



# FACT SHEET FOR DEVELOPING AND MAINTAINING A SERVICE LINE INVENTORY

There is no safe level of lead exposure. EPA will continue to strengthen actions to protect communities from lead in drinking water. This guidance alongside regulatory improvements, infrastructure investments like the \$15 billion provided by the Bipartisan Infrastructure Law for identifying and replacing lead service lines (LSLs), and other actions, are significant steps towards replacing 100% of LSLs across the country.

Service line inventories are the foundation from which water systems can take action to address LSLs. Establishing an inventory of service line materials and identifying the location of LSLs are key steps in getting them replaced. A comprehensive and accurate inventory allows you to publicly track progress on LSL identification and replacement, engaging the community and enhancing transparency. In addition, a comprehensive and accurate inventory can help all systems by supporting asset management programs and customer communications.

## WHO CAN BENEFIT FROM THIS FACT SHEET

All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs) must submit an initial inventory to their state or primacy agency by **October 16, 2024**. If you are a CWS or NTNCWS, this fact sheet can help you understand your requirements and prepare your inventory.

## WHAT INFORMATION DOES IT CONTAIN?

This fact sheet provides an overview of EPA's requirements for developing an initial inventory. It also contains a summary of EPA recommendations. For more details, refer to the full guidance for developing and maintaining a service line inventory, available online here: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>

## HOW IS THIS FACT SHEET ORGANIZED?



### SECTION 1

Required inventory elements and definitions



### SECTION 2

Inventory planning



### SECTION 3

Records review



### SECTION 4

Service line investigations



### SECTION 5

Sharing inventory information with the public



### SECTION 6

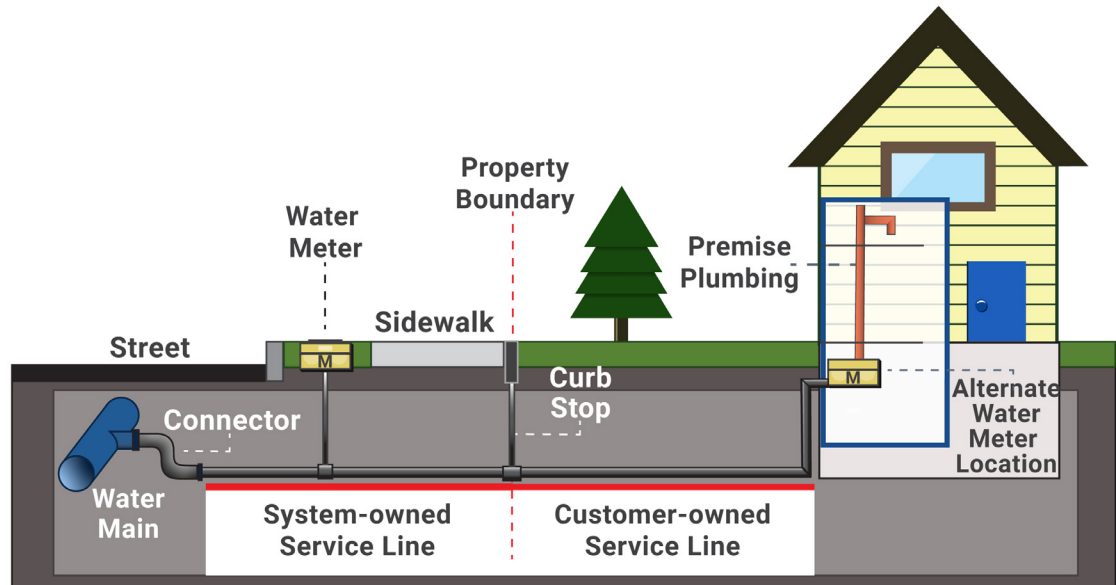
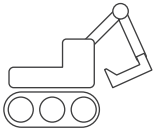
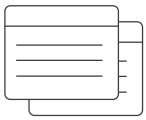
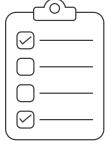
Information for systems with only non-lead service lines



## SECTION 1

### REQUIRED INVENTORY ELEMENTS AND DEFINITIONS

Your inventory **must** include all service lines, regardless of the actual or intended use. You must classify the system- and customer-owned portions separately where ownership is split (see example pictured).



You must classify service lines using one of the four definitions below.

**Lead:** A portion of the pipe that is made of lead, which connects the water main to the building inlet.

**Galvanized Requiring Replacement (GRR):** A galvanized service line that is or ever was downstream of an LSL or is currently downstream of an unknown service line.

**Non-Lead:** The service line is determined not to be lead or GRR through an evidence-based record, method, or technique.

**Unknown:** The service line material is not known to be a lead, GRR, or non-lead, such as where there is no documented evidence supporting material classification.

EPA recommends you track additional information in your inventory, such as pipe diameter and installation date, source of material information, actual material of non-lead lines, and other lead sources (*e.g.*, lead goosenecks and solder).

## SECTION 2

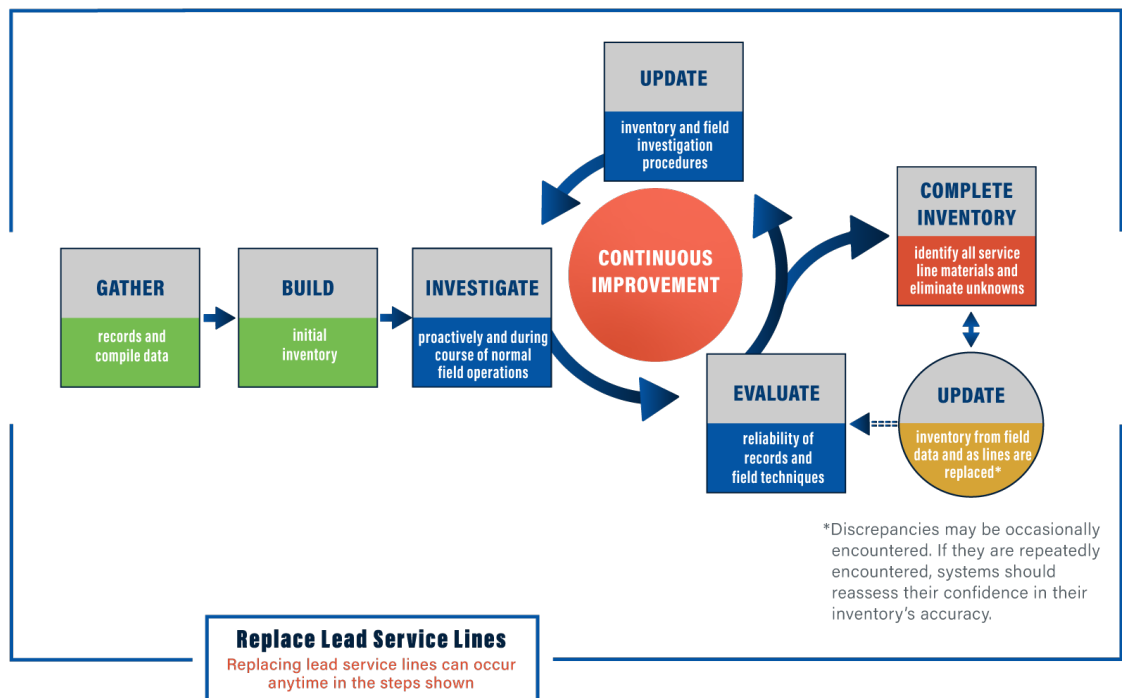
### INVENTORY PLANNING

EPA recommends you begin your inventory development process with the following steps:

- Identify staff and resources.
- Select an inventory format.
- Develop procedures for collecting service line information.
- Develop partnerships.

EPA developed a spreadsheet template that you can use and/or customize for your inventory, available online here <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>. You should choose an inventory format that is easily updated and conforms with any state or primacy agency requirements.

EPA recommends considering the inventory a **living data set** that is continuously improved over time as materials are investigated and LSLs are replaced. See the figure below for a schematic of the inventory lifecycle. As shown, EPA recommends systems to begin lead service line replacement (LSLR) as soon as possible, regardless of the state of inventory development.



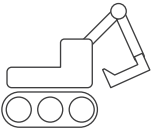
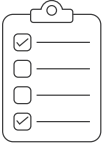
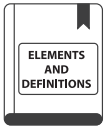
## SECTION 3

### RECORDS REVIEW

You **must** review the following to prepare your initial inventory:

- Previous materials evaluation. Specifically, you must review the materials evaluation you performed to identify lead and galvanized iron or steel under the original Lead and Copper Rule.
- All construction and plumbing codes, permits, and existing records or other documentation that indicates 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 inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.
- Any resource, information, or investigation method provided by or required by the state or primacy agency to develop your initial inventory.

**Records reviewed previously need not be reviewed again.**



**LSIs identified**

73481	645 E. Moler St.	SERVICE RECORD		
LOT NO 230		KIND OF ACCOUNT		
DATE SOLD 7-15-41				
SIZE OF MAIN 6	18" E of E L.L. of 18 <sup>th</sup> St.			
SIZE OF STOP 3/4				
SIZE OF SERVICE 3/4	11" N of S L.L. of Moler St.			
SIZE OF PIPE 3/4				
LENGTH OF PIPE 22 ft. Lead.				
RE-ISSUED				
LOCATION OF WATER	North Wall			
NAME	NUMBER	SIZE	DATE SET	REMARKS
Theobald	5/8	3/4	9/12/10	Ream - 1-3-12
Beck	2024/9/14	5/8	11-3-72	

3844	101 East 1 <sup>st</sup> Ave.	Size of Ferrule	
		Date Sold	
		Lot No	
	114 Ft 26 of - L.L. of Summit St.		
	12 Ft N of S L.L. of 1 <sup>st</sup> Ave.		
Remarks			
Main Size 6"	Stop Size 3/4"	Pipe Length 26	Kind Lead
Date Renewed 9/14/14		Reissued	

Excerpt from Exhibit 4-4 of the full inventory guidance

## SECTION 4

### SERVICE LINE INVESTIGATIONS

You can use investigative methods to classify service line materials as long as the methods are approved by the state or primacy agency. These methods could also be used to verify water system records. Investigative methods described in the full guidance include visual inspection by the customer and/or system personnel, water quality sampling, excavation, and predictive modeling.

The full guidance provides information on each method and possible approaches for prioritizing investigations, such as:

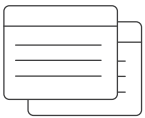
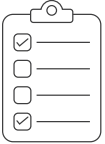
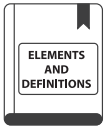
- Consider vulnerable or environmental justice populations.
- Target areas with the most unknowns.
- Target service lines that are most likely lead, especially in tandem with LSLR.
- Target areas where LSLR is occurring.



**PROTECT YOUR TAP**  
*a quick check for lead*

EPA developed the Protect Your Tap online step-by-step guide to help customers identify LSLs in their home, available online.

<https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead-0>



Excerpt from page 5-13 of the full inventory guidance

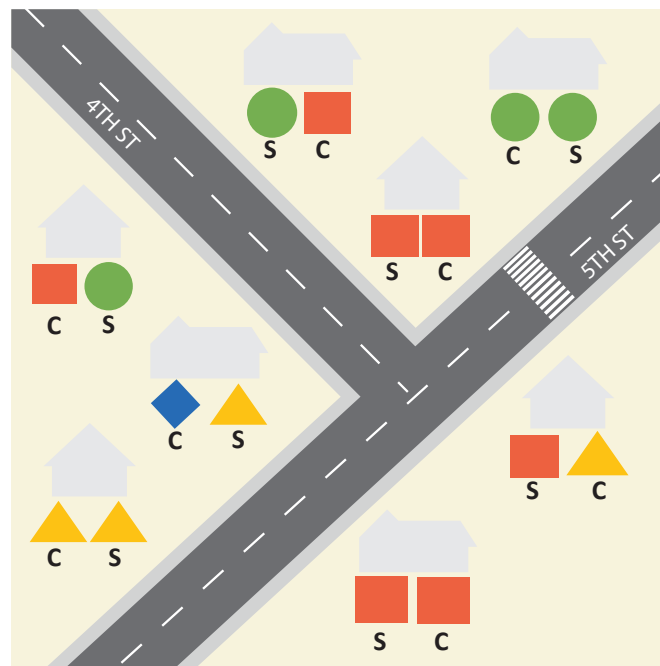
## SECTION 5

### SHARING INVENTORY INFORMATION WITH THE PUBLIC

At a minimum, you **must** make publicly available a location identifier (e.g., street address, intersection, or landmark) for each LSL and GRR service line. EPA recommends that you:

- Provide a location identifier for every service line.
- Consider using a street address as the location identifier.
- Include information on steps that consumers served by LSLs can take to reduce exposure to lead.

If you serve more than 50,000 people, you must provide your inventory online. Many water systems have developed simple or web-based maps to present their service line inventory, share information with the public, and inform their LSLR program.



#### LEGEND

C = Customer-owned  
S = System-owned

Lead      GRR  
Non-Lead      Unknown

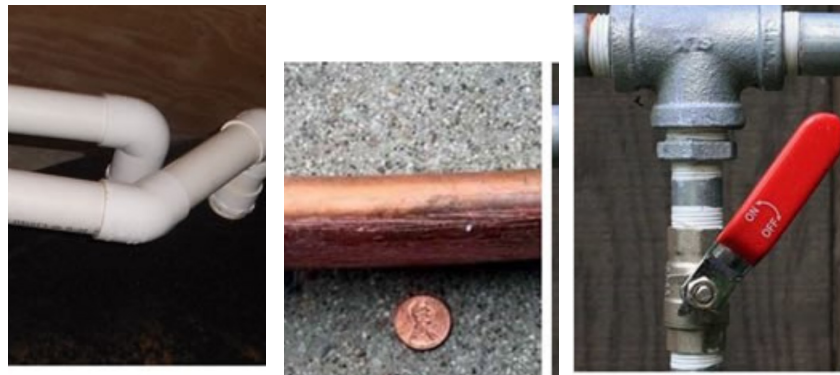
If you have lead, GRR, or unknown services lines, you must provide notification to persons served by these lines within 30 days after completing the initial inventory. If you are a CWS, you must also include instructions on how to access the inventory in your Consumer Confidence Report.

## SECTION 6

### INFORMATION FOR SYSTEMS WITH ONLY NON-LEAD SERVICE LINES

This section is for systems that can demonstrate through evidence-based records, methods, or techniques that all service lines are non-lead, including both the system- and customer-owned portions.

#### Examples of Non-Lead Materials



Plastic

Copper

Galvanized pipe\*

\*Only if the galvanized pipe was determined to have never been downstream of an LSL

#### DO I STILL NEED TO SUBMIT MY INITIAL INVENTORY IF ALL SERVICE LINES ARE NON-LEAD?

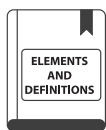
Yes, all CWSs and NTNCWSs must submit an initial inventory to their state or primacy agency by **October 16, 2024**.

#### WHAT ARE MY REQUIREMENTS FOR DEVELOPING THE INITIAL INVENTORY?

The requirements for developing an initial inventory are the same for systems with all non-lead service lines as they are for those with LSLs, GRRs, and/or unknowns. Under the LCRR, you must review previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, and state or primacy agency specified information.

## SECTION 6

### INFORMATION FOR SYSTEMS WITH ONLY NON-LEAD SERVICE LINES (CONTD.)

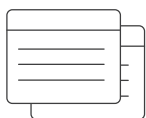


#### DO I NEED TO MAKE MY INVENTORY PUBLICLY AVAILABLE?

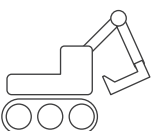


You have the option of (1) making the inventory publicly available, or (2) providing a written statement that your system has no LSLs, GRRs, or lead status unknown service lines, and a general description of methods used to make the determination.

#### WHAT IF I DISCOVER AN LSL OR GRR AFTER I SUBMIT MY INITIAL INVENTORY?



Even when all service lines have been classified as non-lead, EPA recognizes that a lead or GRR service line may subsequently be found. If this happens, you must:



- Notify your state within 30 days, and
- Prepare an updated inventory on a schedule established by your state.

Although not required, EPA recommends that you replace the lead or GRR service line as soon as possible and investigate when it was installed and who installed it. You should consider whether or not the discovery was an isolated event or a potential indicator of additional lead or GRR service lines in your system. If the latter, EPA recommends that you work with your state or privacy agency to determine which service lines should be reclassified as unknown and develop a plan for field investigations.



## ADDITIONAL RESOURCES

For a copy of the full guidance, spreadsheet template, other fact sheets, and a link to EPA's inventory webinar, visit <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>

Looking for ways to fund the development of your inventory? See EPA's LSLR funding page at <https://www.epa.gov/ground-water-and-drinking-water/funding-lead-service-line-replacement>

