



Department of
**Environment &
Conservation**

LSLI, Rule Changes & Funding

May 2024

Welcome

- In person
 - **Sign in for CEUs – 4 CEUS**
- Virtual (Sophia will moderate)
 - Mute mics
 - Turn off cameras
 - Ask questions in the chat or raise hands
 - **Link for CEUs will be included in the chat – at the end**
- Breaks ~ every hour

Agenda

- **Lead Service Line Inventory** – Jennifer Murray
 - Q&A
- **Rule Changes** – Sophia DeMarse
 - Q&A
- **Funding** – Dr. Chris Marlow
 - Q&A



TM

Lead Service Line Inventory

Jennifer Murray, SDW Environmental Scientist



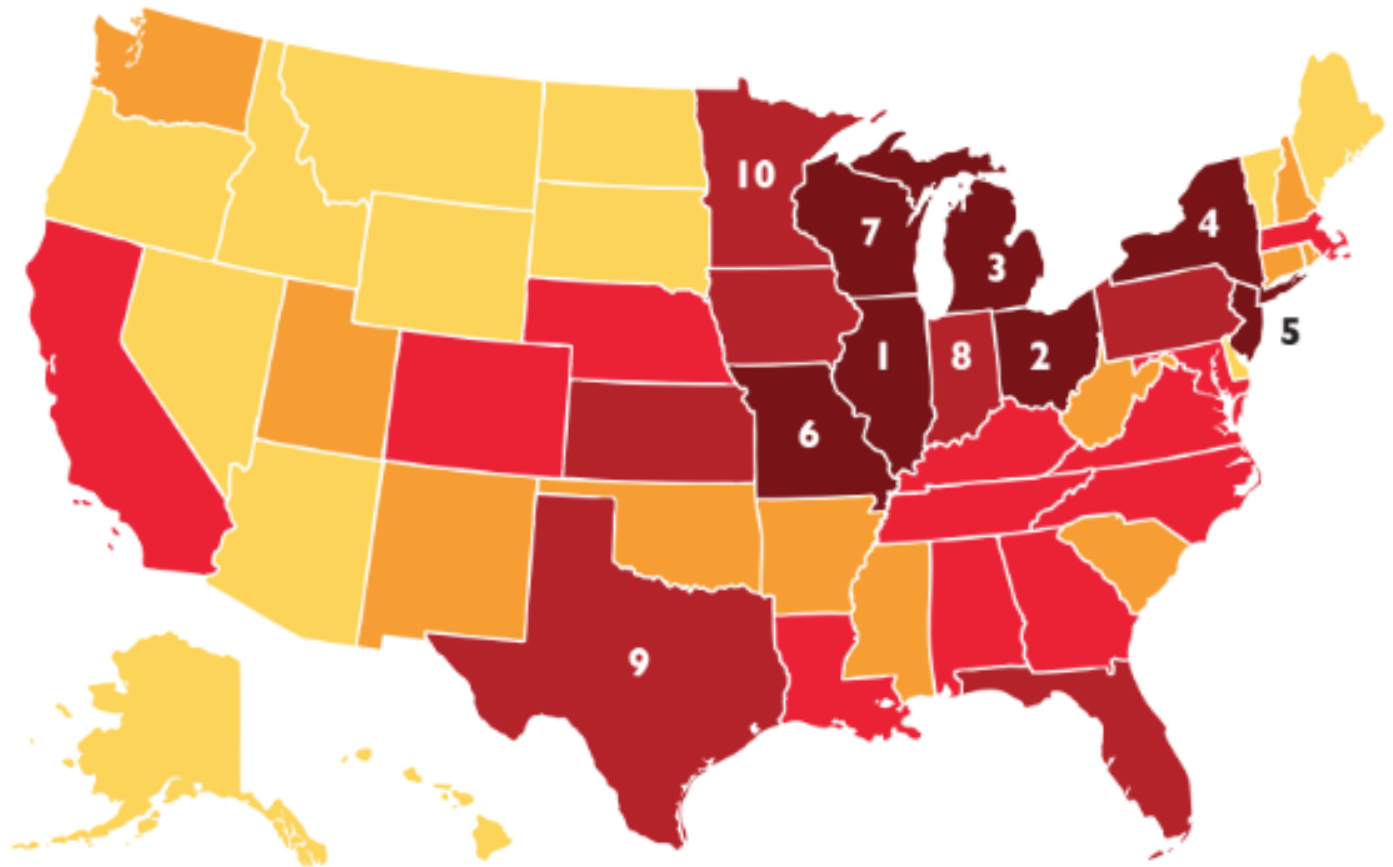
Department of
**Environment &
Conservation**

What's due?

October 16, 2024

1. “Baseline” or “Initial” Inventory in excel template (TDEC website)
2. Inventory publicly available – online for >50,000 **customers served**
3. 30d notice to any customers with LSL, GRR & Unknown lines – by Nov 15, 2024

LEAD SERVICE LINES PER STATE

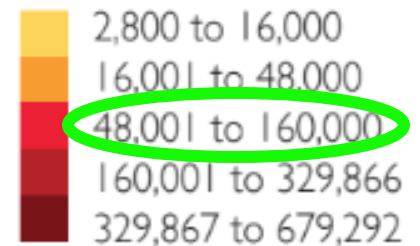


10 STATES WITH THE MOST LEAD LINES

1 Illinois*	679,292	6 Missouri	330,000
2 Ohio	650,000	7 Wisconsin*	329,866
3 Michigan*	460,000	8 Indiana*	290,000
4 New York	360,000	9 Texas	270,000
5 New Jersey*	350,000	10 Minnesota	260,000

*States that have submitted updated LSL

LEAD SERVICE LINES



Missourian Graphic/Lori Obermark.

LSLI Completed & Emailed to TDEC?

37

Out of over 770



Completed LSLI's

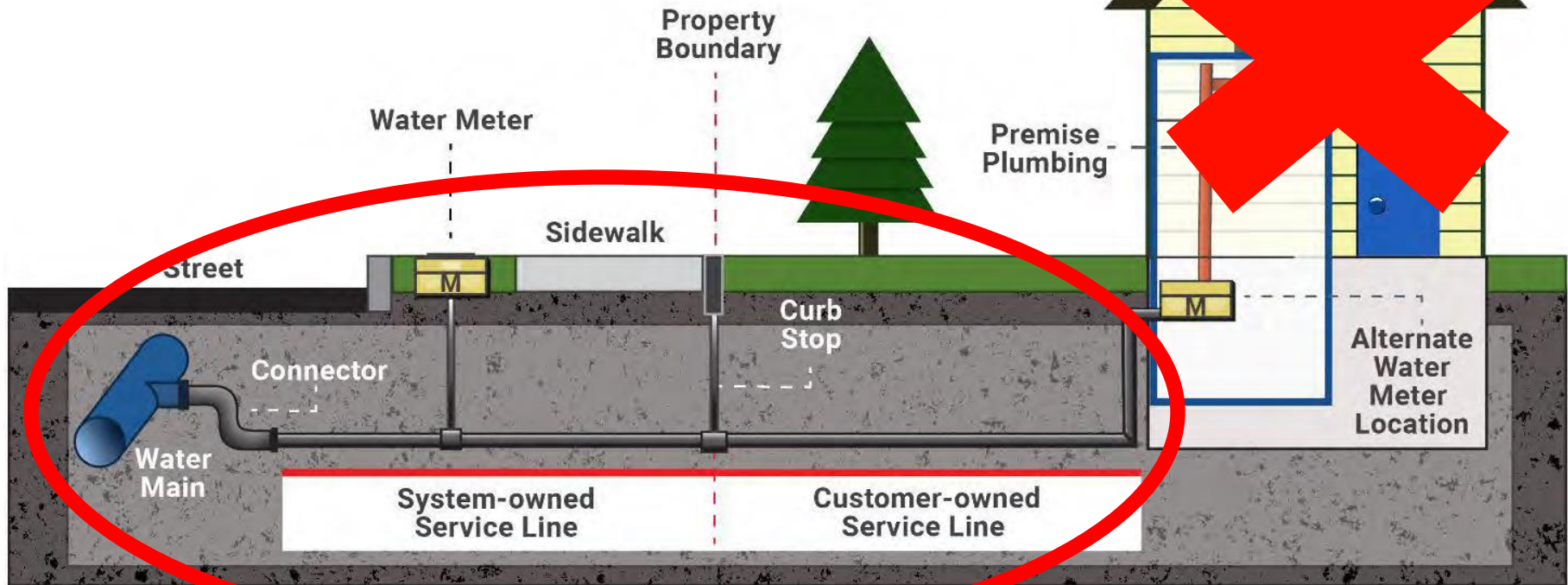
TN0000058	BLOUNTVILLE UTILITY DISTRICT
TN0000099	CELINA WATER SYSTEM
TN0000115	SOUTH CARROLL UTILITY DISTRICT
TN0000135	OLD GAINESBORO ROAD U.D.
TN0000138	CHEROKEE HILLS U.D.
TN0000144	COVINGTON WATER DEPT
TN0000146	COWAN BOARD OF PUBLIC UTILITIE
TN0000166	CUMBERLAND HEIGHTS U.D.
TN0000174	DAYTON WATER DEPT
TN0000192	DOUBLE SPRINGS U.D.
TN0000201	POPLAR GROVE UTILITY DISTRICT
TN0000218	EAST MONTGOMERY U.D.
TN0000245	WEST TN STATE PENITENTIARY
TN0000264	GLADEVILLE UTILITY DISTRICT
TN0000270	GREAT SMOKY MTNS NATIONAL PARK
TN0000294	HENDERSONVILLE U.D.
TN0000386	LA VERGNE WATER SYSTEM
TN0000421	MCKENZIE WATER dEPARTMENT
TN0000471	MONTEREY WATER DEPT

TN0000490	MUNFORD WATER DEPT
TN0000533	TURNEY CENTER
TN0000558	PLEASANT VIEW UTILITY DISTRICT
TN0000581	LAUDERDALE CO WATER SYSTEM
TN0000598	RUSSELLVILLE WHITESBURG U.D.
TN0000645	SECOND SOUTH CHEATHAM U.D.
TN0000667	SPRING HILL WATER DEPT
TN0000719	UNICOI UTILITY DISTRICT
TN0000724	VANLEER WATER DEPARTMENT
TN0000797	CANDLEWOOD LAKES P.O.A. WATERW
TN0000826	CLEARFORK UTILITY DISTRICT
TN0000929	CUNNINGHAM EAST-MONTG WTP
TN0002848	TRAVEL CENTER OF AMERICA
TN0003779	CHEMOURS-NEW JOHNSONVILLE PLAN
TN0004408	AEDC COMPLEX-WATER PLANT (arnold)
TN0004674	NYRSTAR TN MINES-STRAWBERRY PL
TN0005063	NORTHWEST HEADSTART OF HUMBOLD
TN0008279	SEVIER COUNTY WATER DEPARTMENT

What is a Service Line?

A *service line* is the pipe connecting the water main to the interior plumbing in a building.

May be owned by the water system or customer or split.



Sources of **LEAD** in Drinking Water

Delta Faucet Company provides the warning label to comply with products sold in California are required by law to carry the label on toilets, accessories and select repair parts (RPs):

CALIFORNIA PROP 65 WARNING:

This product contains one or more chemicals, including lead, known to the State of California to cause cancer and birth defects or other reproductive harm.

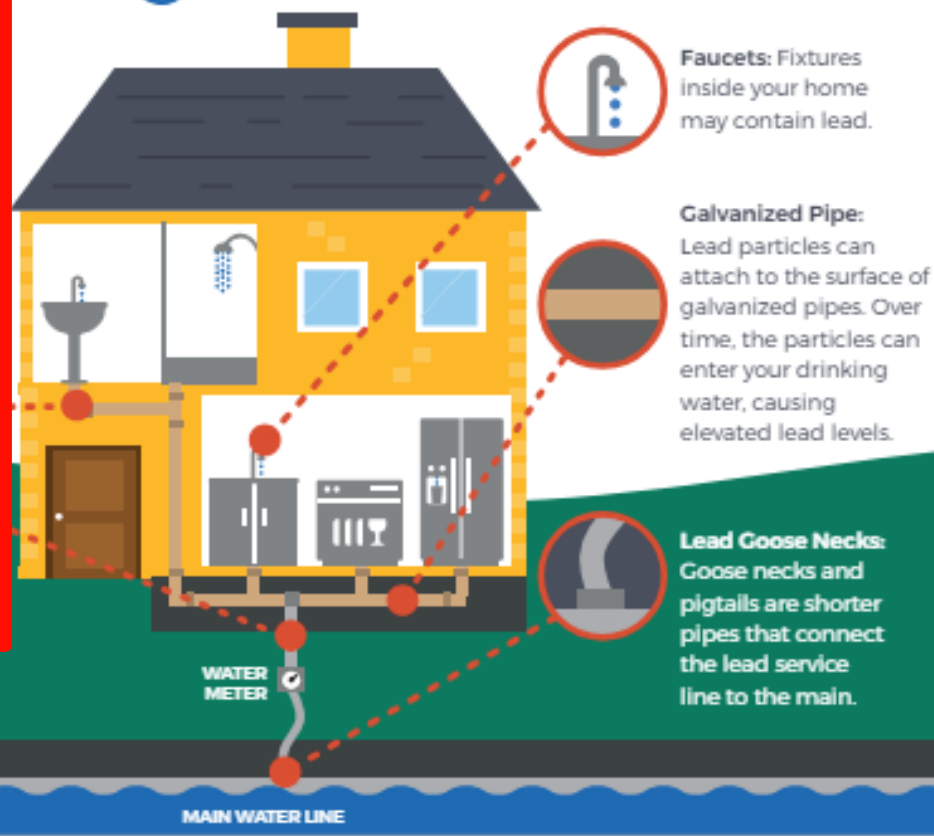
Wash hands after installing or removing this product

Avertissement, Californie Prop 65:

Ce produit contient un ou plusieurs produits chimiques, incluant le plomb, reconnu par l'Etat de la Californie comme étant cancérigènes et entraînant des anomalies congénitales ou autres effets néfastes sur la reproduction.

Laver vos mains après avoir installé ou enlevé ce produit

78889 Rev. D





Department of
**Environment &
Conservation**

Other Sources of Lead



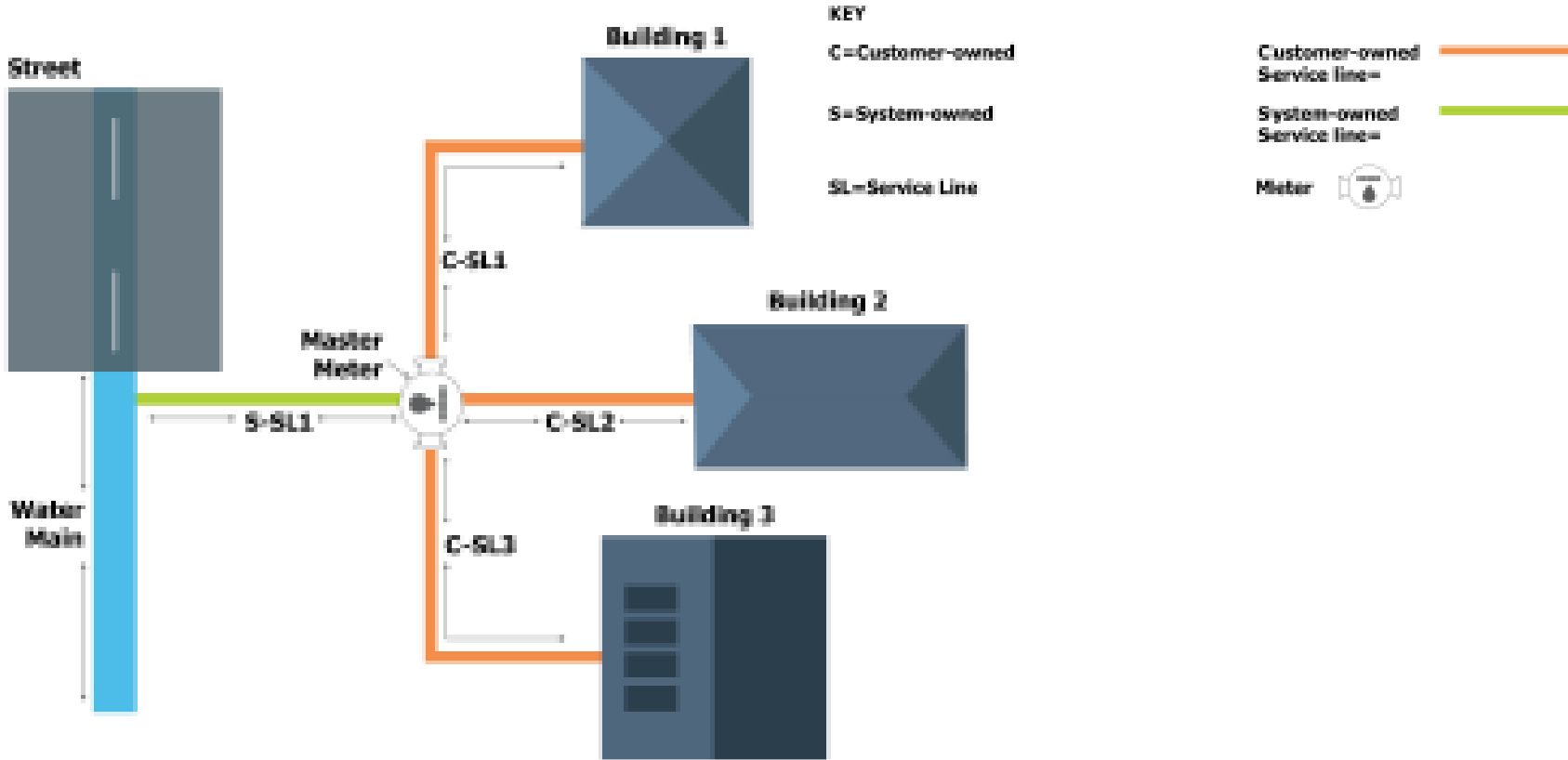
Pigments in industrial paint

What Service Lines to include?

- Systems must include all service lines in their inventories, regardless of the actual or intended use.
- These include, for example, service lines with **non-potable** applications such as **fire suppression** or those designated for emergency. **Irrigation lines**
 - These service lines could be repurposed in the future for a potable or nonemergency use.
- Water systems must also include in their inventory service lines connected to **vacant or abandoned buildings**, even if they are unoccupied and the **water service is turned off**

What is a Service Line?

Small Entity



Example of a Community Water System with a Master Meter and Multiple Service Lines (Plan View)



What is a Service Line?

Small Entity

Example 1: NTNCWS with well pumped directly to a building



Example 2: NTNCWS with well connected to a pressure tank to a building



Example 3: NTNCWS with well connected to a building connected to another building



KEY

NTNCWS=Non-transient non-community water system

S=System-owned

SL=Service Line

System-owned Service line= 

Meter 

Pressure Tank 

Well 

Examples of a Non-transient Non-community Water System (NTNCWS) Service Configurations (Profile View)

LSLI Excel Template

Must be TDEC's format

(because combining into one document)

TN LSLI Template - excel

The screenshot shows the Microsoft Excel interface with the following details:

- File Name:** Lead Service Line Inven... • Saved to this PC
- Current Sheet:** Inventory
- Worksheet Title:** Lead Service Line Inventory Data Sheet
- Color Legend:**
 - Black Font: Required for LSLI
 - Green: Good to know *Not LSLI Required*
 - Blue: May be needed for MSSL *not LSLI Required*
- Table Headers:**
 - Column A: PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)
 - Column B: CURRENT SERVICE LINE MATERIAL - Distributor Side
 - Column C: VERIFICATION SOURCE - Distributor Side
 - Column D: Service Line Material Detail - Distributor Side
 - Column E: SERVICE LINE INSTALL DATE - Distributor Side
 - Column F: Lead Connector
- Table Data (Row 9):**
 - Column A: 1234 Main St
 - Column B: Galvanized Requiring Replacement
 - Column C: F = Field Inspection Only
 - Column D: PEX/Copper
 - Column E: before July 1988
 - Column F: Y

TN LSLI Template - excel

The screenshot shows the Microsoft Excel interface with the following details:

- Title Bar:** AutoSave Off, Lead Service Line Inventory..., Saved to this PC, Search, Jennifer Murray
- Ribbon:** File, Home, Insert, Page Layout, Formulas, Data, Review, View, Help
- Home Tab Groups:**
 - Clipboard: Paste, Wrap Text
 - Font: Open Sans, 10, Bold, Italic, Underline, Paragraph, Merge & Center
 - Alignment: General, \$, %, .00, .00
 - Number: \$, %, .00, .00
 - Styles: Conditional Formatting, Format as Table, Cell Styles
 - Cells: Insert, Delete, Format
 - Editing: Sort & Filter, Find & Select
 - Sensitivity: Sensitivity, Add-ins
- Worksheet:**
 - Formulas Bar:** A9, PWSID #
 - Grid:** Columns A-F, Rows 1-19. Row 9 is highlighted in blue.
 - Table:**

Lead Service Line Inventory Data Sheet		Color			
		Black Font	Required for LSLI		
		Green	Good to know *Not LSLI Required*		
		Blue	May be needed for MSSL *not LSLI Required*		
ACCOUNT INFO - for CWS Reference	PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)	CURRENT SERVICE LINE MATERIAL - Distributor Side	VERIFICATION SOURCE - Distributor Side	Service Line Material Detail - Distributor Side	SERVICE LINE INSTALL DATE - Distributor Side
PWSID #	1234 Main St	Galvanized Requiring Replacement	F = Field Inspection Only	PEX/Copper	before July 1988
 - Bottom Bar:** Ready, Accessibility Investigate, Introduction, Inventory, 100%

General Template Info

Required for all CWS & NTNC systems

2 tabs/sheets

- **Introduction**

- Summarizes WS Info
- Outlines accepted info sources
- Definitions

- **Inventory**

- Must contain **ALL connections** (sprinklers, fire lines, industry, etc.)
- Location, materials, info source

LEAD SERVICE LINE INVENTORY	
As part of the revision, all water systems must develop an initial inventory of all service lines connected to the public water system.	
System Information	
Water System Name	City of Covington
PWSID #	TN0000144
Total connections #	4995
Contact Information	
Name	Joseph Bloechl
Title	Chief Water Treatment Operator
Phone	(901)475-4965
Email	jbloechl@CovingtonTN.com
The following list of sources of information <u>must</u> be reviewed when competing the LSLI:	
<input checked="" type="checkbox"/>	Distribution system maps and recorded drawings
<input checked="" type="checkbox"/>	Information collected for the presence of lead and copper as required under the Code of Federal Regulations (CFR) 40 CFR 141.42.
<input type="checkbox"/>	Capital improvement plans and/or master plans for distribution system development.

Introduction | Inventory | +

TN LSLI Template

Required fields - **BLACK**

- Unique Locational Identifier (Address)
- Current Service Line Material (WS & Private sides)
 - GRR – *Galvanized ever Downstream of Lead*
 - LSL – Lead Service Line
 - NL – Not Lead
 - UKM – Unknown
- Verification Source (WS & Private Sides)
 - Records
 - Field Inspection
 - Statistical Analysis/Predictive Modeling
 - Sequential Monitoring
 - (Emerging Technology)

The screenshot shows an Excel spreadsheet titled "Lead Service Line Inventory Data Sheet". The spreadsheet has the following columns:

PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)	CURRENT SERVICE LINE MATERIAL - Distributor Side	VERIFICATION SOURCE - Distributor Side	Service Line Material Detail - Distributor Side	SERVICE LINE INSTALL DATE - Distributor Side	Lead
1234 Main St	Galvanized Requiring Replacement	F = Field Inspection Only	PEX/Copper	before July 1988	Y

The spreadsheet also includes a legend for colors:

Color	Required for LSLI
Black Font	Required for LSLI
Green	Good to know *Not LSLI Required*
Blue	May be needed for MSSL *Not LSLI Required*

Materials



- **Lead**
- **GRR**
 - Galvanized Requiring Replacement*
- **Not Lead**
 - Ex) Pex, Copper, PVC, CPVC, HDPE, etc.
- **UKM**
 - Unknown

Additional details/descriptors are helpful and can be entered in “[Service Line Material Detail](#)” or other “details” columns



Department of
**Environment &
Conservation**

Verification Methods - 4

5 - if include Emerging Technologies

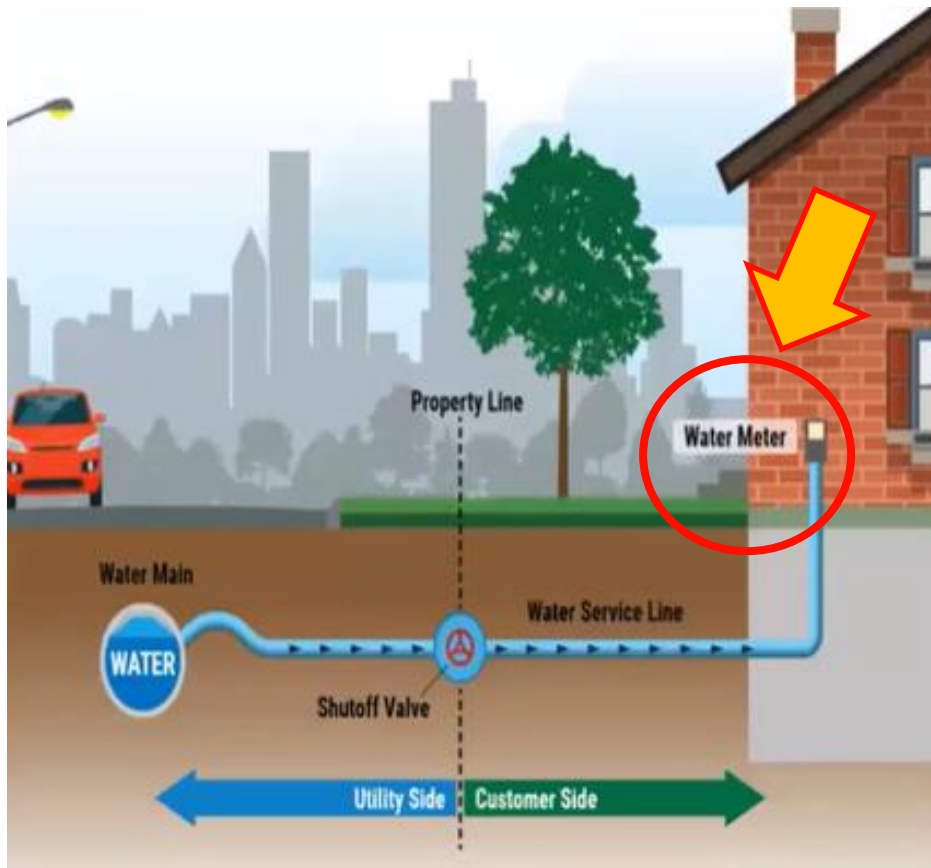
Verification Source - Records

Required

- Maps
- Master plans for DS development
- Capital improvement plans
- Op & maintenance manuals for service connections
- Meter installation records --> **July 1988 lead ban**
- Customer complaint investigative records
- Main construction & maintenance records, service cards/tickets
- Local ordinances, meeting minutes, newspaper articles, etc.
- Property assessor records:
<https://assessment.cot.tn.gov/TPAD>

The image shows two utility service records forms. The left form is numbered 73481 and has handwritten entries: '645 E. Main St.', '230', '7-15-41', '6', '18 - E - S ... 18 2 1/2', '3/4', '11 - N - S ... Main St', '3/4', '22 Highland', 'North Wall', 'Main Size 6"', 'Sub Size 3/4', 'Pipe Length 26', and 'Date Renewed 9/14/14'. The right form is numbered 3844 and has handwritten entries: '101 East 1st Ave', '114 26 of - E. of Summit St', '12 in N of S E. of 1st Ave', and 'Kral Lead'. A red box highlights '22 Highland' on the left form and 'Kral Lead' on the right form. A red arrow points from the box on the left form to the box on the right form. The text 'LSLs identified' is written in red above the right form.

Verification Source - Field Inspection



(Does this represent TN builds?)

- 2 points for Oct 16, 2024
- 1 on Utility Side
- 1 on Customer Side
- Meter box verification only?
- Who replaces customer side? Premise?
- Local ordinances re: utility workers on private property?
- Customer refusal?

Access Private Side? Local Ordinances?

- TN Code § 7-35-401 (2021)
- Title 7 - Consolidated Governments and Local Governmental Functions and Entities; Chapter 35 - Sewers and Waterworks
- Part 4 - Authority to Own and Operate System
- Authority Granted — Part Definitions

- C.1.b.iii. “Project for a private purpose” does not include the renewal or replacement of individual water or sewage lines behind a meter or onto private property when such rehabilitative maintenance or construction is deemed necessary by the municipal corporation because excessive infiltration and inflow from groundwater or rainwater is resulting in sanitary sewer overflows or **other serious health or system capacity issues**. Municipal corporations are authorized, but not required, to maintain or construct individual lines for this purpose *if the property owner consents and agrees to hold the municipal corporation harmless for the work.*

Verification Source - Field Inspection

Location: (Address) _____ Date: _____

Customer Refusal or

Attempt to contact for service line material

Water System

State Water System ID Number: TN000###

Recorded by: Name

Attempt 1: Date, description of attempt, etc.

Attempt 2:

Attempt 3:

Customer Refusal: Example - Customer refuses access to property and refuses to identify service line material.

- Example – Refusal / Attempt to Contact
- Create record of attempts
- Customer refusal & signature
- Name, date, address
- *Accepted attempt methods: Door knocking, door flyers, phone calls, email, text messages, and social media posts.*

Verification Source - Field Inspection

LEAD SERVICE LINE INSPECTION FORM

SERVICE ADDRESS - _____

ACCOUNT # - _____

DISTRIBUTION SIDE OF METER YOKE

PIPE COMPOSITION:

LEAD GALVANIZED COPPER BLACK PLASTIC PEX

OTHER - _____

CUSTOMER SIDE OF METER YOKE

PIPE COMPOSITION:

LEAD GALVANIZED COPPER BLACK PLASTIC PEX

OTHER - _____

VISUALLY INSPECTED BY - _____

DATE INSPECTED - _____

ADDITIONAL COMMENTS -

- Example - **Inspection**
- Name, date, address

Verification Source – Excavation

Excavation @ 2-3 points

- Curb stop to main (meter)
- Curb stop to building (1/2 way to connection point)
- Connection Point to consumption:
 - Inside the home where the service line enters
 - A second point in the longer section of service line that is at least halfway between the first point and the building



Verification Source – Emerging Technology

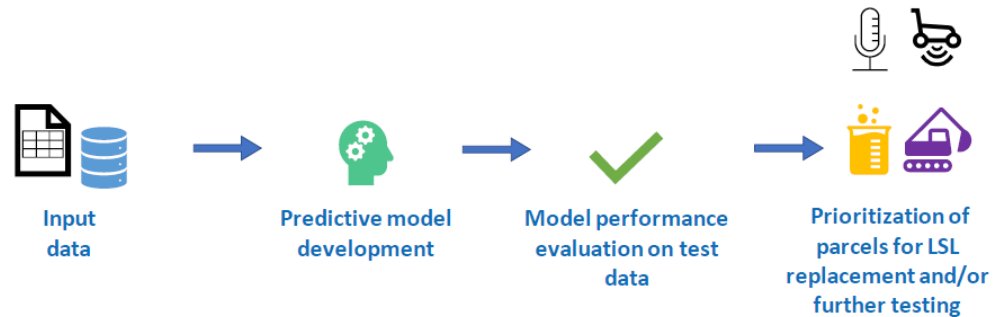
- Internal CCTV inspection
 - **Not approved**, disturbs protective scaling.
- Ground Penetrating Radar Scanners
 - **None approved** yet, these simply do not exist with accuracy needed.
- X-Ray gun
 - Must touch to exposed material
 - **Approved** for materials verification
- Metal Detector
 - Only approved for location,
 - **Not approved** for materials verification



Verification Source – Statistical Analysis

- Often used by engineering /consulting firms with computational algorithms considering multiple complex variables
 - Can be used by water systems on a case-by-case basis, review of methodology & approval required by state.

Typical Workflow for Using Predictive Models



*EPA Predictive Modeling Presentation

- Must have 95% accuracy within 1 mile for TDEC
- Must reevaluate data analysis methodologies when any lead is identified that was deemed as non-lead
- Not accepted for Lead-Free Certifications

Verification Method – Sequential Sampling

Must be TDEC approved:

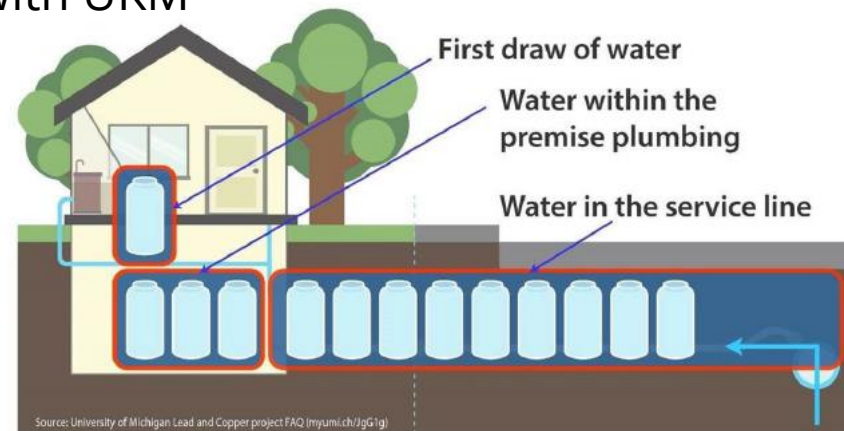
1. Established baseline for fully flushed and sequential samples:

1. From homes that have never had LSLs.
2. From homes with LSLs.

2. Collect fully flushed samples from homes with UKM

-- IF #2 DOES NOT INDICATE LEAD, THEN ↓ --

3. Collect sequential samples from UKM



- Use 1L bottles for sampling
- Turn off water & wait 30 seconds between each bottle
- Must collect a minimum of 5Ls
- A collective total of 5ppb throughout all of the samples indicates LSL+



Department of
**Environment &
Conservation**

Customer Participation

Customer Choice



EPA



FDA



Customer Participation

- Use community surveys
- Advertise
- Start social media campaign

- Offer in-person consultation and inspections
 - Post cards, emails

- Create a website / link
 - Allow submitting surveys
 - Allow photos with surveys
 - NPR free interactive LSL ID tool:
<https://apps.npr.org/find-lead-pipes-in-your-home/en/>
 - Enable asking questions
 - Request appt for WS inspector



- Offer incentives
 - Is it possible to offer credits on water bills, gift cards to participants? *
 - Some locations may qualify for financial assistance for customer-side LSL Replacements
 - Replaced LSLs may improve property resale value **

- Communicate resources and intentions with local officials** and activist groups

Ex) Post Card or Online Survey

TAKE THIS SHORT SURVEY

TO HELP US PROTECT YOUR DRINKING WATER

Silver Creek Water Corporation (SCWC) requests your help in completing this important survey to document the material of your water service line. We would like to have this survey returned by December 22nd, 2023. Lead may be found in the plumbing materials inside your home or business which could be released into drinking water.

This survey may be completed through one of the following methods:

-  **MAIL:** Back of this postcard
-  **PHONE:** (800) 674-7961
-  **EMAIL:** support@t20water.com
-  **ONLINE:** <mailto:support@t20water.com>
-  **DROP OFF:** SCWC Business Office
8104 County Line Road
Sellersburg, IN, 47172
24-HOUR DEPOSITORY IN LOBBY

Your responsibility starts at the adapter that attaches to our water meter setter.

FOR HELP OR TO LEARN MORE GO TO: bit.ly/EPAleadcheck



NAME _____
ADDRESS _____
CITY, STATE, ZIP _____
PHONE _____
EMAIL _____

The type of my water service line is best described as the following:

- Copper
- Plastic
- Lead
- Galvanized steel
- Other: _____
- Unknown
- I am unsure and would like someone from SCWC to assist me in identifying the material.

I have determined the type of my water service line as follows:

- I have observed the material and know what it is.
- I have been provided some form of documentation of the water service line material.
- It is my best guess.
- Other: _____

My house or business was built in one of the following time periods:

- Prior to 1960
- 1960 to 1988
- After 1988
- I am unsure

Account ID: 179
Location ID: _____

Complete, Tear, Mail.



SCWC requests your assistance in completing this survey. At your convenience, please answer all questions and detach the survey along the perforated edge. Once completed, simply place the detached survey in your mailbox or drop it off in your nearest postal drop box.

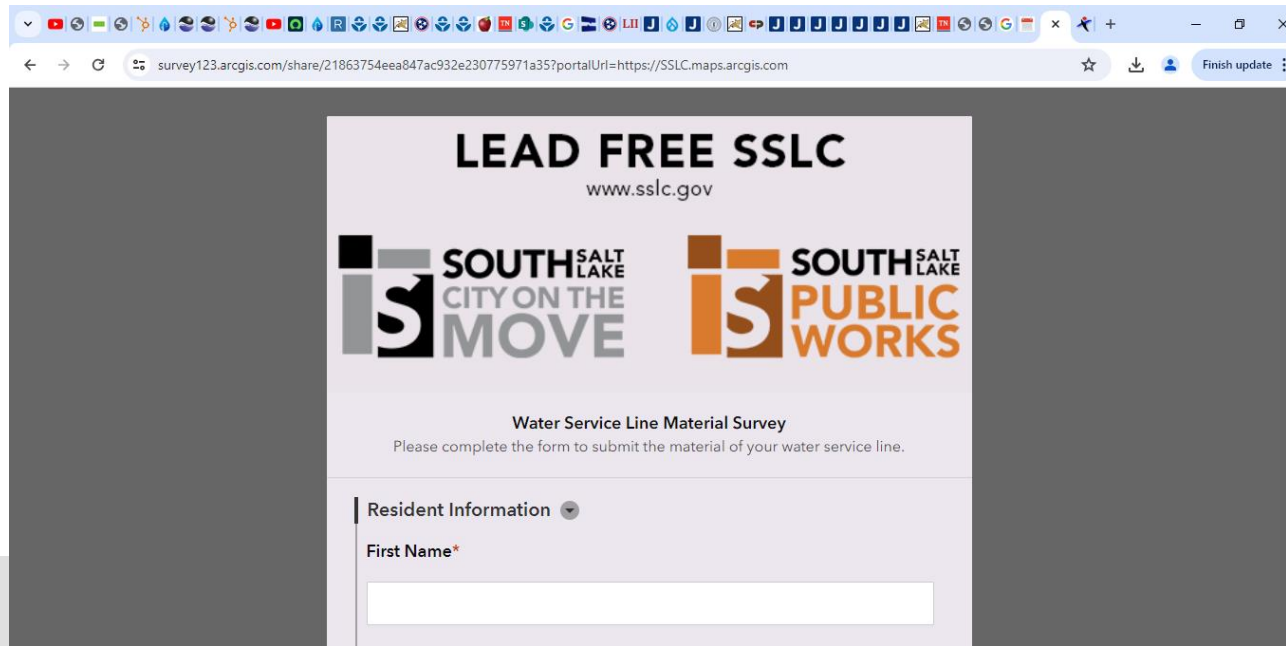


Submit your survey by
DECEMBER 22ND, 2023

A video tutorial is available on
<https://silvercreekwater.org/>
to help identify your service line.

Ex) Survey

- <https://www.youtube.com/watch?v=eVvFt2BOXSM>
- Online Survey - <https://survey123.arcgis.com/share/21863754eea847ac932e230775971a35?portalUrl=https://SSLC.maps.arcgis.com>



The screenshot shows a web browser displaying an online survey. The survey title is "LEAD FREE SSLC" with the website "www.sslc.gov". It features logos for "SOUTH SALT LAKE CITY ON THE MOVE" and "SOUTH SALT LAKE PUBLIC WORKS". The survey is titled "Water Service Line Material Survey" and asks the user to "Please complete the form to submit the material of your water service line." The "Resident Information" section is expanded, showing a "First Name*" field with an empty input box.

Inventory completed.

What do you do with it?

Submit the LSLI

- **Must be submitted BY Oct 16, 2024**
 - EPA will be enforcing any violations – Not TDEC
- The final **LSLI excel file** should be **emailed** to
 - Local Field Office
 - dwrWater.Compliance@tn.gov or Jennifer.murray@tn.gov

The screenshot shows an Excel spreadsheet with the following data:

PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)	CURRENT SERVICE LINE MATERIAL - Distributor Side	VERIFICATION SOURCE - Distributor Side	Service Line Material Detail - Distributor Side	SERVICE LINE INSTALL DATE - Distributor Side	Lead
1234 Main St	Galvanized Requiring Replacement	F = Field Inspection Only	PEX/Copper	before July 1988	Y

Color coding for font color is indicated in the top right of the spreadsheet:

Color	Required for LSLI
Black Font	Required for LSLI
Green	Good to know *Not LSLI Required*
Blue	May be needed for MSSL *not LSLI Required*

TDEC must send list of WS that miss the deadline to EPA for enforcement

* Sanitary survey service lines compared to what submitted on LSL inventory



Department of
**Environment &
Conservation**



What's due?

October 16, 2024

1. “Baseline” or “Initial” Inventory in excel template (TDEC website)
2. Inventory publicly available – online for >50,000 **customers served**
3. 30d notice to any customers with LSL, GRR & Unknown lines – by Nov 15, 2024

Make it Public

Email TDEC link/info

- WS >50K **customers served** must publish LSLI on website
- All other WS must make LSLI publicly accessible upon request
- **REDACT ALL SENSITIVE INFO**
 - No names, account numbers,
 - or phone numbers should be public!

PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)	CURRENT SERVICE LINE MATERIAL - Distributor Side	VERIFICATION SOURCE - Distributor Side	Service Line Material Detail - Distributor Side	SERVICE LINE INSTALL DATE - Distributor Side	Lead Connector
1234 Main St	Galvanized Requiring Replacement	F = Field Inspection Only	PEX/Copper	before July 1988	Y

Legend:

- Black Font: Required for LSLI
- Green: Good to know *Not LSLI Required*
- Blue: May be needed for MSSL *Not LSLI Required*

Make it Public

Email TDEC link/info

- **If NO LEAD lines** found
- Provide a **written statement**, instead of an inventory
- **State that the** distribution system has no lead lines, galvanized requiring replacement lines, or unknown lines.
- The statement must include a general description of the **applicable sources** used to make this determination.
- ****** If in the future, the water system finds a lead service line, the system must notify the State within 30 days of discovery and submit an updated inventory on a schedule established with their State.***

The screenshot shows an Excel spreadsheet with the following data:

Color	Required for LSLI
Black Font	Required for LSLI
Green	Good to know *Not LSLI Required*
Blue	May be needed for MSSL *not LSLI Required*

PHYSICAL ADDRESS or other locational identifier (do not use account number, no duplicates allowed)	CURRENT SERVICE LINE MATERIAL - Distributor Side	VERIFICATION SOURCE - Distributor Side	Service Line Material - Distributor Side
1234 Main St	Galvanized Requiring Replacement	F - Field Inspection Only	PEX/Copper



Department of
**Environment &
Conservation**



1. “Baseline” or “Initial”
Inventory in excel
template (TDEC
website)



2. Inventory publicly
available – online for
>50,000

What’s due?

October 16, 2024

3. 30d notice to any
customers with LSL, GRR
& Unknown lines – by
Nov 15, 2024

30-day Public Education

(by Nov 15)

For all LSL, GRR & Unknowns

- **TDEC Template available now**

- EPA Templates pending

- Translation assistance?

Plan Ahead

- Be prepared
- Community interaction
- Who will field questions/calls
 - Info for Staff
- Public relations staff?

Location: _____ Date Distributed: _____

Potential Lead Exposure Risk Notice

Drinking Water System is required to notify customers, non-paying consumers, and any off-site owner of a property (e.g., landlord) when a service line that may cause elevated lead exposure is identified. The most recent service line inventory indicates that this property has been identified as having a drinking water service line made of:

- Lead
- Galvanized metal that may have been downstream of lead containing [materials](#)
- Unknown material

A service line is a portion of pipe that connects the water main to the building inlet. Ownership of the service line varies by water system, but the **Water System** service line is owned partially by the **Water System** (main distribution line to the meter) and partially by the property owner (from the meter to the building). This service line material has been identified in the **Water System owned portion and in the property owner's portion.**

Water System has developed a lead service line verification and replacement program. Information on this program is available at [include website/upon request \(include details\)](#) and in our annual Consumer Confidence Report. If you are planning to replace your service line, contact us at [\(123\)](#)

Content for Public Education

- The specific content requirements vary depending on whether the service line is **lead, GRR, or unknown**.
- All notifications must include an **explanation of the health effects of lead**, a statement that service line material is either **lead, galvanized requiring replacement, or unknown**, and steps individuals can take to reduce lead exposure in drinking water.
- For a **confirmed lead or galvanized requiring replacement**, the notice must also include information on **opportunities to replace the service line**.
- For an **unknown service line**, the notice must include information on opportunities to verify the material of the service line.
- See 40 C.F.R. section 141.84(e)(3) for the complete list of specific requirements.

Potential Lead Risk Notice – 30d after Oct 16

- All LSL, GRR, or UKM must be given a notice
 - 30d initially, then before July annually w/ additional Certificate of Distribution

LSLs	GRR	UKM
<ul style="list-style-type: none"> ⇒ Description of material ⇒ Health effects of lead ⇒ Steps to reduce lead exposure ⇒ Information about opportunities to replace lead service lines ⇒ Programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line, and ⇒ 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. 	<ul style="list-style-type: none"> ⇒ Description of material ⇒ Health effects of lead ⇒ Steps to reduce lead exposure ⇒ Information about opportunities to replace GRR service lines 	<ul style="list-style-type: none"> ⇒ Description of material ⇒ Health effects of lead ⇒ Steps to reduce lead exposure ⇒ Information about opportunities to verify service line materials

2024 Timeline

Today

MAY

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

139 Days

Inventory Due & Publicly Available

OCTOBER

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

30 Days

30d Public Education Notifications LSL, GRR & Unk Due

NOVEMBER

S	M	T	W	T	F	S
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

Email to TDEC:

- Inventory to TDEC
- 50k+ - email link
- <50k – email details how to access

Email to TDEC:

- Copy of letter
- # mailed for each category (LSL, GRR, UKM)

Updating the LSLI

- **Must be updated annually**

- Expect LCRI to require % of LSL, GRR, & UKM to removed with each update
- Goal - 10 years no lead lines
- Replacement plan

No updates required:

- No LSL, GRR or Unknowns
- Lead-Free Certified

Lead & Copper – LCRR

- Lead & Copper Rule Revisions (LCRR)
 - DWR was granted an extension for promulgating the LCRR
 - Extension is until December 2025
 - **EPA will oversee implementing lead and copper program**
 - Division will still issue notices of potential violations



U.S. ENVIRONMENTAL PROTECTION AGENCY

Photo: Miguel Del Toral/Illustration: Paula Friedrich/WBEZ

Lead & Copper Rule Improvements (LCRI)

- Still proposed, trying to finalize by October 16, 2024, to help figure out how transition from LCRR to LCRI
 - What happens between 2025 and 2027 is still up in the air



- Heavy on notifications to consumer and State
- Pushes full lead service line replacement within 10 years

Customer Choice



What's due?

October 16, 2024

1. “Baseline” Inventory in excel template (TDEC website)
2. 30d notice to all customers with LSL, GRR & Unknown lines – by Nov 15, 2024
3. Inventory publicly available – online for >50,000 *customers served*

Frequently Asked Questions

Frequently Asked Questions

- Include after 1988 builds on inventory list?
- Access to customer side?
- Customer refusal? No response?
 - How many attempts
 - How to document
- Know we don't have any lead, do we still have to do it?
- What if multiple buildings at one address?

Frequently Asked Questions

- What does statistical analysis really mean?
- What information do we post on the website to make it publicly available?
- What do < 50,000 systems have to make available?
- How does TDEC determine # of service lines?

Frequently Asked Questions

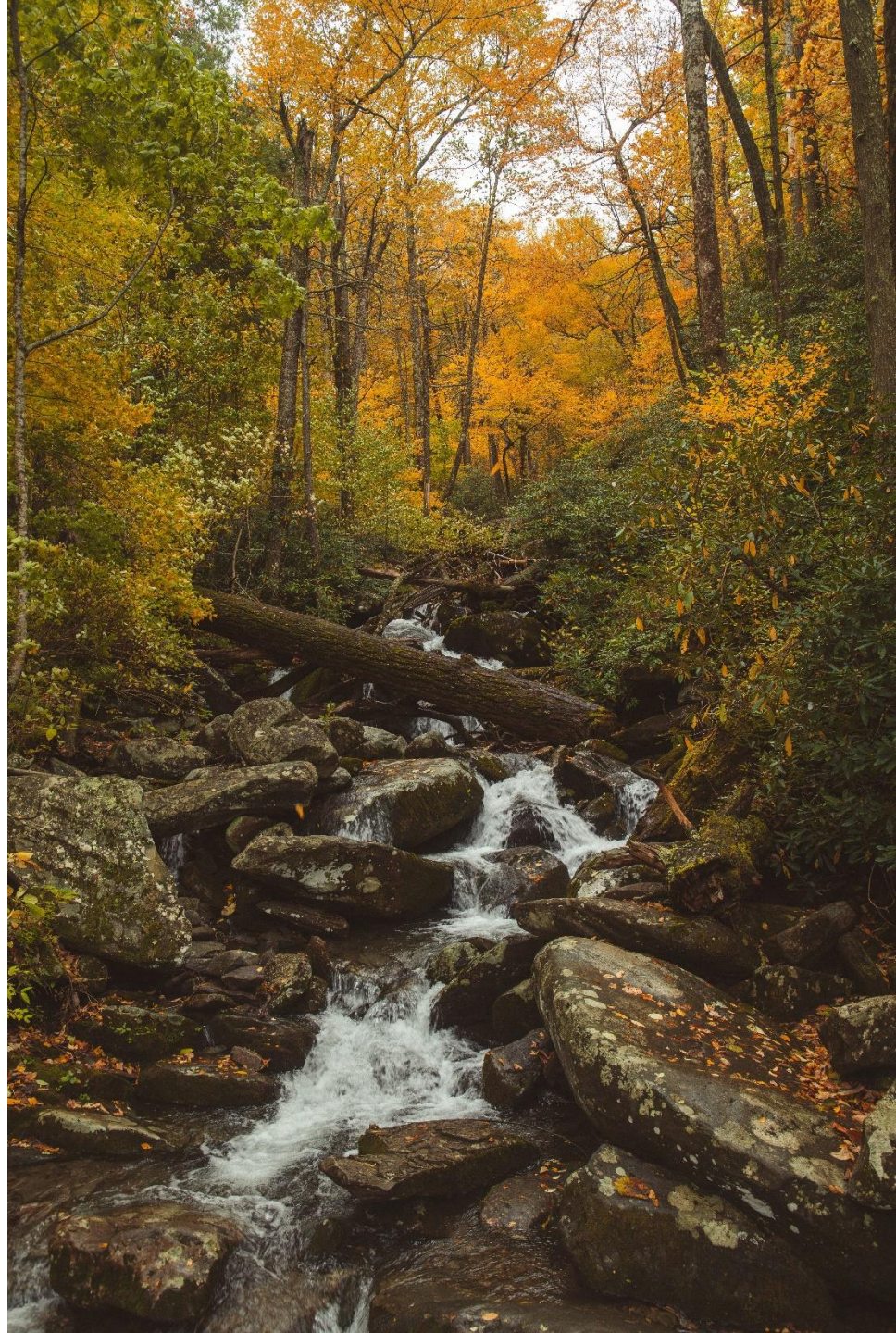
- Replace utility side only?
- Would we be required to provide customers with point-of-use devices for their internal faucets with six months of replacement cartridges?
- What about Schools? (Dept of Educ - WIIN funding)
- Daycares?

Frequently Asked Questions

- What if I can't identify all the service lines before October 16?
- Extension on the Oct 16 deadline?



Questions?



Lead & Copper Program

- Other trainings for regions being planned
 - Service Line Inventory
- Questions about developing your service line inventory contact Jennifer Murray (615) 981-6546
 - Jennifer.Murray@tn.gov

