



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Electronic Submittal of Lead Service Line Inventory

February 27, 2023

**Manny Patel,
Drinking Water Program Manager**



LEAD SERVICE LINE INVENTORY AGENDA

- Background on Lead Service Line Inventory
- Rule Requirement for Inventory Submittal
- Proposed Amendment to Georgia Rule for Safe Drinking Water
- Implementation Timeline
- Public Comment Period
- Q and A
- Adjourn



BACKGROUND

Timeline of Lead and Copper Rule Revision(LCRR)

- EPA published the final amended rule in the Federal Register on January 15, 2021, with a March 16, 2021, effective date and a January 16, 2024, compliance date.
- EPA proposed to extend the effective date until December 16, 2021, and the compliance deadline to September 16, 2024.
- On December 16, 2021, EPA announced that it is considering additional changes to the rule, but not to the Lead Service Line Inventory (LSLI) portion of the rule.



BACKGROUND

- EPA plans to propose Lead and Copper Rule Improvements (LCRI) in summer/fall of 2023.
- EPA anticipates finalizing the forthcoming LCRI prior to October 16, 2024, the initial compliance date in the LCRR.
- The deadline to submit a lead service line inventory remains unchanged at October 16, 2024.



LSLI SUBMITTAL – RULE REQUIREMENTS

§ 40 CFR 141.84 Lead service line replacement requirements.

(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. The inventory must meet the following requirements:

(1) All water systems must develop an initial inventory by October 16, 2024, and submit it to the primacy agency in accordance with § 141.90(e).

§ 40 CFR 141.90 Reporting requirements.

(e) Lead service line inventory and replacement reporting requirements. Water systems must report the following information to the State to demonstrate compliance with the requirements of § 141.84 and 141.85:

(1) No later than October 16, 2024, the water system must submit to the State an inventory of service lines as required in § 141.84(a).



LSLI SUBMITTAL – RULE REQUIREMENTS

§ 40 CFR 141.90 (e) (7) Reporting requirements.

- (e)(7) No later than 30 days after the end of the water system's annual lead service line replacement requirements under § 141.84(f) and (g), the water system must submit the following information to the State, and continue to submit it each year it conducts lead service line replacement under § 141.84(f) and (g):
- (i) The number of lead service lines in the initial inventory;
 - (ii) The number of galvanized requiring replacement service lines in the initial inventory;
 - (iii) The number of lead status unknown service lines in the inventory at the onset of the water system's annual lead service line replacement program;
 - (iv) The number of full lead service lines that have been replaced and the address associated with each replaced service line;
 - (v) The number of galvanized requiring replacement service lines that have been replaced and the address associated with each replaced service line;
 - (vi) The number of lead status unknown service lines remaining in the inventory;
 - (vii) The total number of lead status unknown service lines determined to be non-lead; and
 - (viii) The total number of service lines initially inventoried as “non-lead” later discovered to be a lead service line or a galvanized requiring replacement service line.



LSLI SUBMITTAL – RULE REQUIREMENTS

- The LCRR is silent on how to submit the inventory to the state.
- Water systems can send Excel or Word files, or use any format to submit the inventory and it would technically meet the requirement of the rule.
- EPA has published Lead Service Line Inventory Guidance Document and companion spreadsheet for LSL Inventory.
- EPD **does not want** to receive the inventory via Excel spreadsheets for approximately 2,400 water systems
- EPD is proposing to use electronic submittal that all water systems will use to submit the initial inventory and annual submissions thereafter.



LSLI SUBMITTAL – RULE REQUIREMENTS

- Electronic submittal will make submittals consistent and streamline the process for all water systems.
- EPD estimates that at least three to four full time staff would be necessary for initial inventory review without electronic submittal.
- EPD will need additional staff to review quarterly updates to the inventory, as well as for reviewing the replacement plan, sampling plan and notification requirement.
- Electronic submittals would reduce the overall cost of compliance with the LSR Rules.
- EPD envisions software to be used by water systems beyond initial submittal and as a tool to track progress, submit reports, and document replacement and notices.



LEAD SERVICE LINE INVENTORY SUBMITTAL

Proposed Draft Amendments to Chapter 391-3-5-.25 for Safe Drinking Water

Rule 391-3-5-.25 Treatment Techniques, Lead and Copper Requirements

...

(13) All water systems must develop an initial lead service line inventory by October 16, 2024 in accordance with 40 CFR 141.84(a), and submit it to the Division in accordance with 40 CFR Part 141.90 (e) in an electronic format prescribed by the Director.



LSLI SUBMITTAL – IMPLEMENTATION TIMELINE

- EPD is working with GEFA to identify software for submission of initial LSL inventory and beyond to include annual inventory update, track replacement, and track public notices.
- EPD and GEFA are currently going through the procurement process and hope to finalize vendor selection by mid March.
- EPD will release the LSLI guidance document and companion spreadsheet in March 2023 to provide water systems clarity on what fields will be required.
- Software is expected to be available to water systems around July 2023.



LSLI SUBMITTAL – COMMENTS

- Written comments should be received by close of business on Monday, March 6, 2023.
- Written comments may be emailed to EPDComments@dnr.ga.gov.
- Please include the words “Drinking Water Program Updates” in the subject line.



Questions/Comments?

Manny Patel, GA EPD, Drinking Water Program Manager

Manny.patel@dnr.ga.gov

470-524-0585

