



Non-Lead Service Lines Statement

Liberty – Bellview Heights 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, Liberty–Bellview Heights has determined that its distribution system has no lead or galvanized service lines requiring replacement. This includes any privately-owned or customer-owned service lines.

Liberty–Bellview Heights reviewed all applicable sources of information, including:

- All construction and plumbing codes, permits, and existing records or other documentation that 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, Liberty – Bellview Heights used an alternative method to develop the inventory that was approved by the State Water Resources Control Board Division of Drinking Water on a case-by-case basis.

Liberty – Bellview Heights physically verified a representative subset of service lines. The subset consisted of a minimum of 20 percent of all service lines in its distribution system. To ensure that the confidence level in the results is higher, Liberty proposed the verification of 50% more than the minimum number required. All service lines inspected were verified non-lead (**copper, plastic, or galvanized**). No lead or galvanized requiring replacement service lines were identified. Liberty randomly selected service lines to be physically inspected. The selection was uniformly random and not based on any specific criteria, which could introduce bias.

Liberty – Bellview Heights continues to document service line material information obtained from normal operations, such as service line maintenance or water meter readings, after October 2024 and will update the initial inventory accordingly.

A copy of the approved verification plan can be found here:

<https://libertyutilities.com/bv/verification/>