



Engineering &  
Environmental  
Services

EPA Revised Lead and Copper Rule

# Lead Service Line Inventory

For Community & Non-Transient, Non-Community Public Water Systems

## WHAT

is the Lead Service Line Inventory and WHY is it required?

- > Under the US Environmental Protection Agency (EPA)'s Lead and Copper Rule Revisions (LCRR), regulated public water systems are required to identify all service lines connected to its distribution system, regardless of usage of the water, and distinguish any service lines made of lead or of unknown material (see Title 40 Code of Federal Regulations (40 CFR) §141.84(a)). Service lines must be characterized as Lead, Galvanized Requiring Replacement (GRR), Non-Lead, or Lead Status Unknown.
- > The inventory will estimate the number of high-risk service lines and describe the reliability of existing records, thereby providing important information for future service line replacement efforts.

## WHO

is required to perform a Lead Service Line Inventory?

- > A **“community water system”** is one that serves 15 or more service connections used by year-round residents or that serves 25 or more year-round residents who use water for drinking, cooking, bathing, and cleaning. Community water systems may also serve all the businesses and other water users within their boundaries.
- > A **“non-transient, non-community water system”** is one that serves 15 or more service connections that are used by the same persons for at least six months per year, or serves the same 25 or more persons for at least six months per year. These water systems supply businesses where people may spend a large percentage of time, but these typically aren't a consumer's primary water source. Examples include schools, hospitals and most mining sites.

Reference - <http://www.azdeq.gov/publicwatersystems>

## WHEN

is the inventory due?

- > The Lead Service Line Inventory spreadsheet and associated EPA forms are due to the Arizona Department of Environmental Quality (ADEQ) by October 16, 2024. The inventory should be updated annually to reflect the lead-removal process.
- > Water systems with no existing service lines believed to be lead, galvanized, or unknown may also submit a No Lead Service Line Verification form. Water systems that have demonstrated the absence of lead service lines by October 2024 are not required to submit updated inventories annually.

## HOW

does the inventory process work?

- > EPA has published guidance materials to use for performing a lead service line inventory, and ADEQ continues to provide training and release additional clarifications.
- > The graphic below shows the overall inventory process.

## IDENTIFY

- > Review drawings, as-builts, and manuals for installation dates, line sizes, and pipe materials.
- > Field verify materials.
- > Record inventory entries.



## REVIEW

- > Is there any lead or galvanized steel?
- > Do the galvanized pipes (if any) require replacement?
- > Are there any unknowns?



## REPORT

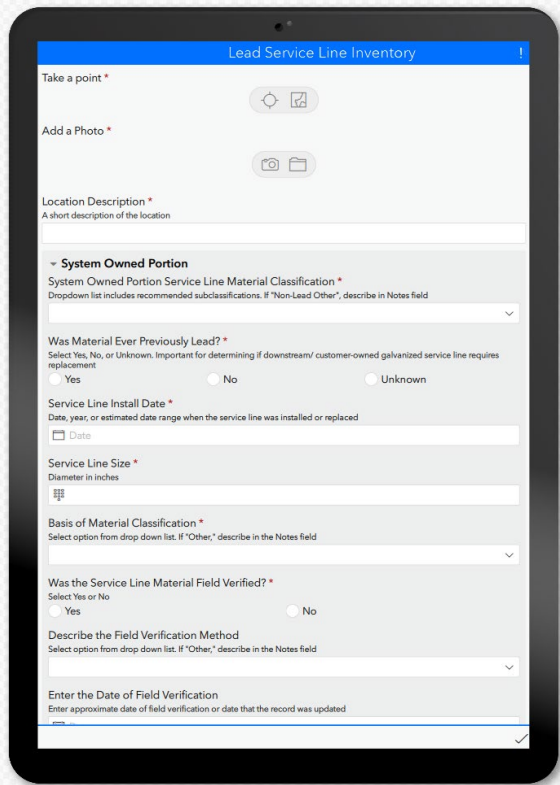
- > Finalize inventory spreadsheet.
- > Complete and submit EPA forms.
- > Complete and submit 'No Lead' verification form, if applicable.



# LET WESTLAND DO YOUR INVENTORY

To best serve our clients, WestLand has combined our extensive mining and water systems engineering experience with our in-house environmental and regulatory expertise and our acclaimed GIS department to create a specialized Lead Service Line Inventory team to support our Arizona clients in fulfilling the upcoming ADEQ/EPA requirements. This Tucson-based team is uniquely qualified and experienced in performing the Lead Service Line Inventory for mine sites and other Non-Transient, Non-Community water systems.

Our field crew identifies each service line using the approved ADEQ methodology and records known information in our custom survey application to facilitate field data collection. Each survey form exports into a single inventory entry in the ADEQ inventory spreadsheet. The survey app also stores pictures and a location identifier for each surveyed point. Using this software, WestLand can deliver geo-tagged photos and/or a .kmz file showing the field-verified service lines, as well as a finalized spreadsheet and the complete ADEQ submittal package to the client.



WestLand's Custom Lead Service Line Inventory Survey App

## How does WestLand know what materials are in your service lines?

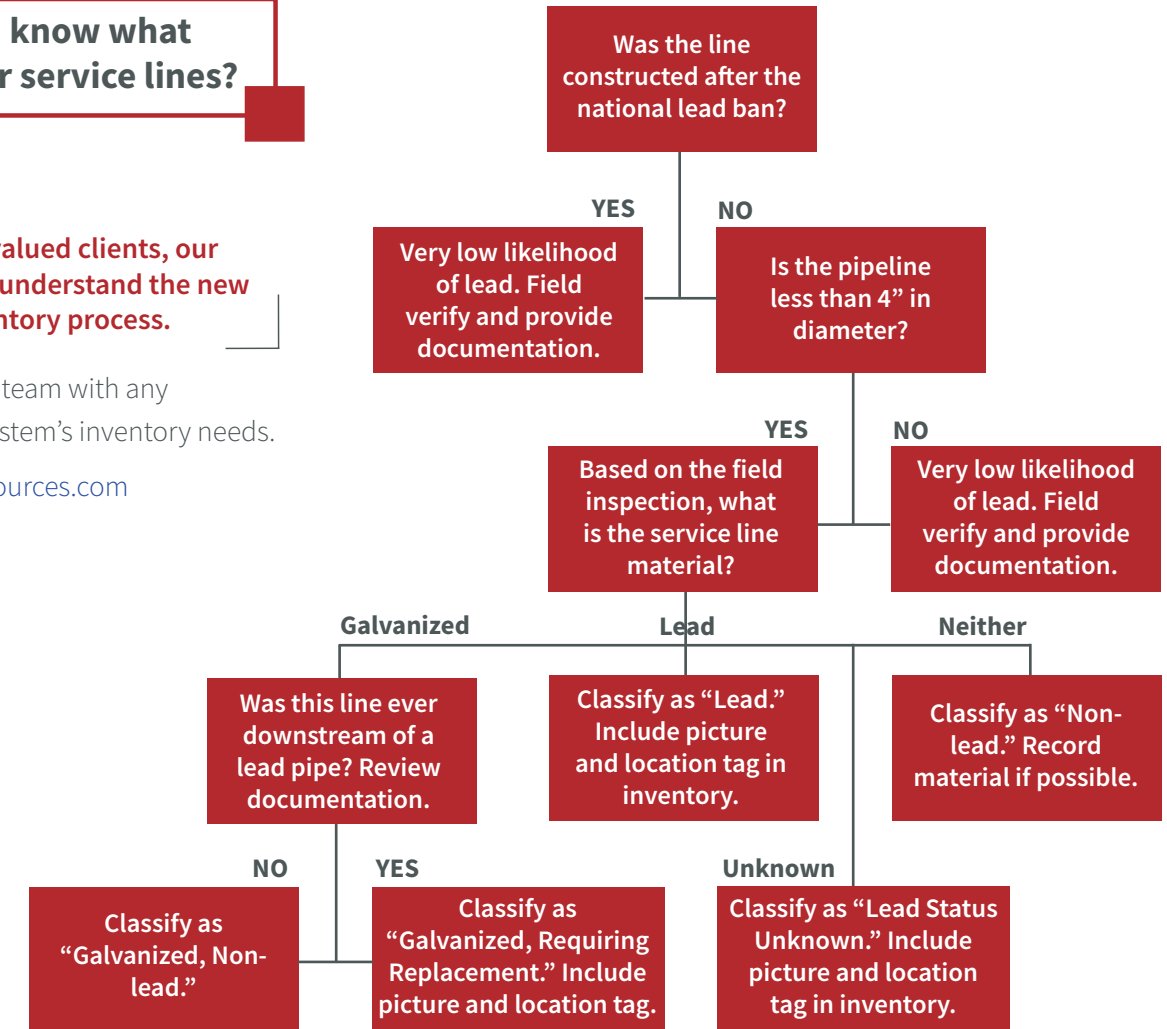
As trusted advisors to our valued clients, our first priority is helping you understand the new requirements and the inventory process.

Feel free to contact our Tucson team with any questions, or to discuss your system's inventory needs.

Email: [MWhite@WestLandResources.com](mailto:MWhite@WestLandResources.com)

Call: 520.206.9585 and ask for:

- > Matt Groff
- > Mariah White
- > Beth Bates





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