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Memorandum

To: All Community & Non-Transient Non-Community Public Water Systems

From: ND Department of Environmental Quality (NDDEQ)
Division of Municipal Facilities
Drinking Water Program, Lead & Copper Rule

RE: Lead & Copper Rule Revision's 2025 Lead Service Line Inventory (LSLI) Requirements

Date: July 28, 2025

The NDDEQ is providing water systems with an update on how to continue meeting the requirements of the Lead and Copper Rule Revision (LCRR) and the Lead and Copper Rule Improvement (LCRI) programs. Systems are encouraged to continue working to accomplish the objectives of both new rule requirements.

This memorandum provides information relating to the **2025 Lead Line Inventories**, the **2025 Annual Service Line Materials Notification** as required by the LCRR and **What is required to be submitted under the LCRI prior to November 1, 2027.**

2025 Lead Service Line Inventory Requirements

Systems will be responsible for completing and uploading the inventory spreadsheet submittal prior to **October 16, 2025**, unless your system is currently under contact and receiving vendor-provided assistance through the NDDEQ's State Revolving Fund's Water Service Line Inventory Technical Assistance project. Water systems will need to download their approved 2024 PWS Lead Service Line (LSL) Inventory spreadsheet from the NDDEQ portal and record updates as water service line materials are identified.

There have been several updates made to the 2025 LSL inventory form. These updates will automatically appear on your downloaded 2024 LSL inventory form that you will receive from the portal. These updates are as follows:

- Under Column F- "*Connector or Gooseneck material*" this information is no longer optional but marked as a requirement under the LCRI regulation.
Under Column F-, other changes include some additional dropdown options on the list that need to be reviewed. If a PWS does not know if there are connectors within the system, then choose "Unknown"
- Under Column X - "*Building Type/Use*" – "*Empty Lot*" has been added to the dropdown list.

Over the next two years, NDDEQ encourages water systems to continue to work on identifying and updating their service line materials to reduce the number of “Unknown” lines within their lead service line inventories. Water systems with many “Unknowns” will be challenged because a higher replacement rate will be needed when the mandated LCRI removal portion of the rule commences.

2025 Annual Service Line Material Notification

All water systems **MUST** individually notify consumers whose service lines have been identified as either Lead, Galvanized Requiring Replacement (GRR) or Lead status “Unknown” by written notice prior to November 15, 2025, **regardless** of whether you have updated your system’s lead service line inventory or not.

- PWS may find copies of the approved service line template notices at the following website: <https://deq.nd.gov/MF/DWP/LCRR/>
- There have been no updates to the templates since last year.
- Notification letters are not required if the entire service line is identified as “non-lead”.
- This service line material type notification must be repeated on an annual basis until all service line material is identified as non-lead for both the public and customer side of the service line.
- New customers must be notified of their line material type at the time-of-service initiation.

The list of addresses/sites that each water system must provide notification of service line material type will be compiled by NDDEQ and sent to the water system by email and hardcopy. This information will be sent after October 16, 2025. If water systems do not provide an updated 2025 LSLI, the NDDEQ, will use the 2024 LSLI to create addresses/sites for the 2025 notification requirements.

What is required to be submitted by November 1, 2027, under the LCRI

Water systems must submit the following information/forms to NDDEQ.

- A Baseline Inventory
- A Lead Service Line Replacement Plan
- Updated Lead & Copper sample site plan based on system’s current Service Line Inventory. Sample sites will be prioritized to service lines identified as Lead and/ or GRR
- A list of all schools and licensed daycares located within your water system’s distribution system

Additional information, guidance, and forms will be provided to the water systems as information becomes available by the U.S. Environmental Protection Agency.

NDDEQ understands that the regulations can be complex, and we are committed to helping you navigate the process within our abilities. Thank you for your continued dedication to maintaining safe, high-quality drinking water for your communities. If you have any questions, please don’t hesitate to call Sandi Washek 701-328-5190 or Mara Vega-Ross 701-328-5298.