

Initial Lead Service Line Inventory Checklist-Certification Form

EPA Region 10 Tribal Drinking Water Program

All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs) must prepare an inventory of all service lines connected to the public water distribution system, regardless of ownership status and use. Thorough explanations and guidance can be found in separate EPA guidance documents.

Definition of a service line: The pipe connecting the water main to the interior plumbing in a building. The service line may be owned wholly by the water system or customer, or in some cases, ownership may be split between the water system and the customer.

EPA Region 10 can help water systems develop inventories. Please contact EPA at R10TribalDW@epa.gov at any time during the process to request assistance.

Instructions:

Please follow the steps below and complete all sections as you build your initial lead service line inventory. ***Submit this completed and signed form along with your completed initial lead service line inventory workbook. Initial lead service line inventories are due by October 16, 2024.***

Part 1: System Information

PWS Name: HOH

PWSID: 105300011

Part 2: Historical Records Review and Information Gathering

Review all historical record sources of information listed below. Check each box when you complete the review of the information source. You may end up gathering multiple pieces of evidence for a service line. For each information source, list all types of records found that help identify service line materials by filling out a line in the "Records Library" sheet of the inventory workbook.

The ideal records provide information to positively identify the material of the entire service line. If you have records that show a service line was installed in 1989 or later (after the federal lead ban), this will also be considered acceptable evidence to identify the service line as "non-lead."

You will be asked to indicate if the service line is owned entirely by the utility or if there is split ownership between the water system and customer. If there is split ownership, you will need evidence to identify both sides of the service line.

Information sources:

☐ Previous EPA required materials evaluation (1980s or 1990s) or other previous materials evaluation.

- **Did you find any records?** ☐ Yes ☒ No
- If yes, for each type of record found that helps identify service line materials, fill out a line in the "Records Library" sheet of the inventory workbook.

☒ All construction and plumbing codes, permits, ordinances, standard specifications, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system.

- **Did you find any records?** ☒ Yes ☐ No

- If yes, for each type of record found that helps identify service line materials, fill out a line in the "Records Library" sheet of the inventory workbook.

☒ 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.

- **Did you find any records?** ☒ Yes ☐ No
- If yes, for each type of record found that helps identify service line materials, fill out a line in the "Records Library" sheet of the inventory workbook.

☐ 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.

- **Did you find any records?** ☐ Yes ☒ No
- If yes, for each type of record found that helps identify service line materials, fill out a line in the "Records Library" sheet of the inventory workbook.

If any other type of historical record that doesn't fit in a category above helps identify service line materials, please discuss with EPA to approve use for identification.

Note: Statement of knowledge is not considered acceptable evidence alone. An evidence-based record is required to identify a service line. You do not have to submit these primary records to EPA, but you must maintain the records as evidence for the inventory and include descriptions in the "Records Library" sheet of the inventory workbook.

Note: Under the new requirements, you must identify and track information on service line materials as they are encountered during the course of normal operations.

Part 3: Development of Initial Inventory

STOP – complete inventory workbook for all service lines in the distribution system using existing information, then continue with this document. When you open the inventory workbook go the User Manual tab first.

Below is the number of service connections on record for your PWS in the EPA database. There may be multiple service connection types. This value is listed for reference to compare with the number of service lines you identify. The definition of a service connection is a connection to a water system that delivers water via pipe or constructed conveyance. The number of service connections will likely be similar or the same as the number of service lines, but there may be specific scenarios that lead to slightly different values. EPA will review the number of service lines in your inventory and compare to the number of service connections on record. Please explain any substantial difference in total service line and service connection values.

Number of service connections in EPA records:

○ _____

Confirmed # of service lines in distribution system based on records review: 45

- If there is a difference between the two values above, please explain:
The above number is 45.

Part 4: Guidance for Information Gaps and Identifying Unknowns

After completing historical records review, are there any service lines with unknown materials in your distribution system? ☐ Yes ☒ No

If no, skip ahead to the next section.

If yes, complete this section below.

EPA recommends you take the time to identify as many service lines as possible and have as few as possible “unknowns” in your inventory. There is no requirement to identify all unknown service lines in your initial inventory. You may submit the inventory with unknown service line materials, but if an inventory contains service lines of unknown material, there will be notification requirements to consumers, possible future requirements to identify these lines and update the inventory, and other possible requirements going forward.

If you investigate unknown service line materials that result in identification, you must document the process and findings and maintain records.

Below are a few methods to identify service line materials. *Contact EPA at R10TribalDW@epa.gov to learn about assistance opportunities to use these methods.*

- Reach out to other organizations you have not yet contacted that may have information.
- Identify and track information on service line material as they are encountered in the course of normal operations.
- Conduct visual inspection of service line using (3-point inspection method).
- Use an excavation method to access buried service lines.
- If you consider an alternate identification approach, contact EPA. Alternate identification methods must be approved by EPA prior to submittal of inventory.

Did you conduct investigations to identify unknown materials? ☐ Yes ☒ No

If yes:

- Describe the methods used in the “Records Library” sheet in the inventory workbook.
- Remember to update the service line entry in the inventory sheet.

If you will be submitting the inventory with “unknown” service line materials, please describe how you plan to identify unknown service line materials in the future:

Proceed when you are finished identifying as many lead service lines as planned and your draft initial inventory is complete.

Part 5: Lead Connectors

Effective October 16, 2024, the LCRR requires that when lead connectors are encountered, they must be replaced during planned or unplanned water system infrastructure work.

If there any known lead connectors (e.g., pigtails or goosenecks) in your distribution system, there are multiple funding sources available that may be used to help with lead connector removal and replacement. Contact EPA for more information on funding opportunities.

Part 6: Communications and Consumer Notification

Are there any “lead”, “GRR”, or “unknown” service lines in the inventory? ☐ Yes ☒ No

If yes, conduct the following Consumer Notification:

☐ **Provide notification to persons served by the water system at the service connection with an LSL, GRR, or unknown service line within 30 days after completing the initial inventory.**

- Contact EPA at EPAR10TribalDW@epa.gov for current template to use for notification.
- Notification must include statement about service line material, lead health effects, and steps to minimize lead exposure in drinking water. If:
 - Confirmed LSL, must also include opportunities to replace the LSL, any available financing programs, and statement that the system must replace its portion if property owners notify the system they are replacing their portion.
 - GRR, must also include opportunities for service line replacement.
 - Lead status unknown, must also include opportunities to verify the material of the service line.
- Notification must be delivered by mail or another EPA approved method.

☐ **Attach one example copy of each type of notice that was distributed to consumers.**

- You must demonstrate that notification was delivered by completing this form and providing a copy to EPA of the notification and information materials that were delivered to consumers.

If no, i.e. all service lines are identified as “non-lead” (Remember: a classification of non-lead must be supported by evidence-based records, methods, or techniques.), there is no requirement to notify individual consumers about the material of their service line.

☐ **Make lead service line inventory publicly available.**

EPA recommends sharing the inventory in a way that is easily accessible for customers, such as your system’s website, by mail, or in-person at your water system office. For community water systems, EPA recommends posting the inventory online with a web-based map, dedicated section on a website, or uploading a spreadsheet or list inventory. For non-transient non-community water systems, it may make sense to share the inventory via email, newsletter, or posting the information in a frequented place.

- Note: Location identifiers are required for all lead, GRR, and unknown service lines in the publicly available inventory.
- Note: Only if all lines are identified as “non-lead”: you may provide a statement instead of making the inventory publicly accessible. The statement must say that there are no lead service lines in the distribution system and describe methods used.

- Describe how the inventory was made publicly available:

Posting at Tribal buildings.

Consumer Confidence Report (for Community Water Systems only):

- In your next CCR, indicate how the public can access the service line inventory information.
- Only if all lines are identified as "non-lead": you may provide a statement in your next CCR that there are no lead service lines in the distribution system, along with a description of methods used.

Part 7: Certify Inventory and Sign

EPA recommends certifying below when you are ready to submit your initial lead service line inventory. Please review the Quality Control sheet in the lead service line inventory workbook prior to submittal and ensure the values match as indicated in the instructions.

☐ I certify that this form and the attached lead service line inventory workbook is as complete and accurate as possible, and all material identifications are evidence-based.

☐ All required customer communications have been conducted or there is a plan to conduct required customer communications within the required timeframe.

Person responsible for lead service line inventory: Walter Ward - Bos V

Title: Water operator

Signature: Walter Ward

Date: 10/16/24

Part 8: Submit Initial Lead Service Line Inventory to EPA

Initial lead service line inventories are due by October 16, 2024.

When you have completed all sections above, please submit your completed and signed initial lead service line inventory materials to EPA Region 10 via email to R10TribalDW@epa.gov.