Lead and Copper Rule Revisions (LCRR)

Initial Lead Service Line Inventory (LSLI) Submission Portal

User Guidance Document | August 2025

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A. First Time Registration with WBKey

Public water systems (PWS) must register a WBKey account to submit their initial inventory on the portal. If you already have a WBKey account, go to Part II of this section.

NOTE: Register One Person to Start the Inventory

Coordinate among your water system staff for <u>ONE person to register and submit the</u> inventory to prevent confusion and incorrect submissions.

Video Tutorial: Setting Up Your WBKey Account and Signing In

Tips for Getting Started

- Visit the <u>WBKey Getting Started Guide</u> for step-by-step instructions for account creation, registration, logging in, and account management.
- Use the Microsoft Edge or Google Chrome web browser to register, if possible. Firefox is currently incompatible with the portal.
- Add DoNotReply@waterboards.ca.gov to your trusted email list.

I. Create a New WBKey Account

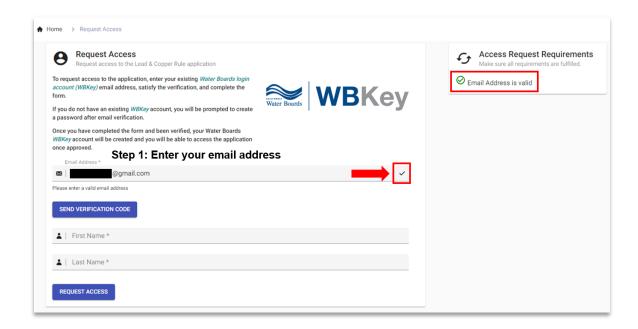
1. Go to the Lead Service Line Inventory (LSLI) Submission Portal

 Click the "Create Account" button under "Get Started". You will only need to create a WBKey account once.

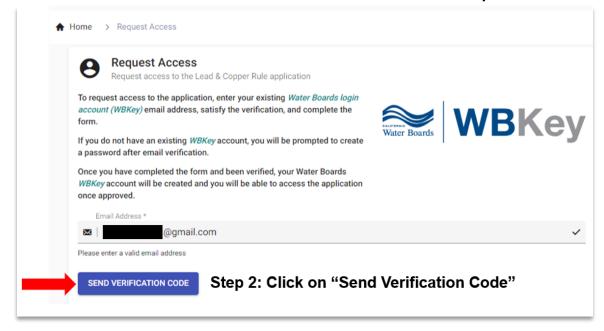


2. Verify your email address

- Enter a valid email address, preferably associated with your water system.
- In the top-right corner, wait for the two dots to stop pulsing and a green check mark to appear—this indicates a valid email address.



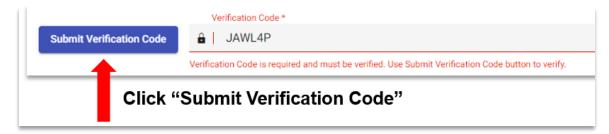
Click the "Send Verification Code" button and leave the window open.



- Log into your email and search for WBKey Account Email Verification from DoNotReply@waterboards.ca.gov. Check your spam folder if the email does not appear in your inbox.
- Please wait a few minutes for the email to arrive in your inbox and look for the security code: "To verify your email address, use this security code: XXXXX."

3. Enter the email verification code

The code consists of capital letters and numbers 0-9 and is case-sensitive. Please
ensure any alphabetical letters in verification code are CAPITALIZED. Use the
verification code provided in your email, not the example code shown below.



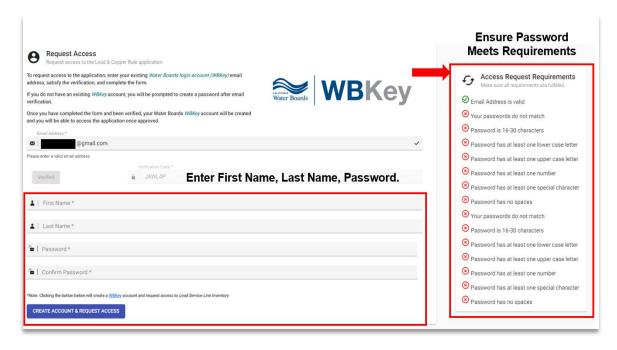
After typing in the code, click the "Submit Verification Code" button.

NOTE: If the Email Verification Code Does Not Work

Request another verification code and try again. If the issue persists, send a screenshot of the error message to DDW-LCR@waterboards.ca.gov and the LCRR Unit will troubleshoot the issue

4. Enter a name and password

- Enter the First Name and Last Name of a contact person from your water system. Do
 not use the water system name in the First Name and Last Name fields.
- Enter and confirm a Password. Ensure the password meets all verification requirements listed.



5. Create the WBKey account

 After filling out the required information, click the "Create Account & Request Access" button. An access request confirmation email will be sent to your inbox.

II. Receive Access to the LSLI Portal

Your access request may be automatically approved, or you may have to confirm your water system information before receiving access.

NOTE: Registering Once

You only need to register and request access to the portal **once**. If you already have a WBKey account, click the "Request Access" button to request access to the LSLI Portal.

We see you already have an account with WBKey. Click below to request access to Lead Service
Line Inventory.

*Note: Clicking the button below will request access to Lead Service Line Inventory with your WBKey.

REQUEST ACCESS

1. Automatic Access Approval

- If you created an account with a <u>PWS Administrative Contact or Operator email address</u> listed in the Safe Drinking Water Information System (SDWIS), <u>your email address may</u> <u>be recognized</u>.
- You should receive a confirmation email that you have been approved to use the inventory portal immediately after registering. Afterwards, you may sign in to set up multi-factor authentication and start the submission.

2. Confirmed Access Approval

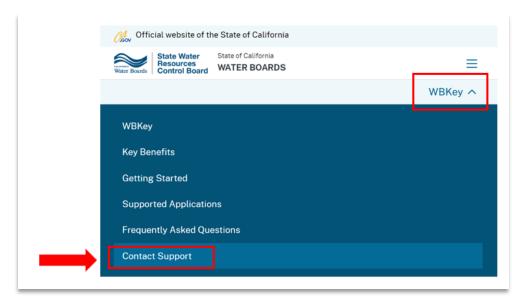
- If your email is not recognized, you will see the following text:
 Access Request Submission Complete
- The LCRR Unit will process your access request and check if your email is listed elsewhere in SDWIS to approve your request.
- If your email is not listed in SDWIS, the LCRR Unit will contact you to confirm the water system name and number you wish to submit an inventory for.
- You will be notified by email to use the portal once your request has been approved.
 Afterwards, you may sign in to set up multi-factor authentication and start the submission.

III. Contact Support

- Visit the <u>WBKey Getting Started Guide</u> for step-by-step instructions for account creation, registration, logging in, and account management.
- For technical issues with MFA, contact WBKey Support by visiting the <u>WBKey Homepage</u> and clicking on "Contact Support."



 If your browser window is not maximized, expand the WBKey tab and click on "Contact Support."



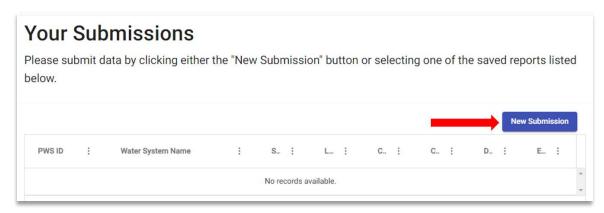
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B. Starting the Inventory

Video Tutorial: Overview of the Inventory Portal

I. New Submission

• Click the 'New Submission" button in the top right corner.



- Create <u>ONE</u> submission per water system.
- **Do not create a new submission every time you sign in.** You may save and return to edit the same submission (more information in <u>Section F</u>)

II. Navigating the Portal

You may click the headers to navigate to different tabs of the portal.



 Or you may use the "Back" and "Next" buttons at the bottom to navigate. If you click the "Save" button, it will be disabled until the saving process is complete.



III. How to Fill Out the Inventory on the Portal

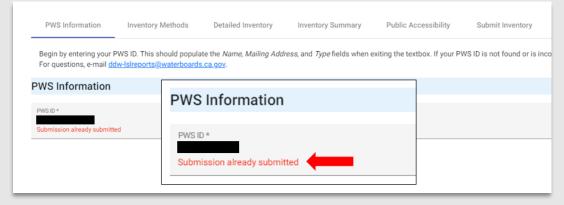
The six tabs in the portal must be completed for the Initial Lead Service Line Inventory and submitted to DDW for review and approval.

1. PWS Information Tab

- Enter your PWS ID using the "CA" followed by a 7-digit number format with no space in between. For example: CA1234567
- The remaining fields will auto-populate. These fields are not editable.
- If any information is incorrect or your water system information does not auto-populate, please email the LCRR Unit at DDW-LCR@waterboards.ca.gov.

NOTE: Multiple Submissions Message

If you see the text "Submission already submitted", an inventory has already been submitted and/or accepted by DDW for your water system by one of your staff persons.



DDW will check to confirm that the email login is associated with the correct PWS.

NOTE: One Person to Start the Inventory

We strongly recommend coordinating among your water system staff so <u>ONE person starts</u> and submits the inventory to prevent confusion and incorrect submissions.

2. Inventory Methods Tab

Video Tutorial: LSLI Portal - Inventory Methods Tab

Part 1: Historical Records Review

- The LCRR requires a historical records review. Please ensure this part is filled out. See the <u>DDW Inventory Instructions</u> for more information.
- A description should be provided of all records used that indicate the system-owned or customer-owned service line materials. If no such records are available or applicable, please enter a description such as "None" or "N/A".

Part 2: Identify Service Line Materials During Normal Operations

 Please indicate during which normal operation activities you are also collecting service line material information and if new standard operating procedures (SOPs) were developed.

3. Detailed Inventory Tab

- See <u>Section C</u> for transferring information from the DDW Inventory Template
 (RECOMMENDED). See <u>Section E</u> for transferring information from an alternative spreadsheet.
- See <u>Section D</u> if you are entering the inventory manually in the portal.

4. Inventory Summary Tab

Video Tutorial: LSLI Portal - Inventory Summary Tab

Part 1: General Information

 For the Initial inventory, the submission year is 2024. Explain if ownership is split, all system-owned, or all customer-owned. Provide any additional information about the inventory.

NOTE: Number of Service Lines Inventoried

The <u>number of service lines</u> in your inventory should be **greater than or equal to** the <u>number of service connections</u> in your system as reported in the Electronic Annual Report (EAR). If the number is different, describe any service connection changes in this section.

• Please check the box to acknowledge you are aware of the public notification requirement to customers served by lead, galvanized requiring replacement, or lead-status unknown service lines (Appendix I).

5. Public Accessibility Tab

Video Tutorial: LSLI Portal - Public Accessibility Tab

- Check all applicable methods in which you will make your inventory publicly available as required in the LCRR.
- If your system serves more than 50,000 people, you are required to have the inventory accessible **online**.

6. Submit Inventory Tab

Video Tutorial: LSLI Portal - Submit Inventory Tab

- Click the submit button to complete the submission process.
- Once you click "Submit", you cannot edit your submission unless it is rejected by DDW. If you submitted your inventory and need to make changes, please contact the LCRR Unit at DDW-LCR@waterboards.ca.gov.
- The LCRR Unit or DDW district staff will notify you by email when your inventory submission is approved or needs revision.

NOTE: Keep a Copy of Your Submission Records

The LSLI portal is currently unable to export a copy of your entire inventory submission for download.

- If needed, the LCRR Unit can provide a spreadsheet copy of your submitted <u>Detailed Inventory data only</u>. This file would not include information from the other sections of your submitted inventory.
- We recommend systems use the <u>DDW Inventory Template</u> to keep a copy of submitted data from all sections of the inventory. Using the template will also make it easier to update and transfer your inventory data for future submissions.
- DDW will archive a copy of your inventory submission approval email. Feel free to save a copy of that email for your own records.

C. Transferring Information into the Portal

This transfer method is for data in the Detailed Inventory tab.

The Detailed Inventory data MUST match the column order and cell dropdown options used in the portal and in the DDW Template.

Video Tutorial: LSLI Portal - Detailed Inventory Tab

 We strongly encourage water systems to use the <u>DDW Inventory Template</u> to enter and format all inventory data <u>BEFORE</u> transferring the data into the portal. This will make the transfer process smoother and <u>serve as a copy of your submission for your</u> <u>records</u>.

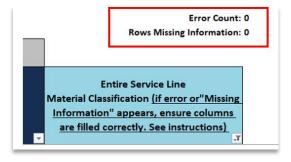
Video Tutorial: Using the DDW Inventory Template

 If your system has an alternative spreadsheet (e.g., one exported from GIS), see <u>Section E</u>.

I. Copying and Pasting the Detailed Inventory

1. Select the data

- Open your detailed inventory spreadsheet file.
- Select data in columns B (Unique Service Line ID) through V (Notes) of the DDW template to transfer into portal. Do not select the column headers, only select your data.
- Make sure there are no errors or rows with missing information in the spreadsheet. See the template tutorial above or the <u>DDW Inventory Instructions</u> for more information.



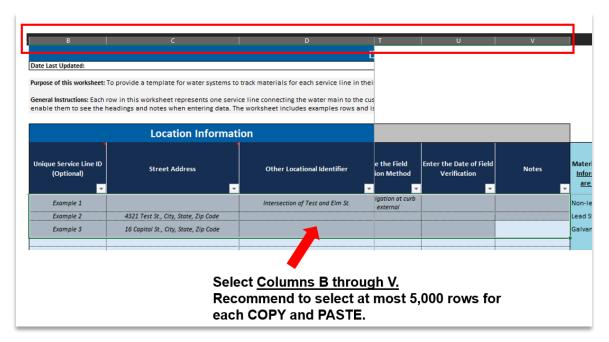
NOTE: Systems with No Split Ownership of Service Lines

If the service lines are entirely <u>System-Owned</u> or entirely <u>Customer-Owned</u>, both portions still need to be filled out.

You <u>MUST</u> repeat the information on <u>BOTH SIDES</u> for the last column (Entire Service Line Material Classification) to auto-populate.

In the Inventory Summary section of the portal, you will indicate who owns the service line(s).

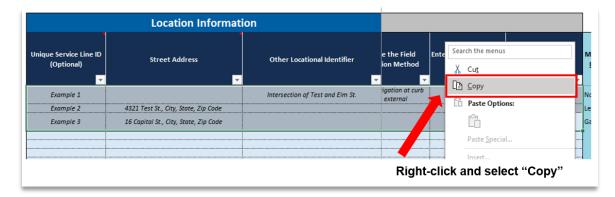
 Check to make sure the correct columns are selected. The paste function will still work if Unique Service Line ID column is left blank.



- **Do not select the Entire Service Line Material (Column W).** You will not be able to copy the last column Entire Service Line Material Classification. This column is locked in the spreadsheet.
- The last column (Entire Service Line Material) will auto-populate in the portal after you paste and save the data, IF a properly formatted material is entered in BOTH the system-owned and customer-owned portions.

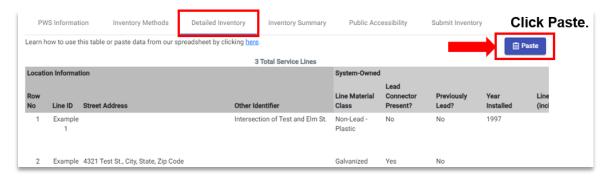
2. Copy the data

 Once the data is selected, press CTRL+C on the keyboard to copy the data <u>OR</u> rightclick on your computer mouse and select Copy.

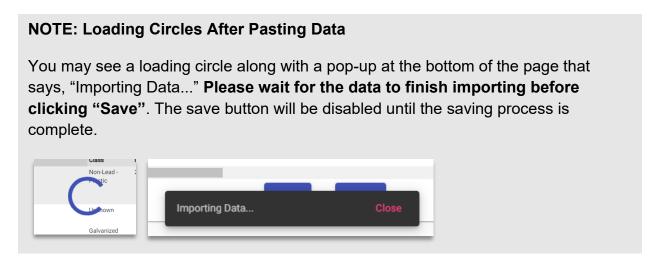


3. Paste the data

- After you have copied your data from the spreadsheet, navigate to the Detailed Inventory tab in the LSLI Portal.
- Click the "Paste" button in the upper right corner of the portal. Click this button ONLY ONCE to avoid duplicate entries. Pressing CTRL+V on your keyboard will not paste the data into the portal.



 If your data does not paste, check to make sure your browser allows pop-ups for this website.



- Pasting subsequent batches of rows <u>WILL NOT</u> delete or overwrite previously pasted data.
- Near the top of the page, you will see the number of service lines (in red) increase with every batch imported.

Displaying rows 1 to 100 of 1 Total Service Lines

 After clicking "Save", the Entire Service Line Material Classification column (the last column) should now be filled. If it is not, see <u>Section D Part II</u> of this document for more information.

NOTE: Invalid Data

If you receive a pop-up that states, "Invalid or no inventory data found in clipboard", allow your browser to access your clipboard, make sure Line Size data are entered in decimal inches, repeat Steps 1 through 3 in this section.

II. Deleting Rows of Data

To clear data, there are two different deletion options in the portal.

1. Remove ALL inventory records

 This will delete <u>ALL</u> rows of service line data in the portal. Scroll to the far right of the Detailed Inventory tab to find "Remove" above a <u>RED</u> trashcan. Click the red trashcan to delete all rows.



2. Remove an INDIVIDUAL inventory record

 This will delete <u>ONE</u> row of service line data in the portal. Scroll to the far right to find the **BLACK** trashcan for that row. Click the black trashcan to delete that row.



III. Displaying Rows 1 to 100

The portal will display 100 service lines at a time. To view rows after 100, use the forward and backward buttons on the bottom.



Please remember to complete the <u>remaining tabs</u> in the portal after completing the Detailed Inventory.

D. Manually Entering Information into the Portal (Not Recommended)

Systems have the option to manually add service line information if they prefer. However, **completing the DDW template FIRST** and then transferring information will help prevent erroneous data entry.

I. Enter Data for a Single Service Line

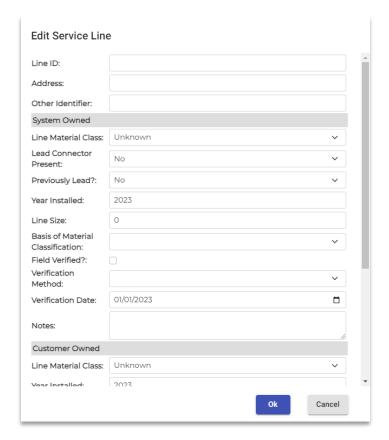
1. Navigate to the Detailed Inventory tab in the LSLI Portal

On the far left side, click the "Add" button. A pop-up will appear.



2. Edit service line material information

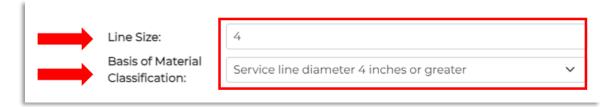
Each field is described below in more detail.



- Line ID This field is optional. Use for numbering or labeling the unique service lines.
- Street Address or Other Locational Identifier (REQUIRED) Enter a street address or another meaningful locational identifier (e.g., block, intersection, or GPS coordinates) for each service line. DDW strongly encourages systems to use street addresses as locational identifiers.
- Service Line Material Classification (REQUIRED) Please classify the service line material using the dropdown options. Systems are encouraged to specify the material of the non-lead service line. The inventory template provides the option of "Non-Lead Copper" and "Non-Lead Plastic" for systems to use where applicable. Water systems that choose to not specify the material of the non-lead service line may select "Non-Lead Other". Note the difference between galvanized and galvanized requiring replacement. (Scroll to the end of this section for more information)
- Lead Connector Present? (REQUIRED) Select the option "No, Was Present in the Past" if a lead connector existed in the past but has been removed. Select "No" if a lead connector was never present.
- Previously Lead? (REQUIRED) Was the service line ever previously lead? This
 question would determine whether a downstream or customer-owned galvanized
 service line is galvanized requiring replacement. Leave this column blank if systemowned portion of the service line is "Lead".
- **Year Installed?** If you select the dropdown option "Installation date is after state or local lead ban" for the **Basis of Material Classification** field, you will need to provide the installation date for the service line.



 Line Size If you select the dropdown option "Service line diameter 4 inches or greater" for the Basis of Material Classification field you will need to provide the size for the service line in inches (decimal).



Basis of Material Classification (REQUIRED) Select the appropriate basis for how the
material was determined. If the service line material is "Unknown," you may leave the
Basis of Material Classification column blank. Select "Other (Explain in Notes)" and
describe the method(s) in the Notes column if your identification method is not listed in
the dropdown option.

NOTE: Case-by-Case Approved Methods

If you selected "Interpolation", "Statistical analysis or predictive models", "Water Sampling", or an "Emerging Method" as a basis, please note <u>an approved inventory</u> workplan is required.

Submit workplans to DDW at DDW-LCR@waterboards.ca.gov for review and approval. Please refer to the LCRR FAQ and Inventory Methods presentation for more information.

NOTE: Systems with No Split Ownership of Service Lines

If the material is the same from the source or main to the building inlet, fill out **BOTH** the <u>System-Owned</u> Line Material Class and <u>Customer-Owned</u> Line Material Class with the same material.

Do not leave the System-Owned and Customer-Owned fields empty; Otherwise, the Entire Service Line Material Classification (last column) will not auto-fill.

3. Save the service line material information you entered

- Once you have entered all your service line information, click "Ok" to exit the service line editor.
- Click the "Save" button at the bottom of the screen. After clicking "Save", you will notice that the Entire Service Line Material Classification column (the last column) is now filled. The save button will be disabled until the saving process is complete.

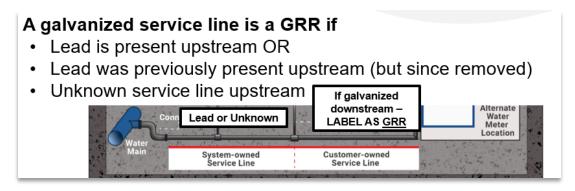
II. If the Entire Service Line Material is Still Blank

There are two reasons why the Entire Service Line Material (last column) may not auto-fill once you click "Save".

 The System-Owned Service Line Classification, Customer-Owned Service Line Classification, and Lead Present? Fields were not filled out. These three fields MUST be filled out. For the Customer-Owned Service Line Classification, galvanized was selected instead
of galvanized requiring replacement, or vice versa. Ensure the correct classification for
the Customer-Owned service line is selected, and the entire service line material
column will auto-fill.

III. Galvanized Versus Galvanized Requiring Replacement (GRR)

- Galvanized: An iron or steel pipe dipped in zinc to prevent corrosion.
- Galvanized Requiring Replacement: A galvanized service line downstream of a lead, previously lead, or unknown service line. If it is unknown if the galvanized service line was ever downstream of a lead service line it is presumed to be galvanized requiring replacement.



NOTE: Data Checks in DDW Inventory Template

Note the DDW Inventory is an Excel spreadsheet with built-in checks that will let you know if you are missing any required data or have incorrectly classified a galvanized service line.

Please remember to complete the <u>remaining tabs</u> in the portal after completing the Detailed Inventory.

E. Transferring Information from an Alternative Spreadsheet

If you are using an alternative spreadsheet format, we recommend organizing the columns and formatting the cell data to match the DDW Inventory Template. This will ensure the data can be transferred correctly into the portal.

1. Organize columns and format cell data

- The portal is sensitive to spaces, hyphens, and capitalization.
- Please see the <u>Appendix II</u> for the exact data fields from the DDW template that are needed for each column.

2. Copy and paste the data into the portal

 Once your data is arranged and formatted to match the template or portal, follow the steps in <u>Section D</u> to copy and paste the information.

NOTE: Entire Service Line Material Not Calculating

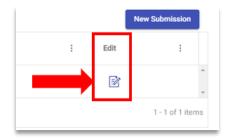
If the Entire Service Line Material is not calculated after you click "Save," ensure required fields are filled out and that galvanized and galvanized requiring replacement service lines are labeled correctly (see <u>Section E</u>). Please check to make sure this field is not empty prior to submitting.

F. Returning to Edit a Saved Inventory

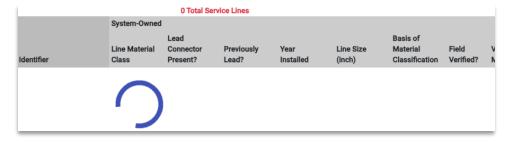
After importing or adding information and saving your changes, you may reopen the inventory to edit the information.

1. Load the saved inventory

 Sign into the portal and locate the inventory on your Submissions Dashboard. Click the pencil and paper icon under the Edit column.



- When you first open the portal, it may be empty. Please wait for the previously saved information to load. This may take a few minutes.
- You <u>DO NOT</u> need to re-enter your PWS ID or other information.
- In the Detailed Inventory tab, you may see 0 Total Service Lines. The loading circle will disappear when all the data has loaded.



2. Edit service line information

 To edit service line information, hover your mouse over the row you would like to edit and double-click. A pop-up should appear for a particular service line. Click "Ok" when finished.

Appendix

I. Required Customer Notification of Lead, GRR, and Unknown Service Lines

Pursuant to <u>40 CFR 141.85(e)</u>, water systems must provide notification to persons served by the water system at the service connection with a lead, galvanized requiring replacement (GRR), or lead status unknown service line (USEPA, 2023).

Timing: Notification <u>within 30 days</u> after completion and DDW approval of the initial inventory submission and repeated annually until only non-lead service lines remain. For new customers added after the initial inventory, water systems must also provide this notice at the time-of-service initiation.

Content: Statement about service line material, lead health effects, and steps to minimize lead exposure in drinking water

If the water system serves communities with a large proportion of non-English speaking consumers, as determined by the State, public education materials must be in appropriate languages or contain a telephone number or address where persons served may contact the water system to obtain a translated copy of the materials or to request assistance in the appropriate language.

If the service line is:

- **Confirmed Lead**: Must include opportunities to replace the LSL, any available financing programs, and statement that the system must replace its portion if property owners notify the system that they are replacing their portion.
- Galvanized Requiring Replacement: Must also include opportunities for service line replacement.
- Lead Status Unknown: Must also include opportunities to verify the material of the service line.

Delivery: By mail or another State-approved method.

Reporting to States: Demonstrate that the water system delivered the notification and provide a copy of the notification and information materials to its State annually by July 1 for the previous calendar year.

II. Data Fields Needed for Detailed Inventory (Using Alternative Format)

Please ensure that your data matches the <u>exact text</u> below <u>(including hyphens and spaces)</u> and the <u>same column order</u> for the copy and paste to be successful. For columns not shown below or with blanks, no specific data format is required. If you would like a copy of this information in spreadsheet format, please refer to the <u>DDW template</u> for the dropdown options.

	System-Owned Portion							
System-Owned Portion Service Line Material Classification	Lead Connector Present?	If Material Anything Other than "Lead" in Column E, Was Material Ever Previously Lead?	Service Line Installation Date	Service Line Size (inches)	Racic of Material Classification	Was the Service Line Material Field Verified?	Describe the Field Verification Method	
Lead	Yes	Yes			Historical records	Yes	Visual inspection at meter pit	
Galvanized	No	No			Installation date is after state or local lead ban	No	Customer self-identification	
Non-Lead - Copper	No, Was Present in the Past	Don't know			Service line diameter 4 inches or greater		CCTV Inspection at Curb Box - Internal	
Non-Lead - Plastic	Don't Know				Service line repair or replacement record		CCTV inspection at Curb Box - External	
Non-Lead - Other					Statistical analysis or predictive models		Water Quality Sampling - Targeted	
Unknown					Interpolation		Water Quality Sampling - Flushed	
					Field inspection		Water Quality Sampling - Sequential	
					Water sampling		Water Quality Sampling - Other	
					Other (Explain in Notes)		Mechanical Excavation at 1 location	
							Mechanical Excavation at multiple locations	

	Customer-Owned Portion							
Customer-Owned Portion Service Line Material Classification	Service Line Installation Date	Service Line Size (inches)	Basis of Material Classification	Was the Service Line Material Field Verified?	Describe the Field Verification Method			
Lead			Historical records	Yes	Visual inspection at meter pit			
Galvanized			Installation date is after state or local lead ban	No	Customer self-identification			
Galvanized Requiring Replacement			Service line diameter 4 inches or greater		CCTV Inspection at Curb Box - Internal			
Non-Lead - Copper			Service line repair or replacement record		CCTV inspection at Curb Box - External			
Non-Lead - Plastic			Statistical analysis or predictive models		Water Quality Sampling - Targeted			
Non-Lead - Other			Interpolation		Water Quality Sampling - Flushed			
Unknown			Field inspection		Water Quality Sampling - Sequential			
			Water sampling		Water Quality Sampling - Other			
			Other (Explain in Notes)		Mechanical Excavation at 1 location			
					Mechanical Excavation at multiple locations			