

Service Line Replacement Plan Checklist

Per [40 CFR 141.84\(c\)\(1\)](#) – Lead and Copper Rule Improvements (LCRI) – all Service Line Replacement Plans must have the following components.

List of Service Lines to Be Replaced

- ☐ Use the DOW Service Line Inventory/Replacement template or your utility's baseline service line inventory to identify.
- ☐ Include all Lead, Galvanized Requiring Replacement, and Unknown service lines (SLs).
- ☐ Provide a summary of each type (how many of each).

Strategy to Identify Remaining Unknown Service Lines

(For those that still have unknowns in baseline inventory)

- ☐ Description of the proposed timeline and methods to be used to identify unknown service lines (SLs).
- ☐ Include identification of materials on both the public and private side.
- ☐ Map or geographic breakdown of SL types (if available).

Replacement Prioritization

(Can be included either as part of the SL Replacement SOP or a stand-alone document)

- ☐ Strategy for prioritizing SL replacements based on public health risk, such as:
 - Locations with lead action level exceedances
 - Homes with vulnerable populations
 - Schools, childcare and healthcare facilities
- ☐ Procedures to update prioritization based on new information (e.g., inventory or replacement plan updates).

Full Service Line Replacement Strategy or Procedure

- ☐ Description of procedures to ensure full SL replacement (both utility and customer-owned portions) within the required timeframe.
- ☐ Strategy to avoid partial SL replacements unless unavoidable, and how risks will be mitigated.
- ☐ Plan for SL replacement during routine operations/maintenance.
- ☐ Justification if only partial replacement is performed (if applicable).

Contracting and Workforce Planning

- ☐ Description of how the utility will secure qualified contractors and labor.
- ☐ Estimated workforce and resources needed to meet replacement goals.

Identify Legal Access Requirements

- ☐ Identify and list laws/tariffs/etc. that permit or prohibit legal access to SLs (especially on customer side)
- ☐ Secure customer permission (e.g., discuss work completed with legal support to develop the documents needed for customer permission)

Customer Communication and Notification

- ☐ Plan to inform the community served that a service line replacement program is available. Include non-ratepayers (non-customers), such as renters, tenants, and other consumers (e.g., persons coming in daily for work).
- ☐ Plan to provide advance notice to customers before replacement.
- ☐ Information provided to customers about:
 - Replacement process
 - Potential risks during replacement
 - Post-replacement flushing instructions
 - Water sampling after replacement
- ☐ Method to collect and respond to customer feedback.

Funding and Financial Assistance Strategy

- ☐ Information about available funding mechanisms for replacements, particularly on the customer side.
 - Explain clearly whether the utility will bear the costs of customer-owned service lines or not, and if not, what plans are in place to ensure full SL replacement within the required timeframe.
- ☐ Strategies to avoid cost barriers for low-income residents.
- ☐ Coordination with grant/loan programs (e.g., DWSRF).

Annual Replacement Goals and Schedule

- ☐ Annual service line replacement targets and timelines. Discuss how the water system will meet the required 10% annual replacement rate, or for those with just a few LSLs, how it will meet a faster replacement rate. (Work with DOW on whether a shortened replacement deadline is feasible for the water system).
- ☐ Metrics to measure progress toward 100% replacement.
- ☐ Process for updating the schedule based on inventory changes or operational challenges.

Post-Replacement Activities

- ☐ Provide a lead-certified POU filter to each affected household, along with installation instructions, flushing guidance, and replacement cartridges for at least 6 months.
- ☐ Procedures for post-replacement flushing, water quality testing, and customer education.
- ☐ Timeline for offering post-replacement water testing to affected households.

Recordkeeping and Reporting

- ☐ Description of records to be maintained (e.g., replaced service lines, customer communication history)
- ☐ System for reporting progress to state regulators and EPA.
- ☐ Schedule for regular updates to the Service Line Inventory and Plan.

Coordination with Other Agencies and Stakeholders

- ☐ Description of partnerships with public health departments, community groups, and other stakeholders.
- ☐ Provide information to local and State health agencies about distribution system and site assessment activities
 - location of any tap sample site that exceeded 0.010 mg/L
 - result of the initial tap sample
 - result of the follow up tap sample
 - result of water quality parameter monitoring

For further information, refer to EPA's Lead and Copper Rule Improvements technical fact sheets:

- [Service Line Inventory and Replacement Requirements](#)
- [Calculating Service Line Replacements](#)