



MEMORANDUM FOR THE RECORD

From: Commanding Officer, U.S. Naval Support Activity, Naples, Italy

Subj: RESULTS OF UNKNOWN WATER SERVICE LINE INSPECTION AT SUPPORT SITE

In accordance with U.S. Environmental Protection Agency (EPA) regulations, NSA Naples has completed a comprehensive inspection of all water service lines at the Support Site. We are pleased to confirm that all water lines are lead-free. The Support Site water system complies with EPA lead and copper rule action levels, ensuring your water is fit for consumption. Furthermore, all water systems across NSA Naples installations are regularly tested for lead, regardless of service line composition, and continue to meet safety standards for consumption.

1. Our public water system is focused on protecting the health of every person living and working in facilities and housing (family and unaccompanied) on our installations. This notice contains important information about your drinking water. Please share this information with anyone who consumes water (drinking, showering, bathing, dishwashing, cooks, and oral hygiene) at this location. In addition to the people directly served at this property, this could and should include people in barracks, family housing, military treatment facilities, schools, Child Development Centers, and workplaces.
2. At Support Site, all of the main waterlines are polyethylene. However, the material composition of a portion or the entire line was unknown. The service lines are the lines that bring water from the main line to each building.
3. To comply with the recently updated U.S. Environmental Protection Agency (EPA) final Lead and Copper Rule Improvements enacted in October 2024, we conducted an inspection of all service lines between February 24th and 28th, 2025. This inspection aimed to identify the materials used and assess their condition to determine any potential lead contamination risks.
4. The inspection results show that your water service lines at Support Site pose no risk of lead contamination. Our analysis found the lines are composed of a combination of poly-propylene, a material that does not contain lead and galvanized steel with no upstream lead source. You can be confident that your water remains fit for consumption.
5. The health and welfare of our personnel, their families and those who rely on the Navy for their water is our top priority.

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6. Support Site water system complies with EPA lead and copper rule action levels. Additionally, all water systems at NSA Naples's installations, regardless of lead service line composition, continue to regularly be tested for lead and is fit for consumption.
7. To learn more about the quality of the drinking water at Support Site, visit our Annual Consumer Confidence Water Quality Report at:
https://cnreurafcenr.cnic.navy.mil/Portals/78/NSA_Naples/Documents/Emergency%20Management/2023%20CCRs/NAPLES%20SUPPORT%20SITE%20CCR%202023%20EN_AF8-22APR2024.pdf?ver=mZ5B93aPNJWBpexsSXvC5g%3d%3d
8. Consult the Inventory Summary Tab below for additional information regarding this NSA Naples Support Site Water Service Lines inspection.
9. Consult the frequently asked questions below regarding the EPA Lead and Copper Rule Improvements compliance onboard NSA Naples, Italy.
10. For further information, please contact PWD trouble desk at: DSN: 314-626-4981; COMM: +39-081-568-4981 or via e-mail: PWDNaplesTroubleDesk@us.navy.mil

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Inventory Summary Tab - NSA Naples Support Site Water Service Lines

Installation: NSA Naples

System Name: NSA Naples - Support Site

Enter Date Last Updated: 04/18/25

Purpose of this worksheet: For water systems to provide a summary of their service line inventory, including information on ownership, inventory format, and the number of service lines for each of the four required materials classifications.

Part 1. General Information

1. Is this the Initial Inventory or an Inventory Update ?	Initial Inventory
2a. Who owns the service lines in your system? <i>If other, please explain below.</i>	The entire service line is owned by the water system
2b. Is there documentation that defines service line ownership in your system, such as a local ordinance? <i>If yes, please describe below and explain where ownership is split (e.g., property line, curb stop).</i>	Yes
Utilities demarcation guidance	
3a. Describe when lead service lines were generally installed in your system.	No lead service lines observed.
3b. When were lead service lines banned in your system? Reference the state or local ordinance that banned the use of lead in your system.	N/A
4. Do you have lead goosenecks, pigtails or connectors in your system?	No
5. What is your overall level of confidence in the inventory (i.e., "Low", "Medium", or "High.") Please explain your rationale below.	
High - Visual inspections at the meter pits and backflow preventers. Visual verification of construction drawings and piping material submittal records.	

Part 2. Inventory Format

Describe your inventory format in the space provided below (e.g., the **Detailed Inventory** worksheet, custom spreadsheet, GIS map). Provide the filename and/or web address if applicable. **Note that you may be required to submit your detailed inventory of each service line in your distribution system.**

Detailed inventory worksheet

Part 3. Inventory Summary Table ¹

If you are using the **Detailed Inventory** worksheet, the classifications you select in the Column "Entire Service Line Material Classification" (Column X) will be used to calculate the total number of service lines for each of the four material classifications below. Otherwise, enter the number of service lines in the aqua-colored cells. **Remember this is the classification for the entire service line.**

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR)
Lead	Any portion of the service line is known to be made of lead. ²	0
Galvanized Requiring Replacement (GRR)	The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.	0
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.	153
Lead Status Unknown	The service line material is not known to be lead or GRR. For the entire service line or a portion of it (in cases of split ownership), there is not enough evidence to support material classification.	0
TOTAL		153

Notes

¹ This summary table is for reporting material for the entire service line connecting the water main to the customer's plumbing. See the **Classifying SLs** worksheet for additional guidance on assigning a materials classification to the entire service line when ownership is split. Remember that systems must track the system-owned and customer-owned portions separately in their inventory.

² A lead-lined galvanized service line is consistent with the definition of an LSL under the LCRR ("a portion of pipe that is made of lead, which connects the water main to the building inlet") (40 CFR §141.2) and must therefore be classified in the inventory as an LSL. Do NOT, however, count non-lead service lines with a lead gooseneck or pigtail as lead service lines unless required by RWQB.

FREQUENTLY ASKED QUESTIONS

U.S. Environmental Protection Agency (EPA) Lead and Copper Rule Improvements compliance onboard NSA Naples, Italy.

What prompted this inspection?

Inspections of water service lines were prompted by the EPA's final Lead and Copper Rule Improvements (LCRI) enacted in October 2024, which requires consumers that have known Lead Service Lines or have pipes that could potentially contain lead be notified within 30 days of completion of the service line inspection.

Why did the EPA update its Lead and Copper Rule?

In October 2024, the EPA published the final Lead and Copper Rule Improvements (LCRI) to significantly reduce exposure to lead through drinking water.

Was the water at Support Site fit for consumption prior to this inspection?

Yes. All water systems at NSA Naples's installations, regardless of service line composition, continues to regularly be tested for lead and is fit for consumption.

Why were the water service lines at other installations like Capodichino or Gaeta not inspected as well?

The Navy had the design specs and visual inspections confirmed that Capodichino and other support installations do not have lead or galvanized steel water service lines, the Support Site required a closer look. This is because the design specs were not in Navy possession and as a result the material composition of Support Site's water service lines (the lines between the main supply line and the building) was unknown.

Is my water tested for lead?

Yes, the 1991 U.S. EPA Lead and Copper Rule Improvements requires water systems to routinely sample for the presence of lead. The results of the routine lead sampling can be found in the installation's annual Consumer Confidence Report (CCR), located on CNIC's Water Quality Information webpage: <https://www.cnic.navy.mil/Operations-and-Management/Base-Support/Environmental/Water-Quality-Information/>

What if routine testing ever confirms the presence of lead in my drinking water above action levels?

If sampling confirms the presence of lead above action levels, drinking water customers will be notified within 24 hours and provided with further guidance, in accordance with the Safe Drinking Water Act. NSA Naples will take appropriate corrective actions to reduce levels of lead wherever they are detected. If necessary, alternate water will be provided.