# Written Statement for Non-Lead Initial Inventories

Systems using Interpolation

## Template Instructions

Under the Lead and Copper Rule Revisions (LCRR), water systems are required to make their initial inventories publicly accessible (40 CFR 141.84(a)(8)). The inventories may be made available on the water system’s website, by mail, or in-person at the water system’s office. Water systems serving greater than 50,000 persons are required to publish their inventories online.

When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines in its inventory, regardless of ownership, it may comply with the LCRR public accessibility requirements using a written statement in lieu of the inventory. The statement would declare that the water system’s distribution system has no lead service lines or galvanized requiring replacement (GRR) service lines. The statement must also include a general description of all applicable sources of information used to make this determination (40 CFR 141.84(a)(9)).

DDW has prepared templates for water systems that have determined they have no lead or GRR service lines. Systems using case-by-case alternative methods should include a description of the method(s) used to develop their initial inventory. Text in the brackets ([ ]) are instructional and should be removed after use. Text in the arrows (< >) should be edited with system-specific information.

**Water systems must submit a completed initial inventory to DDW by October 16, 2024, even if all service lines are classified as non-lead.** All services lines, regardless of ownership, must be documented. This template may be used to comply with public accessibility requirements but not inventory reporting requirements.

## Template

<Insert Water System Name> has completed the initial lead service line inventory required by U.S. EPA’s Lead and Copper Rule Revisions. The deadline for the initial inventories is October 16, 2024.

Through completing a historical records review and field investigations,<Insert Water System Name>has determined it has no lead or galvanized requiring replacement service lines in its distribution system. [Add/remove the next sentence as appropriate]. This includes any privately-owned or customer-owned service lines.

<Insert Water System Name> reviewed all applicable sources of information, including

* [A records review is required under the LCRR. Add/remove sources or edit information as appropriate for your system. You may also choose to describe any of the below bullet points in more detail.]
* All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials;
* All water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures;
* All inspections and records of the distribution system that indicate service line material, including inspections conducted during the course of normal operations (e.g., checking service line materials when reading water meters or performing maintenance activities); and
* All previous service line or meter replacements were conducted.

In addition to reviewing the above sources of information, <insert Water System Name> used an alternative method to develop the inventory that was approved by the State Water Resources Control Board Division of Drinking Water on a case-by-case basis.

<Insert Water System Name> used the interpolation method. The interpolation method is used when the water utility can divide their service area into uniform groups, such as neighborhoods or tracts. Each uniform group shares multiple common characteristics, such as time period built, location, or contractor. The service line materials for each group are assumed to be similar. Water utilities physically verified a percentage of the homes in that group to interpolate or determine the service line material for the remaining homes.

<Insert Water System Name> created interpolation groups based on <insert characteristics used**>** and verified <insert percent verified per group> per group. All service lines inspected were verified non-lead <if possible, specify copper, plastic, or galvanized>.No lead or galvanized requiring replacement service lines were identified. [As appropriate, include information on the prioritization of older homes, years when lead use was allowed or prevalent, etc., or other efforts for targeting areas with a higher likelihood of lead presence.]

[DDW recommends that all systems document any new material information for inventory updates during normal operations. Add the next sentence if applicable.]<Insert Water System Name> continues to document service line material information obtained from normal operations, such as service line maintenance or water meter readings, after October 2024 and will update the initial inventory accordingly.

[You may also link your DDW-approved workplan or summarize the workplan.]