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July 20, 2022

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CENT WIS ENV CENTER BATHHOUSE

Subject: Lead and Copper Rule Service Line Material Inventory Requirements

Dear Water System Operator:

The Federal Lead and Copper Rule Revisions (LCRR) that went into effect in December of 2021, require public water systems to develop and submit a service line material inventory to the Department of Natural Resources Department (department) by October 16, 2024. The department encourages your water system to prepare for this upcoming LCRR deadline by completing the enclosed service line materials inventory worksheet. Service lines are the pipes that carry water to a building (i.e. located outside the building), whereas premise plumbing is the piping that carries water throughout a building (i.e. located inside the building).

LCRR compliant materials inventories must include materials information for every service line connected to the public water system distribution system. Specifically, systems must list and categorize all service line materials as one of the following: confirmed lead; confirmed non-lead; lead status unknown, or galvanized. Galvanized service lines must be classified as "galvanized requiring replacement" (GRR) under the LCRR, unless the public water system knows with certainty that the upstream service line material is not currently and was never previously lead.

In addition, public water systems must also identify and track the source of the information (e.g. construction records, visual inspection, etc.) used to classify each connection to and provide a locational identifier for each service line. Therefore, your system must review all relevant historical records for the water system prior to your initial 2024 inventory submittal. See the attached enclosure for more information about records review requirements.

After your initial 2024 inventory submittal, your system must continue to improve its LCRR materials inventory and submit annual updates to the department until all "lead status unknown" services are confirmed to be lead, non-lead, or GRR; and all lead and GRR lines have been replaced. Additionally, your LCRR service line materials inventory must be made publicly accessible.

If you have any questions regarding these requirements, please contact your DNR Representative, Sarah Hughes, at (715) 697-1806 or SarahE.Hughes@wisconsin.gov.

Sincerely,

Ann Hirekatur
Lead and Copper Rule Coordinator
Public Water Supply Section
Bureau of Drinking Water and Groundwater

LCRR SERVICE LINE MATERIALS INVENTORY INSTRUCTIONS

1. IDENTIFY ALL SERVICE CONNECTIONS

List all water system service connections on the enclosed worksheet (make additional copies as needed) or contact your DNR Representative and request a copy of the Department's materials inventory spreadsheet template. Your system may also use its own equivalent tracking system.

2. CONDUCT RECORDS REVIEW

Review all existing records to identify service line materials in the public water distribution system.

- Where service line material can be determined with certainty based on records, enter the following information on your worksheet or in your spreadsheet, or other tracking system:
 - service line material (or category); and
 - source of information used to identify service line material (e.g. construction records, visual inspection etc.).
- Where the service line material cannot be determined with certainty based on records review, enter "unknown" for each such location in/on your worksheet, or spreadsheet.

3. IDENTIFY & TRACK MATERIALS ENCOUNTERED DURING NORMAL OPERATIONS

Develop and implement a process to identify and track service line materials as they are encountered in the course of normal operations, such as when performing maintenance activities.

4. CONTINUOUS IMPROVEMENT

Use materials information collected during the course of normal operations to continuously update and improve your inventory (i.e. identify unknown materials and verify the accuracy of records-based material classification). Continue to track and update both service line material type and the source of information used to classify each service line in your tracking system.

5. SUBMITTAL AND PUBLIC ACCESSIBILITY

Submit your initial inventory to the Department no later than October 16, 2024. The inventory you submit to the Department must be made publicly accessible and include a locational identifier for each service line. Inventories can be made publicly accessible by continuous posting in visible locations within your service area, or by distribution to your consumers.

RECORDS REVIEW REQUIREMENTS

Water systems MUST review all of the sources of information listed below before submitting their initial inventory due October 16, 2024.

- **Construction and Plumbing Codes and Records**

All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system to identify service line materials for the initial inventory.
- **Water System Records**

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 to identify service line materials for the initial inventory.
- **Distribution System Inspections and Records**

All inspections and records of the distribution system that indicate material composition of the service connections that connect a structure to the distribution system to identify service line materials for the initial inventory.
- **State Requirements**

Any resource, information, or identification method required by the State.

Date 5/24/2011

Service Line Materials Inventory

PWS Name: Antkowiak Station
 PWS ID: 15009108
 Station Name: Antkowiak Station

REQUIRED							OPTIONAL						
ADDRESS AND/OR LOCATION IDENTIFIER	BUILDING TYPE	SERVICE LINE MATERIAL 1	SERVICE LINE MATERIAL 2	WAS THE SERVICE LINE MATERIAL FIELD VERIFIED?	BASIS OF SERVICE LINE MATERIAL CLASSIFICATION	WAS SERVICE LINE MATERIAL 1 EVER PREVIOUSLY LEAD?	SERVICE LINE 1 DIAMETER	SERVICE LINE 1 INSTALL DATE	SERVICE LINE 2 DIAMETER	SERVICE LINE 2 INSTALL DATE	LEAD GOOSENECK PRESENT?	PREMISE PLUMBING MATERIAL(S)*	OTHER COMMENTS
Office (TN Well)	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						1 well 2 buildings
Bathhouse (TN Well 1)	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						1 well 1 building
Walker Lodge	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						1 well 1 building
*South (TN) DORM	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						1 well 1 building
	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						
	School or childcare Other non-residential Single-Family Residential Multi-Family Residential	Mixed Lead Copper Plastic Galvanized	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Lead Copper Plastic Galvanized	Other (specify in comments) Other (specify in comments)	Yes No						

*The service line is the pipe or lateral that carries water to the building (i.e. located outside the building), whereas the premise plumbing is the piping that carries water throughout the building (i.e. located inside the building).

I hereby certify that the above information is complete, true, and correct to the best of my knowledge:

Robert Smith
 PWS Representative
 Signature of PWS Representative

Dir Bldg & Grds

Erin V. Roberts
 PWS Staff
 Signature of DNR PWS Staff