DC Water:

<https://www.dcvater.com/sites/default/files/lead%20pipe%20material%20info%20sheet%2003172020.pdf>

Miscellaneous Resources and Links:

<https://www.lslr-collaborative.org/downloadable-resources.html>