STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

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Frequently Asked Questions
Lead and Copper Rule Revisions (LCRR)

DISCLAIMER

This document provides guidance to public water systems in the development of their initial service line inventories under the Lead and Copper Rule Revisions, 40 CFR § 141.84(a), 40 CFR § 141.85(e) and 40 CFR § 141.90(e), in effect at the time of publication of this document. The information provided in this document does not and is not intended to constitute legal advice. The legally binding requirements related to the development of initial service line inventories are determined by the statutes and regulations. In the event there is a conflict between the guidance in this document and any statute or regulation, the statutes and regulations are controlling. This document does not constitute a regulation, nor does it change or substitute for applicable statutory or regulatory provision. This document does not impose any legally binding requirements on the Department of Public Health or the Environmental Protection Agency.

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This document is a living document that may be revised periodically to reflect changes in statutory or regulatory requirements. Information in this document may not constitute the most-up-to-date information and it is recommended that the statutes and regulations be reviewed for the most current information.

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LCRR Initial Service Line Material Inventory

1. **Q: When is the LCRR Initial Service Line Material Inventory (Initial Material Inventory) due?**

   A: October 16, 2024. See 40 CFR § 141.84.

2. **Q: Who is required to complete the Initial Service Line Material Inventory?**

   A: All Community Water Systems (CWS) and Non-Transient Non-Community Water Systems (NTNC).

3. **Q: What form should a public water system (water system) use to complete the Initial Service Line Material Inventory?**

   A: A water system may complete the CT DPH LCRR Material Inventory Template (click to open) so that all LCRR initial service line material inventory information required under 40 CFR § 141.84(a) is provided. This template can also be found on the Lead and Copper Page of the CT DPH Drinking Water Section website.

4. **Q: If my water system already has a database with some of this information, do we have to use the CT DPH LCRR Material Inventory Template?**

   A: A water system is not required to use the CT DPH LCRR Material Inventory Template. If a water system uses a form that does not provide all the required information by October 16, 2024, this is a violation under the LCRR and may result in EPA enforcement.

5. **Q: Where do public water systems submit the Initial Service Line Material Inventory?**

   A: Using the email, DPH.LeadandCopper@ct.gov, the Initial Material Inventory must be submitted to the DPH Drinking Water Section by October 16, 2024.

6. **Q: What resources are available to help water systems develop the Initial Service Line Material Inventory?**

   A: The EPA released a detailed document, entitled Guidance for Developing and Maintaining a Service Line Inventory, to assist public water systems with completing the Initial Service Line Material Inventory.

For small community water systems and non-transient non-community water systems, the EPA released Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide to help the water systems complete the Initial Service Line Material Inventory.

In addition to the EPA guidance documents, DPH conducted training on the requirements of the Initial Service Line Material Inventory. **Click here to access the DPH Initial Service Line Material Inventory Requirements training session.**

7. **Q: What happens if a water system does not complete and submit its Initial Material Inventory to DPH by October 16, 2024?**

   A: Failure to complete the Initial Service Line Material Inventory and submit it to DPH by October 16, 2024, is a violation of 40 CFR § 141.80(a)(3) and 40 CFR § 141.84(a). EPA is responsible for enforcement of these violations.

8. **Q: Will Initial Service Line Material Inventories and any future inventories submitted to DPH remain confidential?**

   A: The Initial Service Line Material Inventories as well as all future inventories will not be posted to DPH's website. If DPH receives a Freedom of Information Act request for an Initial Service Line Material Inventory filed by a water company, the Initial Service Line Material Inventory may be redacted in accordance with the Freedom of Information Act and applicable state statutes.

9. **Q: What service lines need to be included in the Initial Service Line Material Inventory?**

   A: The final LCRR requires community public water systems (CWS) and non-transient non-community (NTNC) public water systems to identify the service line material composition of the following:
   - All service lines within the water system regardless of ownership, including service lines:
     - Owned entirely by the customer;
     - Owned entirely by the water system; and
     - Owned in part by the water system and in part by the customer (split ownership).
   - All service lines within the water system regardless of actual or intended use, including:

- Service lines with non-potable applications, such as fire suppression or emergency use; and
- Service lines to vacant/abandoned buildings, even if the water is turned off.

- Service lines connecting multiple units/buildings on a property; and
- Service lines connecting a well to a single building where the water system meets the definition of a CWS or NTNC.

10. Q: Are water systems required to include internal plumbing materials in the Initial Service Line Material Inventory?

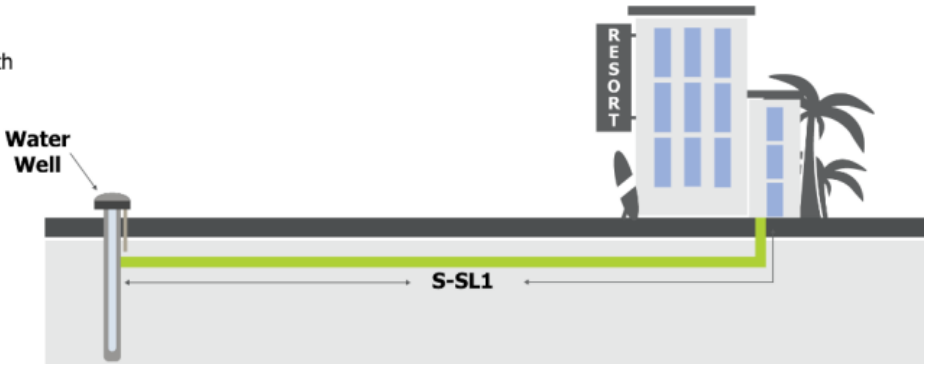
A: No, the LCRR does not require identification of internal plumbing material in the Initial Material Inventory.

Service Line Identification and Configurations

11. Q: For small community and non-transient non-community (NTNC) water systems f with a well feeding the building, what is considered the service line?

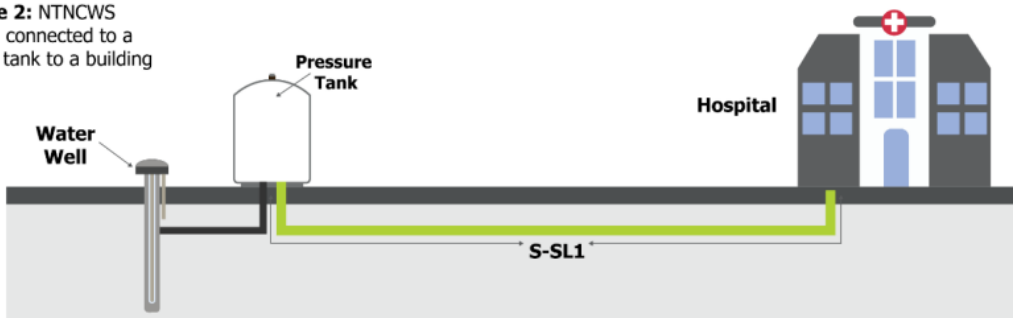
A1: As indicated below in Example 1, the service line would be the line from the well to the building.

Example 1: NTNCWS with well pumped directly to a building



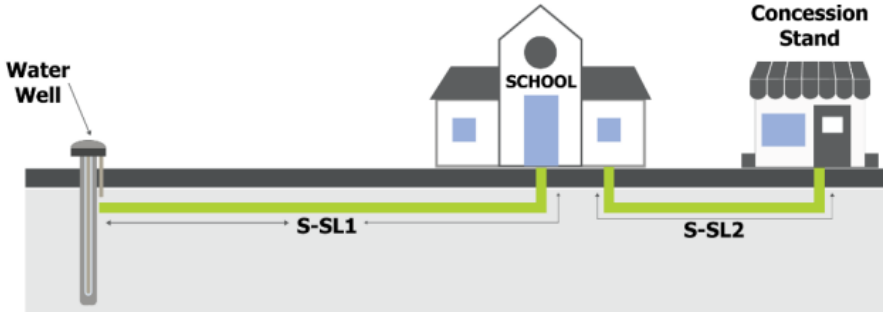
A2. As indicated below in example 2, if the water flows from the well to a pressure storage tank or a pump house located outside the building and then to the building, the service line would be the line from the storage tank or pump house to the building.

Example 2: NTNCWS with well connected to a pressure tank to a building



A3. As indicated below in Example 3, if there are multiple buildings, there will be multiple service lines, with each service line extending to a building. In this case, service line 1 (S-Sl1) and service line 2 (S-SL2) must be inventoried as two separate service lines.

Example 3: NTNCWS with well connected to a building connected to another building

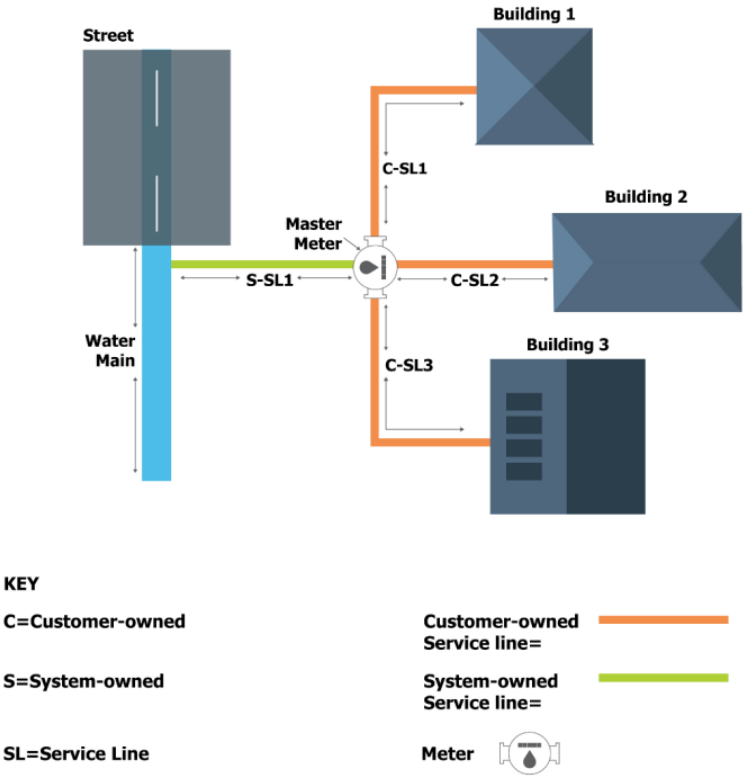


These images can be found in the following EPA document, Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide. Refer to the document for additional information.

12. Q: Where does the service line end in cases where the meter is not inside the home (e.g., the meter is in a meter pit in the yard)?

A: Regardless of the location of the meter, the service line extends from the water main and ends at the building's interior plumbing.

13. Q: How should the following situation be reflected in the Initial Service Line Material Inventory: One service line is tapped into the water main and then branches to several customers?



A: The above example has 3 service lines. Each consists of the portion from the water main to the curb stop (main side of curb stop) (S-SL1), plus the individual branch to each building (building side) (C-SL1, C-SL2, or C-SL3). In this case, the main side of curb stop service line is owned by the water system, and the building side service lines are owned by the customers. The three service lines that must be inventoried and classified in this example would be: 1) S-SL1 - C–SL1; 2) S-SL1 - C–SL2; and 3) S-SL1 - C–SL3. Each branch should be identified with a unique site ID. For each branch, the main side of curb stop service line material will remain the same, while the building side material may vary. If the street address is the same, you can list the individual house numbers with the street address in the inventory street address column.

This image can be found in the following EPA document, Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide. Refer to the document for additional information.

14. **Q: How is the Initial Service Line Material Inventory completed for a multi-unit residential community served by a public water system through a master meter, such as a 50-home mobile home park?**

A: If the mobile home park is **NOT** a separate water system with its own public water system ID (PWS ID), regardless of ownership, the water system serving the mobile

home park must include all service lines within the mobile home park in the Initial Service Line Material Inventory. See 40 CFR § 141.84(a)(2).

The water system will have to work with the owner of the mobile home park community to obtain records/information on the material composition of the service lines to each mobile home. If no information is available, the service lines may be categorized in the inventory as "lead status unknown."

15. Q: Who is responsible for determining service line material for a hospital that is a consecutive public water system with its own PWS ID?

A: Since EPA requires all CWSs and NTNCs to complete an initial service line inventory, both the wholesale water system and the consecutive public water system must include the service line and service line material in their inventories. Where there is just one service line from the wholesale water system to a hospital that is a consecutive public water system with its own PWS ID, the single service connection will be inventoried twice, once by the wholesale water system and once by the consecutive public water system. If the consecutive public water system with its own PWS ID consists of more than one building, such water system must inventory each service line that serves each building.

16. Q: If a water system finds a service line from the water main to the curb stop and no service line from the curb stop to a building side, should the water system enter the main side of curb stop service line into the inventory and leave the building side service line material questions blank?

A: The water system does not need to enter the main side of curb stop service line into the Initial Service Line Material Inventory. When there is no building side service line, the water company may keep the main side of curb stop service line on a separate list. If the customer connects before October 16, 2024, the main side of curb stop service line and the building side service line should be included to the Initial Service Line Material Inventory.

Service Line Material Identification Methods

17. Q: What do water systems have to do to identify service line material?

A: The LCRR requires water systems to use any information on lead and galvanized iron or steel that has been identified pursuant to 40 CFR § 141.42(d) when conducting the inventory of service lines in its distribution system for the Initial Service Line Material

Inventory. Water systems must identify and track service line materials in the inventory as they are encountered in the course of its normal operations (e.g., checking service line materials when reading water meters or performing maintenance activities) pursuant to 40 CFR § 141.84(a)(5).

In addition to the above, the LCRR requires water systems **to review records** to identify service line material composition for the Initial Service Line Material Inventory. The following records must be reviewed to identify service line material as required in 40 CFR § 141.84(a)(3):

- Construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system;
- 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.

If the service line material remains unknown after completing the records review, the service line may be listed as "lead status unknown" in the Initial Material Inventory.

18. Q: What if there are no records of the service line to review?

A: If a water company completes the required records review and no information has been found on the service lines, the service line may be listed as "lead status unknown" in the Initial Material Inventory. See 40 CFR § 141.84(a)(4).

19. Q: Can the construction date of a building be used to classify a service line as non-lead?

A: The EPA's Guidance for Developing and Maintaining a Service Line Inventory provides detailed information on how a water system should review construction and plumbing codes and records.

20. Q: If a community of 50 homes was built on or after December 31, 1989, can a water system assume the contractor used the same non-lead material for all service lines?

A: The EPA's Guidance for Developing and Maintaining a Service Line Inventory provides detailed information on how a water system should review construction and plumbing codes and records.

22. Q: Can the pipe diameter be used to classify a service line as non-lead?

A: EPA's Guidance for Developing and Maintaining a Service Line Inventory states that service lines that are confirmed via records or inspection to be greater than two inches and installed following the federal ban on lead in 1986 are unlikely to be lead service lines. EPA recommends that the diameter be included in the Initial Service Line Material Inventory.

23. Q: Are water systems required to break ground/excavate to determine service line material?

A: The LCRR does not require water systems to break ground or excavate to identify service line material for the Initial Service Line Material Inventory. Please refer to the answer for question 17 above for the LCRR requirements to identify the service line material.

24. Q: What service line identification methods can be used other than a records review?

A: The LCRR requires water systems to review records to develop the Initial Service Line Material Inventory. Water systems may conduct inspections of the service line to identify the material composition and may use the following methods, set forth in EPA's Guidance for Developing and Maintaining a Service Line Inventory, to identify service line material composition:

- **Magnet, and/or Scratch Test**
    - A combination of the magnet and/or scratch test methods may be used to identify lead service lines.
    - If a strong magnet sticks to the service line (Magnet Test), it may be listed as "non-lead."
    - When the service line is carefully scratched (Scratch Test) with a key or a coin (not a sharp object that could puncture the pipe), if the material is soft, easily scratched, and the scratch is silver in color, the service line can be listed as lead.

- The EPA provides Protect Your Tap: A Quick Check for Lead for a step-by-step guide to using these two methods to identify lead service lines.

- **Potholing Validation**
  - Potholing consists of excavating to expose the service line to allow for the visual inspection or another type of inspection, such as magnet or scratch tests to be conducted.

25. Q: The LCRR requires water systems to identify the material composition of the portion of the service line entering customer buildings. Can this be done through a survey sent to the customer and/or building occupant?

A: Yes, if the material composition of the service line entering the building cannot be determined from a records review, has not been observed during normal system operations, and has not been visually inspected by water system personnel, a survey can be sent to the customer and/or building occupant. The survey should include instructions on which information the customer and/or building occupant can provide to assist in determining the service line material and a step-by-step guide on how to verify the service line material entering the building.

The EPA has developed a step-by-step guide that water systems can share with customers to assist them in identifying service line material.

26. Q: What if the property owner denies the water system access to investigate the building side service line?

A: The service line must be classified as "lead status unknown" until the material is determined.

Service Line Material Classification

27. Q: What is a lead service line?

A: A service line is a lead service line when any portion of pipe is made of lead, which connects the water main to the building inlet. See 40 CFR § 141.2 for complete definition. EPA's Guidance for Developing and Maintaining a Service Line Inventory states that a lead-lined galvanized service line is consistent with the definition of a lead service line.

28. Q: When is a galvanized service line classified as "galvanized requiring replacement" (GRR)?

A: A galvanized service line must be classified as GRR if the line is or was at any time downstream of a lead service line, or if it is currently downstream of a lead status unknown service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line, and the line must be classified as GRR. Under the LCRR, if the only source of lead material upstream of a galvanized service line is a lead gooseneck, pigtail or connector and is not a galvanized service line that is considered a lead service line then the service line is **NOT** GRR. See 40 CFR § 141.84(a)(4)(ii).

29. Q: How are brass and wrought iron service lines classified?

A: Brass and wrought iron service lines are not defined in the LCRR as either lead or GRR service lines. The EPA recommends tracking this information. For brass or wrought iron lines, when completing the CT DPH LCRR Material Inventory Template, please select "OT" (Other - non-lead) for the service line material AND put the actual material in the "Comments" column.

30. Q: Is a service line known to contain lead solder classified as a lead service line?

A: The EPA's Guidance of Developing and Maintaining a Service Line Inventory does not consider a pipe that contains lead solder to be a lead service line.

Please note, however, that there is a column within the CT DPH LCRR Material Inventory Template where water systems may document any lead solder in the service line for future reference, or to meet potential future compliance requirements.

31. Q: Are lead connectors (also referred to as goosenecks or pigtails) considered lead service lines (LSLs)?

A: A connector, as defined 40 CFR § 141.2, is as a short section of piping, typically not exceeding two feet, which can be bent and used for connection between rigid service piping. Non-lead service lines with a lead connector is not considered a lead service line, see Guidance of Developing and Maintaining a Service Line Inventory.

32. Q: A few years ago, our water system completed partial service line replacements, replacing main side of curb stop service lines with copper pipe. Once the lines were replaced, we disposed of (or overwrote) the old records regarding the previous lines. Without knowing if the main side of curb stop service line was ever lead, if the

building side is galvanized, does the water system have to classify the entire service line as "Galvanized Requiring Replacement"?

A: Yes.

33. **Q: If there is a lead gooseneck upstream of a galvanized service line, is the galvanized service line classified as "Galvanized Requiring Replacement" (GRR)?**

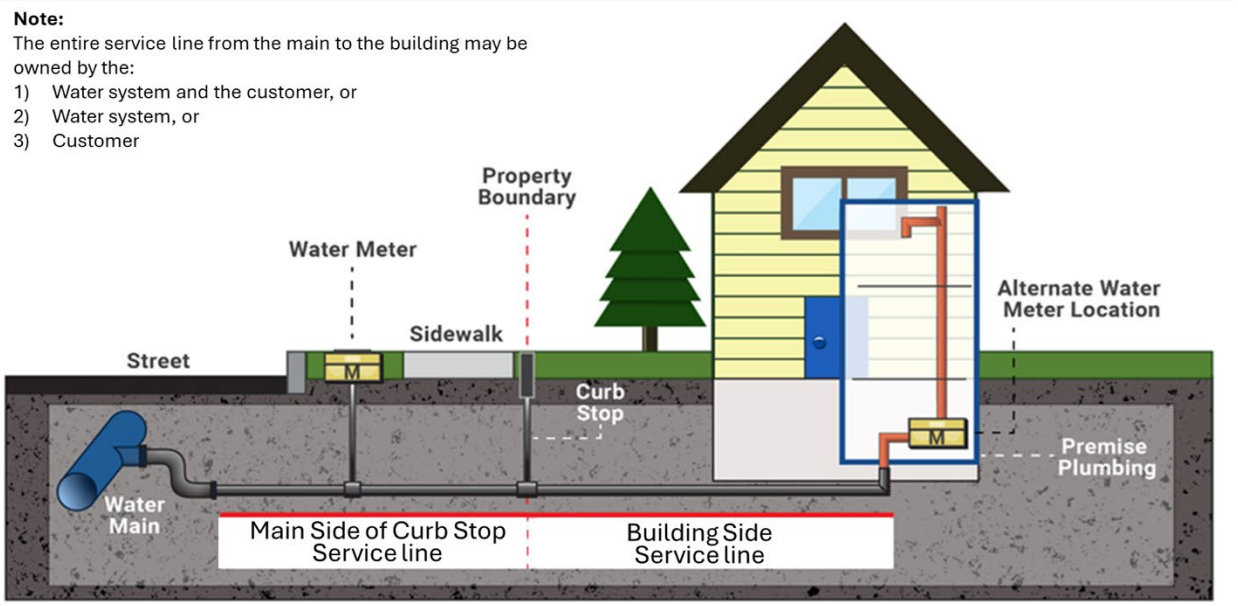
A: Under the LCRR, if the only source of lead material upstream of a galvanized service line is a lead gooseneck, the service line is **NOT** GRR.

34. **Q: Is it possible for a galvanized service line to be classified as non-lead instead of galvanized requiring replacement?**

A: Yes. If the galvanized service line is not lined with lead and is not currently downstream of a lead service line or a lead status unknown service line AND the galvanized line was never downstream of a lead service line, then the galvanized line can be classified as non-lead, and specifically listed as galvanized pipe in the Initial Material Inventory.

35. **Q: If a water system with galvanized service lines to a building purchases water from a city that still has some lead service lines, would the purchasing water system's service lines be classified as "galvanized requiring replacement" because of the selling water system's lead service lines?**

A. No, the classification of the purchasing water system's service lines to its buildings is not affected by the selling water system's lead service lines if the selling water system's service lines are not connected directly to the purchasing water system's service lines to the buildings. For purposes of this example, the galvanized service line to a building without any upstream portion of lead service line from the main to the building (see the red line in the graphic below) is not a galvanized requiring replacement service line.



36. Q: Can a water system submit an Initial Service Line Material Inventory listing all service lines as "lead status unknown"?

A: Yes, if the water system performed the required records review and was unable to identify the material composition of the service lines, they can all be listed in the Initial Service Line Material Inventory as "lead status unknown."

CT DPH LCRR Material Inventory Template

37. Q: I'm having trouble filling in some of the fields in the CT DPH LCRR Material Inventory Template Excel spreadsheet. An error message appears saying it's a protected sheet.

A: Some of the cells in the CT DPH LCRR Material Inventory Template are protected and cannot be edited because they will automatically populate based on information entered other cells. For example, the "ENTIRE SERVICE LINE MATERIAL CLASSIFICATION" column will automatically be filled in based on the information entered in the "MAIN SIDE OF CURB STOP SERVICE LINE MATERIAL" and "BUILDING SIDE SERVICE LINE MATERIAL" columns.

38. Q: How do I complete the CT DPH LCRR Material Inventory Template if it does not have enough rows for the number of service lines in our water system?

A: If there are not enough rows in the CT DPH LCRR Material Inventory Template to list all service lines in your water system, you can add more rows and data calculations using the "INSERT" function. Do not use the "COPY" and "PASTE" functions, as the data calculation in the template will not expand into the copied rows.

The maximum number of rows in the template is 5,000. If more rows are needed, please contact the DPH Drinking Water Section (DPH.LeadandCopper@ct.gov) to request a customized template.

39. Q: In the CT DPH LCRR Material Inventory Template, what is the difference between the "SITE ID" and the "LOCATIONAL IDENTIFIER"?

A: The site ID is a unique system identifier assigned by the water system. The site ID may be used as a sampling point ID, if applicable. A locational identifier is information provided by the water system to identify the location of each service line in the publicly accessible version of the inventory. This may be the street address, GPS coordinates, a recognizable landmark, intersection information, block, or other detail to describe the location.

40. Q: If field verification demonstrates that a portion of the service line (either main side of curb stop or building side) is made of two different non-lead materials (e.g. copper and PVC), how do I enter that information into the DPH LCRR Material Inventory Template?

A: If either the main side of curb stop service line or the building side service line are made of two different non-lead materials, you may enter "other – non-lead" for the material of the applicable service line, then in the comments section at the end of the row, you may specify which two materials are present.

Public Notification Requirements (For the LCRR Initial Material Inventory)

41. Q: When must water systems provide customers with public notification of the Initial Material Inventory?

A: The LCRR requires water systems to inform all persons served by a lead, galvanized requiring replacement (GRR), or lead status unknown service line of the line material within 30 days following completion of the Initial Service Line Material Inventory per 40 CFR § 141.85(e).

Public notification must also be provided to new customers served by lead, GRR, or lead status unknown service lines at the time-of-service initiation. See 40 CFR § 141.85(e)(2).

Public notification to all customers served by lead, GRR, or lead status unknown service lines must be repeated annually by July 1st. See 40 CFR §§ 141.90(e)(13); 141.90(f)(4).

The public notification content must meet the LCRR requirements. DPH has developed public notifications templates for water systems to use on lead, galvanized requiring replacement, and lead status unknown, available on DPH's website.

42. Q: What delivery methods can water systems use to notify customers served by a lead, galvanized requiring replacement (GRR), or lead status unknown service line?

A: Notification to persons served by service lines classified as lead, GRR, or lead status unknown must be by mail.

Public Accessibility of the Initial Material Inventory

43. Q: Must water systems use the CT DPH Initial Service Line Material Inventory Template for the publicly accessible version of the Initial Service Line Material Inventory?

A: No, water systems may use a different format to make the Initial Service Line Material Inventory available to the public, it must include all information required for the publicly accessible Initial Service Line Material Inventory. See 40 CFR §§ 141.84(a)(8); 141.84(a)(9).

44. Q: What information must be included in the publicly accessible version of the Initial Material Inventory?

A: The publicly accessible version must include a location identifier associated with each lead service line and galvanized requiring replacement service line. The location identifier may be a street address, block, intersection, or landmark. Water systems may, but are not required to, include a locational identifier for lead status unknown service lines or list the exact address of each service line. See 40 CFR § 141.84(a)(8)(i).

Water systems serving greater than 50,000 people must make the publicly accessible inventory available on-line. See 40 CFR § 141.84(a)(8)(ii).

Water systems that have demonstrated they have no lead, galvanized requiring replacement (GRR), or lead status unknown service lines (regardless of ownership) in its inventory, may, in lieu of publishing their inventory, provide a written statement that there is no lead service lines or GRR service lines in the distribution system, along with a general description of the sources specified in the LCRR used to make that determination. See 40 CFR § 141.84(a)(9).

Service Line Replacement

45. Q: When must water systems begin replacing lead and galvanized requiring replacement (GRR) service lines?

A: This requirement is not addressed in the final LCRR.

46. Q: Must water systems cover the cost of lead and GRR service line replacement for customer-owned lines?

A: The final LCRR does not address whether water systems must cover the cost of replacing the customer-owned portion of lead or GRR service lines.

47. Q: What funding is available to water systems to help with the cost-of-service line replacement?

A: The Drinking Water State Revolving Fund (DWSRF) program and the Bipartisan Infrastructure Law (BIL) lead service line funding program are available to help water systems develop the Initial Material Inventory and conduct lead service line replacement. For DWSRF and BIL funding information, please contact the CT DPH Drinking Water Section DWSRF Program at DPH.DWSRF@ct.gov.

Additional funding information is available at the following EPA websites:

- Lead Service Lines | US EPA
- Water Technical Assistance (WaterTA) | US EPA
- Identifying Funding Sources for Lead Service Line Replacement | US EPA

48. Q: Is the BIL funding that is available for Initial Material Inventory development and lead service line removals in the form of grants or loans?

A: BIL funding may be available to water systems for Initial Service Line Material Inventory development and lead service line replacement in the form of grants and low interest loans, through DPH's Drinking Water Section DWSRF Unit. For more information, please contact the DWSRF Program at (DPH.DWSRF@ct.gov).

Lead and Copper Compliance Sampling

49. Q: When must water systems begin lead and copper sampling with the new tier levels and the new sampling protocol?

A: Lead and copper sampling using the new tier levels and new sampling protocol is not addressed in the final LCRR.

Lead Testing in Schools and Child Care Facilities

50. Q: What lead testing requirements must water systems meet for customers that are schools and child care facilities?

A: The lead testing requirements for schools and child care facilities that are customers of a water system is not addressed in the final LCRR. Schools and childcare facilities, which are public water systems with their own PWS IDs, must comply with section 19-13-B102(e) of Regulations of Connecticut State Agencies.