Small NTNC Service Line Inventory Template Instructions
Virginia Department of Health, Office of Drinking Water

Applicability

1. These instructions apply to the ODW Small NTNC Service Line Inventory Template. This template is located on the ODW Lead and Copper Rule Revisions web page.
2. The ODW Small NTNC Service Line Inventory Template is intended for nontransient noncommunity (NTNC) waterworks with 5 and fewer service connections and the waterworks owns all the service connections.
3. If the ownership of the service connections is split between the waterworks and the customer, this template is not applicable. In this case, use the ODW Community Waterworks Service Line Inventory Template.
4. All community waterworks and nontransient noncommunity (NTNC) waterworks with 6 or more service connections should use the ODW Community Waterworks Service Line Inventory Template.

Getting Started

1. Save a copy of this workbook to your hard drive or network drive. Consider adding your system PWSID to the file name (e.g., InventoryTemplate_VA7000001) and indicating in the filename if this is the "initial" inventory or "update1", "update 2", etc.
2. Complete the detailed inventory information in the **LSLI** worksheet by following the instructions below.
3. When you have completed the worksheets, submit this file to the Office of Drinking Water using the Service Line Inventory Web Portal (instructions forthcoming).

Helpful tip:
When starting with the template on ODW's website, enter your data into rows under the examples. Don't overwrite the examples rows with your data. Before uploading the data, delete the rows with the examples.

Check for updates

The service line inventory template and accompanying instructions are subject to change and update. ODW will issue additional instructions for how to submit the inventory template and any additional inventory information to be entered through ODW's web portal. Check ODW's Lead and Copper Rule Revisions (LCRR) web page for updates.

Inventory Summary: Background

The summary automatically calculates the total numbers of service lines for each of the four material classifications: Lead, Non-lead, Galvanized Requiring Replacement, and Lead Status Unknown.

Note that:

a. A lead-lined galvanized service line is consistent with the definition of a lead service line 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 a lead service line. Do NOT however, count non-lead service lines with only a lead gooseneck or pigtail as lead service lines.

ODW encourages water systems to identify other sources of lead as they are encountered or where records exist and include this information in their inventories. Other sources of lead may include goosenecks, pigtails, lead solder, or other fittings and equipment that contain lead.

Detailed Inventory Worksheet – LSLI Tab

Purpose: To provide an inventory template water systems can use to track materials for each service line.

General Instructions: Each row in this worksheet represents one service line connecting to the premise plumbing. Track each connected service line, regardless of use (e.g., potable, fire suppression, irrigation, industrial water, wholesale connection, etc.) and regardless of status (active, inactive, etc.).

Remove the examples from the template (Example 1, Example 2, etc.) before submitting the inventory.

Instructions specific to small NTNC waterworks

EPA has defined service line to mean, "the pipe connecting the water main to the interior plumbing in a building." In the context of small NTNC waterworks, the distinction between water mains and service lines may be unclear. ODW will take the "service line" to mean any buried segment of piping from the source (such as a well) to a building, excluding any premise plumbing. Some NTNC waterworks will have more than one buried segment of piping or service lines.

Premise plumbing is generally plumbing inside a home or building, but does not include pumping, treatment and storage that are part of a waterworks. Waterworks do not need to report premise plumbing materials in their service line inventory.

NTNC waterworks must identify the materials for the service lines. Refer to Figures 1 and 2 for examples of service lines.

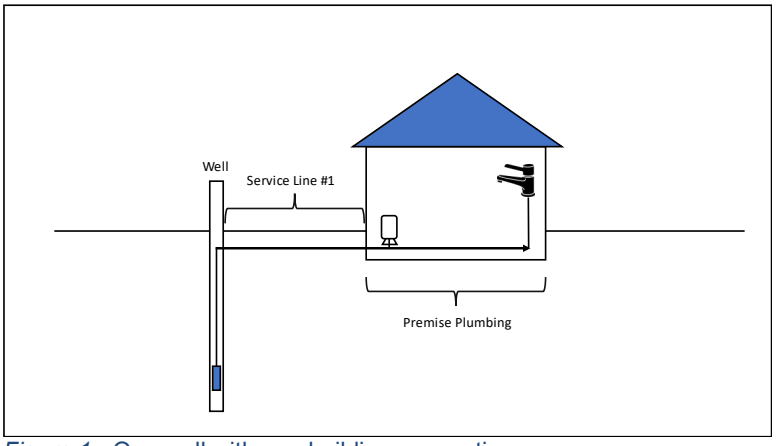

Figure 1 - One well with one building connection.

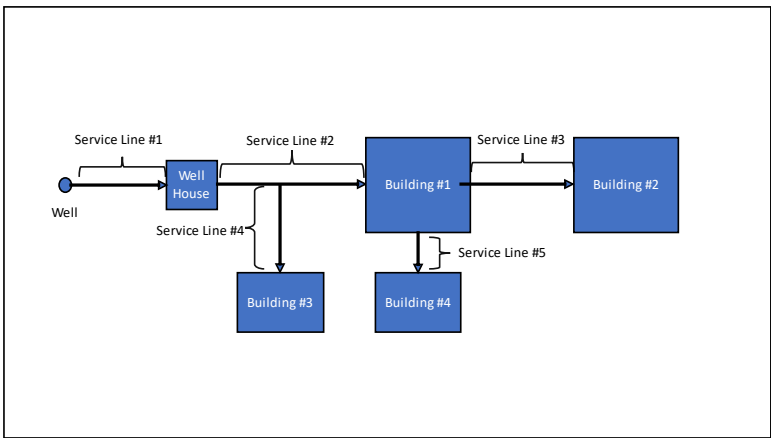

Figure 2 - One well with multiple buildings and service connections.

Inactive and disconnected service lines

If the service line is connected to the waterworks, meaning connected to the distribution system, the service line must be included in the inventory, even if it's valved off and there is no usage. Service lines that are connected could be reactivated sometime in the future. If the service line is NOT connected to the waterworks, meaning there is no physical connection to the distribution system, then EPA is not requiring it to be in the initial service line inventory submittal.

The worksheet is organized into the following sections:

- Location Information
- System-Owned Portion
- Other Potential Sources of Lead
- Additional Information to Assign Tap Monitoring Tiering
- Lead Service Line Replacement (LSLR).

ODW requires waterworks to report responses for columns with aqua shading in row 2. ODW recommends that waterworks complete columns with navy blue shading to the extent data is available. Water systems should NOT customize this worksheet by adding or deleting columns, as this worksheet will be uploaded into ODW's data system. As explained in more detail below, select a response from either a dropdown menu or directly enter the information. Five examples with a range of available data are provided for reference. Users should remove the examples before submitting your data.

Location Information

- Column A - **Unique Service Line ID**: Assign a unique ID to each row that represents one service line. For example, you may number each row starting with the number 1 and ending with the number that equals the number of service lines included in your inventory.

The **Street Address** can include the full address, if desired. For example, 123 East Main Street, Anytown, VA, 23456.

How to Avoid Service Line ID Errors
- Make sure they are not too long – 50 characters is the maximum.
- Avoid special characters – only letters, numbers, apostrophes, hyphens, and periods are allowed.

- Column B- **Street Address** and Column C – **City/Town**: Enter a street address in Column B and the City/Town in Column C for each service line. *ODW is requiring that systems provide addresses as their location identifier and include this information for all service lines.*

NTNCs may have multiple service lines or buildings with the same street address. Use the **Other Location Identifier** to help identify service lines.

How to Avoid Address Errors

The address tool will flag an address error for the user to review if it finds more than one possible address match. To help the tool narrow down options to just one match, try the following tips:
- Spell out words whenever possible:
- Replace "E" with "East", "N" with "North", etc.
- Replace "Blvd." and "Blvd" with "Boulevard", "Rd" and "Rd." with "Road", etc.
- Include City, State, and Zip Code in the Street Address field as much as possible.

Avoid including apartment numbers, suite numbers, and other information typically listed on a second address line. If the full address is listed first including city/state/zip before listing the Apartment # or similar, the address mapping tool may be able to process it better.

- Column D – **Other Location Identifier:** Enter other

The **Other Location Identifier** is limited to only letters, numbers, apostrophes, hyphens, and periods.

location information, such as lot number, site number, building number or name, etc. (Optional)

System-Owned Portion

Complete the information in Columns E through M for each service line. If the ownership of service lines is split, where the system owns a portion, and the customer owns a portion, then you must use the ODW Community Waterworks Service Line Inventory Template.

- Column E - **System-Owned Service Line Material Classification**: Use the dropdown menu to select the material subclassifications for the system-owned portion of the service line. If "Non-lead - Other" is selected, provide additional information in Column M - Notes.
- Column F - **If Non-Lead, Was Material Ever Previously Lead?** Use the dropdown menu to select "Yes", "No" or "Don't know."
- Column G - **Service Line Installation Date**: Enter the date in the format of MM/YYYY when the service line was installed or replaced.
- Column H - **Service Line Size**: Enter the diameter in inches. This information may be useful as a screening method to help identify if a service line is Non-lead. Most lead service lines are 2 inches or less in diameter.

For Column F – Answer If any upstream service line materials were ever lead (not including lead connectors and lead goosenecks). For example, referring to Figure 2, if Service Line #2 was ever lead, then downstream service lines would answer “Yes”.

- Column I - **Basis of Material Classification**: Use the drop-down menu to select the method used for materials classification. If the method you used is not one of the options, select "Other" and describe the basis for material classification in Column N - Notes.
- Column J - **Was the Service line Material Field Verified?** Select ''Yes" or "No" from the dropdown menu.
- Column K - **Describe the Field Verification Method**: If "Yes" is selected in Column J, use the drop-down menu to select the method used for field verification. If the method used is not one of the options, select "Other" and describe the field verification in Column M - Notes.
- Column L - **Enter the Date of the Field Verification:** If "Yes" is selected in Column J, enter the date in the format of MM/YYYY.
- Column M - **Notes**: Use this column to provide any additional information such as additional details about the basis of material classification, additional information on the field verification method, or documentation of previous materials classification.

The **Notes** field is limited to only letters, numbers, apostrophes, hyphens, and periods.

Other Potential Sources of Lead

- Column N – **Is there a Lead Connector?** Use the dropdown menu to indicate if there is a lead connector. Indicate “Yes,” “No,” or “Don’t Know.” For example, if a lead gooseneck or pigtail is used to connect the water main to the service line, then enter, “Yes.”
- Column O - **Is there Lead Solder in the Service Line?** Use the dropdown menu to indicate if there is lead solder in the service line. Indicate “Yes,” “No,” or “Don’t Know.”
- Column P - **List Other Fittings and Equipment Connected to the Service Line that Contain Lead**: List connectors and any other lead-containing fittings and equipment that are connected to the service line such as backflow preventers and/or meters.

Lead solder is unlikely for galvanized and plastic service lines. Lead solder is possibly present for copper service lines and “don’t know” for unknown service lines.

The Column P – **List Other Fittings…** is limited to only letters, numbers, apostrophes, hyphens, and periods.

Additional Information to Assign Tap Monitoring Tiering

Columns Q through T are used to document additional information that can be helpful in assigning a tap sample tiering classification as follows:

- Column Q - **Building Type Connected to the Service Line**: Use the dropdown menu to indicate if the building type connected to the service line is single family, multiple family residence, building or other. For example, a service line serving a non-residential building would be classified as a "building". A service line serving only a fire suppression system or an irrigation system would be classified as "other".
- Column R - **Point-of-Entry or Point-of-Use Treatment Present?** Use the dropdown menu to indicate if the home or building connected to the service line has a point-of-entry or point-of-use treatment device. For example, a whole house softener is a point-of-entry treatment device. A lead filter installed on a kitchen sink is a point-of-use treatment device.
- Column S - **Does the Interior Building Plumbing Contain Copper Pipes with Lead Solder Installed Before Your State's Lead Ban (April 1, 1986)?** Use the dropdown menu to indicate if the premise plumbing contains lead solder installed before the Lead Ban. Refer to the *Lead Ban Guidance and Chronology* on https://www.vdh.virginia.gov/drinking-water/lcrr-guidance/
- Column T – **Current LCR Sampling Site?** Use the dropdown menu to indicate if this location is a current sampling site for lead and copper tap sampling under the Lead and Copper Rule.

Lead Service Line Replacement (LSLR)

- Column U - **Date of System-owned LSLR**: Indicate the date the system-owned portion of the lead service line was replaced if applicable. Use the format MM/DD/YYYY.

Galvanized Requiring Replacement (GRR)

"Galvanized Requiring Replacement" means the galvanized service line is or ever was at any time downstream of a lead service line (LSL) or is currently downstream of a lead status unknown service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL (40 CFR §141.84(a)(4)(ii)).

ODW takes "downstream" to mean along the service line, and not along the distribution pipe. An example of a GRR service line is when the customer-owned portion from the meter to the building is galvanized, and the system-owned portion from the water main to the meter was previously lead but has been replaced. The customer-owned portion of the service line would be GRR.

For most NTNC waterworks the system owns the entire service line. An example of a GRR service line at a NTNC is when the portion from the well to the meter was previously lead but has been replaced and the portion from the meter to the building is galvanized. The classification for the entire service line would be GRR.

Note that answering Column F - If Non-Lead, Was Material Ever Previously Lead? "Yes" or "Don't know" will cause a downstream galvanized portion to be classified as Galvanized Requiring Replacement and will impact the classification of the entire service line as shown in Table 1.

Table 1: Classification of Entire Service Line with Two Materials		
First Portion	**Second Portion**	**Classification for Entire Service Line**
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead	Lead Status Unknown	Lead Status Unknown
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Lead	Lead
Lead Status Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Non-lead	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown
Source: *Exhibit 2-3 of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).*		