



## Drinking Water Bureau

### Frequently Asked Questions for Lead Service Line Inventory Lead and Copper Rule Revisions (LCRR)

#### Introduction

Under the Revised Lead and Copper Rule of the Safe Drinking Water Act, Community and Non-Transient Non-Community drinking water systems must create a Lead Service Line Inventory (LSLI) for their drinking water system and submit it to the state agency by **October 16, 2024**. Below are answers to frequently asked questions about the rule.

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Created by the Southwest Environmental Finance Center at the University of New Mexico



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### Frequently Asked Questions

#### Who needs to fill out a Lead Service Line Inventory?

All Community and Non-Transient Non-Community (NTNC) drinking water systems need to fill out an LSLI.

#### Where can I find the Lead Service Line Inventory template and information for New Mexico?

- You may find information for New Mexico on the New Mexico Environment Department Drinking Water Bureau Lead and Copper Rule Revisions (LCRR) webpage: [https://www.env.nm.gov/drinking\\_water/lcrr/](https://www.env.nm.gov/drinking_water/lcrr/)
- The State of New Mexico references its Lead and Copper codes by [40 CFR Part 141 Subpart I \[1\]](#)
- Nationally relevant information can be found on EPA's website: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>

#### What specifically is due on October 16, 2024?

- A service line inventory that fills all the federally required information, including street address, system-owned service line material classification, privately owned service line material classification, overall service line material classification and the methods used to determine service line materials. [2]
- If a community system, a list of schools and childcare facilities served by the utility that were constructed prior to January 1, 2014, must be submitted.
- An initial draft of a lead replacement plan based on the federal topics that must be included. [3]

#### Is it acceptable to have unknown service line materials in your initial inventory?

- It is acceptable to have unknown service line materials in your initial inventory. If you have lead, galvanized requirement replacement (GRR), or unknown service lines, you must also submit:
- A plan to determine the unknown service line materials or a lead service line replacement plan.
- A plan to distribute public education materials to connections served by lead, GRR, or unknown service lines.

#### Where can I find a list of addresses to put in the template?

- Water system billing software
- Municipal or county government
  - Planning or zoning office
  - 911 systems
- System maps or as-builts
- GIS software (e.g. Google Maps)

[1] <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I>

[2] [https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance\\_August%202022\\_508%20compliant.pdf](https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf)

[3] [https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I#p-141.84\(b\)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I#p-141.84(b))



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### How do I determine service line material?

Service line material identification must be through evidence-based methods. Below are listed methods in the general order of ease. Use whatever combination makes sense for your water system. All documentation alone or in combination should indicate the service line materials used.

- 1) First - investigative sources:
  - Date building was constructed or connected to water system
    - Lead banned in 1986; if newer than 1986 no lead service line [4]
    - Historical satellite imagery can help determine age (e.g. Google Earth)
- 2) Second - investigative sources:
  - Records review:
    - Service line installation records
    - Plumbing permits
    - Building permits
    - Meter installation records
    - Distribution system as-builts
    - Other records or services at location
- 3) Third - investigative sources:
  - Customer surveys
    - It is recommended that feedback from surveys be accompanied by photo evidence of the service line material or for the utility to verify the material.
  - Contractor or plumber surveys
    - Affidavits stating materials used are not acceptable by themselves, but are acceptable if accompanied with backup evidence, such as receipts.
  - Visual or scratch test at meter
  - Visual or scratch test from inside home
  - Service line diameter
    - Lead service lines are generally not larger than 2" inches in diameter [5]
- 4) Fourth - investigative source:
  - Predictive modeling for lines unknown after other detection methods
    - Method must be statistically rigorous and include citation of scientific backing.
    - Method must be approved by NMED DWB prior to start of work.
    - New Mexico currently does not have specific guidance on predictive modeling, but other state and agency methods can be used for guidance. [6]

[4] [https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance\\_August%202022\\_508%20compliant.pdf](https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf), Chapter 4.2

[5] <https://www.michigan.gov/egle/-/media/Project/Websites/egle/Documents/Programs/DWEHD/Community-Water-Supply/Lead-Copper/Minimum-Service-Line-Material-Verification-Requirements.pdf>

[6] <https://awwa.onlinelibrary.wiley.com/doi/full/10.1002/aws2.1226>



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### How do I determine service line material? (cont.)

- 5) Fifth - more invasive or complicated investigative sources:
- Excavation and visual identification or scratch test
    - Vacuum or mechanical excavation
  - CCTV or other material detection method from inside service line
  - Water quality sampling
    - Different methodology than regular LCR sampling
    - Methodologies described in Hensley et al. (2021) [7]

### What are the material classifications in the inventory?

- Lead
- Non-lead
- Galvanized Requiring Replacement (GRR; galvanized pipe that has at any time been downstream of a lead service line)
- Unknown [8]

### What happens if a water system puts “unknown” for service line material classification?

- Unknown pipes are assumed to be lead or galvanized requiring replacement until they are determined not to be.
- Within 30 days of completion of the initial inventory, systems must notify and provide public education to all persons served by lead, galvanized requiring replacement, and lead status unknown lines. The system must make its service line materials inventory publicly accessible.
- A water system must make progress on identifying unknown service lines in their inventory each year.
- Community and NTNC public water systems with lead, galvanized requiring replacement, and lead status unknown lines will have their Lead and Copper sampling schedules change to a standard schedule if they were previously on a reduced schedule.

### What counts as a lead service line?

- Only the service line material itself, not including any solder or connectors, such as pigtails or goosenecks. [9]
- Although a lead gooseneck is not considered a lead service line, a water system must replace any lead gooseneck, pigtail, or connector it owns when encountered during planned or unplanned water system infrastructure work

[7] <https://awwa.onlinelibrary.wiley.com/doi/full/10.1002/aws2.1226>

[8] [https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance\\_August%202022\\_508%20compliant.pdf](https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf), Chapter 2.1

[9] [https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance\\_August%202022\\_508%20compliant.pdf](https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf)



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### If a galvanized service line is or was downstream of a lead gooseneck, does this classify it as GRR?

No, because a gooseneck is not considered to be a lead service line, this galvanized pipe can be categorized as non-lead, galvanized. However, because lead from the gooseneck can still accumulate on the galvanized line, it is recommended that all are replaced.

### What happens if the homeowner does not allow for hands-on investigation of the customer owned service line?

- The water system must make a concerted effort to identify all customer owned service lines, but private property owners do not have to allow you onto their property to identify the material.
- A water system must provide documentation to the State of customer refusals including a refusal signed by the customer, documentation of a verbal statement made by the customer refusing replacement, or documentation of no response from the customer after the water system made a minimum of two good faith attempts to reach the customer regarding the service line inventory.
- A water system must make at least two good faith attempts to get information from customer owned portions.
- If a private service line material cannot be identified, the material is assumed to be lead and the water system must provide public notice educational material to the homeowner on the dangers of lead in drinking water.

### Where can a water system find educational materials to give to homeowners who do not allow for service line material identification?

- Although some materials exist, states agencies and organizations are currently creating materials. More will be available in the coming months and years.
- Existing sources of educational material:
  - <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water#health>
  - <https://www.consumernotice.org/environmental/lead/>

### Do inactive service connections need to be included?

Yes, all service lines that connect a structure to the main need to be included, even if they are not active, because it's possible they will become active at a later date. Connections that have been capped at the main or physically disconnected do not need to be included.



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### What do we do if we find lead or GRR service lines?

Within 30 days of the submission of the initial service line inventory, you must notify residents of all connections that are served by a lead, GRR, or lead status unknown line. [10]

In the proposed Lead and Copper Rule Improvements, all lead and GRR lines must be replaced within ten years [11]

### Is funding available for water systems to replace service lines?

- Yes, many sources of funding exist for water systems to replace system owned service lines, including Drinking Water State Revolving Funds and state specific funds.
- A list of general funding sources for water systems can be found here: <https://efcnetwork.org/resources/funding-tables/>
- A list of federal funding sources can be found here: [https://www.epa.gov/sites/default/files/2020-12/documents/ej\\_lslr\\_funding\\_sources-final.pdf](https://www.epa.gov/sites/default/files/2020-12/documents/ej_lslr_funding_sources-final.pdf)
- More funding sources are being created, so be sure to check for updates on NMED, EPA, and other federal and state agency websites.

### Will funding sources pay for customer owned portions of service lines?

- Yes, different funding sources pay for different things, some of which include replacement of customer owned portions of service lines.
- Funds that explicitly mention customer owned service lines include:
  - Inflation Reduction Act Community Change Grants Program (<https://www.epa.gov/inflation-reduction-act/inflation-reduction-act-community-change-grants-program>)

### What happens if I find a lead or GRR service line after I initially put it as non-lead in the inventory?

You are required to contact the state agency within 30 days of the discovery and correct the classification. [10]

### Do I have to make the inventory publicly available?

- Public water systems that have lead, galvanized requiring replacement, or lead status unknown must make the inventory accessible to the public. The information that must be available includes the address and the material of the service lines.
- If your system serves more than 50,000 people, your inventory must be posted online.

[10] [https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance\\_August%202022\\_508%20compliant.pdf](https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf), Exhibit 1-1

[11] <https://www.epa.gov/ground-water-and-drinking-water/proposed-lead-and-copper-rule-improvements>



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### Do I have to make the inventory publicly available? (cont.)

- Your Consumer Confidence Report (CCR) for 2024 (distributed in 2025) must include information on your LSLI and instructions on how someone can access the information.
- If you do not have any lead or GRR lines in your system, you can publish a statement saying that there is no lead or GRR lines and a statement on how you came to that conclusion.

### Who can I contact if I have any questions or need assistance filling out the inventory?

#### New Mexico Environment Department Lead and Copper Rule Administrator

- Diana Aranda
  - Phone: 505-372-8166
  - Email: [lcr.manager@env.nm.gov](mailto:lcr.manager@env.nm.gov)

#### Technical Assistance (TA) Providers in New Mexico

- Southwest Environmental Finance Center at UNM
  - Phone: 505-333-9667
  - Email: [swefc@unm.edu](mailto:swefc@unm.edu)
  - Website: <https://swefc.unm.edu>
- New Mexico Rural Water Association
  - Phone: 505-884-1031
  - Email: [info@nmrwa.org](mailto:info@nmrwa.org)
  - Website: <https://nmrwa.org/>
- Rural Community Assistance Corporation (RCAC)
  - Phone: 916-447-2854
  - Email: [registration@rcac.org](mailto:registration@rcac.org)
  - Website: <https://www.rcac.org/>

### Further Resources

- Federal Regulations on Lead and Copper Rule Revisions: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I>
- New Mexico Environment Department Drinking Water Bureau webpage on Lead and Copper with state specific information on LSLI: [https://www.env.nm.gov/drinking\\_water/lead-and-copper-program/](https://www.env.nm.gov/drinking_water/lead-and-copper-program/)
- EPA's webpage on Lead and Copper Rule Revisions with information on LSLI: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>
- EPA Information on lead service lines: <https://www.epa.gov/ground-water-and-drinking-water/lead-service-lines>
- EPA's proposed Lead and Copper Rule Improvements: <https://www.epa.gov/ground-water-and-drinking-water/proposed-lead-and-copper-rule-improvements>
- Lead service line identification: A review of strategies and approaches: <https://awwa.onlinelibrary.wiley.com/doi/full/10.1002/aws2.1226>