

Written Statement for Non-Lead Initial Inventories

Systems that Physically Verified All Services Lines

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

[City of Hemet](#) 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, [City of Hemet](#) has determined it has no lead or galvanized requiring replacement service lines in its distribution system. This includes any privately-owned or customer-owned service lines.

[City of Hemet](#) reviewed all applicable sources of information, including

- 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, [City of Hemet](#) physically inspected all service lines in its distribution system, regardless of ownership. All service lines were verified non-lead with identification of material as copper or plastic.

[City of Hemet](#) will update service line material information obtained from normal operations, such as service line maintenance, installation, or water meter readings, after October 2024 and will update the initial inventory accordingly.