



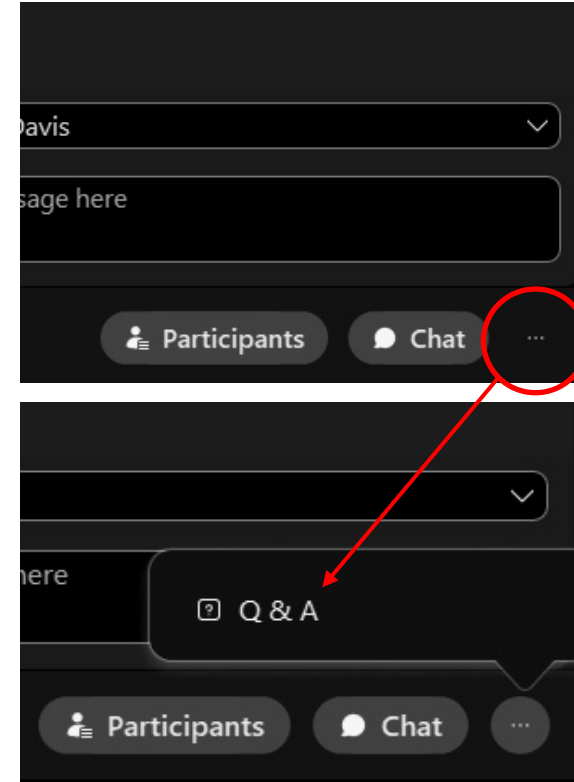
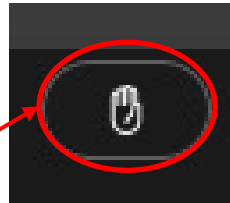
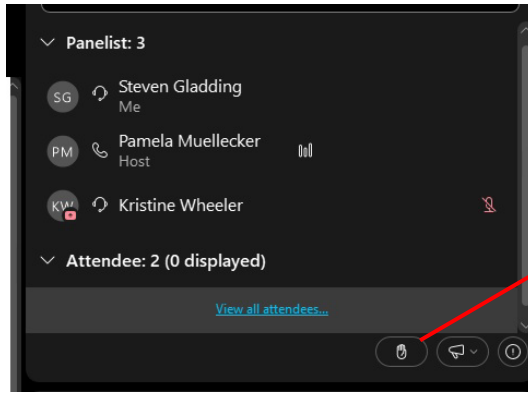
**Department
of Health**

Service Line Material Inventory Questions & Answers

New York State Department of Health
Bureau of Water Supply Protection

To ask a question

- Enter your question into the Q&A during the presentation
- or
- Raise Hand to ask a question at the end



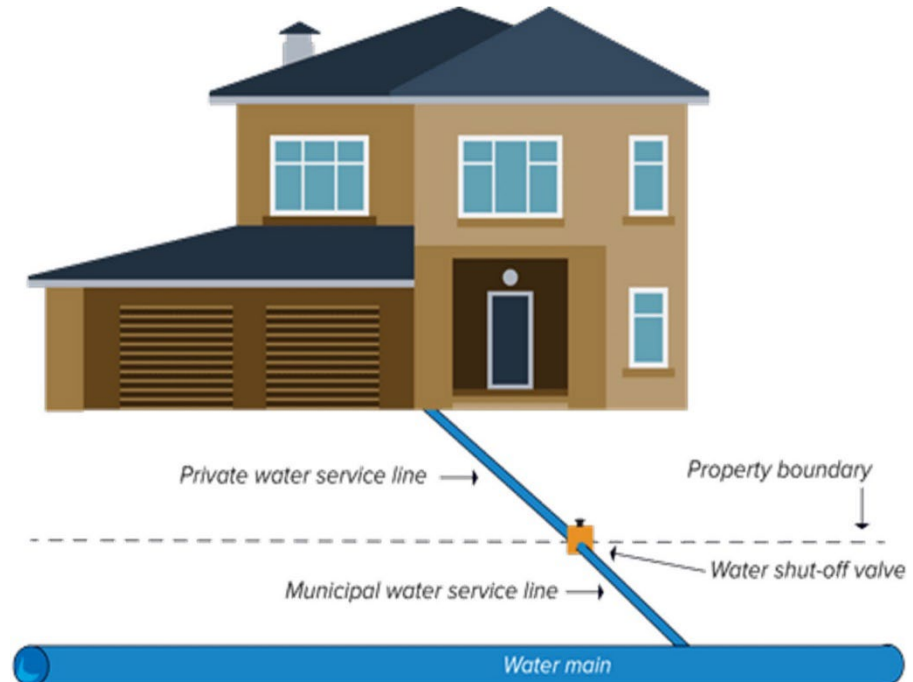
Definitions

What is a lead service line (LSL)?

Any portion of pipe that is made of lead, which connects the water main to the building inlet that may be owned by the water system, the property owner, or both.

If any portion of an SL is made of lead, the SL is the LSL

Very Important



Source: <https://www.health.ny.gov/environmental/water/drinking/slslrp/>



Department of Health

What is a galvanized service line requiring replacement (GSLRR)?

- A galvanized service line that was or currently is downstream of an LSL, or an SL of unknown material.
- If a water system can't demonstrate that the galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL.

What is a non-lead service line (non-LSL)?

An SL determined not to be lead or not to be GSLRR through an evidence-based record, method, or technique.

What is a lead status unknown service line (unknown SL)?

An SL where its material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification.

What is the so-called Lead Ban?

For this presentation, “Lead Ban” means June 1986, when EPA banned using lead pipes delivering drinking water, or a date when a municipality banned using lead pipes, if earlier.



What is a gooseneck, pigtail, or connector?

- A short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping.



frequently
asked
questions

- Lead goosenecks, pigtails, or connectors (collectively called “goosenecks” for this presentation) are not part of the LSL.
- If the only lead piping serving the home is a gooseneck and it is not a GSLRR, the service line is not an LSL.

LCRR & LCRI

(in a Nutshell)

Lead and Copper Rule Revisions (LCRR)

- **LSL Inventory**

- LSL Replacement
- Monitoring
- Public Education and Notification
- Reporting
- Corrosion Control Study and Treatment
- Small System Flexibility
- “Find-and-Fix”

**Will be replaced with
the Lead and Copper
Rule Improvements
(LCRI)**

LCRI in a Nutshell

Lead Service Line Replacement Plan

- Requirements for replacing all lead service lines?

Prioritizing Historically Underserved Communities

- Replace all lead service lines with prioritizing underserved communities.

Compliance Tap Sampling

- Reviewing available data to strengthen compliance with tap sampling requirements.

Trigger Level (TL) and Action Level (AL)

- Reviewing the need for the TL.
- Lowering the AL?

Service Line Inventory Q & A

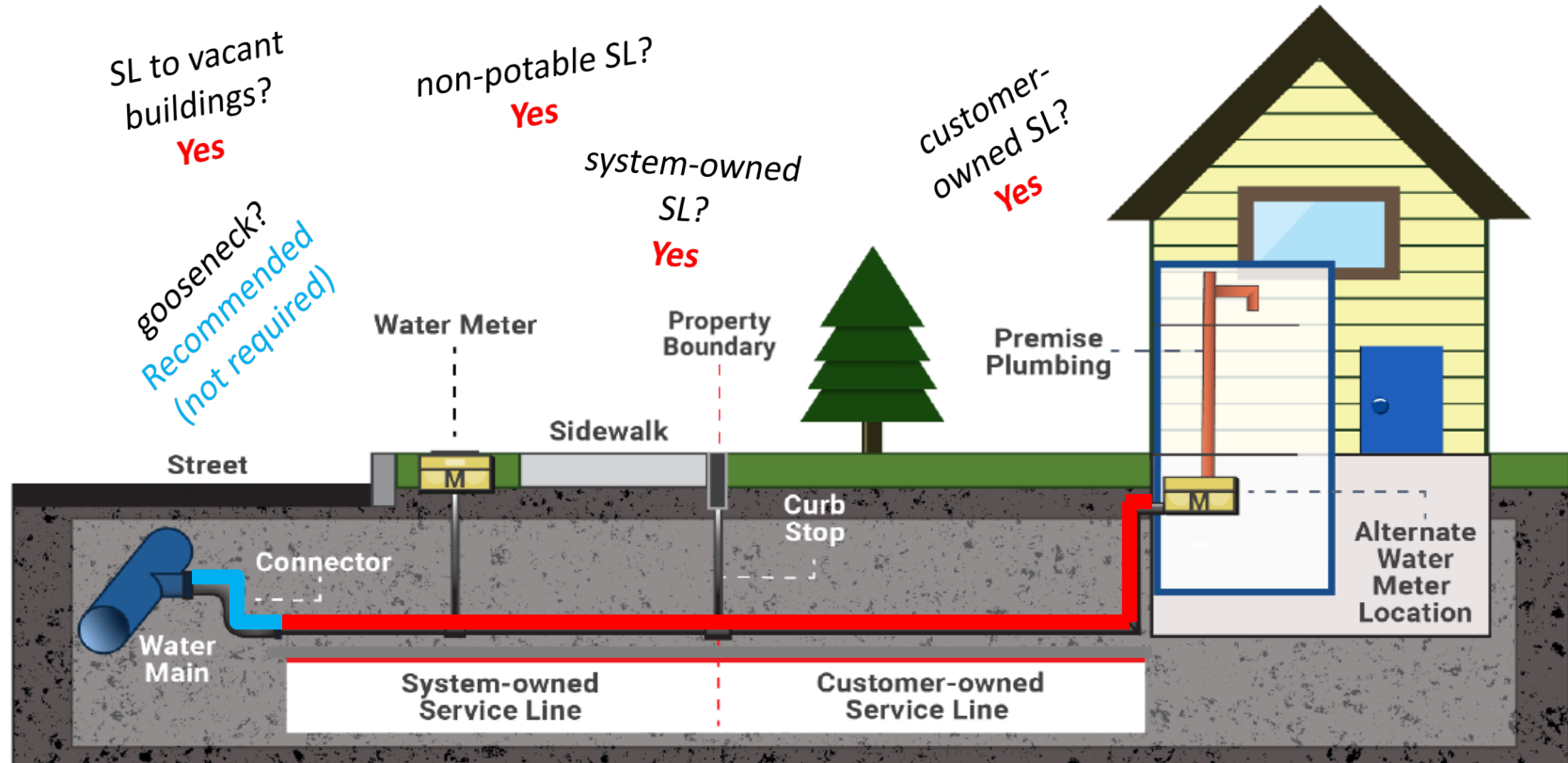


What system needs to prepare an SLI?

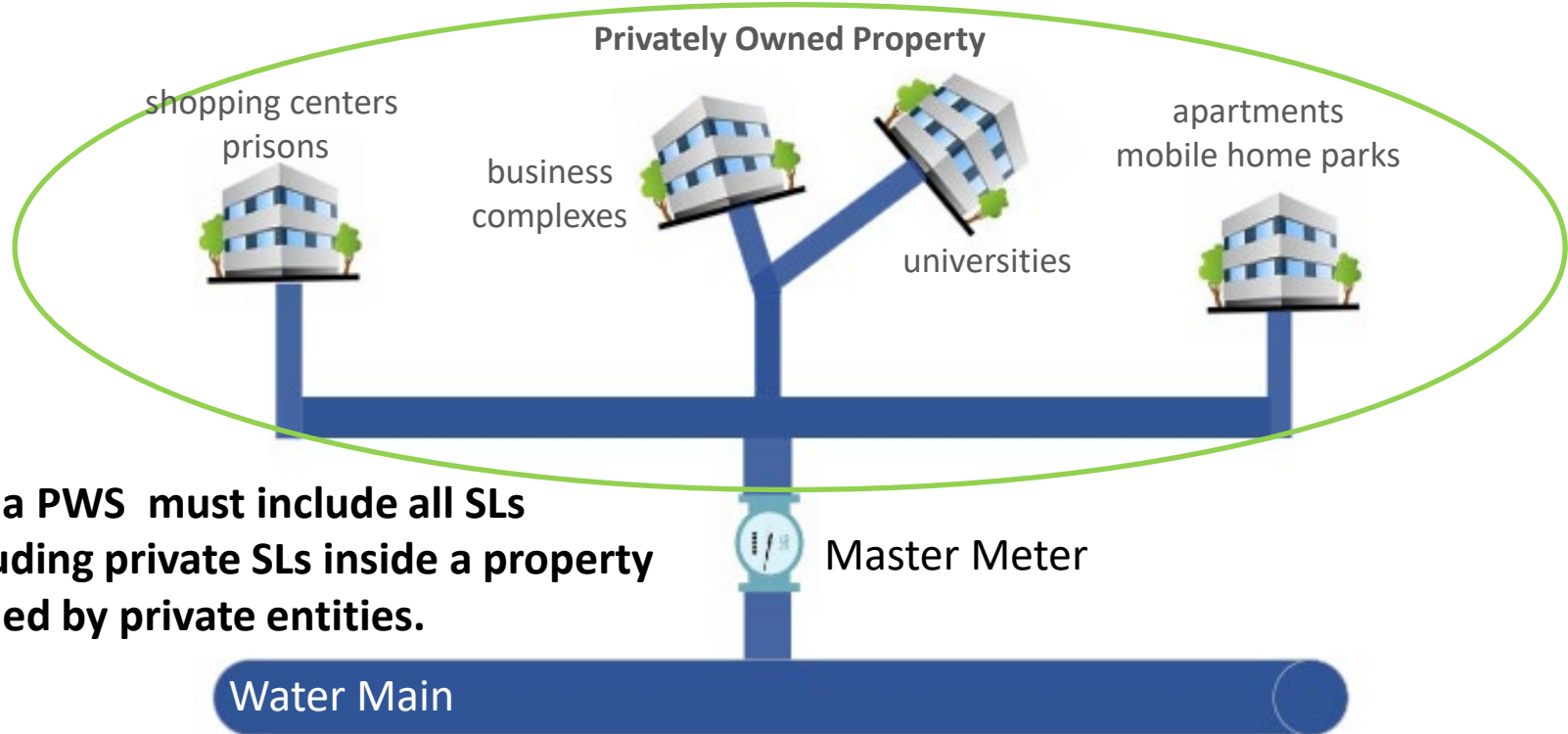
Every NTNC and federally defined CWS

- Systems with no LSL, GSLRR, or unknown SL? **Yes**
- Systems eligible for the 9-year monitoring cycle under the LCR? **Yes**
- Mobile Home Parks? **Yes**
- NTNC Businesses? **Yes**

What needs to be included in the inventory?



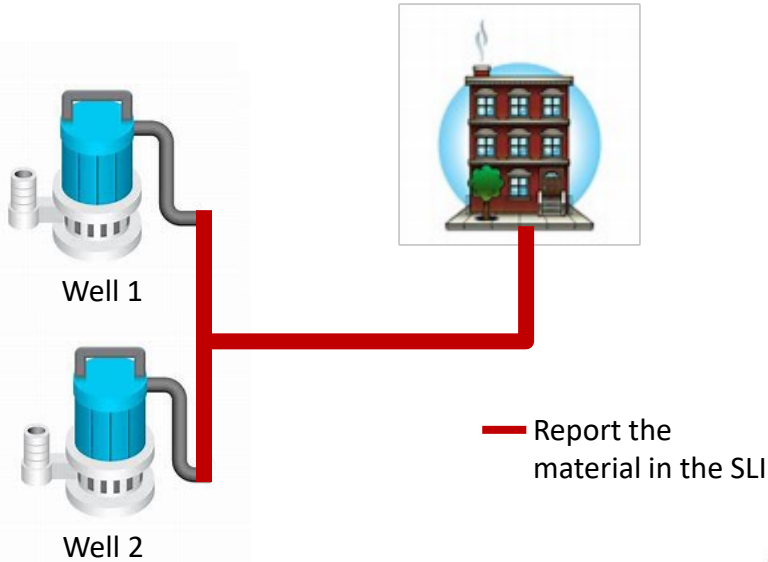
Should I include these SLs?



Yes, a PWS must include all SLs including private SLs inside a property owned by private entities.

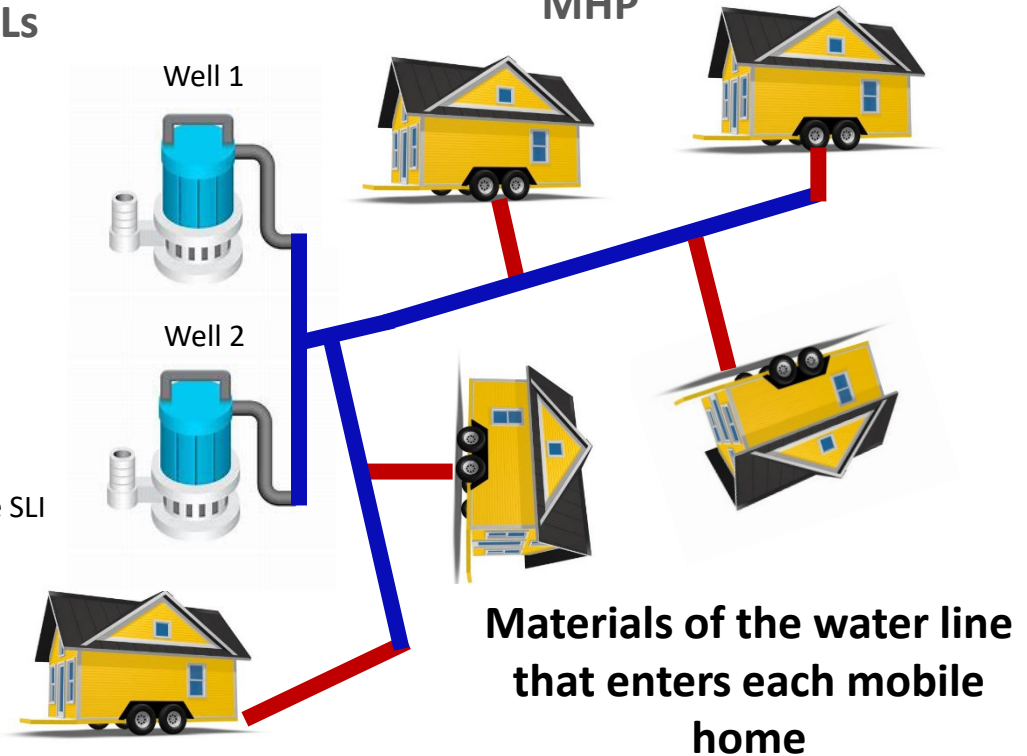
What water line should I report?

NTNC & Small CWS without Clear SLs

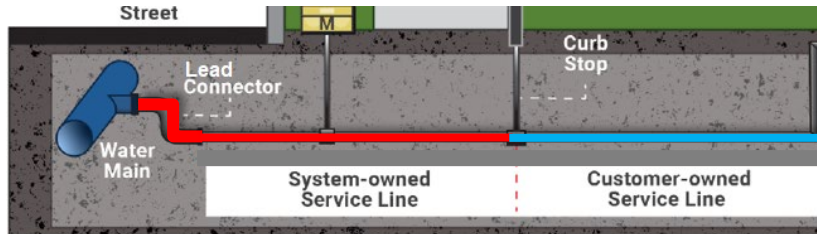


Materials of water line from the well(s) to the building inlet

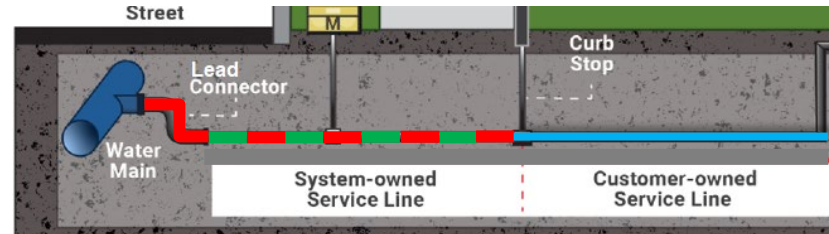
MHP



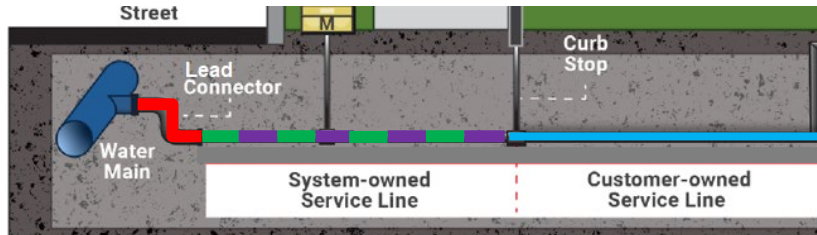
Lead Gooseneck & GSLRR, it's complicated



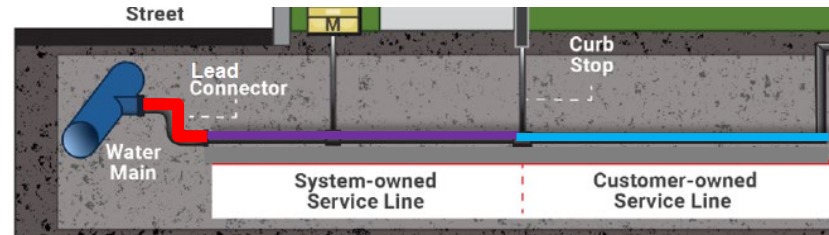
GSLRR



GSLRR








GSLRR



GSLRR

A gooseneck material doesn't affect the determination of galvanized SL between the GSLRR and non-lead SL!

- | | | | |
|---|--|---|-------------------|
|  | currently lead |  | currently unknown |
|  | currently non-lead but previously lead |  | galvanized steel |
|  | currently non-lead including galvanized but previously unknown | | |

What do I need to include in the inventory?

Current Public Side SL Material ⓘ	Was Public SL Material Ever Previously Lead?	Public SL Material Verification Method ⓘ	Public SL Installation or Replacement Date	Public SL Size	Customer SL Material ⓘ	Customer SL Material Verification
Galvanized	No	Records	1965	1" < SL ≤ 1.5"	Galvanized	Records
Plastic	No	Field Inspection	1990	Upto 1"	Plastic	Field Inspection
Copper	Unknown	Records	1985	1" < SL ≤ 1.5"	Copper	Records

All columns with headings in blue are required entries.

Columns with headings in grey are recommended but not required.

Customer SL Size	SL Category ⓘ	Note
	GSLRR	
	Non-Lead	

Do not type or paste in column Q, "SL Category." The template will **automatically determine SL types** based on the information entered.

What do I need to include in the inventory? (continued)

Required Fields	Recommended Fields
<ul style="list-style-type: none">• Address.• Current public side SL material.• Was public side SL ever lead?• Public SL material verification method.• Customer SL material.• Customer SL material verification method.	<ul style="list-style-type: none">• Lead goose neck present?• Public/customer SL installation or replacement date.• Public/customer SL size.• Lead solder present?• Building type.• POU/POE treatment present?

What do I need to include in the inventory? (continued)

Summary of Lead Service Line Inventory

I. System Information

Water System Name	
PWS ID Number	

II. Contact Information for Owner / Licensed Operator of Record Completing the Form

Contact Name	
Contact Phone Number	
Contact Email Address	

III. Summary of Inventory

Total Number of Service Lines in the Distribution System	2
Total Number of Identified Service Lines	2
Total Number of Lead Service Lines	0
Total Number of GSLRR	1
Total Number of Non-LSL	1
Total Number of Unknown Service Lines	0

Service Lines	Lead	GSL or GSLRR	Non-Lead	Unknown
PWS - Side Service Lines	0	0 GSL	2	0
Customer - Side Service Lines	0	2 GSL	0	0
Total Number of Service Lines in the Distribution System	0	1 GSLRR	1	0

Service Line Identification Methods

Identification Methods	PWS- Side SLs	Customer-Side SLs
Historical Records	0	0
Field Inspection	1	1
Customer Identification with Photo or other Verification	NA	0
Excavation	1	1
Sequential Sampling	0	0
Statistical Analysis/Predictive Model	0	0

IV. Inventory Availability - The inventory must be available to public

If 50,000 customers or greater: Posting the inventory online water system's website.	Address:
If under 50,000 customers: Explain how to access the inventory	

V. Certifications

By submitting this form, I have verified and certify the information listed in this form is true and accurate to the best of my knowledge and belief.

Name Title Date

Fill out sections boxed in red, I, II, IV & V.

Do not fill out Section III. It'll be automatically filled based on information provided in the LSL template workbook.

Important
Name your inventory as
LSLI_NYPWSID#

For example:
LSLI_NY1234567



Type the name and title of the person submitting the inventory and the date.

What if customers own the entire SL?

Treat SLs as if ownership splits. Enter information about the SL section from the main to the curb stop in the “Public Side SL” information columns (from D to I); and about the SL section from the curb stop to the building inlet in the “Customer SL” columns (from J to P).

- SL from the main to the curb stop – enter SL information in the “Public Side SL” columns (from columns D to I).
- SL from the curb stop to the building inlet – enter SL information in the “Customer SL” columns (from J to P).
- Leave a note in the “Note” column (column R), e.g., “customers own the entire SL.”

The screenshot shows a software interface with a table. The table has columns labeled 'Category' and 'Note'. The 'Note' column contains the text 'customers own the entire SL'.

Category	Note
	customers own the entire SL

Acceptable Identification Methods

- ☑ Available Record Search.
- ☑ Excavation.
- ☑ Visual Observation (including inspection with a camera)
- Public Outreach.
 - ☑ Scratch/Magnet Test.
 - ☐ Lead Test Kit (for identifying lead solder).

Other Methods for Planning (verification is required)

- ☑ Sequential Tap Sampling.
- ☑ Predictive/Probability Model.

What are acceptable records?

- Construction, service line, and meter installations, permits, maintenance, or any records which indicate the service line material; distribution system maps; local plumbing codes, etc.
- Engineering plans and specifications.
- Any inspection reports and records that indicate the service line composition.

**Not confident in the
accuracy of records?
Perform physical
confirmation**

*Very
Important*

*cross-check records with other records, field
investigations, previous SL investigations, and
customer self-identification of SL materials*



**Department
of Health**

Is sampling acceptable, if so what kind?

Sequential Profile Maximum Concentration (SPMC)

Weighted Average Sequential Lead Concentration (WASLC)

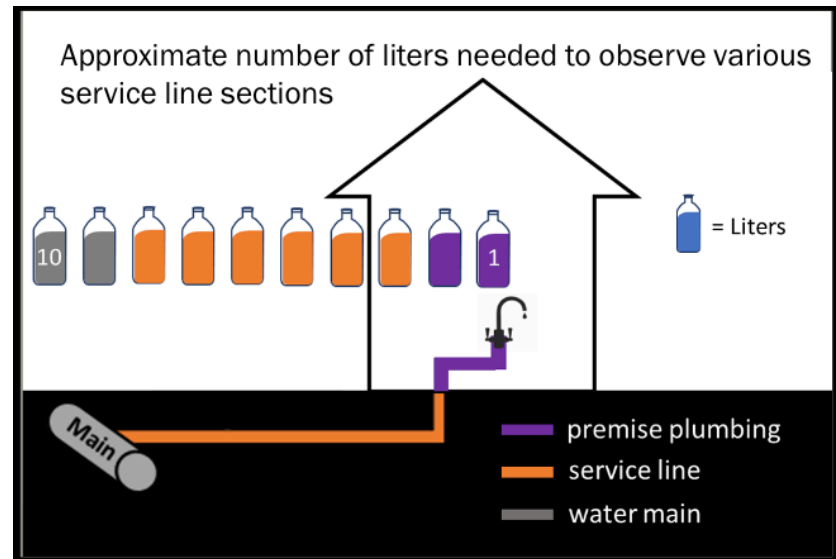
Acceptable with some physical verification for systems not adding a corrosion inhibitor.

Not acceptable
(may change in the future).

First Draw Sample

Fully Flushed Water Sample

Fully Flushed Sample Maximum Flow Concentration



Do all model results need physical verification?

NYS will accept some model results without physical verification on a case-by-case basis.

Provide sufficient information to the State and the LHD to evaluate how much physical verification is adequate. Examples of the information include:

- a number of unknown SLs.
- a number of known SLs.
- completeness of historical SL materials records.
- random physical verification process such as the proposed number of SLs that will be physically verified.
- confidence interval for the model.

Note: A State's initial determination for a required physical verification rate can be revised based on the accuracy of physical confirmation results.

Our PWS was built after June 1986 (or the local “lead ban”).

If you have the following records, choose SL materials in column E and column J from the dropdown menu:

- written records showing the entire distribution system was constructed after June 1986 or a local “lead ban;” and
- the entire length of customer-owned SL was installed after June 1986 or the lead ban.

NYSDOH LSLI Template will automatically determine qualifying SL as “non-Lead” in column Q (“SL Category”). No further verification is required.

If you do not have such records, you need to verify the SL material.

D	E	F	G
Seneca, Pigtail for Currently Present?	Current Public Side SL Material ①	Was Public SL Material Ever Previously Lead?	Public SL Material Vi Method ①
	Copper		Records
	Lead including lead-lined galvanized		Records
	Galvanized		
	Plastic		
	Known Other		
	Unknown but could be lead		
	Unknown but unlikely lead		
	Unknown		

What is a customer's self-identification?

Surveys or interviews followed by verifications by a water system. Must provide sufficient information to assist customers in accurately identifying SL materials.

- Hard copy surveys – Homeowners fill out a simple form indicating their SL material and provide a picture to be verified.
- Online surveys – Homeowners take a survey and upload pictures simultaneously.
- All customer-identified service line materials must be verified by a water system.
- May not receive good public participation without extensive outreach.

The video for “how to identify drinking water SL materials” is available at:

<https://www.health.ny.gov/environmental/water/drinking/lead/>; and at: <https://www.youtube.com/watch?v=PcO5FCE9Vfw>

Can I use customers' identification of their SL materials?



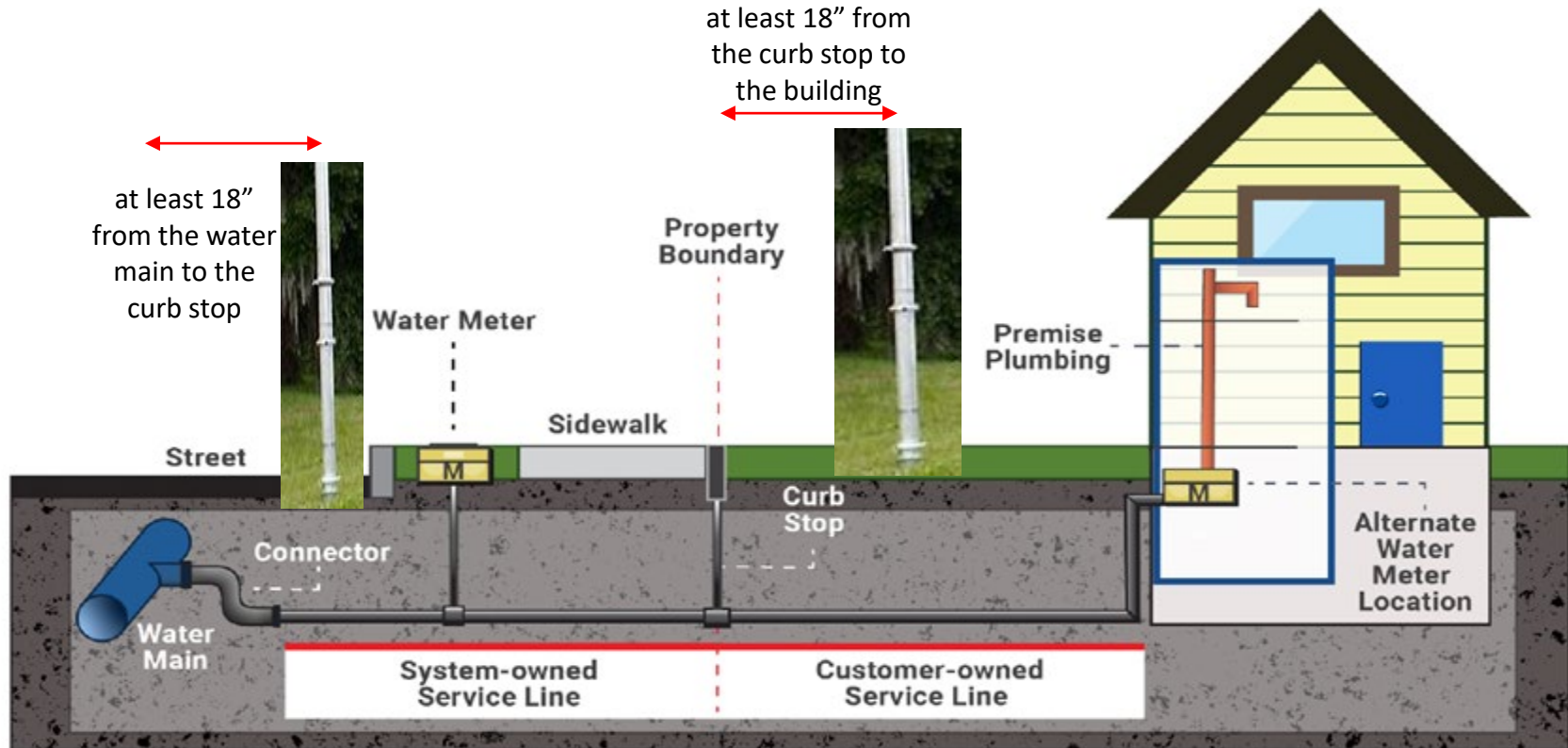
Photos like these and magnet test results provided by a customer don't require further verification by PWS staff.



If a photo looks like one of these, you need further verification, e.g., a site visit by PWS staff or a professional plumber.

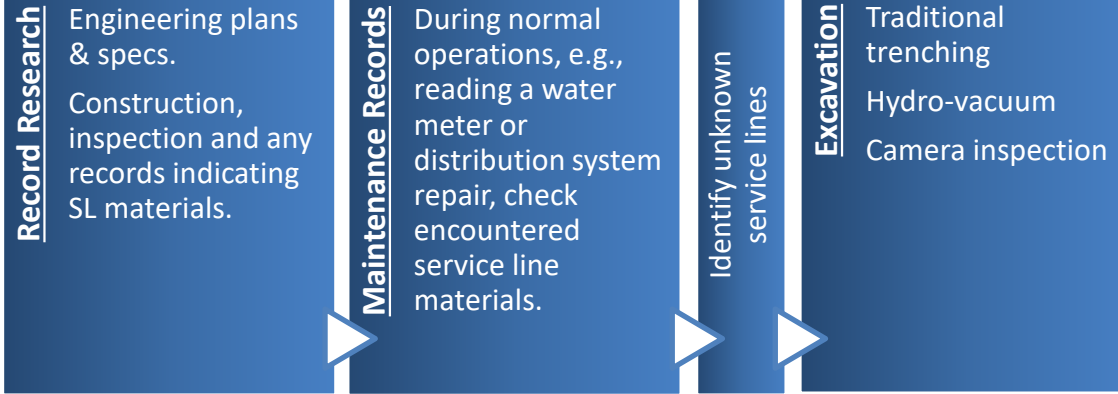
The video for "how to identify drinking water SL materials" is available at: <https://www.health.ny.gov/environmental/water/drinking/lead/>; and at: <https://www.youtube.com/watch?v=PcO5FCE9Vfw>

What is acceptable potholing (a.k.a. hydro-vacuum)?

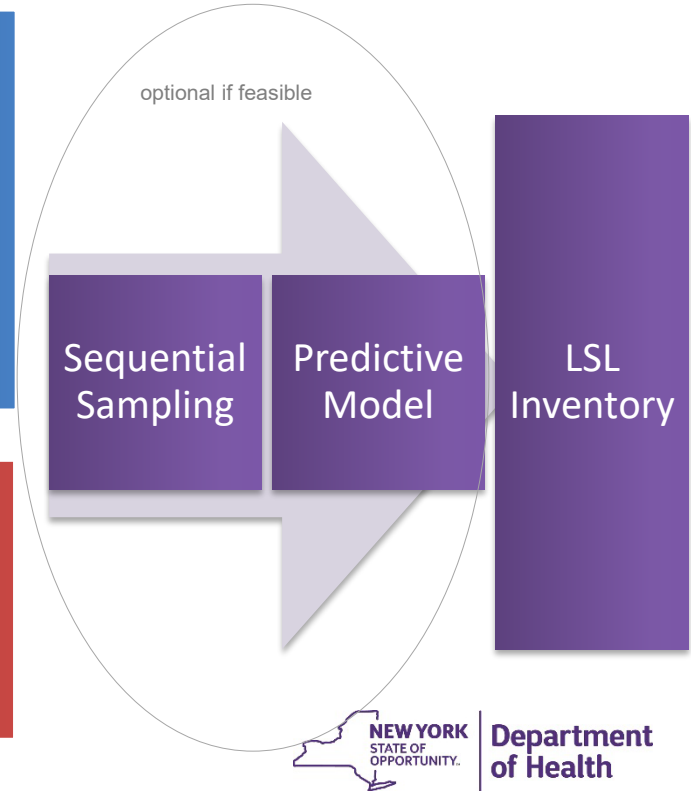


Where should I start?

WTP-Owned SLs



Customer-Owned SLs



Where do I submit the inventory?

PWS

- Submit the initial inventory to the LHD via e-mail or a cloud storage service (e.g., SharePoint or Google Drive).
- Comply with the public notification requirements.

LHD

- Review the inventory for completeness and accuracy.
- May request supporting documents.
- Forward the PWS's inventory to the State.
- Enter the inventory in SDWIS.

NYSDOH

- May require supporting documents and/or ask questions.

Should we have our inventory available to the public?

If your system has any LSL, GSLRR, or unknown SL:

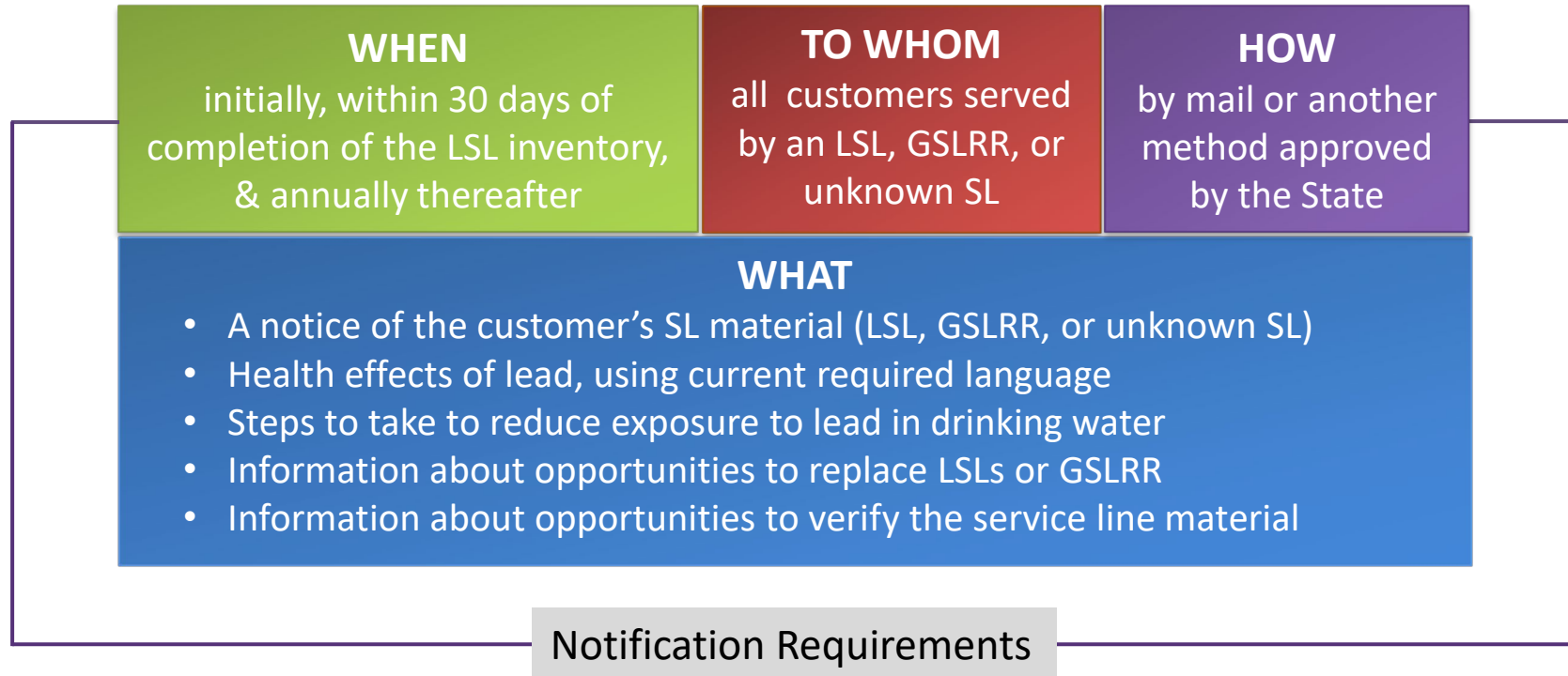
- Have the inventory publicly accessible.

PWSs serving > 50,000 persons – publicly accessible inventory available online.

- Instructions to access the inventory must be included in Annual Water Quality Report.
- Update annually (or triennially if on reduced monitoring) to reflect changes from the previous year.



What do I need to tell our customers who have LSL, GSLRR, or unknown SL?



How do I make our inventory available to the Public?

34

NYS does not have required formats.

- Interactive web-based map which may have a real-time update capability (most powerful tool).
- Static map.
- Searchable online database, e.g., the inventory prepared using the NYS DOH template at the water system's website.
- Printed maps, tables, or spreadsheets (not recommended unless a system has less than a few hundred SLs).



Source: [Guidance for Developing and Maintaining a Service Line Inventory \(epa.gov\)](https://www.epa.gov/guidance-for-developing-and-maintaining-a-service-line-inventory)

I don't have any LSL, GSLRR, or unknown SLs

Issue a written statement declaring that there is no LSL, GSLRR, or unknown SL instead of having a full inventory available.

- include a general description of all sources used for the determination.
- not required to provide inventory updates unless they find any LSLs.
- must prepare an updated inventory on a schedule established by the State if find any LSLs, GSLRR, or unknown SLs in your system in the future.

You must still prepare and submit the initial inventory. The written statement is not a substitute for the initial inventory.

How often do I need to submit updates?

Update the inventory at the following frequencies and submit it to your LHD within 30 days of the end of each monitoring period.

- Annually if your system's monitoring frequency is semi-annual or annual.
- Triennially if your system's monitoring frequency is triennial.
- No update if your system has no LSL, GSLRR, or unknown SL.

EPA may revise the inventory requirements under the future revision (LCRI). Until any change in the LCRR, a PWS must comply with the LCRR inventory requirements, including the update requirement.



Is funding available for preparing the inventory?

The Bipartisan Infrastructure Law, also known as the Infrastructure Investment and Jobs Act or Bipartisan Infrastructure Bill, provides funding for preparing an SL inventory for applicable water systems. Visit the following NYSDOH site for more information:

https://health.ny.gov/environmental/water/drinking/docs/lead_service_line_project_submission_guidance.pdf



Any Questions?



**Department
of Health**

Questions

LSL inventory regulatory guidance:

min-sook.kim@health.ny.gov

LSL replacement funding opportunities:

stephen.marshall@health.ny.gov