

IMPORTANT: Public Water Systems (PWS) should carefully review and consider the following information as they complete their service line inventory (SLI): This information is being provided to assist public water systems in finalizing and submitting their Lead and Copper Rule Revisions (LCRR) required SLI, as amended by the forthcoming final federal Lead and Copper Rule Improvements (“LCRI”) rule.

The Department’s expectations regarding how to provide sufficient evidence to categorize a service line as “Non-lead” remain consistent with the information relayed during training in 2021-2023 and what is provided on the Department’s Lead and Copper Rule website: ([Lead and Copper Rule \(pa.gov\)](https://www.dep.state.pa.us/water/leadandcopper)). These expectations, as outlined in the associated website materials, are intended to ensure that the most accurate information regarding service line material is obtained and provided within the service line inventory and will reduce the likelihood that PWS will fall short of minimum evidence criteria specified in EPA’s forthcoming final LCRI. However, an important point to emphasize is that while these are the Department’s expectations of how systems *should* complete their inventory, current Department regulations do not specify these criteria *must* be met. The requirements of what systems “must” meet for sufficient evidence for non-lead designations will be addressed through PA’s rulemaking to implement the federal LCRI, which will begin after EPA finalizes and publishes the LCRI.

What does this mean for the Initial Inventory?

After completing a thorough records review, if available evidence does not meet all expectations outlined in Department training materials, PWS responsible officials and certified operators **may** choose to identify a service line as a non-lead material if they are confident in the accuracy of the record(s) and associated investigations. For example, for any record from pre-1991 that identifies the service line material, the Department expects the water system to use an investigative technique to verify the material, such as conducting a one-point visual inspection (see the [Non-Lead Verifications Training Aid with Examples](#)). However, if PWS personnel responsible for completing the SLI have high confidence in a record, such as a tap card that predates 1991, that accurately identifies service line material, they may decide to use this record as “stand-alone” evidence without conducting a further investigation at the time of the initial inventory submission. PWS personnel making these decisions would ultimately be responsible for explaining why this record is accurate and does not require any further verification. Most importantly, PWS personnel making these decisions should be aware that upon publication of final federal and state LCRI rules, further verification may be required.

Using the DEP Template:

The Department also received questions revolving around the evidence requirements in the PA SLI Template (also available on the website). The template is built around the Department’s expectations for non-lead evidence. For a water system that doesn’t meet the expectations for identifying the material, or that used an investigative method not included in the spreadsheet, the template does not allow the user to add this service line to the inventory due to a lack of sufficient evidence. When this occurs, water systems may select option “D) Other – enter in comments field” under the “Basis of Material Classification: Non-field method” column in conjunction with another method, such as “A) Records review” to document sufficient evidence:

<u>Basis of Material Classification - Non-Field Method</u>	Basis of Material Classification - Non-Field Method
<i>A) Records review</i>	<i>D) Other - enter in Comments field</i>

Examples of when this may apply include:

1. Use of an Ordinance/Rules & Regulations or other legally binding document that indicates that service lines were made of a material other than lead that was published prior to the PA lead ban in 1991.
2. Use of a service line greater than 2 inches in diameter to justify a service line being non-lead.
3. Use of an emerging *Department Approved* technology that is not included in the drop-down options, such as the Swordfish Technology developed by ElectroScan and approved by the Department on May 22, 2024 for systems to potentially consider.
4. Use of records, such as tap cards, that a water system has HIGH confidence in, which documents the service line material installed prior to 1991 .

If water system personnel decide to utilize the “Other” option, they will need to document details of the method utilized in the “Additional Comments” field within the spreadsheet. Below are examples from the DEP template corresponding to the numbered examples above.

1. Ordinance:

Basis of Material Classification - Non-Field Method	Basis of Material Classification - Non-Field Method	Basis of Material Classification - Field Method	Date of Field Verification	Additional Comments
A) Records review	D) Other - enter in Comments field			We have an ordinance demonstrating that only copper was used since 1975

2. Service Line >2”:

Basis of Material Classification - Non-Field Method	Basis of Material Classification - Non-Field Method	Basis of Material Classification - Field Method	Date of Field Verification	Additional Comments
A) Records review	D) Other - enter in Comments field			Records indicating the service line from this location is 3 inches

3. Emerging Department-approved technology:

Basis of Material Classification - Non-Field Method	Basis of Material Classification - Non-Field Method	Basis of Material Classification - Field Method	Date of Field Verification	Additional Comments
A) Records review		L) Other - enter in Comments field	6/3/2024	We used the ElectroScan Swordfish technology

4. Tap cards from pre-1991:

Basis of Material Classification - Non-Field Method	Basis of Material Classification - Non-Field Method	Basis of Material Classification - Field Method	Date of Field Verification	Additional Comments
A) Records review	D) Other - enter in Comments field			We have high confidence in this tap card from 1981

Using this option will result in the “Sufficient Evidence for Non-Lead” column showing as “Department Review.” This will allow the service line to be entered into the spreadsheet and the “Department Review” to occur at a later time following submission of the inventory, such as during an inspection at the water system. For example, the Department, during an inspection, may ask to review the record

that you used which legibly identifies what water system personnel have high confidence to be the current material, size, etc. of that particular service line.

<u>Service Line Classification</u>	<u>Sufficient Evidence for Non-Lead?</u>
<i>Non-Lead</i>	<i>Department review</i>

Please contact RA-PADWIS@pa.gov with questions.