



Drinking Water State Revolving Fund

Lead Service Line Loan Questions and Answers

331-721 • 4/17/2023

General

Q: Is this the only year that Lead Service Line (LSL) funding is available?

A: No. The Bipartisan Infrastructure Law provides LSL funding through 2026. We currently plan to offer an LSL cycle each year through 2026.

Q: What happens if a property owner refuses to have the service line replaced?

A: Extend customer service to the property owner to discuss reasons for refusal and health impacts of the lead service line not being replaced. Request additional community outreach from ODW. Document the refusal and keep a copy for your records.

Q: What address should I use for the application?

A: Use the address of your office within the service area or the center of your service area.

Q: How do we explain the use of public funds on private property and for private use?

A: The federal government has mandated that states identify and address lead service lines. The goal is to remove lead exposure for all people. The LSL loans are federal funds with these mandates.

Q: Do I need an easement for my inventory?

A: You may request permission from the property owner to inspect their service line. If they refuse, please contact DWSRF as we can work with you to extend additional customer service on the importance of identifying service line material. You will need a construction easement for any potholing or service line replacement.

Q: Who do I contact for more information about the LSL Loans?

A: Send an email to DWSRF@doh.wa.gov or call Jocelyne Gray at 564-669-4893.

WALT

Q: How do I access WALT?

A: Contact DWSRF@doh.wa.gov to get set up with a WALT account. Once registered, or if you have accessed WALT before, follow the directions in the [Washington Loan Tracking External User Guide 331-614 \(PDF\)](#).

Q: As a technical assistance provider, a grant writer, a consultant, or other third-party assisting a water system with their application, may I obtain access to WALT on behalf of the water system?

A: Yes. Contact DWSRF@doh.wa.gov to get set up with a WALT account.

Q: Do I need a Secure Access of Washington (SAW) account?

A: Yes. Directions on how to set up your account is located in the [Washington Loan Tracking External User Guide 331-614 \(PDF\)](#).

Eligible Projects

Q: Are lead main line valve components eligible for LSL replacement funding?

A: No. Funding is for service line components only.

Q: What if the customer already replaced their portion of the service line?

A: Document the updated line—when it was updated and with what material. Replace the service line from the main line to the new material.

Q: If there are just lead connectors on the service, can I just replace those?

A: No. You must replace the service line and the lead components.

Q: Can this funding be retroactive to cover eligible expenses before contracts are signed in September?

A: No. Work must not begin until the contract is signed.

Q: If a service meter predates the 1986 lead ban and has lead components, will the loan pay for its replacement?

A: Yes, if replaced as part of the full LSL replacement.

Q: If a service meter predates the 1986 lead ban and does not have lead components, will the loan pay for its replacement?

A: No.

Q: If a service meter is post-1986 lead ban, will the loan pay for its replacement?

A: No.

Planning Document Requirements

Q: What does “current and approved” mean regarding a planning document?

A: Current and approved means as of April 28, 2023, your Water System Plan (WSP) is not expired, or your Small Water System Management Program (SWSMP) has been approved by us and includes current management and operations procedures. There is an expiration date in the WSP approval letter. SWSMP approvals do not expire, but may not have been updated with policy changes, ownership changes, or regulation changes. Contact your [regional planner](#) to determine if your WSP is expired or if your SWSMP needs to be updated.

Q: Do I need a current and approved planning document to be eligible for the LSL Loan?

A: No. Only if applying for the LSL **Replacement** Loan.

Q: If my planning document (Water System Plan or Small Water System Management Program) is being worked on, but not yet approved, am I eligible for the LSL Replacement Loan?

A: No. You may apply for a Lead Service Line **Inventory** Loan.

Q: Does LSL replacements need to be in my planning document since the WAC requires the project to be in my planning document?

A: No. The emergency rule changes to WAC 246-296 states the project does not need to be in the planning document for LSL projects.

Q: I haven't started updating or developing my planning document. Is it required for the LSL Inventory Loan?

A: No. You must include the planning document as part of your scope of work.

Q: Is it possible to do the service line inventory at the same time as my planning document update or creation?

A: Yes. The LSL inventory will help with your asset management development, which is required to be part of your planning document.

Q: Who do I contact if I have more questions about my planning document?

A: Contact your [regional planner](#).

Disadvantaged Community Definition

Q: Is there a rule defining disadvantaged community?

A: Yes. An [emergency rule change to chapter 246-296 WAC](#) was published just for the LSL Loan cycle. The adopted rule expires June 27, 2023. We will look at future changes during a formal rulemaking process later this year.

Q: How is disadvantaged community status determined?

A: First the water system is identified as small, less than 3,300 people served, or is located in a rural county as identified by the [Office of Financial Management](#). Second, the [Climate and Economic Justice Screening Tool](#) is reviewed. If the water system serves a majority of areas identified as disadvantaged or the project primarily serves disadvantaged census tracts, then the water system is considered disadvantaged. If a water system is not identified as disadvantaged on the map, then the underwriter will review the Household Burden and Poverty Prevalence indicators.

Q: How do I complete the calculations if my water system is not identified as disadvantaged on the Climate and Economic Justice Screening Tool?

A: You do not do the calculations. Our underwriter reviews the applications and determines who qualifies for subsidy. If they need calculations to determine Household Burden Indicator and Poverty Prevalence Indicator, they will reach out to your system for financial documentation.

Q: Where do the calculations come from?

A: The calculations come from the [Developing a New Framework for Household Affordability and Financial Capability Assessment in the Water Sector](#) prepared for the American Water Works Association, National Association of Clean Water Agencies, and Water Environmental Federation.

Cultural, Historical, and Environmental Review Requirements

Q: Can the Area of Potential Effect (APE) encompass the entire boundary of the water system service area?

A: Contact Scott.Kugal@doh.wa.gov or 360-480-7617 to determine area of impact to be reviewed.

Q: Can the Area of Potential Effect (APE) be specific areas within my water system service area?

A: Yes. Contact Scott.Kugal@doh.wa.gov or 360-480-7617 to determine area of impact to be reviewed.

Q: Do I need to complete the cultural and historical review process if I am potholing to identify service line material?

A: Yes. If you are disturbing any ground, you are supposed to complete the cultural and historical review process.

Service Line Inventory Compliance per the Lead and Copper Rule Revisions

Q: When are the lead service line inventories due?

A: The inventories are required to be submitted to the state by October 16, 2024, per the Lead and Copper Rule Revisions.

Q: What happens if I don't submit my inventory by the October 16, 2024, due date, but we are working on the inventory?

A: Your water system will acquire a reporting violation and requires Tier 3 public notification.

Q: What happens if I don't submit my inventory by the October 16, 2024, due date and have not started my inventory?

A: Your water system will acquire a treatment technique violation and requires Tier 2 public notification.

Q: Is there a template for the service line inventory?

A: Yes. EPA has a [spreadsheet template](#).

Q: What sort of review will there be of the service line inventories?

A: Submit your service line inventories to the regional offices. The regions will track who submits their inventories and if the number of service lines coincides with the number of connections on the WFI. Detailed reviews are unlikely.

Q: Where can I find more information about the service line inventory requirements?

A: The Lead and Copper Rule Revision (LCRR) team created the [Lead Service Line Inventory Guidance 331-711 \(PDF\)](#) on how to complete the inventory and an [LSL Inventory FAQ 331-712 \(PDF\)](#). Additional information is located on the [LCRR webpage](#).



To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 (Washington Relay) or email civil.rights@doh.wa.gov.