

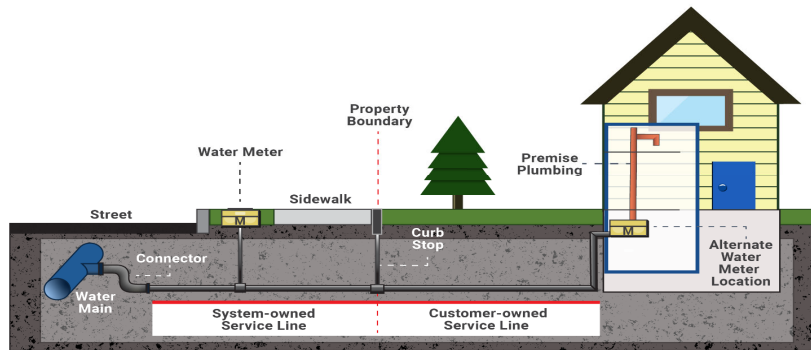
Classifying the Entire Service Line When Ownership Is Split

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. 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. **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	Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead - galvanized	Non-lead
Non-lead	Non-lead - material other than galvanized	Non-lead
Non-lead	Unknown	Unknown
Non-lead, but may have previously been lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Unknown	Lead	Lead
Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Unknown	Non-lead	Unknown
Unknown	Unknown	Unknown

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

Drop Down Lists for Detailed Inventory

- | | | |
|----------------------------|----------------------------------|--|
| Lead | Records | Records |
| Lead-lined galvanized | Installation date after lead ban | Service line diameter > 2 inch |
| Non-Lead galvanized | Service line diameter > 2 inch | Build/installation date after lead ban |
| Non-Lead copper | Field inspection | Customer report |
| Non-Lead plastic | Statistical method | Field inspection |
| Non-Lead other | Other | Statistical method |
| Unknown- likely lead | | |
| Unknown- unlikely lead | | |
| Unknown - material unknown | | |

Detailed Inventory

PWS Name: City of Roy
 PWSID: 45027K

Date Last Updated:

Purpose of this worksheet: This is a modified version of EPA's template; modified to assist water systems with completing the minimum data elements needed for a lead service line inventory.

General Instructions: Each row in this worksheet represents one service line connecting the water main to the customer's plumbing. The worksheet includes required and recommended elements; the columns with the aqua shading and listed required need to be completed to meet the requirements of the LCRR. Important notes for each column are in Row 12. Note that users can freeze panes to enable them to see the headings and notes when entering data. The worksheet is formatted for approximately 5,000 entries.

Location Information		System-Owned Portion			Customer-Owned Portion			Entire Service Line Material Classification (required)	Other Potential Sources of Lead		Lead Service Line Replacement (LSLR)		
Location Identifier (required)		System-Owned Portion Service Line Material Classification (required)	If Non-Lead in Column D, Was Material Ever Previously Lead?	Basis of Material Classification (required)	Notes	Customer-Owned Portion Service Line Material Classification (required)	Basis of Material Classification (required)		Notes	Is there a Lead Connector?	Is there Lead Solder in the Service Line?	Date of System-owned LSLR	Date of Customer-owned LSLR
Street Address	Other Location Identifier												
<i>Water systems must track addresses of all service lines in their internal inventory. If the system does not use addresses for their location identifier, other options could include a unique ID, parcel number, landmark, intersection, block, or other details to specify service line locations.</i>		<i>Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field</i>	<i>Dropdown list. Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement</i>	<i>Select option from dropdown list. If "Other," describe in the Notes field</i>	<i>Use this field for documenting additional relevant information.</i>	<i>Dropdown list includes recommended subclassifications. If non-lead other, describe in Notes field.</i>	<i>Select option from dropdown list.</i>	<i>Use this field for documenting additional relevant information.</i>	<i>Select the proper classification using dropdown list and "Classifying SLs" tab.</i>	<i>For example, lead gooseneck or pigtail where the water main is connected to the service line</i>	<i>Select Yes, No, or Don't Know</i>		
121 E 1ST ST		Non-Lead plastic	No	Installation date after lead	City Water system was	Unknown- unlikely lead	Build/installation date after		Unknown	No	No		

Inventory Summary

City: City of Roy
pwsid: 45027K

Enter Date Last Updated: **01/06/24**

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

Part 1. General Information

1. Is this the Initial Inventory or an Inventory Update ?	<i>Initial Inventory</i>
2. If you used a lead ban date to classify non-lead, what date did you use? Provide rationale if date used is prior to 1986.	
6/1987, The date the Water system was installed.	
3. Do you have lead goosenecks, pigtails or connectors in your system?	<i>No</i>

Part 2. Inventory Summary Table ¹

The below summary will help you when submitting your inventory to the state. The classifications listed in the "Detailed Inventory" tab Column K "Entire Service Line Material Classification" are used to calculate the total number of service lines for each of the four material classifications below. **These are the totals for the four classifications for all service lines inventoried.**

Service Line Material Classification	Definition	Total Number of Service Lines (REQUIRED to be reported under the LCRR)
Lead	Any portion of the service line is known to be made of lead. ²	0
Galvanized Requiring Replacement (GRR)	The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.	0
Non-Lead	All portions of the service line are known NOT to be lead or GRR through an evidence-based record, method, or technique.	44
Lead Status Unknown	The service line material is not known to be lead or GRR. For the entire service line or a portion of it (in cases of split ownership), there is not enough evidence to support material classification.	296
TOTAL		340

Notes

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

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

Public Accessibility Documentation

PWS Name: City of Roy

PWSID: 45027K

Enter Date Last Updated: 01/06/24

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? Yes

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:

PWS Information

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

Facility Information

Water System Name:

City of Roy

PWSID:	Population Served (number of people):	Number of Service Connections:	PWS Type:
45027K	796	340	<input checked="" type="checkbox"/> CWS <input type="checkbox"/> NTNCWS

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:

216 McNaught Rd. S

City or Town:	State:	Zip Code:
Roy	Washingotn	98580

System Contact Person

Name:	Title:
Ryan Fuller	Public Works
Telephone:	Email:
253-843-1113 ext.2	publicworks@cityofroywa.us

Person Who Prepared Inventory (if different from above)