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

Applicability
1. These instructions apply to the ODW Community Waterworks Service Line Inventory Template. This template is located on the ODW Lead and Copper Rule Revisions web page.
2. The VDH ODW Community Waterworks Service Line Inventory Template is intended for all community waterworks and nontransient noncommunity (NTNC) waterworks with 6 or more service connections.
3. NTNC waterworks with 5 or fewer service connections should use the Small NTNC Service Line Inventory Template and related instructions.

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. Complete the information for Inventory Methods, Inventory Summary, and Public Accessibility Documentation in the Service Line Inventory Web Portal (instructions forthcoming on the LCRR web page).
4. When you have completed the worksheets, submit this file to the Office of Drinking Water using the Service Line Inventory Web Portal (instructions forthcoming).

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 the 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. The software system automatically classifies each service line material according to the rubric in Table 1 based on the material classifications of the system-owned portion and the customer-owned portion.

Note that:

a. Systems must track the materials of the system-owned and customer-owned portions separately in their inventory.

b. 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 in their distribution system.

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

The worksheet is organized into six sections:

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

The data system will automatically assign the material classification for the entire service line based on the rubric in Table 1.

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. Eight 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. Number each row starting with the number 1 and ending with the number that equals the number of service lines included in your inventory.
- Column B - Street Address & Column C - City: Enter a street address in Column B and the City 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.**
- Column D - Sensitive Population: Indicate if the location serves a sensitive population using the dropdown menu. If "Yes - Other" is selected, provide additional information in Column N - Notes.
- Column E - Disadvantaged Neighborhood: Indicate if the location meets the state affordability guidelines or other measures using the dropdown menu.

System-Owned Portion

Complete the information in Columns F through N if either (1) the system owns the entire service line, or (2) ownership is split, where the system owns a portion, and the customer owns a portion.

- Column F - 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 N - Notes.
- Column G - If Non-Lead, Was Material Ever Previously Lead? Use the dropdown menu to select "Yes", "No" or "Don't know." This information is important for determining if a downstream/customer-owned galvanized service line requires replacement (i.e., classified as galvanized requiring replacement).
• Column H - **Service Line Installation Date**: Enter the date in the format of MM/YYYY when the service line was installed or replaced.

• Column I - **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.

• Column J - **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 K - **Was the Service line Material Field Verified?** Select "Yes" or "No" from the dropdown menu.

• Column L - **Describe the Field Verification Method**: If "Yes" is selected in Column K 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 N - Notes.

• Column M - **Enter the Date of the Field Verification**: If "Yes" is selected in Column K, enter the date in the format of MM/YYYY.

• Column N - **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.

**Customer-Owned Portion**

• Complete the information in Columns O through V if either (1) the customer owns the entire service line or (2) ownership is split, where the system owns a portion, and the customer owns a portion. See the instructions above for the system-owned portion.

**Other Potential Sources of Lead**

• Column W - **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 X - **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 Y - **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.

**Additional Information to Assign Tap Monitoring Tiering**

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

• Column Z - **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 an irrigation system would be classified as “other”.

• Column AA - **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 AB - **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/lcr-guidance/](https://www.vdh.virginia.gov/drinking-water/lcr-guidance/)
• Column AC – **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 AD - **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.

• Column AE - **Date of Customer-owned LSLR**: Indicate the date the customer-owned portion of the lead service line was replaced if applicable. Use the format MM/DD/YYYY.

**Classifying the Entire Service Line When Ownership Is Split**

In many cases, service line ownership is split meaning that the system owns a portion, and the customer owns a portion of the service line. Exhibit 1 below is a diagram of a possible division in service line ownership between the water system and customer. While the LCRR requires the inventory to categorize each service line or portions of the service line where ownership is split, a single classification per service line is also needed to support various LCRR requirements, such as lead service line replacement (LSLR), tap sampling, and risk mitigation. Upon uploading the inventory into the web portal, the software will automatically calculate the total service lines in each of the four categories based on your entries. Table 1, below, indicates the rubric for classifying the material for the entire service line when ownership is split between the water system and customer. For more information, see EPA’s, *Guidance for Developing and Maintaining a Service Line Inventory* (2022).

![Exhibit 1 Example of Service Line Ownership Distinction between the Water System and Customer](image-url)

*Exhibit 1 Example of Service Line Ownership Distinction between the Water System and Customer*

Source: Exhibit 2-2 of *Guidance for Developing and Maintaining a Lead Service Line Inventory* (USEPA, 2022).
**Galvanized Requiring Replacement (GRR)**

“Galvanized Requiring Replacement” means the galvanized service line is or ever was at any time downstream of an 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.

Note that answering Column G - If Non-Lead, Was Material Ever Previously Lead? "Yes" or "Don't know" will cause a galvanized customer-owned 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 When Ownership is Split**

<table>
<thead>
<tr>
<th>System-Owned Portion</th>
<th>Customer-Owned Portion</th>
<th>Classification for Entire Service Line</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lead</td>
<td>Lead</td>
<td>Lead</td>
</tr>
<tr>
<td>Lead</td>
<td>Galvanized Requiring Replacement</td>
<td>Lead</td>
</tr>
<tr>
<td>Lead</td>
<td>Non-lead</td>
<td>Lead</td>
</tr>
<tr>
<td>Lead</td>
<td>Lead Status Unknown</td>
<td>Lead</td>
</tr>
<tr>
<td>Non-lead</td>
<td>Lead</td>
<td>Lead</td>
</tr>
<tr>
<td>Non-lead and never previously lead</td>
<td>Non-lead, specifically galvanized pipe material</td>
<td>Non-lead</td>
</tr>
<tr>
<td>Non-lead</td>
<td>Non-lead, material other than galvanized</td>
<td>Non-lead</td>
</tr>
<tr>
<td>Non-lead</td>
<td>Lead Status Unknown</td>
<td>Lead Status Unknown</td>
</tr>
<tr>
<td>Non-lead, but system is unable to demonstrate it was not previously Lead</td>
<td>Galvanized Requiring Replacement</td>
<td>Galvanized Requiring Replacement</td>
</tr>
<tr>
<td>Lead Status Unknown</td>
<td>Lead</td>
<td>Lead</td>
</tr>
<tr>
<td>Lead Status Unknown</td>
<td>Galvanized Requiring Replacement</td>
<td>Galvanized Requiring Replacement</td>
</tr>
<tr>
<td>Lead Status Unknown</td>
<td>Non-lead</td>
<td>Lead Status Unknown</td>
</tr>
<tr>
<td>Lead Status Unknown</td>
<td>Lead Status Unknown</td>
<td>Lead Status Unknown</td>
</tr>
</tbody>
</table>

*Source: Exhibit 2-3 of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).*