



Questions and Answers

Guidance for Service Line Inventory and Compliance Requirements

**Drinking Water Program
Division of Water Resource Management
Florida Department of Environmental Protection
January 2024**

Questions in Blue – Department Responses in Black

Question: Who needs to complete a Service Line Inventory?

- *All community water systems and all non-transient, non-community water systems must develop a service line inventory using the EPA LSLI template for submission by October 16, 2024.*

- Question: Our water system does not have lead/copper service lines. All material used is PVC or a similar non-lead material. Would we still be required to complete a service line inventory spreadsheet? Also, are we going to be required to take inventory of the piping material from the meter to the place of residency.
- *Yes, all community water systems and all non-transient non community water systems are required to submit a service line inventory to the State of Florida by October 16, 2024. The Lead and Copper Rule Revisions (LCRR) further outlines that this inventory must include all service lines connected to the distribution system regardless of ownership status. So, where service line ownership is shared, the inventory would need to include both the portion of the service line owned by the water system and the customer-owned portion of the service line.*

- Question: Do lead connectors, goosenecks, and pigtails count toward the definition of a lead service line?
- *According to the Lead and Copper Rule Revision (LCRR), if the only lead piping serving the home is a lead gooseneck, pigtail, or connector, and it is not a galvanized service line that is considered a lead service line, the service line is not a lead service line (40 CFR §141.2) but could require replacement in accordance with 40 CFR §141.84(c).*

- Question: What is the significance of the “After 2014” date?
- *In 2014, there was an amendment to the 1986 Lead ban that reduced the definition of “lead free” for piping and pipe fittings to 0.25% (weighted average with respect to wetted surfaces).*

- Question: What if a water system doesn’t have any historical records?
- *Systems are required by rule to review all records listed in 40 CFR §141.84(a)(3) to the best of their ability. The inventory template will ask the system to indicate whether each required record was reviewed and certify that the information within the inventory is true, accurate, and complete. However, the state understands that the inventory is a living document and during the course of normal operation and maintenance the system may need to update the inventory as new information is discovered or received.*

- Question: If a water system has done the background work of going through data and has determined that they do not know the lead status of a significant number of their service lines, what should they do?

- *If a water system has reviewed all records required by the LCRR (40 CFR §141.84(a)(3)) and is still unable to determine the material of their service lines, they have a few options. They can report the service line material as “lead status unknown.” It is understood that completing the service line inventory will be an on-going project for water systems. Therefore, reporting the service line material as “unknown”, especially for the initial inventory, is acceptable. The inventory is intended to be a living document that is continuously improved over time. Unknowns should naturally decrease over time as the system goes through normal operations and continues to gather additional information. Importantly, water system should be working to verify unknowns and may use a variety of methods identified by EPA or approved by the Department. Chapter 5 of the EPA “Guidance for Developing and Maintaining a Service Line Inventory,” EPA 816-B-22-001, August 2022, outlines a number of methods for service line investigations. Many of these methods are not required under the LCRR but are examples of tools that can be used to verify historical records and gather information when the service line material is unknown. Record review is the first and highest priority and provides information to guide additional investigations where needed to identify service line materials. Note, the Department has provided guidance identifying selected additional approved methods that are not specified by the EPA under 40 CFR 141.84(a)(3), but which are more fully discussed in EPA August 2022 guidance.*
- [Question: Can a water system use meter pit investigations to verify unknown service lines?](#)
- *Per EPA guidance (Section 6.1.2), “remember that no matter the approach, systems must review all historical records as listed in the LCRR”. This information is further outlined in Chapter 4. After required record review, meter pit investigations with scratch and magnet tests are acceptable field investigation techniques according to EPA guidance (See Chapter 5 of guidance, specifically section 5.1 and 5.1.1). Each PWS should document their process and procedures for service line inspections and determinations in a system-specific Standard Operating Procedure (SOP).*
- [Question: My understanding is that any service line of unknown material \(i.e. Lead Status Unknown\) are considered lead under LCRR. Is that true?](#)
- *Unknown service lines should NOT be reported as Lead. While it’s true that reporting service lines as “Lead Status Unknown” does come with additional steps (such as public notice), Lead Status Unknown is its own category within the service line inventory. Public notice is required because when systems have “Lead Status Unknown” service lines, they have not determined that the service line is “non-lead”.*
- [Question: A utility has galvanized service line material on the customer side but unknown \(not proven to be lead/non-lead yet\) on the utility side. Will this be a Tier 3 site or a Tier 5 site?](#)

Classification of Entire Service Line When Ownership is Split, from the Classifying SLs worksheet, the scenario described would be a Galvanized Requiring Replacement (GRR) service line and would therefore be considered a Tier 3 site. The only GRR sites that would not be Tier 3 would be non-single-family residences. The state approved EPA inventory form includes formulas to automatically calculate the tiering. If the pertinent information is filled out, then Column Y should automatically generate the appropriate tier using the new tiering criteria.

- **Question:** Does the inventory need to include irrigation and fire line pipes?
- EPA's "Guidance for Developing and Maintaining a Service Line Inventory" emphasizes that a service line is defined as "the pipe connecting the water main to the interior plumbing in a building." Therefore, all lines that go from a water main to a building must be included in the inventory. Section 2.2.1 notes that a service line could be repurposed to a potable application in the future from a current non-potable use, thus these should be included in the system's service line inventory.
- **Question:** A system services a 1928 home with unknown pipe material. The operator of the system thinks they can identify the piping material by investigating the meter pit and seeing what type of material leads to the home, but they wanted to know if there were other ways to determine the tier.
- A Single-Family Residence (SFR) will always be classified as Tier 1. If the service line material could not be identified visually within the meter pit/box, the customer may be able to provide information that confirms service line material.
- **Question:** A system services a 1978 commercial building with copper pipe, would this be considered a Tier 4?
- A community water system with insufficient Tier 1, Tier 2, and Tier 3 sampling sites must complete its sampling pool with "Tier 4 sampling sites," consisting of single-family structures that contain copper pipes with lead solder installed before the effective date of the State's applicable lead ban. A community water system with insufficient Tier 1, Tier 2, Tier 3, and Tier 4 sampling sites must complete its sampling pool with "Tier 5 sampling sites," consisting of single-family structures or buildings, including multiple family residences that are representative of sites throughout the distribution system. For the purpose of this paragraph (a)(7), a representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the water system. Water Systems may use non-residential buildings that are representative of sites throughout the distribution system if and only if there are insufficient numbers of single-family or multiple family residential Tier 5 sites available.
- **Question:** A system has located a 1995 Single Family Residence with copper pipe. Is this Tier 1?

- *No, For the purpose of sampling based on the service live inventory, Single Family Residences will be Tier 1 when that are served by a lead service line.*
- Question: Are record drawings a sufficient tool to confirm private and public service line ownership and material classification?
- *Drawings can be used to identify and classify the service line material used for both utility and customer owned portions. Any records that indicate what material was used when the service connection was installed would be acceptable. One thing to keep in mind is the level of confidence the utility has as to what method is used to identify the service line material.*
- Question: Based on the amendment to the Safe Drinking Water Act in 1986 which prohibits lead in piping material used for drinking water, can it be assumed that all service connections installed from the actual promulgated date, 1986, to present date as non-lead in the service lines, both public and private?
- *Even though the EPA published the SDWA in 1986, Florida's Rule went into effect on January 18, 1989. (Rule 62-555.322, Fla. Admin. Code.) Therefore, utilities can use 1989 as the Lead Ban date, and anything constructed after this date can be classified as 'non-lead' per Florida's January 18, 1989, Lead Ban Date. Public water systems can also use earlier dates where supporting documentation is maintained by the utility such as local building codes that were enacted with an earlier effective lead ban date.*
- Question: Can the sample data the system has accumulated over the past 30 years from the Tier 1, Tier 2 and Tier 3 locations be used to rule out lead service lines in those neighborhoods?
- *No, but it can help systems prioritize areas within the service territory that may potentially have lead. You can use the data to rule out the sample location if the results indicate no amount of lead has ever been found.*
- Question: The system is uncertain as to whether or not lead was ever upstream of identified galvanized service connections on the customer portion of the service connection, what responsibility does the system have regarding private side service line replacement?
- *If there is an uncertainty as to whether lead was ever upstream of a galvanized service connection, the utility will identify the galvanized line as GRR, Galvanized requiring replacement. As for all service connections that have been identified as unknown, lead or GRR, the system must notify the affected customer within 30 days of submitting the LSLI.*
- Question: Is the System required to provide service line material documentation to the State, as backup? For example, if we are physically verifying (digging up)

the lines, do we need to take pictures of all the sites and provide that to FDEP? Do we need to provide record drawings or sampling data?

- *The system will maintain records, such as invoices, pictures, drawings, etc., at their place of business, and such records that were relied upon for developing the initial service line inventory. These records should be maintained by each utility for a period of at least 12 years in accordance with 40 CFR § 141.91.*

- Question: Will the State implement a deadline as to when the service line inventory must be completed and that all lines are identified as non-lead?
- *The state has not implemented a final completion date as of the writing of this document. Only the initial inventory submittal date of October 16, 2024, has been identified.*

- Question: Can utilities classify service lines greater than 2 inches in diameter as non-lead? If not, is there a threshold service line diameter that can be used to assume non-lead?
- *Yes, Pipe diameter can be an important input to determining service material classification, considering that LSLs are often generally limited to 2 inches or smaller in diameter. Because LSLs were generally not constructed with an interior diameter over two inches, they will typically be connected to single family homes or buildings with a limited number of units. Service lines that are greater than 2 inches in diameter can be identified as non-lead on the inventory. This classification is consistent with EPA's LSLI Guidance.*

- Question: Will the State include lead connectors/goosenecks in the definition of lead service lines?
- *Florida has not defined lead goosenecks, pigtails, and connectors as part of the service line, but recommends that systems inventory the lead connectors/goosenecks and pigtails when encountered during normal maintenance operations. Replacements may be required.*

- Question: Will the State of Florida's definition of a lead connector/gooseneck be consistent with EPA's guidance?
- *Yes, Florida will be consistent with EPA's guidance. The State of Florida plans to maintain consistency with EPA's requirements for the Lead and Copper Rule Revisions.*

- Question: Will Florida produce guidance for the LSLI that may differ from EPA's guidance?
- *Yes. Florida has prepared guidance for developing and submitting LSLI's. This guidance is available at the [FDEP LSLI website](#).*

- [Question: Will Florida require a specific format of the LSLI?](#)
- *Yes. Florida has adopted the EPA's LSLI spreadsheet in order to provide a consistently and readily available means to provide the service line inventory information.*

- [Question: Is it required that all service connections, including commercial service connections, be included on the LSLI?](#)
- *Yes. All service connections, both residential and commercial, must be identified on the LSLI.*

- [Question: When systems have completed the LSLI, where and to whom do they submit the inventory?](#)
- *When systems have completed their LSLI they must submit it to the appropriate District office or ACHD. Once submitted the inventory will be reviewed by staff. Staff will utilize the 'state checklist' to review the inventory for completeness and accuracy.*

- [Question: Will inventories be verified and/or reviewed by district and/or ACHD staff?](#)
- *Yes, all inventories must be verified or reviewed by the appropriate DEP District Office or ACHD. In the event an office needs to verify information on the materials for certain service connections, public water systems should maintain its documentation such as receipts, invoices, records that supports the service line material classification. Please keep this documentation at your office and available in the event it is requested.*

- [Question: Must the inventory identify Single Family Residences \(SFR\) separately from Multi Family Residences?](#)
- *Yes. A SFR would be your typical residence; however, a duplex would be a multi-family residence.*

- [Question: Do I need to submit a Lead Service Line Replacement Plan \(LSLRP\)? If so, when is it due?](#)
- *If the inventory indicates the presence of Lead, GRR, or unknown service connections, yes, you must develop a LSLRP in accordance with applicable requirements at 40 CFR § 141.82(b). If the inventory indicates that there are no lead, GRR, or lead status unknown service lines, then you do not need to develop a LSLRP. The LSLRP is due at the same time the initial LSLI is to be submitted, October 16, 2024. Please note that EPA published proposed Lead and Copper Rule Improvements (LCRI) on Dec. 6, 2023 (Federal Register Vol. 88, No. 233, p. 84878) that are expected to address or revise EPA's requirements for LSLRPs.*

- [Question:](#) If lead, GRR and unknown lines are identified in the inventory, is the system required to notify the customers?
- *Yes. Systems that identify Lead, GRR, and unknown lines on the LSLI must notify customers within 30 days of submitting the LSLI.*

- [Question:](#) Are all the columns and fields within the LSLI template required even though EPA states some fields are recommended?
- *No. Those columns or fields identified on the EPA LSLI template as recommended are not required. However, the Department encourages that all columns and fields within the LSLI template be filled out completely and thoroughly, especially where such information may help with future updates or questions from the public.*

- [Question:](#) When submitting the LSLI, does the entire Excel Workbook need to be submitted?
- *Yes. Please send in the entire LSLI template as it is organized. Some of the fields have formulas that calculate totals from other sheets within the workbook.*

- [Question:](#) Will the State of Florida allow verification techniques that include using statistical methods like *Predictive Modeling*?
- *Yes. The Department views the use of predictive modeling as an approved tool and recognizes it may be helpful to better identify service line materials, and reduce the number of service lines that would otherwise be identified as “unknown.” Please see the Department’s Guidance for Service Line Inventory and Compliance Requirements, in Accordance with Subpart I of Title 40 CFR Part 141, Control of Lead and Copper, for Community and Non-Transient, Non-Community Public Water Systems in Florida, for more information on the documentation requirements for predictive modeling.*

- [Question:](#) As a result of EPA’s service line inventory requirement, will the replacement of a service line identified as, “lead,” or “galvanized requiring replacement,” require a construction permit pursuant to Chapter 62-555, Fla. Admin. Code?
- *No. Rule 62-550.520, Fla. Admin. Code designates specific exceptions in which no permit is required for construction or alteration. With regards to the removal and replacement of service lines identified as “lead” and “galvanized requiring replacement,” Rule 62-555.520(1)(d), Fla. Admin. Code, states that no construction permit is required for the types of work or alterations in subparagraphs 1 through 13. The exception identified in paragraph (13) refers to the “installation or alteration of any water service line to a single building, including any water service line dedicated exclusively to a fire protection or*

irrigation system serving a single building or its premises”. Therefore, no construction permit is required for the removal and/or replacement of service lines identified as “lead” or “galvanized requiring replacement”. If the service line meets the definition of a water main as outlined in Rule 62-555.314, Fla. Admin. Code, (i.e., under the control of a public water system and has an inside diameter of three inches or greater), then notification is required in Rule 62-555.520(1)(c), Fla. Admin. Code.

- [Question: Will service line inventories submitted to the department prior to the release of official guidance need to be resubmitted now that guidance has been released.](#)
- *If a system has already submitted their initial inventory, each district and or ACHD would review the submission against the applicable regulations and DEP guidance. If needed, the office would request additional information or request that any deficiencies be corrected in the normal course of the review. Districts and ACHD’s should ensure that submittals meet the applicable requirements prior to acceptance, and are encouraged to use the, “State Checklist,” in the EPA LSLI template (i.e., the last tab in the EPA LSLI workbook file) as a guide to focus that review.*
- Note: Nothing herein is intended to modify Department rules or guidance documents incorporated within those rules. This Q&A is a living document and is subject to change.