Service Line Inventory Template Instructions and Requirements

These instructions will be continuously updated to further assist public water systems (PWS), and address questions that may come up. It is recommended that you check back often to see if there are any updates.

These instructions were last updated: 12/18/2023.

What is the Purpose of this Template?

The purpose of this template is to help water systems comply with the service line inventory requirements of the January 15, 2021, Lead and Copper Rule Revisions (LCRR). This template supplements the US EPA document, <u>Guidance for Developing and Maintaining a Service Line Inventory</u> (2022), by providing a standardized template to submit the initial inventory and inventory updates to Ohio EPA.

Inventories will only be accepted in the Ohio EPA template format

Ohio EPA now has instructions detailing how systems with existing databases can generate a <u>CSV file that will be an acceptable format, rather than utilizing the Excel file. Contact Zach</u> <u>Anderson at Zachary.Anderson@epa.ohio.gov if you are interested in using this.</u>

This template will help PWS track materials for each service line in their distribution system. This template should be filled out including all service lines in the PWS distribution system, and each service line or portion of the service line must be classified as lead, galvanized requiring replacement (GRR), non-lead or lead status unknown. The initial service line inventory must be submitted to Ohio EPA no later than **October 16, 2024**.

Please note that the LCRR is using the terminology <u>initial</u> inventory. Only a few fields in the template are required for compliance with the LCRR. In the proposed LCRI there is an updated initial inventory called the <u>baseline</u> inventory (likely due in 2027) that will require connector material (Column AH) to be on the inventory. It is recommended that PWSs complete as many recommended fields, like connectors, as possible in their initial inventory.

Getting Started

- 1. Save a copy of the template to your hard drive or network drive on your computer. For ease of use in the future, use your PWS ID in the filename.
 - a. For example:
 - i. Inventory_OHxxxxxxx_Date_Initial/Update/etc.
- 2. Complete the Inventory Template by filling out *at least* all required fields for every service line in your distribution system.
- 3. At the top of the template on the left-hand side, there is a [+] symbol that opens the PWS Information box. Please fill out the PWS Name and PWS ID before you complete the rest of the template. A [-] symbol will be available when the PWS information box is open, this button will minimize that box. There is also a button titled "for detailed instructions CLICK HERE" and this will provide a link to access these instructions.

- 4. DO NOT copy and paste the template into a new Excel document. Leave the examples at the top and begin entering your data into line 16.
- 5. When you have finished entering at least all the required information on the inventory template for all service lines in your distribution system, submit to Ohio EPA.
- 6. Non-transient, non-community systems (NTNC) or any system that owns the entire service line are required to complete the Customer-Owned Portion of the spreadsheet (Columns Z-AG) and the System-Owned Portion of the spreadsheet (Columns O-Y). It's recommended to add ownership explanation in the Comment section located on Column AS.

Inventory Worksheet

General Instructions: Each row in this worksheet represents one service line connecting the water main to the customer's piping. Columns with red shading are required by the LCRR; and columns with blue shading are recommended and completion will facilitate future compliance obligations. Water systems must fill out at least all the required fields for all service lines in their distribution system (regardless of use). As explained in more detail below, you will either select your response from a dropdown menu or directly enter the information.

Location 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. Some systems may be able to utilize a customer billing ID.
- Columns C: Site Name Include a site name for the service line. For example, University of Anytown, Anytown Hospital, Anytown School, or Grandma's Home Daycare.
- Columns D H: Street Number, Street Name, City, Zip Code, County Enter a full street address in Columns D-H. Note that US EPA requires the publicly accessible inventory to include a location identifier (e.g., block, intersection, landmark, GPS coordinates, or water meter) for lead, galvanized requiring replacement, non-lead, and unknown service lines.
- Columns I and J: Latitude and Longitude Include the latitude and longitude for each parcel the service line serves. Please use the decimal degrees format for your latitude and longitude. It should be in the format of XX.XXXX, -XX.XXXX. If you have your latitude and longitude in degrees minutes seconds, please calculate the decimal degrees using this formula, ${\rm D_{dec}}={\rm D}+\frac{M}{60}+\frac{S}{3600}$, or by using a reputable online calculator.
- **Columns K N: Asset Management Information** Include whether the service line is in your • Asset Management Plan, the asset status and the asset start date and end date. Asset status as inactive may be used to represent a system-owned service line that is not currently in use (e.g., a vacant property).

System-Owned Portion

***40 CFR §141.84(a)(3) Requires the review of certain records for the initial inventory service line material classification. ***

Review Chapters 2 and 4 of <u>Guidance for Developing and Maintaining a Service Line Inventory</u>. Complete the information in Columns O - Y 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. If the system owns the entire service line (such as a NTNC), note that in Column AS and fill in both the System-Owned section and the Customer-Owned section with the relevant information.

The State of Ohio banned the use of lead service lines on September 12, 1988, if a service line is determined to be non-lead based on an installation record, Columns Q and V or AA and AD, as applicable, should also be completed.

- Column O: System-Owned Service Line Material Classification Use the dropdown menu to select the recommended material subclassifications for the system-owned portion of the service line. If your systems owns the entire service line, you do not need to complete Columns Z to AG. Also, if your system-owns the entire service line and it is known to be various materials, please indicate that in Column AS and list the highest known risk material present. [Highest risk] Pb>Pb lined galvanized>galvanized>non-lead [Lowest risk]. If you select "Non-Lead – Other," provide additional information in the notes section, Column AS – Notes.
- Column P: If Non-Lead in Column P, Was Material Ever Previously Lead? Use the dropdown menu to select "Yes," "No," or "Unknown." This information is important for determining if a downstream/customer-owned galvanized service line requires replacement.
- **Column Q: Service Line Installation Date** Enter the date, year, or estimated date when the system-owned portion of the service line was installed or replaced.
- **Column R: Is the Service Line Metered?** Indicate if the service line is metered.
- **Column S:** Service Line Use Use the dropdown menu to select the correct use for each service line. This could be drinking, non-drinking, or a combination of both.
- **Column T: Service Line Size** Enter the diameter in inches of the system-owned portion of the service line. 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 U:** Service Line Length Enter the known or estimated length in feet of the systemowned portion of the service line.
- **Column V:** Basis of Material Classification Use the dropdown 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 AS Notes.
- **Column W: Was the Service Line Material Field Verified** Indicate if the system-owned portion of the service line has been field verified.
- Column X: Describe the Field Verification Method If you selected "Yes" in Column W, use the dropdown 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 AS – Notes.
- **Column Y: Enter the Date of the Field Verification** Enter the date of field verification of the system-owned portion of the service line.

Customer-Owned Portion

Complete the information in **Columns Z – AG** 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. NTNC systems or systems that own the entire service line are required to complete this section, just note ownership in Column AS.

- **Column Z: Customer-Owned Service Line Material Classification** Use the dropdown menu to select the recommended material subclassifications for the customer-owned portion of the service line. If you select "Non-Lead Other," provide additional information in the comments section, Column AS Notes.
- **Column AA:** Service Line Installation Date Enter the date, year, or estimated date when the customer-owned portion of the service line was installed or replaced.
- **Column AB:** Service Line Size Enter the diameter in inches of the customer-owned portion of the service line. 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 AC:** Service Line Length Enter the known or estimated length in feet of the customer-owned portion of the service line.
- **Column AD:** Basis of Material Classification Use the dropdown 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 AS Notes.
- **Column AE: Was the Service Line Material Field Verified** Indicate if the customer-owned portion of the service line has been field verified.
- Column AF: Describe the Field Verification Method If you selected "Yes" in Column W, use the dropdown 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 AS Notes.
- Column AG: Enter the Date of the Field Verification Enter the date of field verification of the customer-owned portion of the service line.

Other Potential Sources of Lead

- **Column AH: Connector Material Type** Use the dropdown menu to indicate the connector material type.
 - "**Replaced Lead**" is for a connector that was previously lead and changed out to a different connector material type or connector was removed completely.
 - This is not a required field for the initial inventory in 2024 but likely will be required in the baseline inventory that is due in 2027 as part of the proposed LCRI.
- Column AI: Is there Lead Solder in the Service Line? Use the dropdown menu to indicate if there is lead solder in the service line.

Additional Information to Assign Tap Monitoring Tiering

LCRR and LCRI will change the tier definitions that you are familiar with under the current rule. This section is not required, but it is highly recommended that it is completed as it will help you comply with future sampling requirements. Columns AJ through AO are for documenting additional information that is helpful in assigning a tap sample tiering classification as follows:

- Column AJ: Building Type Connected to the Service Line Use the dropdown menu to indicate
 if the building type connected to the service line is a single-family structure (SFS), SFS with
 school, SFS with childcare facility, multi-family residence (MFR), MFR with school, MFR with
 childcare facility, non-residential building, non-residential building with school, or nonresidential building with childcare facility.
- **Column AK: If Column AJ Includes a School...Lowest Grade Served –** Select the lowest grade school at the type of school building from Column AJ.
- **Column AL: Building Construction Date** Enter the date in mm/dd/yyyy that the building was constructed.
- **Column AM: Building Plumbing Materials** Use the dropdown menu to indicate the building plumbing materials. If mixed plumbing exists, use the highest known risk material present. [Highest risk] Pb>Cu with Pb solder>galvanized>non-lead [Lowest risk]
- Column AN: Plumbing Installation/Replacement Date Enter the date in mm/dd/yyyy that the plumbing was installed or replaced.
- Column AO: 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-ofuse treatment device.
- Column AP: LCR Sampling Point ID If this location is a sampling site for lead and copper tap monitoring, enter the sampling point ID.

Lead Service Line Replacement (LSLR)

- Column AQ: Date of System-Owned LSLR Indicate the date the system-owned portion of the lead service line was replaced, if applicable. If you have a planned replacement date, you can enter the projected date here. Just make sure to update your inventory once replacement occurs.
- **Column AS:** Date of Customer-Owned LSLR Indicate the date the customer-owned portion of the lead service line was replaced, if applicable. If you have a planned replacement date, you can enter the projected date here. Just make sure to update your inventory once replacement occurs.

Comments

• **Column AS: Comments** – 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. 1000 character limit.

Submittal Requirements

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- The initial service line inventory is due to Ohio EPA no later than **October 16, 2024**.
- Complete the <u>Service Line Inventory Submittal Form.</u>
 - \circ $\;$ Fill out all information.

- Click submit.
- You will see a confirmation page that will provide you with the email address where you will send your inventory.
 - A copy of your answers will be emailed to you as a PDF.
- Make sure to email your inventory to the email address provided on the form.

A separate Inventory Submittal Form must be submitted for each PWS ID

• For a PWS that serves more than 50,000 people, the inventory must also be posted online (more information on this requirement will be released later).

Notification Requirements

- PWS that have lead service lines, GRR, or lead status unknown service lines must provide notification to people served by these lines within 30 days after completing the initial inventory.
 - Delivery must be by mail, or another Ohio EPA approved method.
- The notification must be repeated on an annual basis until the entire service connection is no longer a lead, galvanized requiring replacement, or lead status unknown service line.
 - For new customers, water systems shall also provide the notice at the time of service initiation.
- Content of notifications:

Ohio EPA is working on notification templates for PWS use, and they will be available on the website as soon as they are completed

- Persons served by a confirmed lead service line: The notice must include a statement that the person's service line is lead, steps persons at the service connection can take to reduce exposure to lead in drinking water, information about opportunities to replace lead service lines as well as programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line, a statement that the water system is required to replace its portion of a lead service line when the property owner notifies them they are replacing their portion of the lead service line, and the health effects of lead required language:
 - "Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems."
- Persons served by a galvanized requiring replacement service line: The notice must include a statement that the person's service line is galvanized requiring replacement, an explanation of the health effects of lead (see above language), steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities for replacement of the service line.
- **Persons served by a lead status unknown service line:** The notice must include a statement that the person's service line material is unknown but may be lead, an

explanation of the health effects of lead (see above language), steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities to verify the material of the service line.

• Water systems must demonstrate that they delivered the notification properly and provide a copy of the notification and information materials to Ohio EPA annually by July 1 for the previous calendar year.