



# Service Line Inventory Template, V.3.1

Date last updated: July 20, 2022

## What is the purpose of this template?

The purpose of this draft template is to help water systems and states comply with the service line inventory requirements of the January 15, 2021 Lead and Copper Rule Revisions (LCRR). This template supplements the draft EPA document, *Guidance for Developing and Maintaining a Service Line Inventory (2022)* by providing fillable forms and tables that water systems can use to document their methods, organize their inventory, submit the initial inventory and inventory updates to the state, and document how they are making the inventory publicly available. This template also provides a checklist for state review. Note that EPA does **NOT** require systems use this template for their inventory. Refer to EPA's 2022 Inventory Guidance for minimum inventory requirements and recommendations.

## How is the template organized?

The **worksheets** in this template are color coded:

- Yellow sheets are instructions and background.
- Dark blue sheets are templates for systems.
- The dark green sheet is a template for states.

See the table below for a description of each worksheet.

The **cells** in this template are also color coded:

- Gray cells are background or instructions.
- Light blue cells are fillable cells for systems.
- Aqua cells are the required fields in the **Detailed Inventory** worksheet.
- Light green cells are fillable cells for states.

## Template Organization

| Worksheet Type              | Worksheet Name               | Description   |
|-----------------------------|------------------------------|---|
| Background                  | Template Instructions_System | Contains detailed instructions for systems.   |
|                             | Template Instructions_States | Contains detailed instructions for states.  |
|                             | Classifying SLs              | Summarizes requirements for classifying the entire service line when ownership is split ( <i>i.e.</i> , when the system owns a portion and the customer owns a portion).  |
| Templates for Water Systems | PWS Information              | For systems to document basic system information.   |
|                             | Inventory Methods            | For systems to document the methods and resources they used to develop and update their inventory.  |
|                             | Inventory Summary            | For 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. Systems can enter the totals into this worksheet or automatically generate totals based on information in the <b>Detailed Inventory</b> worksheet.   |
|                             | Detailed Inventory           | Provides a customizable format water systems can use to track materials for each service line in their distribution system. Each row equals one service line connecting the water main to the customer's plumbing. Separate columns track locational information, the system-owned portion, the customer-owned portion, other possible sources of lead, information for assigning a tap sample tiering classification, and information for lead service line replacement (LSLR). Systems can customize the worksheet by adding or deleting columns. |
|                             | Public Accessibility Doc.    | For systems to provide documentation to states on how they met the public accessibility requirements of the LCRR.   |
| Templates for States        | State Checklist              | Provides a checklist that states can use to determine and document if water systems met all of the January 15, 2021 LCRR requirements for their Initial Inventory including timely submission, required elements, use of information sources, public accessibility, and public notification of service line materials.  |

Note: Hidden rows below are for drop down lists. Do not modify or delete.

# System Template Instructions

**Purpose of this worksheet:** To provide detailed instructions for each worksheet for systems that elect to use this template.

## Getting Started

1. Save a copy of this workbook to your hard drive or network drive. Consider adding your system PWSID or other system identifier to the filename (e.g., Inventory Template\_XX0000000) and indicating in the filename if this is the "initial" inventory or "update1", "update2", etc.
2. Complete the **PWS Information, Inventory Methods, Inventory Summary, and Public Accessibility Documentation** worksheets by following the instructions below.
3. If you decide to use the **Detailed Inventory** worksheet in this workbook to organize information on service line material, follow the instructions below. Alternatively, you can use a different format for your inventory such as a list, custom spreadsheet, database, or map. You will be asked to describe the inventory format on the **Inventory Summary** worksheet.
4. When you have completed all relevant worksheets, submit this file to your state. Note that the state may require you to submit your inventory of each service line in your distribution system.

## PWS Information Worksheet

**Purpose:** For water systems to document basic system information.

**Directions:** Include information about your facility, mailing address, contact person, and person who prepared the inventory by completing the light blue cells. For the question regarding your public water system (PWS) type, check the appropriate box (CWS for community water system or NTNCWS for non-transient non-community water system). For the question "If you are a CWS, do multi-family residence comprise at least 20% of the structures you serve", click the light blue cell to use the dropdown menu.

## Inventory Methods Worksheet

**Purpose:** For water systems to document the methods and resources they used to develop and update their inventory.

### Directions:

Enter Date Last Updated in row 5 of the worksheet. You do not need to complete the information for PWS name and PWSID in rows 3 and 4, respectively. They will autofill from the information provided in the **PWS Information** worksheet.

**Part 1: Historical Records Review.** Describe the records you reviewed for your inventory and the level of confidence in these records (low, medium, high) for each of the five types of records that must be reviewed under the LCRR. Document other records that you reviewed in section 6. Refer to the examples provided in Column B and EPA's 2022 Inventory Guidance for assistance.

**Part 2: Identifying Service Line Material During Normal Operation.**

for PWS name and PWSID in rows 3 and 4, respectively. They will autofill from the information provided in the **PWS Information** worksheet.

**Part 1: Historical Records Review.** Describe the records you reviewed for your inventory and the level of confidence in these records (low, medium, high) for each of the five types of records that must be reviewed under the LCRR. Document other records that you reviewed in section 6. Refer to the examples provided in Column B and EPA's 2022 Inventory Guidance for assistance.

**Part 2: Identifying Service Line Material During Normal Operation.**

- Question 1: Check each box that indicates during which normal operating activity(ies) your water system collects service line material information. If you check "other", explain in the space below the question.
- Question 2: Use the dropdown menu to indicate if you developed or revised your standard operating procedures. If "yes", include a description in the space below the question.

**Part 3: Service Line investigations.**

- Question 1: Check each box that indicates the investigative methods used to prepare your inventory. If you check "other", please explain in the space below the question.
- Questions 2 and 3: Enter your response to each question in the space below each question.

## Inventory Summary Worksheet

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

**Directions:**

Enter Date Last Updated in row 5 of the worksheet. You do not need to complete the information for PWS name and PWSID in rows 3 and 4, respectively. They will autofill from the information provided in the **PWS Information** worksheet.

**Part 1: General Information.**

- Question 1: Use the dropdown menu to indicate if this is an initial inventory or inventory update.
- Question 2a: Use the dropdown menu to indicate who owns the service line. If other, describe in the space below the question.
- Question 2b: Include reference to any documentation that defines service line ownership in the system, such as a local ordinance, and if applicable, where ownership is split (e.g., property line, curb stop).
- Question 3a: Describe when the lead service lines were generally installed in your system.
- Question 3b: Describe when lead service lines were banned in your system including a reference to the state or local ordinance that banned their use.
- Question 4: Use the dropdown menu to indicate if you have any lead connectors in your system. For example, a lead gooseneck or pigtail that connects the service line to the water main. If you are unsure, select "Don't know."
- Question 5: Provide your overall level of confidence in the inventory (i.e., "Low", "Medium", or "High"). Please explain your rationale in the space below the question.

**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 the state may require you to submit your detailed inventory of each service line in your distribution system**

- Question 5: Provide your overall level of confidence in the inventory (*i.e.*, "Low", "Medium", or "High"). Please explain your rationale in the space below the question.

## 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 the state may require you to submit your detailed inventory of each service line in your distribution system.**

## Part 3: Inventory Summary Table.

This summary table is for classifying and reporting material for the entire service line connecting the water main to the customer's plumbing. 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 in Table 1 of the **Inventory Summary** worksheet. Otherwise, enter the number of service lines in the aqua-colored cells in Table 1. Refer to the definitions provided as part of the summary table and the **Classifying SLs** worksheet for additional guidance on assigning a materials classification to the entire service line when ownership is split between the water system and customer.

### **Note that:**

- Systems must track the system-owned and custom-owned portions separately in their inventory.
- 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 only a lead gooseneck or pigtail as lead service lines unless required by your state.
- EPA encourages water systems to identify other sources of lead such as goosenecks, pigtails, lead solder, or other fittings and equipment that contain lead as they are encountered or where records exist and to include this information in their inventories.

## Detailed Inventory Worksheet

**Purpose:** To provide a customizable format 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. The worksheet is organized into seven sections:

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

Columns with aqua shading are required by the LCRR; all other columns with navy blue shading are options for systems to consider. Water systems can customize this worksheet by adding or deleting columns. As explained in more detail below, you will either select your response from a dropdown menu or directly enter your information.

### **Locational Information**

- Additional Information to Assign Tap Monitoring Tiering
- Lead Service Line Replacement (LSLR).

Columns with aqua shading are required by the LCRR; all other columns with navy blue shading are options for systems to consider. Water systems can customize this worksheet by adding or deleting columns. As explained in more detail below, you will either select your response from a dropdown menu or directly enter your information.

### Locational Information

- **Column B - Unique Service Line ID:** Assign a unique ID to each row that represents one service line. You can 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 C - Street Address & Column D - Other Location Identifier:** Enter a street address in Column C with the option of including another, non-address location identifier (*e.g.*, block, intersection, landmark, GPS coordinates, or water meter) in Column D for each service line. **Note that the LCRR requires the publicly accessible inventory to include a location identifier for each lead and galvanized requiring replacement service line. EPA recommends that systems consider using addresses as their location identifier.**
- **Column E - Sensitive Population:** Indicate if the location serves a sensitive population using the dropdown menu. If you select, "Yes - Other", provide additional information in Column O - Notes.
- **Column F - Disadvantaged Neighborhood:** Indicate if the location meets the state affordability guidelines and other measures using the dropdown menu.

### System-Owned Portion

Complete the information in Columns G-O 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 G - System-Owned Service Line Material Classification:** Use the dropdown menu to select the recommended material subclassifications for the **system**-owned portion. If you select "Non-lead - Other", provide additional information in Column O - Notes.
- **Column H - 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.
- **Column I - Service Line Installation Date:** Enter the date, year, or estimated date range when the service line was installed or replaced.
- **Column J - 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 lead. Most lead service lines are 2 inches or less in diameter.
- **Column K - 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 materials classification in Column O - Notes.
- **Column L - Was the Service Line Material Field Verified:** Select "Yes" or "No" from the dropdown menu.
- **Column M - Describe the Field Verification Method and Column N - Enter the Date of the Field Verification:** If you selected "Yes" in Column L, use the drop-down menu to select the method used for field verification. If the method you used is not one of the options, select "Other" and describe the field verification in Column O - Notes.
- **Column O - 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 P-W if either (1) the customer owns the entire service line,

used for field verification. If the method you used is not one of the options, select "Other" and describe the field verification in Column O - Notes.

- **Column O - 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 P-W 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.

### **Entire Service Line Material Classification**

- Use the dropdown menu to indicate which of the required four service line material classifications apply to the entire service line based on your entries for the system-owned portion (Column G) and customer-owned portion (Column P). Refer to the **Classifying SL** worksheet for guidance on how to classify the material for the entire service line when ownership is split. The inventory summary sheet will auto-calculate the total service lines in each of the four categories based on your entries in this column.

### **Other Potential Sources of Lead**

- **Column Y - Is there a Lead Connector?:** Use the dropdown menu to indicate if there is a lead connector. For example, a lead gooseneck or pigtail used to connect the water main to the service line.
- **Column Z - Is there Lead Solder in the Service Line?:** Use the dropdown menu to indicate if there is lead solder in the service line.
- **Column AA - Describe Other Fittings and Equipment Connected to the Service Line that Contain Lead:** Include 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 AB through AE are for documenting additional information that is helpful in assigning a tap sample tiering classification as follows:

- **Column AB - 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.
- **Column AC - 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 device.
- **Column AD - Does the Interior Building Plumbing Contain Copper Pipes with Lead Solder Installed Before Your State's Lead Ban (Generally 1986 - 1988)?:** Use the dropdown menu to indicate if lead solder pre-dates your state's lead ban.
- **Column AE - Current LCR Sampling Site:** Use the dropdown menu to indicate if you have identified this location as a sampling site for lead and copper tap sampling.

### **Lead Service Line Replacement (LSLR)**

- **Column AF - Date of System-owned LSLR:** Indicate the date the system-owned portion of the lead service line was replaced, if applicable.
- **Column AG - Date of Customer-owned LSLR:** Indicate the date the customer-owned portion of the lead service line was replaced, if applicable.

## Lead Service Line Replacement (LSLR)

- **Column AF - Date of System-owned LSLR:** Indicate the date the system-owned portion of the lead service line was replaced, if applicable.
- **Column AG - Date of Customer-owned LSLR:** Indicate the date the customer-owned portion of the lead service line was replaced, if applicable.

## Public Accessibility Doc. Worksheet

**Purpose:** For systems to provide documentation to states on how they met the public accessibility requirements of the LCRR.

### Directions:

- Enter Date Last Updated in row 5 of the worksheet. You do not need to complete the information for PWS name and PWSID in rows 3 and 4, respectively. They will autofill from the information provided in the **PWS Information** worksheet.
- Question 1: Check each box that indicates the locational identifiers that you use for your service line inventory. If you check "Other", please explain in the space below the question.
- Question 2: Use the dropdown menu to indicate if every service line has a location identifier. If "no", explain in the space below the question. **Remember that the LCRR requires systems to use a location identifier for service lines that are lead and galvanized requiring replacement.**
- Question 3: Check each box that indicates how you are making your inventory publicly accessible. If you check "Other", please explain in the space below the question. **Note that the LCRR requires all systems that serve more than 50,000 people to provide the inventory online.**

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# State Template Instructions

**Purpose of this worksheet:** To provide detailed instructions for states that elect to use this template.

## State Checklist Worksheet

**Purpose:** For states to determine and document if water systems met all of the January 15, 2021 LCRR requirements for their Initial Inventory including timely submission, required elements, use of information sources, and public accessibility.

**Directions:** Enter Date Last Updated in row 5 of the worksheet. You do not need to complete the information for PWS name and PWSID in rows 3 and 4, respectively. They will autofill from the information provided in the **PWS Information** worksheet.

**Part 1: Person Completing This Checklist.** Enter the information that is specific to the individual who is completing the checklist.

**Part 2: Review for Timely Submission.** Select "Yes" or "No" from the dropdown menu to indicate if the initial inventory was submitted by the LCRR deadline of October 16, 2024.

### Part 3: Review for Required Elements.

- Question 1: Use the dropdown menu to indicate if the system's inventory includes all service lines connected to the distribution system. Consider if the total number of service lines in the **Inventory Summary** worksheet, Part 3, matches sanitary survey and monitoring data in the state's database (e.g., SDWIS/State) based on the population served, number of service connections (including those for non-potable use), number of accounts, census data, or other information provided by the water system in the **PWS Information** worksheet.
- Question 2: Use the dropdown menu to indicate if the system's inventory includes portions owned by the water system and the customer (if applicable). Check the service line ownership type selected in the **Inventory Summary** worksheet, Part 1, Question 2a. If the system selected "Ownership is Split . . .," check that their inventory includes information for both the system-owned and customer-owned portions.
- Question 3: Use the dropdown menu to indicate if the system classified all service lines as Lead, Galvanized Requiring Replacement, Non-Lead, or Lead Status Unknown. Consider if the system completed each row of the inventory summary table in the Inventory Summary worksheet, Part 3. Some rows may be zero.
- Question 4: Provide any additional comments related to the required elements of the system's initial inventory in the space below the question.

### Part 4: Review for Information Sources.

- Question 1: Use the dropdown menu to indicate if the system used each of the information sources required by the LCRR to prepare its initial inventory. You can review the information in the Inventory Methods worksheet, Part 1 to help make that determination.
- Question 2: Use the dropdown menu to indicate if the system collected service line material information during normal operations. You can review the information in the Inventory Methods

#### Part 4: Review for Information Sources.

- Question 1: Use the dropdown menu to indicate if the system used each of the information sources required by the LCRR to prepare its initial inventory. You can review the information in the Inventory Methods worksheet, Part 1 to help make that determination.
- Question 2: Use the dropdown menu to indicate if the system collected service line material information during normal operations. You can review the information in the Inventory Methods worksheet, Part 2 to help make that determination.
- Question 3: Use the dropdown menu to indicate if the system has conducted investigations to verify service line material. You can review the information in **Inventory Methods** worksheet, Part 3 to make that determination. Note that field investigations are not required by the LCRR but recommended by EPA to verify historical records and gather information where records do not exist to reduce the number of unknowns in the system as quickly as possible. Also note that If a water system chooses an investigation method not specified by the state under 40 CFR §141.84(a)(3)(iv), state approval is required under 40 CFR §141.84(a)(3).
- Question 4: Provide any additional comments related to information sources used to develop the system's initial inventory in the space below the question.

#### Part 5: Review for Public Accessibility.

- Question 1: Use the dropdown menu to indicate if the inventory includes location identifiers for each service line that is lead or galvanized requiring replacement. Consider checking the inventory for location identifiers and reviewing the system's answers in the **Public Accessibility Doc.** worksheet, Questions 1 and 2.
- Question 2: Use the dropdown menu to indicate if the system made its inventory publicly accessible. Consider reviewing the method by which the water system is making its inventory publicly accessible as identified in the **Public Access. Documentation** worksheet, Question 3. Check that systems serving more than 50,000 people have posted their service line inventories online.
- Question 3: Provide any additional comments/documentation related to public accessibility of the system's initial inventory in the space below the question.

#### Part 6: Review for Customer Notification of Service Line Material.

- Question 1: Use the dropdown menu to indicate if the water system's inventory consists of all non-lead service lines. If "No", then complete questions 2 through 5. If "Yes", the requirements to provide a service line notice do not apply and do not complete questions 2 through 5.
- Question 2: Use the dropdown menu to indicate if the water system delivered the notification to people served by an LSL, GRR, or lead status unknown service line within 30 days of completing the initial inventory.
- Question 3: Use the dropdown menu to indicate if the water system met the reporting requirements by demonstrating that they delivered the notification and providing a copy of the notification to the state by **July 1** for the previous calendar year.
- Question 4: Use the dropdown menu to indicate if the notification met the required content for:
  - a. **Confirmed LSLs:** The water system must meet all six requirements in order to select "Yes." If the system has no confirmed LSLs, then select "N/A."
  - b. **GRR:** The water system must meet all four requirements in order to select "Yes." If the system has no GRR service lines, then select "N/A."
  - c. **Unknowns:** The water system must meet all four requirements in order to select "Yes." If the system has no service lines of lead status unknown, then select "N/A."
- Question 5: Use the space provided to add any additional comments/documentation related to

- a. **Confirmed LSLs:** The water system must meet all six requirements in order to select “Yes.” If the system has no confirmed LSLs, then select “N/A.”
  - b. **GRR:** The water system must meet all four requirements in order to select “Yes.” If the system has no GRR service lines, then select “N/A.”
  - c. **Unknowns:** The water system must meet all four requirements in order to select “Yes.” If the system has no service lines of lead status unknown, then select “N/A.”
- Question 5: Use the space provided to add any additional comments/documentation related to customer notification for people served by an LSL, GRR, or lead status unknown service line.

### Additional State Instructions

To facilitate electronic reporting to EPA, states can extract information on the total number of service lines in each of the four categories from Part 3 of the **Inventory Summary** worksheet.

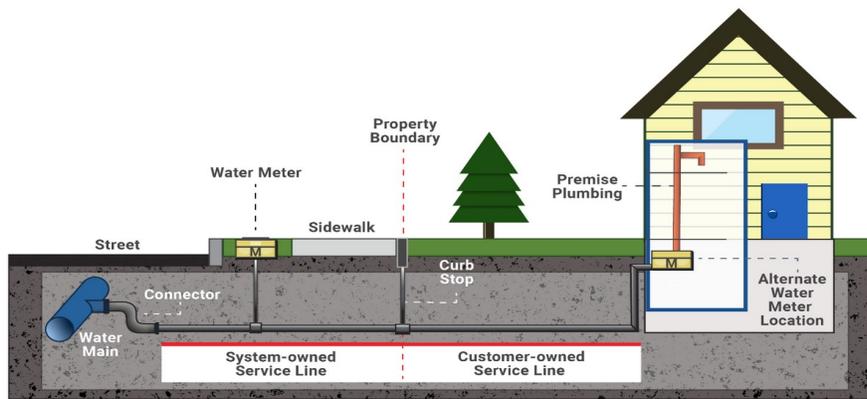
# Classifying the Entire Service Line When Ownership Is Split

**Purpose of this worksheet:** To summarize EPA's requirements for classifying the entire service line when ownership is split.

## Introduction

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. The LCRR requires systems to classify the service line material for each portion separately. However, a single classification per service line is needed by states to report initial inventory data to EPA and supports the lead service line (LSLR) and tap sampling requirements under the existing Lead and Copper Rule (LCR) and potential revised requirements under the Lead and Copper Rule Improvements (LCRI). Table 1 below indicates how to classify 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



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

**Table 1: Classification of Entire Service Line When Ownership is Split**

| System-Owned Portion   | Customer-Owned 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 2-2 of *Guidance for Developing and Maintaining a Service Line Inventory* (USEPA, 2022).

## PWS Information

**Purpose of this worksheet:** For water systems to document basic system information.

### Facility Information

Water System Name:

**Sunny View Water System**

|           |                                       |                                |   |
|-----------|---------------------------------------|--------------------------------|---|
| PWSID:    | Population Served (number of people): | Number of Service Connections: | PWS Type:   |
| XX0000001 |                                       |                                | <input type="checkbox"/> CWS <input type="checkbox"/> NTCWS |

If you are a CWS, do multi-family residences comprise at least 20% of the structures you serve?

Select "Yes" or "No"

### Mailing Address

Street or P.O. Box:

City or Town:

State:

Zip Code:

### System Contact Person

Name:

Title:

Telephone:

Email:

**Person Who Prepared Inventory (if different from above)**

# Inventory Methodology

PWS Name: Sunny View Water System

PWSID: XX0000001

Enter Date Last Updated:

**Purpose of this worksheet:** For water systems to document the methods and resources they used to develop and update their inventory.

## Part 1: Historical Records Review

| Type of Record   | Describe the Records Reviewed for Your Inventory and Indicate Your Level of Confidence (e.g., Low, Medium, or High) |
|--|---|
| 1. Previous Materials Evaluation<br><i>Example: Locations of Tier 1 lead tap sampling locations that are served by a lead service line.</i>  |   |
| 2. Construction Records and Plumbing Codes<br><i>Examples: Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.</i>                                |   |
| 3. Water System Records<br><i>Examples: Capital improvement plans. Standard operating procedures. Engineering standards.</i>   |   |
| 4. Distribution System Inspections and Records<br><i>Examples: Distribution system maps. Tap cards. Service line repair/replacement records. Inspection records. Meter installation records.</i> |   |
| 5. Additional Records Required by Your State   |   |
| 6. Other Records   |   |

## Part 2: Identifying Service Line Material During Normal Operations

1. During which normal operating activities are you collecting information on service line material? Check all that apply.

- |   |   |
|---|---|
| <input type="checkbox"/> Water meter reading<br><input type="checkbox"/> Water meter repair or replacement<br><input type="checkbox"/> Service line repair or replacement | <input type="checkbox"/> Water main repair or replacement<br><input type="checkbox"/> Backflow prevention device inspection<br><input type="checkbox"/> Other |
|---|---|

If "Other", please explain:

2. Did you develop or revise standard operating procedures to collect service line material information during normal operation? Select "Yes" or "No"

If "Yes", please describe:

## Part 3: Service Line Investigations

1. Identify the service line investigation methods your system used to prepare the inventory (check all that apply). If a water system chooses an investigation method not specified by the state under 40 CFR §141.84(a)(3)(iv), state approval is required. **Note that investigations are not required by the LCRR but can be used by systems to assess accuracy of historical records and gather information when service line material is unknown.**

- |   |   |
|---|---|
| <input type="checkbox"/> Visual Inspection at the Meter Pit<br><input type="checkbox"/> Customer Self-Identification<br><input type="checkbox"/> CCTV Inspection at Curb Box - External<br><input type="checkbox"/> CCTV Inspection at Curb Box - Internal<br><input type="checkbox"/> Water Quality Sampling - Targeted<br><input type="checkbox"/> Water Quality Sampling - Flushed | <input type="checkbox"/> Water Quality Sampling - Other<br><input type="checkbox"/> Mechanical Excavation<br><input type="checkbox"/> Vacuum Excavation<br><input type="checkbox"/> Predictive Modeling<br><input type="checkbox"/> Other |
|---|---|

Water Quality sampling - Sequential

If "Other", please explain:

2. If "Predictive Modeling", please briefly describe the model and inputs used:

3. How did you prioritize locations for service line materials investigations? For example, did you consider environmental justice and/or sensitive populations, did you use predictive modeling, and/or did you target areas with high number of unknowns?

# Inventory Summary

PWS Name: Sunny View Water System

PWSID: XX0000001

Enter Date Last Updated:

**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 <b>Initial Inventory</b> or an <b>Inventory Update</b> ?   | Select One                           |
| 2a. Who <b>owns the service lines</b> in your system? <i>If other, please explain below.</i>  | Select Ownership Type                |
| 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> | Select "Yes" or "No"                 |
| 3a. Describe when lead service lines were generally installed in your system.   |                                      |
| 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.  |                                      |
| 4. Do you have lead goosenecks, pigtails or connectors in your system?  | Select "Yes" or "No" or "Don't Know" |
| 5. What is your overall level of confidence in the inventory (i.e., "Low", "Medium", or "High.") Please explain your rationale below.   |                                      |

## 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 the state may require you to submit your detailed inventory of each service line in your distribution system.**

## Part 3. Inventory Summary Table <sup>1</sup>

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) |
|---|--|--|
| <b>Lead</b>                                   | Any portion of the service line is known to be made of lead. <sup>2</sup>  | 1  |
| <b>Galvanized Requiring Replacement (GRR)</b> | 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.                          | 3  |
| <b>Non-Lead</b>                               | All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.   | 2  |
| <b>Lead Status Unknown</b>                    | 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. | 2  |
| <b>TOTAL</b>                                  |  | 8  |

Notes

<sup>1</sup>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.

<sup>2</sup>EPA recommends including lead-lined galvanized pipe as lead in the inventory because potential lead exposure is similar to that of a lead service line. Do NOT, however, count non-lead service lines with a lead gooseneck or pigtail as lead service lines unless required by your state.



# Public Accessibility Documentation

PWS Name: Sunny View Water System  
PWSID: XX0000001

Enter Date Last Updated:

**Purpose of this worksheet:** For systems to provide documentation to states on how they met the public accessibility requirements of the LCRR.

1. Select the location identifiers that you use for your service line inventory. Check all that apply.

- Address
- Street
- Block
- Intersection
- Landmark
- GPS Coordinates
- Other

If "Other", please describe:

2. Does **every service line** have a location identifier?

Select "Yes" or "No"

If "No", explain. Remember that location identifiers are required for service lines that are lead and galvanized requiring replacement.

3. How are you making your inventory publicly accessible? Check all that apply. Remember that if your system serves > 50,000 people, you **must** provide the inventory online.

- Interactive online map
- Static online map
- Online spreadsheet
- Printed service line map
- Printed tabular data
- Information on water utility mailings or newsletter
- Hard copy information available in water system office
- Other

If "Other", please describe:

| State Checklist for Initial Inventory Submittal |  |
|---|--|
| PWS Name: Sunny View Water System               |  |
| PWSID: XX0000001                                |  |
| Enter Date Last Updated:                        |  |

**Purpose of this worksheet:** For states to determine and document if water systems met all of the January 15, 2021 Lead and Copper Rule (LCRR) requirements for their **Initial Inventory** including timely submission, required elements, use of information sources, public accessibility, and public notification of service line materials.

| Part 1: Person Completing This Checklist |        |
|--|--------|
| Name:                                    | Title: |
|  |        |
| Telephone:                               | Email: |
|  |        |

| Part 2: Review for Timely Submission  |                      |
|---|----------------------|
| 1. Was the initial inventory submitted by the deadline of October 16, 2024?<br><i>Consider post-mark or date sent via email or reported into a state data system.</i> | Select "Yes" or "No" |

| Part 3: Review for Required Elements  |                      |
|---|----------------------|
| 1. Does the inventory include <b>all</b> service lines connected to the distribution system?<br><br><i>Consider if the total number of service lines in the <b>Inventory Summary</b> worksheet, Part 3, matches sanitary survey and monitoring data in the state's database (e.g., SDWIS/State) based on population served, number of service connections (including those for non-potable use), number of accounts, census data, or other information.</i> | Select "Yes" or "No" |
| 2. Does the inventory include portions owned by the water system and the customer?<br><br><i>Check the service line ownership type selected in the <b>Inventory Summary</b> worksheet, Part 1, Question 2a. If the system selected "Ownership is Split" check that their inventory includes information for both the system-owned and customer-owned portions.</i>  | Select "Yes" or "No" |
| 3. Did the system classify all service lines as either Lead, Galvanized Requiring Replacement (GRR), Non-Lead, or Lead Status Unknown?<br><br><i>Consider if the system completed each row of the inventory summary table in the <b>Inventory Summary</b> worksheet, Part 3. Some rows may be zero.</i>   | Select "Yes" or "No" |
| 4. In the space below, provide additional comments/documentation related to required elements of the system's initial inventory.  |                      |
|   |                      |

| Part 4: Review for Information Sources   |                      |
|--|----------------------|
| 1. Did the system use the following historical records to prepare their initial inventory: previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records.<br><br><i>Consider if the system identified historical records in each row of the <b>Inventory Methods</b> worksheet, Part 1, Rows 1 through 4. Consider if the system completed Row 5 if additional records are required in your state.</i>   | Select "Yes" or "No" |
| 2. Is the system collecting service line material information during normal operations?<br><br><i>Consider if the system checked one or more normal operations activities in the <b>Inventory Methods</b> worksheet, Part 2. Consider asking the systems to submit updated or new standard operating procedures documenting service line material information collection.</i>  | Select "Yes" or "No" |
| 3. Has the system conducted investigations to verify service line material?<br><br><i>This is not required by the LCRR but recommended by EPA to verify historical records and gather information where records do not exist to reduce the number of unknowns in the system as quickly as possible. Consider:</i> <ul style="list-style-type: none"> <li>If the system checked one or more of the investigative methods on the <b>Inventory Methods</b> worksheet, Part 3.</li> <li>If in their inventory, the system indicated that the materials classification was based on investigations.</li> <li>The number of unknowns - EPA strongly discourages systems from submitting inventories with all unknowns. If all service line materials are lead status unknown, consider asking the water system to conduct investigations.</li> </ul> | Select "Yes" or "No" |
| 4. In the space below, provide additional comments related to information sources used to develop the system's initial inventory.  |                      |
|  |                      |

| Part 5: Review for Public Accessibility |  |
|---|--|
|---|--|

|   |                             |
|---|-----------------------------|
| <p>1. Does the inventory include locational identifiers for each service line that is lead or galvanized requiring replacement?</p> <p><i>Consider checking the inventory for location identifiers and reviewing the system's answers in the <b>Public Accessibility Doc.</b> worksheet, Questions 1 and 2.</i></p>   | <p>Select "Yes" or "No"</p> |
| <p>2. Did the system make its inventory publicly accessible?</p> <p><i>Consider reviewing the method by which the water system is making its inventory publicly accessible as identified in the <b>Public Accessibility Doc.</b> worksheet, Question 3. Check that systems serving more than 50,000 people have posted their service line inventories online.</i></p> | <p>Select "Yes" or "No"</p> |
| <p>3. In the space below, provide additional comments/documentation related to public accessibility of the system's initial inventory.</p>  |                             |