Lead and Copper Updates: Service Line Inventory Material (SLIM) Notices

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Environmental Protection Agency









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How to complete your Service Line Inventory

US EPA - Service Line Inventory

Initial submittal due October 16th, 2024

- All NTNC and COM must submit
- Must use Ohio EPA's Inventory Template or approved CSV file
- Must include PWS Name and ID
- Must include each service line connected to the system
- Must complete of all (Red) required columns

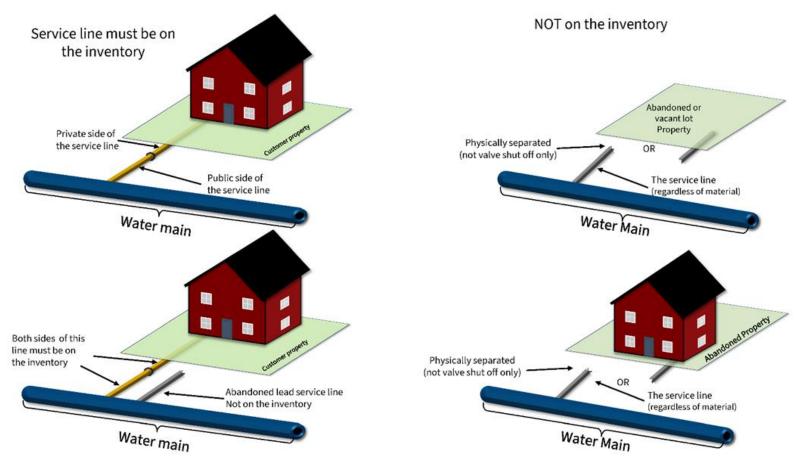


Not the

Lead

Map!

What Service Lines Count?



*Lead goosenecks, pigtails, or connectors under than 24" will not create a lead service line or a galvanized requiring replacement (GRR) line.



Inventory Data Required

Minimum Required Columns to Complete (10 total):

- Unique Service Line ID
- Location identification: Street Number/Name, City, Zip, County, Latitude/Longitude of parcel
- System-Owned Portion of the Service Line Material Classification
 - Lead, Lead Line Galvanized, Galvanized, Non-Lead (3), or Unknown (3)
 - If Non-lead, it will ask was it ever lead
- Customer-Owned Portion of the Service Line Material Classification
 - Lead, Lead Line Galvanized, Galvanized, Non-Lead (3), or Unknown (3)
- Plus, any other cells that turn red, based on optional information provided

*Connector Material will likely be required in 2027 with baseline inventory (only required with records review)



Service Line ID Methods

- Required records for identification:
 - Previous materials evaluation
 - Construction/plumbing codes and records
 - Water system records
 - Local ordinances
 - Distribution system inspections
 - For more, see Exhibit 4-1 in U.S.
 EPA's Service Line Inventory
 Guidance

- Additional possible methods of identification:
 - Ohio banned lead Sept 1988
 - Basic visual inspection
 - Customer survey
 - Predictive models
 - Water samples (lead ID only)
 - Excavation
 - Etc.

Contact Ohio EPA if your system is requesting to use a method not listed here



Service Line Inventory ID

Helpful Documents

- Residential Survey Template and Instructions
- Residential Survey Flyer Template
- Service Line Inventory Fact Sheet
- FAQ for Service Line Inventories
- EPA's Guidance for Developing and Maintaining Service Line Inventory

REPLACE WITH YOUR SYSTEM NAME

WE NEED YOU

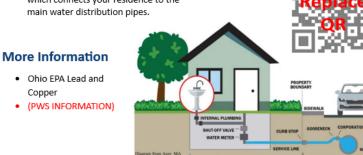
Help Us Get the Lead Out

What?

How?

- To protect our customers from lead in drinking water, we are working to identify and catalog all service lines, including those in your home.
- To limit cost and disruption to residents, we need your help identifying your home's service line, which connects your residence to the main water distribution pipes.

Please use the QR code below to complete the short survey, or contact us for a paper copy. This 5–10-minute survey will walk you through how to identify your home's service line.



Have Questions? Contact: PWS Contact Name at EMAIL or PHONE



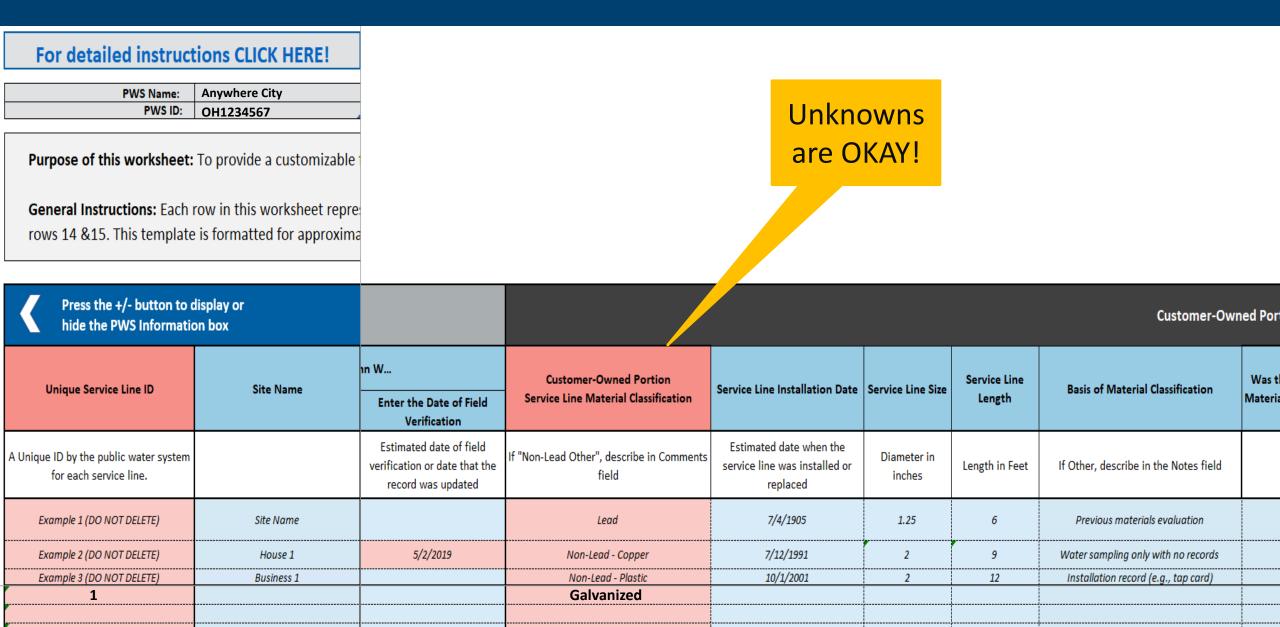
Completing the Inventory

For detailed instruct	tions CLICK HERE!											
PWS Name: PWS ID:	Anywhere City OH1234567											
Purpose of this worksheet	: To provide a customizabl	e format water s	systems can use	to track materia	als for each serv	vice line in their	distribution syst	tem.				
General Instructions: Each are included in rows 14 &1				-							the columns wi	ith t
Press the +/- button to o hide the PWS Information					Location Inform	nation						
Unique Service Line ID	Site Name	Street Number	Street Name	City	Zip Code	County	Latitude	Longitude	In Asset Management	Asset Status	Asset Start Date	A
A Unique ID by the public water system for each service line.		Water systems must track addresses of all service lines in their internal inventory. For the publicly accessible version, location identifiers are required for lead and galvanized requiring replacement. If th not use addresses for their location identifier, other options could include GPS coordinates, landmark, intersection, block, or other details to specify service line locations.					: If th					
Example 1(DCINDT DELETE)	Site Name	1234	Test St	Test City	88888	Test County	##.#####	-##.######	Yes, No, Linknown	Active, Inactive, Not Applicable	mmlddsggg	
Example 2 (DCI NCIT DELETE)	House 1	1502	Main St	Braceville	44444	Adams	41.2566	-80,9806	No	Active	## 2022	
Example 3 (DCI NCIT DELETE)	Business 1	1268	Main St	<i>Braceville</i>	44444	Adams	41.2560	-80,9820	Yes	Inactive	115/2016	1
1		50	W Town St	Columbus	43215	Franklin	39.9589	-83.0012				

Completing the Inventory

For detailed instruct	Inventory								
PWS Name: PWS ID:					Unkr	nowns			
Purpose of this worksheet	: To provide a customizabl					are (DKAY!		
General Instructions: Each included in rows 14 &15. T	· · · · · · · · · · · · · · · · · · ·		he columns with	n the RED shadir	ng are required by the LCR	R and/or Ohio The B	LUE columns are rec	commended. In	formati
Press the +/- button to hide the PWS Information					/				
	Site Name	Access Sharkers			System-Owned Portion	If Non-Lead in Column O		Is the Service Line	ice Line Service
Unique Service Line ID	Site Name	Asset Status	Asset Start Date	Asset End Date	Service Line Material Classification	Was Material Ever Previously Lead?	Service Line Installation Date	Metered	Service
A Unique ID by the public water system for each service line.		nd galvanized requiring replacement. If the system does not to specify service line locations.		If "Non-Lead Other", describe in Comments field	Important for determining if service line requires replacement	Estimated date when the service line was installed or replaced	e Service Line Metered or Not Mettered	Drinki Drin Comb	
Example 1 (DO NOT DELETE)	Site Name	Active, Inactive, Not Applicable	mm/dd/yyyy	mm/dd/yyyy	Non-Lead - Copper	Yes	3/19/1999	Yes	Dri
Example 2 (DO NOT DELETE)	House 1	Active	1/1/2022	1/1/2023	Non-Lead - Plastic	No	4/2/2005	Yes	Dri
Example 3 (DO NOT DELETE)	Business 1	Inactive	1/15/2016		Non-Lead - Copper	No		Yes	Comt
1					Non-Lead - Copper	Yes	7/2/1991		

Completing the Inventory





Environmental Protection Agency

How to submit your Service Line Inventory

Inventory Submittal Requirements

1.1		
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	V	

1. Fill out the Online Service Line Inventory Submittal Form



2. Submit Service Line Inventory Verification Form



3. Confirmation email will provide the email address to send inventory spreadsheet



4. Email the Inventory Excel Spreadsheet to address provided



Individual Inventory Submittal Form and Excel submission must be completed for each PWS ID





Service Line Inventory Submittal and Verification

The Lead and Copper Rule Revisions require water systems to use or record specific information. This online form serves as verification these requirements were followed. A new form must be filled out for each PWS ID.

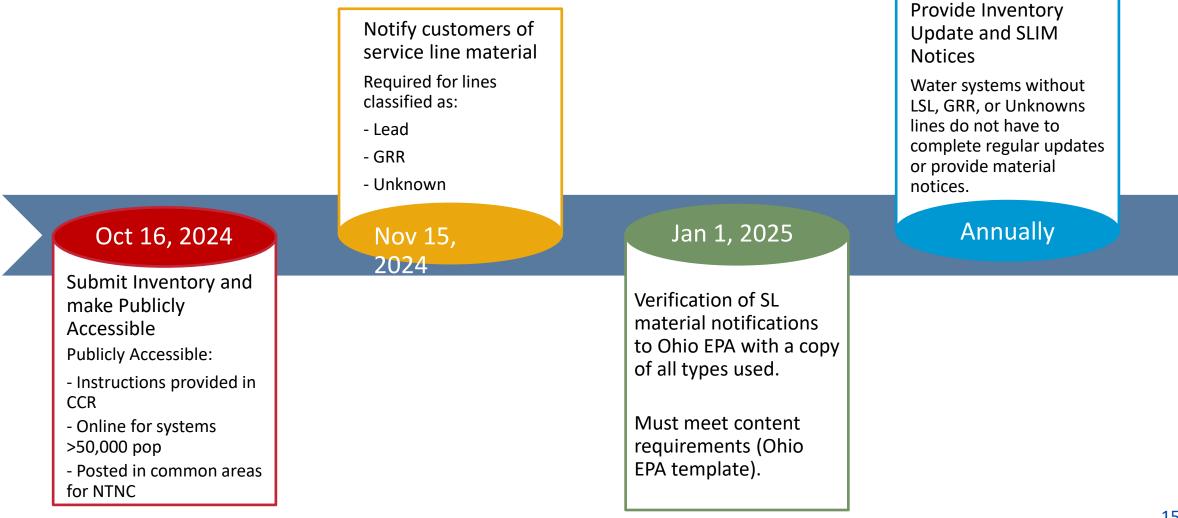
Please answer the questions below. At the end you will be provided an email to send your inventory file(s).

All fields are required and a copy of your answers will be emailed to the address you provide below for your records.

Contacts: https://epa.ohio.gov/divisions-and-offices/drinking-and-ground-waters/about-ddagw/ddagw-contacts or call 614-644-2752.



Inventory and Service Line Inventory Material (SLIM) Notification Timeline



SLIM Notice Documents

Templates Now Available:

- Lead Service Line Notification
- Galvanized Requiring Replacement (GRR) Service Line Notification
- Lead Status Unknown (Unknown) Service Line Notification
- SLIM Verification Form
- SLIM Notification Guidance Document



Who Receives the Notice?

- Customers and all persons served if their service line is classified as lead, GRR, or unknown
- Includes: owner and all occupants of the building or home.
 - If tenants are not billed separately, the owner/management should be instructed to post the information in areas for tenants to see.
- NTNC or Single-Structure Com: post the notice(s) in common areas for consumers to view.
 - If PWS is a school/daycare/correctional facility the legal guardian shall be provided notification.



When Must Customers be Notified?

- No later than November 15, 2024
- Continued annually for as long as their service line is classified as lead, GRR, or unknown
- Provided to new customers at time of service initiation
- Must be completed by mail or another direct delivery method.
 - Email, hand delivery, posting notices (NTNC)



Approved Delivery Methods for Service Line Inventory Material (SLIM) Notice					
Delivery Method	Description				
Mail - Paper copy	Mail a paper copy of their specific SLIM Notice to each bill-paying customer.				
Mail - Notification that the SLIM notice is available on website	Mail each bill-paying customer a notification that states the SLIM Notices are available and provides a direct URL to their SLIM Notice where it can be viewed.				
Email – Direct URL to SLIM	Email each bill-paying customer with a direct link to their specific SLIM Notice.				
Email – Notice sent as an attachment to the email	Email each bill-paying customer with their specific SLIM Notice as a file attachment (EX: PDF, Word doc, etc).				
Email – Notice sent as an embedded image in an email	Email each bill-paying customer with their specific SLIM Notice information embedded in the body of the email.				
	Not Approved Delivery Methods for				
	Service Line Inventory Material (SLIM) Notice				
Delivery Method	Description				
Mail - Generic paper copy	Mailing a generic paper copy with nonspecific information on service line materials does NOT meet the requirements.				
Mail - Link to a website where the notice is not specific	Mailing each bill-paying customer a non-direct URL that requires the customer to search for the SLIM does NOT meet the requirements.				
Email – Notice sent as a link in an attachment to the email	Emailing each bill-paying customer an attachment with a link to the SLIM does NOT meet the requirements.				

Service Line Classification

System-Owned Portion	Customer-Owned Portion	Classification - Material
Material	Material	notice sent
Lead	Lead, Galvanized, Non-lead, Unknown (any type of material)	Lead Service Line Notification
Lead	Galvanized	Lead Service Line Notification
Lead, Galvanized, Non-lead, Unknown (any type of material)	Lead	Lead Service Line Notification
Non-Lead	Lead	Lead Service Line Notification
Unknown	Lead	Lead Service Line Notification
Non-Lead, but previously lead or system is unable to demonstrate it was not previously lead	Galvanized	Galvanized Requiring Replacement (GRR) Service Line Notification
Unknown	Galvanized	Galvanized Requiring Replacement (GRR) Service Line Notification
Unknown	Non-Lead	Lead Status Unknown (Unknown) Service Line Notification
Unknown	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Galvanized	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Non-Lead	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Galvanized	Non-Lead	No notice sent
Non-Lead	Non-Lead	No notice sent
Non-Lead and never previously lead	Galvanized	No notice sent
Notes: Non-Lead material includes copper, plas	tic steal iron etc	•

Non-Lead material includes copper, plastic, steal, iron, etc.

Classification looks at both sides of the service line materials regardless of ownership for notice requirements.

SLIM: Required Content LCRR § 141.85 (e)(3)

Lead Notice

- Statement that the service line is lead
- Explanation of the health effects
- Steps to reduce exposure
- Information about opportunities to replace lead service lines
- Financing solutions to assist owners with replacements
- Statement that the water system is required to replace its portion of the LSL when the property owner notifies them that they are replacing their portion

GRR Notice

- Statement that the service line is galvanized requiring replacement
- Explanation of the health effects
- Steps to reduce exposure
- Information about opportunities for replacement of the service line.

Unknown Notice

- Statement that the service line is unknown but may be lead
- Explanation of the health effects
- Steps to reduce exposure
- Information about opportunities to verify the material of the service line.



Delete these instructions prior to issuing notice: Highlighted text should be edited. Red text is optional, delete if not using.

[INSERT CONSUMER NAME AND ADDRESS]

Re: Notification of Lead Service Line

Dear Consumer:

[INSERT NAME OF PWS] is the public water system (PWS) responsible for providing drinking water to this location. You are receiving this notification because records indicate this home or building has a lead service line. A service line is a pipe that connects the water main to the building.

What Does This Mean?

Under the authority of the Safe Drinking Water Act, the US Environmental Protection Agency (EPA) requires us to notify water consumers who are served by a lead service line. A lead service line means that a portion of the pipe that connects the water main to the home or building contains lead.

What are the Health Effects of Lead?

There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreases in IQ and attention span. Lead exposure can also result in new or worsened learning and behavior problems. The children of persons who are exposed to lead before or during pregnancy may be at increased risk of these harmful health effects. Adults have increased risks of heart disease, high blood pressure, and kidney or nervous system problems. Contact your health care provider for more information about your risks.

What Can I Do to Reduce Exposure to Lead if Found in My Drinking Water?

- Do not boil water to remove lead. Boiling water will not reduce lead.
- Flush your tap if it has been unused for 6 or more hours. Lead levels increase over time as
 water sits in lead-containing plumbing materials. Regular water usage in your home or
 building can reduce lead levels in drinking water. When water has not been used for 6 hours or
 more, homes and buildings served by lead or galvanized requiring replacement service lines
 should be flushed until you note a temperature change, then flush for one more minute.
- Use cold water for cooking, drinking, and preparing baby formula. Do not cook with, drink, or make baby formula from your hot water tap. Lead dissolves more easily in hot water. Always use cold water and heat if needed.
- Use an ANSI certified lead filter. Filters certified to the ANSI/NSF 53 standard for lead removal can be effective at reducing lead levels in water. [Optional: IF PWS IS MAKING FILTERS AVAILABLE, INCLUDE INFORMATION ON HOW THE CONSUMER CAN OBTAIN A FILTER]
- Regularly clean your faucet aerators. Over time, particles containing lead can build up on the inside of aerator screens. Cleaning aerators regularly will help eliminate this source of lead.

- For pregnant persons, infants, and young children. Some populations such as pregnant
 persons, infants, and young children may be more at risk from the harmful effects of lead.
 These populations may consider taking extra precautions if their home is served by a lead or
 galvanized requiring replacement service line. These extra precautions may include having
 their drinking water analyzed for lead, using an alternative source of water (such as bottled
 water), or utilizing a filter certified to ANSI/NSF 53 standard for lead removal. [OPTIONAL:
 PWS CAN ADD OTHER OPTIONS THAT CONSUMERS CAN TAKE TO REDUCE EXPOSURE]
- Replace lead containing plumbing fixtures. Many old faucets, valves, and other plumbing
 fixtures may contain lead. Identify if your building's plumbing fixtures contain lead, and
 replace them when appropriate.
- You may wish to have your child's blood tested for lead. Your local county health department can be reached for additional assistance.
- (OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027): You may wish to test your water for lead. To request this, contact [INSERT PWS CONTACT INFO] for more information.

(OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027): To obtain a copy of the service line replacement plan [OR VIEW THE PLAN ONLINE], please visit [INSERT WEBSITE ADDRESS OR PHYSICAL ADDRESS / LOCATION THAT THE SERVICE LINE REPLACEMENT PLAN CAN BE FOUND].

(OPTIONAL SECTION) What is [INSERT NAME OF PWS] Doing?

[PWS can insert what they are doing to reduce lead levels. This could include corrosion control treatment installed, recent lead and copper compliance sample 90th percentiles, or any relevant plan in place]

What Can You do About Your Lead Service Line?

[REQUIRED: Insert information on opportunities to replace their lead service lines as well as programs that provide financial solutions to assist property owners with replacement of their portion of a lead service line]. (You can find example language in the guidance document "Service Line Inventory Material (SLIM) Notification Guidance"). As your PWS, if you notify us that you are replacing your portion of a lead service line, we are required to replace our owned portion of that lead service line.

(OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027): If you disagree that your home or building is served by a lead service line, please notify [INSERT PWS CONTACT INFO OR ADD INSTRUCTIONS FOR CUSTOMER TO NOTIFY].

For More Information, Please Contact: [INSERT CONTACT INFORMATION FOR YOUR PWS], visit U.S. EPA's website at <u>www.epa.gov/lead</u>, or visit Ohio EPA's <u>Learn About Lead</u> [Ohio Environmental <u>Protection Agency</u> website. For information about other lead exposure, please visit the Ohio Department of Health's <u>Childhood Lead Poisoning</u> website. [OPTIONAL: PWS CAN INSERT OTHER RELEVANT LINKS]

Please share this information with all the other people in this home or building, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

Example Language

- Example language can be found in the SLIM Guidance Document
- Includes help if your PWS does not have replacement opportunities or funding solutions available

Material Notice	Required Content – LCRR § 141.85 (e)(3)	Potential information to include	Example of what to include if PWS does not have information available
Lead Service Line Notification	Information about opportunities to replace lead service lines as well as programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line	Insert what your PWS can offer to help the property owners with their replacement (e.g., planned replacement events scheduled in the distribution system, a contractor or person they can contact for replacement work, any financial opportunities that your PWS is able to offer, or other additional opportunities or financial information).	Replacement Opportunities: "As your PWS, we are required to provide you with information on opportunities for replacing your lead line. Currently, we do not have any scheduled opportunities. Once available, you will be notified." Financial Solutions: "As your PWS, we are required to provide you with information on programs that provide financial solutions to assist with the replacement of your portion of the lead service line. Currently, we do not have any programs. Once available, you will be notified."
Galvanized Requiring Replacement (GRR) Service Line Notification	Information about opportunities for replacement of the service line	Insert what your PWS can offer to help the property owners with their GRR service line replacement (e.g., planned replacement events in the distribution system, a contractor or person they can contact for replacement work, or additional opportunities).	"As your PWS, we are required to provide you with information on opportunities for replacing your GRR line. Currently, we do not have any scheduled opportunities. Once available, you will be notified."
Lead Status Unknown (Unknown) Service Line Notification	Information about opportunities to verify the material of the service line	Insert what your PWS can offer to help the property owners identify or verify their unknown material type (e.g., scheduled educational campaigns, onsite surveys/inspections, PWS projects planned to help determine the material). If the privately owned side of the service line is unknown, this may be a good time to ask your customer to investigate their line material. An example customer survey template is available on <u>Ohio EPA's</u> website.	If the Unknown material is on the PWS side: "As your PWS, we are working to identify the material of the public portion of the service line." If the Unknown material is on the customer owned side: "To limit cost and disruption to residents, we need your help identifying your home's service line. Please use the [QR code or attached survey] or contact us for a paper copy to complete a short questionnaire." If unsure or no opportunities to provide: "As your PWS, we are required to provide you with information regarding opportunities to determine the material of the service line. Currently, we do not have any planned opportunities. Once available, you will be notified."



SLIM Verification Form

- Submit Verification form with a copy of each type of notice used to Ohio EPA by January 1, 2025
- Verification Form Requires:
 - How many notices were issued
 - Types of notice(s) used (including a copy)
 - Delivery method used
 - Delivery date
 - Confirmation that the Service Line Inventory is publicly accessible
- Annually afterwards initial submittal
- Submit to <u>DDAGW Lead Inventory@epa.ohio.gov</u>

Ohio	
Environmental Protection	

Service Line Inventory Material (SLIM) Notification Verification Form

Agency		
PWS NAME:	DRINKING \	VATER PROGRAM – COMPLIANCE NOTIFICATION
PWS ID:	COUNTY:	

All COM and NTNC public water systems with lead, galvanized requiring replacement, or lead status unknown service lines in their inventory pursuant to § 141.84(a) must provide a SLIM notification to people served by these lines. Systems must provide the initial material notification within 30 days of completion of the required Service Line Inventory. Systems must then repeat the notification on an annual basis until the entire service connection is no longer a lead, galvanized requiring replacement, or lead status unknown (unknown) service line. For new customers, water systems shall also provide the notice at the time of service initiation. Systems are required to provide a SLIM notification to persons served no later than 30 days after completion of the inventory AND submit a copy of each type of notification used with this completed form by January 1st to DDAGW Lead Inventory@epa.ohio.gov</u>. Retain a copy of this report in your files with supporting documentation for a minimum of 12 years.

	SLIM Notification Used	Notification Count
1.	Water systems must notify all persons served by a lead, galvanized requiring replacement, or lead status unknown service line. Examples of each type of notification used must be	LSL:
	submitted with this form. Check all notices that were issued: Lead Service Line Notification (LSL) 	GRR:
	 Galvanized Requiring Replacement (GRR) Service Line Notification Lead Status Unknown Service Line Notification (Unk) 	Unk:

	Required Direct Delivery of SLIM	Date Completed
2.	SLIM notification was provided by a method acceptable to the Director no later than thirty	
	days after the completion of the service line inventory. Check all methods that were used:	
	Mail delivery	
	Hand delivery	
	E-mail document delivery	
	Posting the notice in conspicuous locations throughout the area served (NTNC and	
	Single-Structure Community Systems only)	
	Other method approved by Ohio EPA:	
	For systems that are schools, day cares, nursing homes, or correctional institutions, legal	
	guardians or power of attorney shall also be directly provided notification.	
3.	Service Line Inventory was made publicly accessible (NTNC & COM PWSs). If COM PWSs	
	serving greater than 50,000 persons, Service Line Inventory was also made available online.	

Check box if examples of service line material notification(s) issued are attached.

I hereby certify that the SLIM notification(s) were distributed to all necessary persons served by the water system. Distribution was made by the methods and dates indicated above.

Signature of Respo	nsible Official	Printed Name	Title	Date	
For Ohio EPA use on	ly:	Notification Verific	cation received date:		
On time: 🗆	Late: 🗆	Acceptable	: 🗆	Not Acceptable: 🗆	



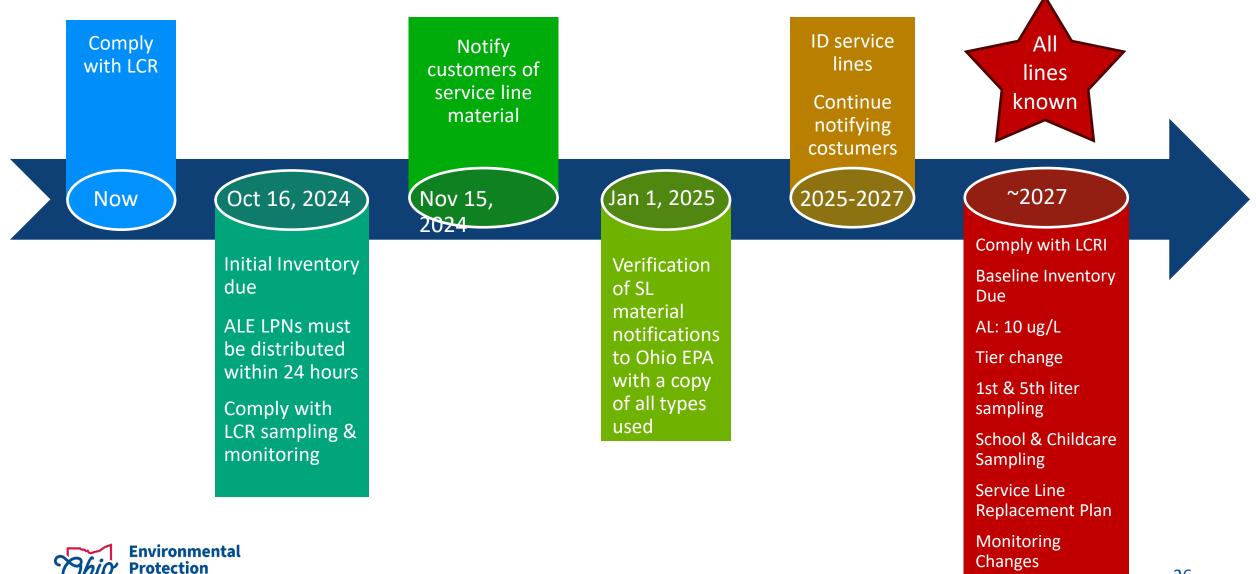
Baseline Inventory

Ō	Will be due in 2027	
•1.	Connector material will be required on the inventory	Only needs to be a records review
•	Street address will be required	Already a requirement in Ohio
	Annual updates of the inventory	Only if you have LSL, GRR, or Unknown

- Info that Ohio EPA is discussing becoming mandatory
 - 'Basis of Material Classification'
 - Will be necessary for validation



Timeline



Agency

Thank You



Contact Us:

General questions: DDAGWLeadCopper@epa.ohio.gov

Heather Jackson, Supervisor 614-644-2767 Heather.Jackson@epa.ohio.gov Jodi Elam, Lead and Copper Compliance Coordinator 614-369-3817 Jodi.Elam@epa.ohio.gov Zachary Anderson , Lead and Copper Compliance 614-644-4902 Zachary.Anderson@epa.ohio.gov Alexandra Haritos, Lead and Copper Compliance **%** 614-644-2915 Alexandra.Haritos@epa.ohio.gov

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