



Frequently Asked Questions About EPA's Proposed Lead and Copper Rule Revisions Service Line Inventory Requirements April 2022

EPA adopted revisions to the Lead and Copper Rule that include a requirement for public water systems to conduct inventories of service lines and to identify service line material types. The intent of the service line inventory requirement is to identify those service lines made of lead so that they can be scheduled for removal and replacement.

What are the basic requirements for the service line inventory?

Public water systems must conduct an inventory of all service lines, on both the water system side and the homeowner side of the meter, and to submit the results to OHA—Drinking Water Services (DWS) by October 16, 2024. Service line materials must, at a minimum, be classified as one of the following:

- **Lead**, where the service line is made of lead;
- **Non-lead**, where there is evidence to support this determination;
- **Galvanized requiring replacement**, where a galvanized service line is downstream of a current or former lead service line; or
- **Lead status unknown**, where there is no documentation or evidence to classify the material type.

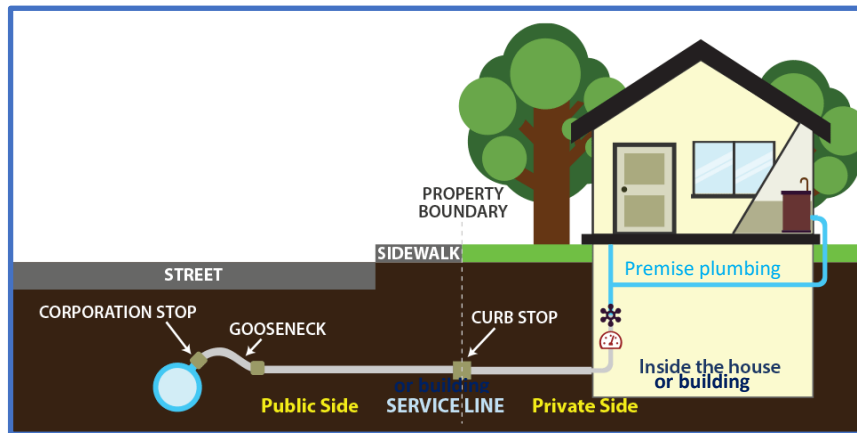
Records, permits, codes and rules may be used to classify material type. Visual inspection is not required if other evidence is available.

Which public water systems (PWSs) need a service line inventory?

The service line inventory and annual update applies to all Community (C) and Non-Transient Non-Community (NTNC) water systems. Transient Non-Community (TNC) and Oregon Very Small (OVS) PWSs are not required to provide inventories.

What is a *service line*?

A *service line* is defined as the pipe(s), fittings, and meter located between the discharge of the corporation fitting (aka corp stop) adjacent to a water main and a customer's building inlet. The service line may be owned by the water system, the property owner, or both. The diagram below shows an example.



What is a *lead* service line?

A *lead* service line is a portion of pipe that is made of lead, which connects the water main to the building inlet.

What is a *non-lead* service line?

A *non-lead* service line is any service line that is determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement. Examples include plastic, copper, or galvanized lines that are not downstream of a known lead service line. In Oregon, service lines installed after 1985 are considered non-lead because this is when the lead ban was enacted in the state.

What is a *galvanized requiring replacement* service line?

A galvanized service line is considered *galvanized requiring replacement* if it ever was, or is currently, downstream of any lead service line (not including lead goosenecks or pigtails) or service line of unknown material.

What is a *lead status unknown* service line?

Any service line where there is no documented evidence supporting material classification is considered a *lead status unknown* service line.

How is service line material determined for the initial inventory?

The following sources of information can be used for determinations in the initial inventory. Any methodology or technique not listed below must be approved by the state:

- All construction and plumbing codes, permits, and existing records and other documentation that indicate the service line materials used to connect structures to the distribution system.
- 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.
- All inspection records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.

What about service lines built after the mid-1985 Oregon lead prohibition?

Service lines installed in 1986 and later are considered non-lead service lines. DWS recommends that the system further document the material of non-lead service lines (for example, plastic or copper) for the PWS records.

What if only part of the service line is lead?

Any portion of the service line (see diagram above) that is lead results in that service line being a *lead service line*.

If our system previously certified that there was no lead in the distribution system, is an inventory still required?

While previous investigations of service lines are valuable, every system needs to conduct an inventory of service lines under the rule and submit the results by the deadline of October 16, 2024. Previous certification did not account for the different classifications of the full (public and private) service lines, and for many systems, connections have increased.

Do I have to verify the material type of every service line by October 16, 2024?

A system can use all available documentation to identify service lines and consider those without documentation as *lead status unknown* in the initial inventory. However, unknowns must eventually be determined and until they are classified by material type, they will be assumed to be *lead service lines* for purposes of lead service line replacement plans.

Do I have to dig up all the service lines to identify the material type?

The initial inventory does not require excavation or physical verification. Records and evidence of installation after Oregon's lead-in-plumbing prohibitions are sufficient to identify material type. If records or evidence are lacking, unknown service line materials may be verified at the meter or where the line enters a home or building. Potholing may be necessary to verify an unknown if other methods are unsuccessful.

What if lead pigtails or gooseneck connections are identified?

If a repair is conducted and a lead pigtail or gooseneck is discovered, the PWS is required to replace it at the time of repair. These types of connectors are not considered *lead service lines* under the EPA Lead and Copper Rule Revisions. However, lead piping is prohibited in Oregon and must be removed where it is known to exist.

What if the service line branches on the customer property?

A line that branches after the meter and before multiple structures is considered one line for the purposes of counting service lines.

What needs to be submitted to DWS?

Oregon will develop a spreadsheet (MS Excel) and reporting instructions prior to the submittal deadline.