

LSLI - FAQ

Frequently Asked Questions for Lead Service Line Inventories

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TDEC DWR Offices: 1-888-891-8332

Email: DWRwater.compliance@tn.gov

Acronyms:

LCR – Lead & Copper Rule

LCRR – Lead and Copper Rule Revised

CCR – Consumer Confidence Report

PWS – Public Water System

NTNC – Non-Transient, Non-Community Water System

LSL – Lead Service Line

LSLI – Lead Service Line Inventory

LSLR – Lead Service Line Replacement

ALE – Action level Exceedance (15 ppb)

TLE – Trigger Level Exceedance (10 ppb)

UKM – Unknown Materials

GRR – Galvanized Requiring Replacement

MSSL – Master Sampling Site List

LCRI – Lead and Copper Rule Improvements (coming soon)

Didn't we already do this?

The LSLI is not the MSSL (Master Sample Site List). The MSSL can act as a launch-point for starting the LSLI. If you submitted an MSSL, your TDEC Field Office has a digitized copy upon request.

The MSSL only contains the minimum required quantity of sites for lead and copper tap sampling plan. The LSLI will contain plumbing details for ALL service connections on the distribution system.

The initial inventory must be submitted by October 16, 2024, and updated over time to reflect changes, such as verification of Unknown service line material compositions or LSLs that have been replaced.

What are the MINIMUM requirements?

All Public (PWS) and Non-Transient, Non-Community (NTNC) water systems must create an inventory, regardless of size or other water system characteristics, and the inventory must include all service lines in the distribution system, regardless of ownership status or the water usage (e.g., non-potable use such as fire suppression system).

Minimum requirement is a full list of all connections and description of service line materials on both the WS side and the Customer side: Location, WS side material, Customer side material.

Minimum materials details accepted: Lead, Galvanized Requiring Replacement (GRR), Non-Lead (must be evidence-based), Unknown.

The lead-ban became effective in Tennessee starting July 1988. Since we know that there are no lead service lines installed after that date, sites constructed July 1988 and later automatically have evidence-based Non-Lead classification. Connections larger than 2" are generally accepted as Non-Lead.

Yes, materials can be listed as "Unknown", but it will require a lot more labor and expense long-term, see "What's the deal with UKMs" page 6.

How do we get money to help complete the LSLI & LSLR?

The State will be offering loans and grants through 2031 for Lead Service Line Replacement activities, including identification of lead service lines.

Priority will be given to historically disadvantaged communities.

Apply at the TDEC website:

<https://www.tn.gov/environment/program-areas/wr-water-resources/srpf/srf-home/i-need-funding/funding-dw-projects.html>

In what format can the LSLI be submitted?

As of right now, the LSLI must be submitted as an Excel file. This is the best way to ensure uniform information across more than 2.8 million service connections in the state.

What is the benefit for getting the LSLI done early?

After October 16, 2024, all sites with LSLs, GRR, & UKMs must be provided a notice within 30 days & repeated annually.

Action Level Exceedances (ALEs) & Trigger Level Exceedances (TLEs) are much more complex and expensive than they used to be. Identifying all the service lines will reduce the number of UKMs calculated into the LSLR and will reduce the expense of outreach/education should your WS experience a TLE or ALE.

Identifying LSLs & GRRs early will allow more time to secure funding for replacement. The money is available on a first-come-first-served basis.

Where to start?

Obtaining the historical information from several sources will aid in the development of an accurate inventory. Listed below are items and information for the PWS to review for the initial inventory:

1. Determine ownership of the service lines in the PWS: entire line public (PWS), entire line private (customer), or combination.
2. Determine if there is any ordinance that prohibits reburial of exposed lead lines, and its effective date.
3. Determine if there was a date or timeframe after which lead pipes in the system were no longer used: July 1988 in TN.
4. System tap cards, which have significant information. Determine if they are available and have been maintained over time. The card typically has the meter replacement date, is listed by address or another unique identifier, and may list building usage (single-family residence, multi-family residence, K-12 school, child daycare, or business).
5. Private side records, if applicable, such as a permitting process or other process where records were returned to the PWS of work done on the private side of the service line.
6. Water main construction and replacement records, including dates of current water mains. Examples: In specific replacement projects were the service lines wholly replaced, partially replaced, or is that not known? Was there a standard practice of replacing the entire service line when a main was replaced? Are there any standard operating practices that would reliably inform service line composition? Would a newly constructed building be connected to an existing service line?
7. Review capital improvement projects over the years to determine if certain areas had work done that affected the service lines.
8. Data from the 1991 Lead and Copper Rule (LCR):
 - a. Review the lead tap sampling data under LCR since 1991, to evaluate which areas have had elevated lead levels.
 - b. Review the initial LCR Materials Inventory and any updates, which may indicate areas with lead service lines or areas where service lines were replaced.
 - c. Any other distribution system inspection records or studies, such as leak studies, which may have reviewed service line composition.
9. Consider the requirement to maintain and update the inventory over time, to identify Unknown lines, and to remove LSLs and GRR lines. This is a process that will be ongoing for quite some time for many systems.
10. Develop a plan to address the "Unknown" (UKM) service lines, which would include public communications with building owners and occupants.

Other Information Sources for PWS to Use

Potentially useful information can be obtained from specific city government departments related to building construction, which is not typically held within the PWS records:

1. Tax assessor records for each property: https://www.assessment.cot.tn.gov/RE_Assessment/.
2. Timeframe of building construction and when taps were made.
3. Building codes and plumbing codes in use during those timeframes.
 - a. Typical plumbing materials and practices.
 - b. Accuracy of information.

Methods to obtain information on private side service lines:

1. Provide instruction materials and questionnaire for the occupant on how to access the service line entry point into the building and determine the service line composition. Several reference materials have already been developed which are listed under the Resources section.
 - a. Is the questionnaire/survey enough? Can the PWS receive it via email, post-mail, and/or website?
 - b. Will a photo be required? Can the PWS receive it via text and/or email?
 - c. Onsite inspection inside building by knowledgeable person.
2. Meet with local, active, and retired plumbers and water supply operators to discuss what has been found in the past 40-50 years, and in what areas of the system.
3. Sequential sampling of the service line may be used to determine composition through lead results when visual inspection is not feasible. It may not work to determine "Non-Lead" because of corrosion control films on pipe interior, but this method could be used to determine LSL or GRR if lead is detected prior to the tap.

How can we get more customers to participate?

Annual distribution of Public Education materials to all LSLs, GRR, & UKMs will encourage many to participate. But there will be others who want privacy, others who simply do not care to participate, and still more that are just hard to reach with busy schedules.

Optional ideas to consider:

- Incorporating easy-to-understand communications: surveys, pamphlets, etc.
- Utilizing meter-readers to: engage with customers, deliver materials, and inspect sites.
- Create a website for customers to fill out a survey.
 - Feel free to include the NPR interactive tool at:
<https://apps.npr.org/find-lead-pipes-in-your-home/en/>
- Communicate resources and intentions with activist groups.
- Mention federal funding available for LSL Replacement.
- Advertise opportunities to participate on monthly billing statements, CCRs, newspapers, etc.
- Other PWS in the nation have utilized incentives for survey participation & LSLR Replacement, this may likely mean getting the local political officials involved.

What's the deal with GRRs (Galvanized Requiring Replacement)?

GRR is any galvanized line that is or has ever been downstream of lead pipes. Was *ever-possibly* connected to lead pipes back in 1960-something? If yes, then it counts as GRR. Was there never lead in the distribution system, and it can be proven with records review that lead was never utilized? Then no, it does not count as GRR. Of course, we know that the quality of galvanized piping deteriorates over time and most of them will likely need replacement anyways.

GRR lines should be treated as LSLs with regards to customer outreach and should be replaced immediately upon discovery. **GRR qualifies for LSLR funding in the LSLR Plan.**

What's the deal with UKMs (Unknown Materials)?

Yes. Sites can be included with "Unknown" materials (UKM); there is no deadline to investigate the material composition of all Unknown service lines. – BE AWARE – All UKMs are treated as possible LSLs with regards to educational outreach.

Including Unknown service lines in the inventory will demonstrate transparency, build trust, and present an opportunity for customer engagement, all of which should mitigate commenter concerns about potential customer alarm about the presence of Unknown service lines.

Water systems may elect to provide more information in the inventory regarding their Unknown lines if it clearly distinguishes service lines classified as "Unknown" from those whose material has been verified through records or inspection.

All LSLs ,GRRs, and UKMs get Public Notices

After October 16, 2024 LSLs, GRR, & UKMs must be provided a notice **within 30 days** and **repeated annually**. New customers must be provided a notice at the time of service initiation.

The notices must include:

LSLs	GRR	UKM
⇒ Description of material	⇒ Description of material	⇒ Description of material
⇒ Health effects of lead	⇒ Health effects of lead	⇒ Health effects of lead
⇒ Steps to reduce lead exposure	⇒ Steps to reduce lead exposure	⇒ Steps to reduce lead exposure
⇒ Information about opportunities to replace lead service lines	⇒ Information about opportunities to replace GRR service lines	⇒ Information about opportunities to verify service line materials
⇒ Programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line, and		
⇒ A statement that the water system is required to replace its portion of a lead service line when the property owner notifies them that portion of the lead service line is being replaced		

Once there are no UKM then the submission of LSLI updates can be reduced to match the tap monitoring frequency (often triennial).

Once a site is no longer UKM and is verified Non-Lead then they will no longer need to be given education materials.

All LSLs ,GRR, and UKMs get Public Education with TLE & ALE:

In the case of a 90th TLE or ALE, LSLs, GRR, & UKMs are treated as LSLs:

- ⇒ All LSLs, GRR, & UKMs must be directly provided educational materials within 3 days.

All WS with LSLs ,GRR, and/or UKMs must develop an LSL Replacement Plan (LSLR).

Lead Service Line Replacement Plan – required for all systems with LSLs, GRR, & UKMs lines; involves developing a detailed plan for replacing lines in the case of TLE or ALE.

LSLR plan must include process for discovery of UKMs.

Changing an UKM to verified Non-Lead does not count towards LSLR removal rate. However, verifying that no lead service lines exist in the distribution system does remove all requirements of LSLR Plan.

See LSLR section below for overview, see official rule for details. More guidance information will also be available soon.

What about Lead Connectors?

The minimum requirements of the LSLI do not include investigation/identification of Lead Connectors; however, system-owned lead connectors must be replaced whenever they are encountered during water system activities, such as emergency repairs or planned infrastructure work, and offer to replace a customer-owned connector - at no cost to the system. A lead connector is defined as a short section of piping not exceeding 2 feet.

How frequently does the LSLI need to be updated?

After 2024, the LSLI must be updated at the frequency of tap-sampling, either every 3 years or annually. WS that sample every 6-months will only submit the LSLI updates once per year.

Certified Non-Lead PWS do not need to provide updates unless an LSL is found.

Our WS does not have any LSLs at all. What do we need to do?

You will still need to submit a Service line Inventory form; it will not need to be made public. Also, complete the Lead-Free Certification form and submit this with your LSLI. Request the Lead-Free Cert. from your TDEC field office.

Updates to the inventory are only required if an LSL is identified in the system.

The LSLI is finished, now what?

Submit the LSLI to DWRwater.compliance@tn.gov.

PWS serving an estimated population of $\geq 50K$ must also post on a public-facing website the location of all LSLs, GRR, & UKMs.

Keep your list handy. It must be reviewed and resubmitted/recertified with each sampling event. It will also be reviewed during each Sanitary Survey inspection.

Publishing the LSLI

All PWS must make the LSLI publicly accessible and provide instructions on how to access the material in their published CCR. *****Make sure to redact any sensitive information such as personal names, phone numbers, and account numbers before releasing.***** The location identifier could be a general location such as a street, block, intersection, or landmark, or other geographic marker associated with the service line.