

Lead Service Line Inventories Guidance

Q: What is a lead service line inventory?

A lead service line (LSL) inventory is a collection of data, which accounts for the service line material on both sides of the water meter, and it includes the public water supply (PWS) system-owned and customer-owned portions of the service line. All systems, even those without lead lines, are required to develop an initial inventory by October 16, 2024.

A service line is the pipe that connects the water main to the interior plumbing of a building. Service lines can be comprised of several components:

- **Connector** – A short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping. It is also known as gooseneck or pigtail.
- **System-Owned Service Line** – The portion of the service line owned by the public water system. It typically spans between the water main and water meter.
- **Customer-Owned Service Line** – The portion of the service line owned by the customer. It typically spans between the water meter and building plumbing.

Q: What information are PWS required to submit?

The inventory must include all service lines connected to the public water distribution system whether the service line is owned by the system, customer or partly by both. When developing the initial inventory, systems must review and utilize records that document the material composition of service lines connections.

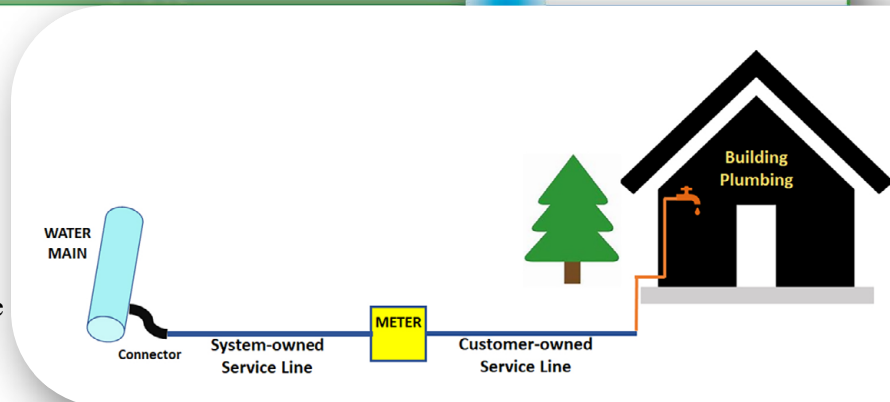
Every portion of the service line must be designated as one of the following:

- **Lead** – A service line comprised of any amount of lead.
- **Galvanized Requiring Replacement (GRR)** – An iron or steel service line that has been coated with zinc (i.e., galvanized) **and** is or was ever downstream of a lead service line or a lead status unknown service line. A galvanized iron or steel service line which is definitively known never to have been downstream of a lead service line is a non-lead line.
- **Non-Lead** – A service line comprised of copper, plastic, or galvanized metal that is proven to be lead-free.
- **Lead Status Unknown** – A service line of completely unknown materials.

Q: How do I tell if my pipes contain lead?

There are two primary methods to determine if service lines contain lead: historical records review and service line investigation.

A **Historical Records Review** must describe the records used to determine if the service lines contain lead. These record types include:



- 1. Previous Materials Evaluations** – such as locations of Tier 1 lead tap sampling locations that are served by an LSL.
- 2. Construction and Plumbing Codes and Records** – such as local ordinances adopting an international plumbing code that included the Safe Drinking Water Act lead ban of 1986, which took effect statewide in Oklahoma on May 6, 1987, year or estimated year when service lines were installed or replaced, or permits for installing or replacing service lines..
- 3. Water Systems Records** – such as distribution system maps, meter installation records, tap cards, capital improvement or master plans.
- 4. Distribution System Inspections and Records** – such as inspection records, service line repair or replacement records, or other information obtained through normal operations.

EPA recommends, but does not require, that systems consider using **Service Line Investigations**. If this method is used, the actual material observed should be described and the use of non-lead as a material descriptor should be avoided. The two methods for service line investigations are:

- 1. Visual Inspection** – Observations made at the meter pit.
- 2. Excavation** – Potholing at points that are a minimum of 18 inches upstream and downstream from the meter.

Q: What are galvanized service lines and why are they a concern?

A galvanized service line is iron or steel piping that has been dipped in zinc to prevent corrosion and rusting. Lead particles can attach to the surface of galvanized pipes and accumulate over time. These lead deposits can leach into the drinking water and pose a health hazard.

A GRR is a galvanized service line that is or was at any time downstream of an LSL or service line of unknown material. If the system is unable to demonstrate that the galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL.

Q: What happens if a service line containing lead or GRR is identified?

Systems must provide notification to persons served by the water system at a service connection with the following classifications:

- Confirmed LSLs, the notification must also include information about opportunities to replace the LSL, any available financing programs, and statement that the system must replace its portion if the property owners notify the system that they are replacing their portion.
- GRR, the notification must also include information about opportunities for service line replacement.
- Lead status unknown, the notification must also include a statement that the service line is unknown but may be lead and information about opportunities to verify the material of the service line.

Based on the results of the inventory and lead sampling, the system may be required to replace lead and galvanized service lines. Systems must keep an annual count of the number of service lines needing replacement.

Q: Is the inventory required to be publicly available?

Yes, systems must ensure that the results of the inventory are publicly accessible. To make inventories publicly available, systems must:

- Provide location identifiers for lead and galvanized service lines.
- Place information regarding how to access the service line inventory in the Consumer Confidence Report.
- Provide an online copy of the inventory if the system serves more than 50,000 people.
- Use a written statement in lieu of having a publicly accessible copy of the inventory if the system does not have any lead, GRR, or lead status unknown service lines.

Q: Can the inventory be updated after it is submitted?

Yes, it is expected that systems will identify and document service line materials in the inventory as they are encountered during normal operations. The inventory must be updated as new information is received/uncovered.

Q: How is the inventory submitted?

Systems can submit their initial inventory to the PWS Compliance Section or email it to DEQ at DrinkingWater@deq.ok.gov

As systems complete their LSL Inventories, DEQ will be available to provide technical assistance at every step of the way. For more information about completing LSL inventories and why this information is being collected, visit DEQ's website at:

<https://www.deq.ok.gov/lead-service-line-inventory>

or contact DEQ at DrinkingWater@deq.ok.gov.