

# Validating Non-Lead Service Lines/A Practical Framework: American Water Works Association Guidance



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The American Water Works Association (“AWWA”) issued a guidance document titled:

*Validating Non-Lead Service Lines – A Practical Framework* (“Framework”).

AWWA describes itself as the largest organization of water supply professionals in the world whose membership includes more than 4,300 utilities that supply roughly 80% of North America’s drinking water.

AWWA states that the Framework was designed to assist water systems completing the United States Environmental Protection Agency’s (“EPA”) Lead and Copper Rule Improvements (“LCRI”) validation study. EPA’s validation study is described as a:

... mechanism to assess the accuracy of nonlead service line classifications in inventories to ensure that water systems are ultimately removing all lead service lines (LSLs) and galvanized requiring replacement (GRR) service lines from the distribution system.

All community water systems and non-transient non-community water systems must conduct the validation study unless a waiver is approved by their State. In general, most water systems must complete the study by December 31, 2034, unless otherwise determined by the State.

The Framework’s objectives include:

- How to conduct the study.
- How to evaluate the study results.
- How to report the results to the State.

Key components of the validation study are describes as including:

- Establishing the validation pool (first identifying a validation pool of all eligible non-lead services lines, excluding service lines that had prior inspections on both sides, were installed after a federal, state, or local lead ban, or had a documented lead service line replacement).
- Conducting the validation study (Randomly selecting a number of service lines based on the size of the validation pool to conduct exterior wall visual inspections on both sides of the service lines in the validation pool).
- Evaluating the study results (reviewing the service line classifications to determine the number of LSLs and GRRs identified among the non-lead service lines randomly selected for inspection as part of the study).

- State submission (reporting to their State the inventory version and date that was used for establishing the non-lead validation pool, the method used to classify service lines in the validation study, and the number of LSL and GRR service lines found in the validation study).

The Framework also includes a section that addresses additional factors that could impact the validation study and suggested interpretations that water systems could discuss with their State.

The Framework was prepared by CDM Smith and the individual authors include:

- Joanna Cummings.
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- Wendy Lundeen.

A copy of the Framework can be found [here](#).