

## Statement of Non-Lead Initial Service Line Inventory

California American Water has completed the initial lead service line inventory required by U.S. EPA's Lead and Copper Rule Revisions for its Toro water system. The deadline for the initial inventories is October 16, 2024.

Through completing a historical records review and field investigations, California American Water 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.

California American Water reviewed all applicable sources of information, including

- County parcel year-built data. Properties built after January 1, 1986, were determined to have no lead service lines because the State of California had banned the use of lead as of that date;
- 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
- Previous service line or meter replacements records.

In addition to reviewing the above sources of information, California American Water 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.

California American Water physically verified a representative subset of service lines for its Toro water system. The subset consisted of a minimum of 20 percent of all service lines in its distribution system. All service lines inspected were verified non-lead, consisting of copper, plastic, or galvanized. No lead or galvanized requiring replacement service lines were identified. Parcels predating 1900 or dating from 1940 to 1949, if any, were prioritized because of the higher likelihood of lead presence.