



# Service Line Materials Inventory Requirements

*TOWN & COUNTRY ENGINEERING, INC.*

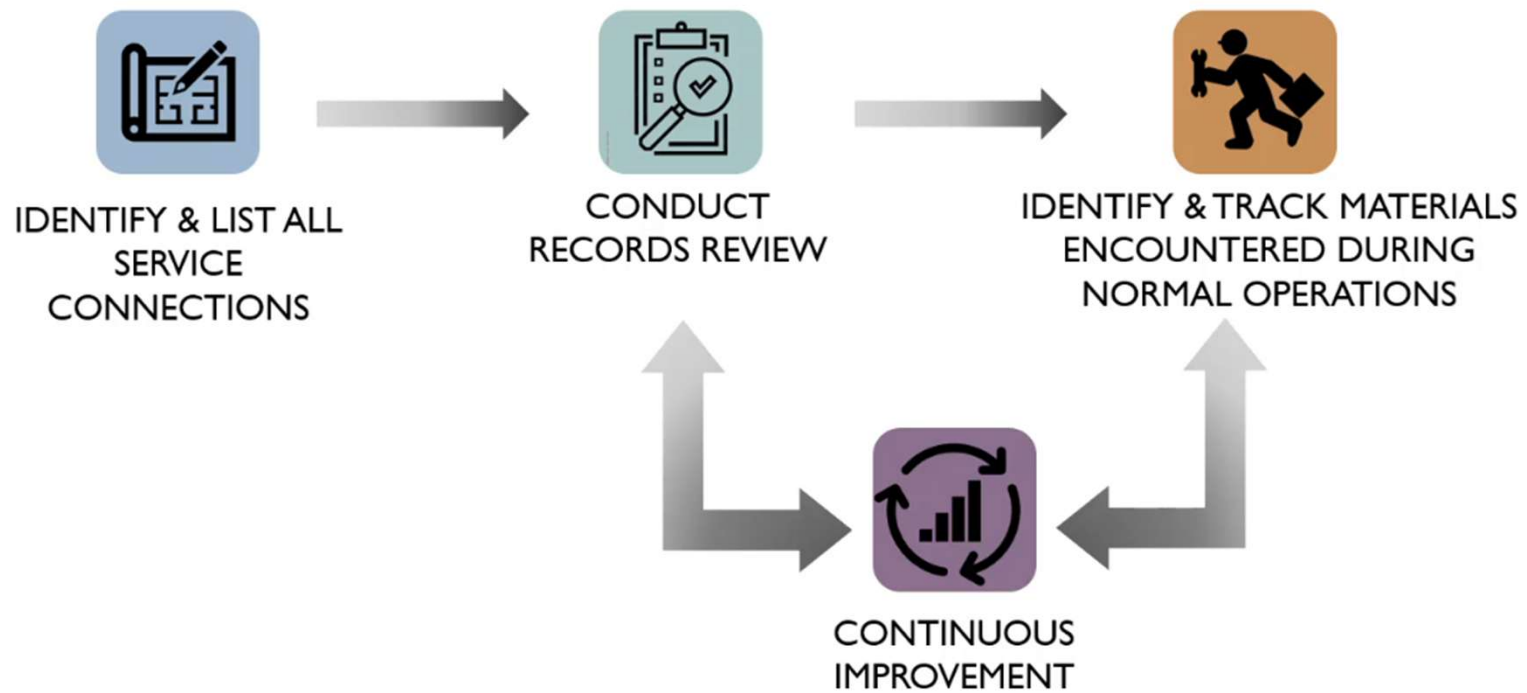
# LCRR SERVICE LINE MATERIALS INVENTORY REQUIREMENTS

- ▶ Went into effect into December 16, 2021
- ▶ Compliance date – October 16, 2024

# LCRR SERVICE LINE INVENTORY

- **§141.84(a)** *Lead service line inventory.* All water systems must develop an inventory to identify the materials of service lines connected to the public water distribution system.
- (2) The inventory must include all service lines connected to the public water distribution system regardless of ownership status.

# INVENTORY STEPS





## INITIAL REPORTING (10/16/24)

- ▶ Records Review Only
- ▶ No Field Verification Required
- ▶ Report Service Line Material or as Unknown



- ▶ What needs to be inventoried?
  - ▶ Service line material only
  
- ▶ What Locations Do the Inventory Include?
  - ▶ Every service connection in the public water distribution system
  
- ▶ Is Public Accessibility Required?
  - ▶ Yes



# INVENTORIED SERVICE LINES

- ▶ Potable Service Lines
- ▶ Non-Potable Service Lines
  - ▶ Fire suppression
  - ▶ Service lines connected to vacant lots or abandoned buildings

# RECORDS REVIEW

- ▶ Review all existing records to identify street & customer side service line material
  - ▶ Water System Maps
  - ▶ As-Builts
  - ▶ Lateral Cards/Inspection Records
  - ▶ Ordinances/Plumbing Codes
    - ▶ Federal Lead Ban - 1986



# NOTIFICATION AND REPORTING

- ▶ Submit Inventory to DNR Field Rep (10/16/24)
  - ▶ LCRR Service Line Inventory Methods & Completeness Form
- ▶ Make Inventory Publicly Accessible
  - ▶ Service Line Inventory
  - ▶ Notify Customers served by Lead, Galvanized and Unknown Services
    - ▶ EPA has template notices of their website

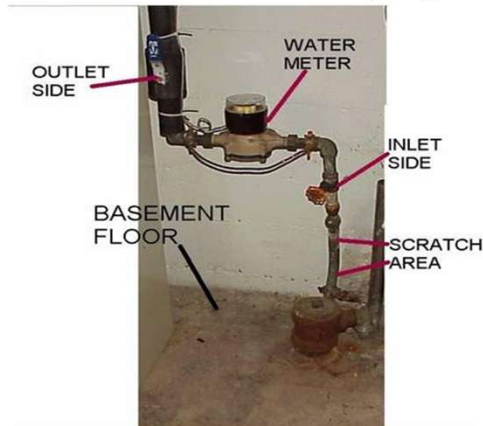


# PUBLIC NOTIFICATION

- ▶ Explanation of the health effects of lead
- ▶ Steps consumers can take to reduce exposure to lead in drinking water
- ▶ Contact information for the public water system
- ▶ How to identify lead service

## Identifying a Lead Service Pipe

Tools needed: flathead screwdriver, refrigerator magnet



- Locate the water service pipe coming into the building (usually in the basement). An "inlet valve" and the water meter are installed on the pipe after the point of entry.
- Identify a test area on the pipe between the point where it comes into the building and the inlet valve.
- If the pipe is covered or wrapped, expose a small area of metal.
- Use the flat edge of a screwdriver or other tool to scratch through any corrosion that might have built up on the outside of the pipe.

### Lead Pipe

If the scratched area is shiny and silver, your service line is lead. A magnet will not stick to a lead pipe.



## Identifying a Lead Service Pipe

### Copper Pipe

If the scratched area is copper in color, like a penny, your service line is copper. A magnet will not stick to copper pipe.



### Galvanized Steel Pipe

If the scratched area remains a dull gray, and a magnet will stick to the surface, your service line is galvanized steel.





## **Templates for Notification of Known or Potential Service Line Containing Lead**

## WHAT IF THE INITIAL REPORTING IS INCOMPLETE??

- ▶ WDNR will send a “Federal service line inventory violation” letter
  - ▶ Corrective action is identified
- ▶ Send corrected inventory to WDNR
- ▶ You give public notification of the violation

## Failure to Develop Initial Inventory or make publicly accessible for Service Line Materials or Make Publicly Accessible - Template 2

### IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

#### **[Water System Name] Failed to [Develop and/or Make Public] an Initial Service Line Inventory**

Our water system recently violated a drinking water requirement. As our customers, you have a right to know what happened, what you should do, and what we did (are doing) to correct this situation.

We were required to develop and make publicly available an initial inventory of service lines connected to our distribution system by October 16, 2024. [If combining with reporting violation, include text: “Our system failed to submit this initial inventory of service lines to the [Name of state or other primacy agency] by October 16, 2024.”] The inventory must identify the service line materials as lead galvanized requiring replacement (GRR)<sup>1</sup>, lead-status unknown/unknown, or non-lead. Identifying and ultimately removing lead and GRR service lines is an important way to protect public health.

[If the inventory has not been developed, consider using the following text: There is the potential your service line could be made of lead or contain lead. People living in homes with service lines that are made of or contain lead have an increased risk of exposure to lead from their drinking water.”]

[If applicable, enter the following statement: “We notified persons served at service connections with a lead, galvanized, or unknown service line on [enter date]”. [If applicable, include directions on how to access the publicly available inventory.]

# NEXT STEPS – AFTER INITIAL REPORTING

- 2025
  - December 31, 2025 – Consumer notices must be sent to all consumers served by lead, galvanized requiring replacement (GRR), or lead status unknown (LSU) service lines.
  - Notices must be submitted annually thereafter
- 2026
  - Inventory updates are optional, but suggested
- 2027
  - Inventory of connectors is required (goosenecks)
  - Start mandatory service line replacement programs no later than 11/1/27
  - 10-year clock starts for replacement of lead services
- 2030
  - Assessment of replacement program
  - Show an avg replacement of 10% each year (due 12/31/30)
  - Deferred deadline
- 2037
  - Annual inventory updates are required



# TRACKING AFTER INTIAL REPORTING

- ▶ Develop a process to identify and track service line materials as they are encountered during normal operations
  - ▶ Reading Meters
  - ▶ Maintenance
  - ▶ Construction

# CONTINUOUS IMPROVEMENT

- ▶ Use information collected during normal operations
- ▶ Work to Identify Unknow Materials
- ▶ Verify Accuracy of Records
- ▶ Continue to Track Service Line Material

# AVAILABLE FUNDING

- ▶ Bipartisan Infrastructure Law (BIL) included \$15 billion for lead service line identification and replacement nation-wide over 5 years
  - ▶ Available through **Safe Drinking Water Loan Program**
  - ▶ SFY 2026 Allocations not provided yet, estimated to be \$83,278,000
  - ▶ SFY 2027 will be last year of BIL funding
  - ▶ Funding for **full** LSL replacements (public and private sides) and related inventory work



# AVAILABLE FUNDING

- ▶ Lead service Line Replacement Community Outreach Grant
  - ▶ Max \$150,000 per communities, per cycle
  - ▶ Applications accepted until April 30, 2026
  - ▶ For community outreach to residents in support of an ongoing or upcoming LSL replacement project

# LSL REPLACEMENT FUNDING (BIPARTISAN INFRASTRUCTURE LAW)

## ► BIL Overview – Safe Drinking Water Fund

- 49% must be awarded as principal forgiveness (PF) to disadvantaged municipalities or projects in disadvantaged census tracts
- Remaining funds are loans at 0.25% interest rate
- DNR is prioritizing private side construction and filtration (i.e., pitcher filters, point-of-use devices) costs
- PF and Loans allocated to private side first

# LSL REPLACEMENT FUNDING (BIPARTISAN INFRASTRUCTURE LAW)

## ► BIL Overview Safe Drinking Water Fund

- For SFY 2026, DNR received 47 applications from 29 municipalities requesting \$182 million in LSL funding
- **Will not** be enough BIL LSL funding for all SFY 2026 applicants
- Reserved \$40 million in base Safe Drinking Water Loan Program loan funds for LSL applicants who did not receive a full funding allocation
  - Standard subsidized loan interest rate (either 55% or 33% of the market rate)

# LSL REPLACEMENT FUNDING (BIPARTISAN INFRASTRUCTURE LAW)

## ► LSL Program Basics

- Intent to Apply due October 31, Application due June 30
- Applications for LSL replacement and/or inventory projects submitted separately from watermain projects, even if related
- Any municipality can apply, but PF can only be awarded to disadvantaged municipalities or for projects in disadvantaged census tracts

# LSL REPLACEMENT FUNDING (BIPARTISAN INFRASTRUCTURE LAW)

## ► LSL Program Basics

- Must be prepared to receive **loan funds** for private side replacements
- Water revenue pledge, in most cases, is **not** a viable option
- Need approval from the Public Service Commission of Wisconsin (PSC) for customer-side LSL replacement financial assistance programs that utilize water utility ratepayer funds



# FEDERAL REQUIREMENTS

- ▶ All projects must:
  - ▶ Pass environmental review screening for all locations
  - ▶ Solicit for disadvantaged businesses at all levels of contracting or when advertising RFQs
  - ▶ Comply with Davis-Bacon Wage Rates & Related Acts
  - ▶ Comply with Build America, Buy America (BABA) procurement
  - ▶ Provide the customer with point-of-use filtration between the public and private side replacements, **and** filters for 6 months of use following the full LSL replacement

# CONTRACTING OPTIONS

- ▶ Municipally-bid contract
  - ▶ Familiar process for most municipalities
  - ▶ Best way to get a large number of replacements done quickly
  - ▶ Davis-Bacon always applies – Heavy wage determination should be used, even if just replacing private side LSLs
  - ▶ BABA applies unless total loan is less than \$250,000

# CONTRACTING OPTIONS

## ► Prequalified List

- Municipality issues Request for Qualifications (RFQ) to establish the list
- Needs to include certification that all federal requirements will be followed
- BABA & Davis-Bacon may apply
- DBE solicitation applies to advertising the RFQ