



Quick Reference Guide for Lead Service Line Inventories

IDEM Drinking Water Branch

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The Lead and Copper Rule Revisions (LCRR) require water systems to complete an inventory of the service lines in their system and report that information. This document is intended to be used by water systems as a simple reference guide to satisfy the MINIMUM requirements of the LCRR lead service line inventory. A good inventory will include additional information and be very useful for the water system.

Who is required to complete an inventory?

All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs) must prepare an inventory of ALL service lines (including those not in use) connected to the distribution system.

When is the inventory required?

All inventories must be submitted to IDEM by October 16, 2024.

What information do I need to submit as part of my inventory?

The following elements are required for each service line in your inventory: Location identifier (address), Material classification, and Identification process (See Column K of Detailed Inventory sheet on EPA Excel template).

What do I need to submit for the location identifier?

The water system must create and maintain an inventory that includes the exact address associated with each service line connected to the public water system (40 CFR §141.84(a)). It's also recommended to include the GPS coordinates of the curb box.

What do I need to submit for the material classification?

You must select from one of the following options for each service line in the inventory:

1. Lead
2. Galvanized Requiring Replacement (GRR)
3. Non-Lead (strongly recommend including material type like plastic, copper, etc.)
4. Unknown

How are each of those material classifications determined?

<u>Material</u>	<u>Classification</u>
Lead	Any portion of the service line is known to be made of lead EXCEPT if only the gooseneck/pigtail/connector is lead.
Galvanized Requiring Replacement (GRR)	The service line is not made of lead, but a portion is galvanized, and the system is unable to demonstrate that the galvanized line was NEVER downstream of a lead service line.
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.
Unknown	The service line material is not known to be lead or GRR. There is not enough evidence to support material classification.

How do we determine if we have lead, GRR, non-lead, or unknown service lines?

It's recommended that you start by reviewing your existing records like construction records, maps, plans, tap cards, plumbing codes, permits, meter installation records, etc. If the existing records don't provide enough information to make the determinations, you need to pursue other investigation methods like visual inspection, water quality sampling, excavation, etc.

What if the ownership of the service lines is shared in some way between the system and customer (Example: system owns to the curb stop and customer owns to the building)?

You need to submit the material classification for both the system-owned portion and customer-owned portion.

What if my system has only non-lead service lines (No lead service lines, GRR, or unknown)?

Your system still needs to submit your inventory by October 16, 2024. You may provide a written statement that the system has no LSLs or GRRs and include a general description of the methods used to make the determination. CWSs will need to include language in their annual Consumer Confidence Report (CCR) explaining how customers can access the inventory.

What happens if we have LSL, GRR, or unknown in our system?

If you have LSL, GRR, or unknown, you must provide notification to people served by these lines within 30 days after completing the initial inventory. That information must include:

1. Statement that the service line material is lead, GRR, or unknown
2. Info on the health effects of lead
3. Steps to minimize exposure in drinking water

Additional information about replacement, financing, and further identification is also

required depending on the material classification of the service line. Systems with LSL, GRR, or unknown material classification will be required to develop replacement plans. If an exceedance occurs, the system will be required to implement the replacement plan. IDEM recommends all systems explore options to remove lead service lines. The ultimate goal is to get all lead components removed from the distribution systems.

How does my system submit our inventory to IDEM?

IDEM is in the process of creating a user-friendly Excel spreadsheet to allow systems to collect and submit the inventory information to IDEM. EPA has released a template on their Revised Lead and Copper webpage which systems can use until IDEM has a final version.

Who sees the information from the inventory?

The inventories must be made publicly available. Systems serving more than 50,000 people must provide the inventory online. IDEM is working on developing a tool to provide a means of sharing the information online for systems of all sizes.

After I submit our inventory, am I done?

The initial inventory submittal is just the first step in this overall process to remove lead service lines from existing infrastructure. The inventories will become living documents that are routinely updated. Additional information may be received which updates the inventory. Replacements will be noted on future inventories. Public notification efforts will be required.

Who do I contact at IDEM with questions about the inventory process?

If you have any questions, please contact IDEM's Drinking Water Branch at 317-234-7430 or DWBMGR@idem.in.gov.