

Small NTNC Service Line Inventory – Direct Entry into Swift Submittals Portal

Virginia Department of Health, Office of Drinking Water

Applicability

1. These instructions apply to the addition of individual service lines directly into the GEC Swift Submittals portal for creating and submitting a Service Line Inventory.
2. These instructions are intended for use by Small Non-Transient Non Community waterworks with 5 or fewer service lines, wherein the waterworks owns all service lines in their entirety. If the portion of any service line that enters the building/connection is owned by a different entity than the waterworks itself, the waterworks should refer to the [ODW Community Waterworks Service Line Inventory – Direct Entry into Swift Submittals Portal](#) document for detailed instructions for using the GEC Swift Submittals portal.
3. All community waterworks and nontransient noncommunity (NTNC) waterworks with 6 or more service connections should also refer to the [ODW Community Waterworks Service Line Inventory – Direct Entry into Swift Submittals Portal](#) document.

Getting Started

1. Log into your GEC account at <https://portal.gecsws.com> to open the Swift Submittals homepage.
2. Click on “Update Service Lines” (in the left sidebar), select the waterworks you are representing, and then click on “Add New Service Line” (at the lower right corner).

Lead Service Line Inventory Updates - Detailed Instructions for New Entries

Each time you click on “Add New Service Line,” you will be entering detailed information for a single service line connecting a water main to a customer's plumbing. This will need to be done separately for 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.).

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.

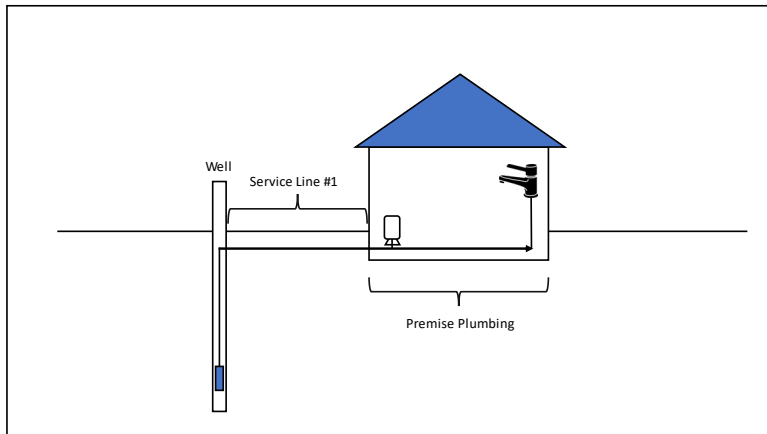


Figure 1 - One well with one building connection.

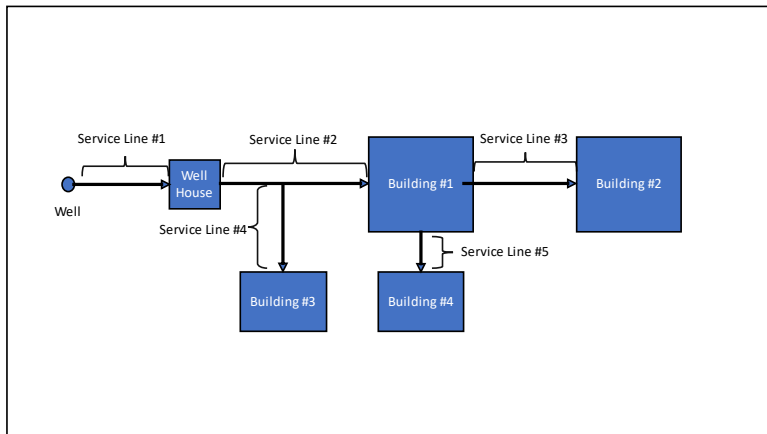


Figure 2 - One well with multiple buildings and service connections.

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 Add New Service Line data entry process is organized into five 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 fields marked with an asterisk (*). ODW recommends that waterworks report responses for all fields to the extent data is available. As explained in more detail below, select a response from either a dropdown menu or directly enter the information.

Location Information

- **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.

- **Street Address*** and **City/Town***: ODW is requiring that waterworks provide addresses as their primary location identifier and include this information for all service lines. The map feature may identify the precise location based on the information you enter, but if it is not able to do so, this will not interfere with the completeness or accuracy of the entry.
- **Other Location Identifier**: Enter other location information, such as lot number, site number, building number or name, etc. This will be essential when there are multiple buildings, and thus multiple service lines, but all have the same street address (e.g., buildings on a campus).

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

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

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

System-Owned Portion

Complete this section with information about each service line in its entirety. 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.

- **System-Owned Portion Service Line Material Classification***: Select the material subclassifications for the system-owned portion of the service line. If "Non-lead - Other" is selected, provide additional information in the "Notes (System Side)" box at the bottom of this section.
- **If Non-Lead, Was Material Ever Previously Lead?*** Select "Yes", "No" or "Don't know." This information is important for determining if a downstream/customer-owned galvanized service line will ultimately require replacement (i.e., classified as galvanized requiring replacement).
- **Service Line Installation Date**: If known, enter the date in the format of MM/YYYY when the service line was installed or replaced.
- **Service Line Size**: If known, 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.
- **Basis of Material Classification***: 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 the "Notes (System Side)" box at the bottom of this section.
- **Was the Service Line Material Field Verified?*** Select "Yes" or "No" from the dropdown menu. Not all service lines must be field verified. Depending on the identification method, a certain subset of lines must be verified. See the *Lead Ban Guidance and Chronology* on ODW's [LCRR Guidance web page](#).
- **Describe the Field Verification Method**: If service line was field verified, 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 the "Notes (System Side)" box at the bottom of this section.
- **Enter the Date of the Field Verification**: If service line was field verified, enter the date.
- **Notes**: Use this box 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.

If Non-Lead, Was Material Ever Previously Lead?* – 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".

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

Service Line Material Field Verified – This means the service line material was determined by observing the service line by field methods. Typically, field verification is used when records are incomplete or are unreliable. Small NTNC’s should field verify at least one service line for the initial inventory, and we strongly recommend they field verify as many lines as is practical.

Other Potential Sources of Lead

- **Is there a Lead Connector?*** Select “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.”
- **Is there Lead Solder in the Service Line?*** Select “Yes,” “No,” or “Don’t Know.”
- **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.

List Other Fittings... is limited to only letters, numbers, apostrophes, hyphens, and periods.

Why ask about Lead Connectors, Lead Solder, and other Lead Fittings?

- These items are included to maintain consistency with the EPA Service Line Inventory Template.
- This information, if available, should be tracked. It is useful for identifying sample locations for your Lead and Copper Rule tap monitoring plan and prioritizing service lines for replacement.
- Lead Solder in service lines could be a criterion for replacement.
- Lead Fittings in service lines could be a criterion for replacement.
- Lead Connectors and Lead Solder are criteria assigning Tier Level for future sampling (see “Additional Information to Assign Tap Monitoring Tiering,” below). Lead connectors in a service line are a criterion for Tier 3 sample sites, while Lead Solder in Building Plumbing is a criterion for Tier 4 sample sites.
- Point-of-Entry or Point-of-Use Treatment may disqualify a sample site and should be tracked if known.

Additional Information to Assign Tap Monitoring Tiering

These fields are used to document additional information that can be helpful in assigning a tap sample tiering classification as follows:

- **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”.
- **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.
- **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/>
- **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)

In the future, if a lead or Galvanized Requiring Replacement line is replaced, you will come back to this entry to provide the replacement date. Any line replacement completed before the creation of this inventory should not be entered in this section as a “replacement”; rather, the current material(s) should be identified in the first section of this form (“System-Owned Portion”).

- **Date of Waterworks-Owned LSLR:** Indicate the date the waterworks-owned portion of the lead service line was replaced if applicable.
- **Date of Customer-Owned LSLR:** Indicate the date the customer-owned portion of the lead service line was replaced if applicable.

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).