Department for Environmental Protection
Division of Water
300 Sower Boulevard
Frankfort, Kentucky 40601

Lead and Copper Rule Improvements

Baseline Service Line Inventory Certification

This document must be submitted to the Division of Water (DOW) by November 1, 2027.
To submit, please upload to **EEC eForm 169 - Drinking Water Information and Data Submittal.**

Please email us at DrinkingWaterCompliance@ky.gov with any questions.

You are not required to use this form; it is provided for your convenience. You may submit other forms prepared by other entities or a letter, as long as the required information is included.

Name of System: _____ PWS ID: _____

Date Baseline Inventory submitted: _____

I certify that the water system named above has developed and maintained a Baseline Service Line Inventory in accordance with 40 CFR 141.84 and has provided the required inventory information to the Division of Water.

_____ Please initial to certify that each of the following have been completed (list continues on p. 2):

The water system developed and submitted a Baseline Inventory that includes all service lines connected to the public water distribution system regardless of ownership and includes connector information where required. (40 CFR 141.90(e)(2))

The water system located and reviewed available records necessary to identify service line materials and connector materials, including previous materials evaluations, construction and plumbing records, water system records, distribution system maps, inspection records, historical service records, and other relevant information. (40 CFR 141.84)

Each service line in the inventory is categorized using the required material classifications, and the system-owned and customer-owned portions are identified, where applicable. Service lines of unknown material are identified as such. (40 CFR 141.84)

A brief description of service line ownership, records reviewed, inventory development methods, validation methods, connector identification methods, and public communication methods is provided to DOW in this document or an attachment.

The water system has made the inventory publicly available (required for all inventories that contain lead, galvanized requiring replacement, and unknown service lines), and will continue to meet applicable public accessibility requirements. (40 CFR 141.84)

There is a standard process to identify service line materials (and connector materials, when relevant) during routine operations and maintenance, and that process is being communicated and enforced with all staff that work on the distribution system. (40 CFR 141.84)

An appropriate verification method is assigned to each service line showing whether they were field-verified or identified from records review only. (This is important for the service line validation requirement, re: 40 CFR 141.84(b)(5)).

We certify that the summary of service lines in this certification document and the description of connectors found and their materials is accurate and aligns with the Baseline Inventory requirements.

Please initial any of the following that apply:

_____ The water system is a wholesale system with no service lines.

_____ All service lines included in the inventory were installed after the applicable state lead ban.

_____ The water system has records or other documentation supporting that no lead service lines, galvanized requiring replacement service lines, or lead connectors are present.

_____ If service lines or connectors of unknown material remain in the inventory, the water system has a plan to identify those unknown materials, including the annual rate of identification planned.

_____ If lead service lines, galvanized requiring replacement service lines, or lead status unknown service lines are present, the water system will comply with all applicable customer notification requirements. (40 CFR 141.85)

Responsible Party Name: _____ Title: _____

Responsible Party Email: _____ Phone: _____

Signature: _____ Date: _____

Person who prepared inventory: _____ Title: _____

Preparer's email: _____ Phone: _____

Please fill out all applicable sections of the following pages to the fullest extent possible. Attach additional pages if needed. Providing this information with as much detail and clarity as possible assists the Division of Water inventory reviewers to understand whether the water system's inventory was completed thoroughly and accurately, prevents delays in assessing compliance, and avoids unnecessary violations.

Historical Records Review

1. What types of records were used to verify service lines for the mandatory historical records review?

- ☐ Previous materials evaluation
- ☐ Distribution system maps
- ☐ Local plumbing code or ordinance
- ☐ Municipal records
- ☐ Tap cards / work orders
- ☐ Inspection records
- ☐ Standard operating procedures
- ☐ Meter installation records
- ☐ Service line repair / replacement records
- ☐ Service line installation records
- ☐ Capitol improvement plans
- ☐ Engineering / construction standards
- ☐ Plumber / inspector / subcontractor records
- ☐ Other

If 'Other', please explain:

2. Did your system or community ban the use of lead service lines (LSLs) prior to the statewide mandate of January 1, 1988? ◯ Yes ◯ No

If yes, explain and provide the date LSLs were banned. Date: _____

3. Are there service lines (either customer-owned or utility-owned or both) in the distribution system that are only identified by records (not field verified)? ◯ Yes ◯ No

If yes, were any of the service lines identified by records alone installed before the lead ban? ◯ Yes ◯ No

If so, the water system may be required to complete a service line validation prior to 2034; work with DOW for details on how to complete this requirement (also see 40 CFR 141.84(b)(5) for more information).

Identifying Service Line Material Through Physical Verifications

1. During which normal operating activities are you collecting information on service line material? Check all that apply. (If a water system chose an investigation method not specified below, state approval is required. See EPA document "Guidance for Developing and Maintaining a Service Line Inventory" (August, 2022) for a description of alternative methods that could be used with state approval).

- ☐ Water meter reading, repair, or replacement
- ☐ Service line repair or replacement
- ☐ Water main repair or replacement
- ☐ Visual inspection at meter pit
- ☐ Backflow prevention device inspection
- ☐ Vacuum excavation (meter pit or other)
- ☐ Mechanical excavation
- ☐ Statistical method
- ☐ Predictive modeling
- ☐ Customer reported
- ☐ CCTV inspection
- ☐ Other (including water sampling; describe on next page)

If Other on question 1 (p. 3), please describe:

2. If predictive modeling or a statistical method were used, state the date the method was approved by DOW. Approval by DOW is required for use.

   _____

3. Is there a standard process or operating procedure to identify service line and connector materials during routine operations and maintenance? ◯ Yes ◯ No

   If 'Yes', please describe, including a description of how the method or procedure is being communicated to all distribution staff.

Service Line Connectors

1. Are any connectors in the distribution system? (A connector is a short, pipe-like piece that connects two pipes together, such as the main line to the service line. It does not include fittings, couplings, tees, etc.). ◯ Yes ◯ No

   If 'No', explain how this was verified, then skip to the next section.

2. How were connector materials identified for the service line inventory? (Choose one)
   - ☐ Physically verified
   - ☐ Records review
   - ☐ Combination of physical verification and records review

3. Mark all the locations where connectors were identified in the distribution system:
   - ☐ Main to service line
   - ☐ Utility-owned service line to meter
   - ☐ Customer-owned service line to meter
   - ☐ Customer-owned service line to premise plumbing
   - ☐ Other – List:

4. Provide details about where connectors typically are on service lines in the distribution system, how you determined where connectors are, and how you identified connector material.

5. Are any of the identified connectors lead? ◯ Yes ◯ No

   If yes, list how many lead connectors were identified: _____

Galvanized Service Lines

1. Are there any galvanized service lines in the distribution system? ◯ Yes ◯ No
   If no, skip to the Public Accessibility section.

2. Are any galvanized service lines in the service line inventory classified as Galvanized Requiring Replacement (GRR)? ◯ Yes ◯ No

   If 'Yes', answer questions 3 and 4 on the next page; if 'No', skip to question 5.

3. Are any GRR service lines classified as GRR solely because the system cannot demonstrate that they were never downstream of a lead service line? ◯ Yes ◯ No

   Approximately how many? _____

4. Is there evidence of known lead service lines upstream from the GRR service lines? Explain.

5. Are any galvanized service lines in the inventory classified as 'Non-lead'? ◯ Yes ◯ No

   If 'Yes', how did you determine the service line could be classified as 'Non-lead'?

   - ☐ Records review documents no history of lead contact
   - ☐ Physical verifications and records review
   - ☐ Used the DOW GRR reclassification method. List date of approval:

   If records review is part of the determination, please explain what records or documents were used. (Not required if water system went through the DOW GRR reclassification process).

Public Accessibility

In order to meet the public accessibility requirements of LCRI, how will the inventory be made publicly available? Check all that apply. *Remember that systems serving > 50,000 people must provide the inventory online.*

- ☐ Available online. Provide a link: _____
- ☐ Hard copy available in City Hall
- ☐ Hard copy available in water system office
- ☐ Printed service line map
- ☐ Online service line map
- ☐ Information in water utility mailings or newsletter
- ☐ Other – Explain:

TEAM KENTUCKY
ENERGY AND ENVIRONMENT CABINET

Summary Information

This summary is for the entire service line inventory and references the overall service line classification.*

Service Line Material Classification	Definition	Total Number of Service Lines
Lead Service Line (LSL)	Any portion of the service line is known to be made of lead or is lined with lead.**	
Galvanized Requiring Replacement (GRR)	No sections of the service line are made of lead, but a portion is galvanized and it is/was either downstream from a lead service line or the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.**	
Lead Status Unknown	Either the utility-owned or the customer-owned (or both) section of the service line is of an unknown material, and neither section is known to be lead or GRR.	
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique. (It is recommended in the inventory to list the actual material – e.g., copper, PVC, etc. – when known).	
	TOTAL:	0

Service line identification number (SLID): Do service lines in the baseline service line inventory have a different number in the SLID column than in the initial service line inventory from October, 2024?

◯ Yes ◯ No

If so, is the baseline inventory SLID based on a different number/column from the initial service line inventory (e.g., the location identifier), or is it something new for the baseline inventory? Explain.

If not already explained above, which identification number is consistent between the initial and baseline service line inventories? Examples may be the global ID (for GIS users), location ID, etc.

* This summary table is for reporting material for the entire service line connecting the water main to the customer's plumbing. Remember that water systems must track the system-owned and customer-owned portions separately in their inventory, but then assign a single material classification to each service line for this form.

**This classification does not apply when the only lead on or upstream from the service line is/was a lead gooseneck or connector shorter than 36" or lead solder.