



ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
300 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601

Initial Service Line Inventory Certification

This document must be submitted to the Division of Water by October 16, 2024.

To submit, please upload to EEC eForm 169. Drinking Water Information and Data Submittal.

Please email us at DrinkingWaterCompliance@ky.gov with any questions.

You are not required to use this form; it is provided for your convenience. Systems may submit other forms prepared by other entities or a letter, as long as the required information is included.

Name of System: PWS ID Date inventory submitted:

I certify that the water system has produced a Service Line Inventory in accordance with 40 CFR 141.84(a) and the guidelines provided by the state, and provided it to the Division of Water.

The water system is a wholesale system with no service lines. (Only initial below statements where relevant).

Please initial each of the following:

The water system developed an initial inventory that included all service lines connected to the public water distribution system regardless of ownership, by October 16, 2024. (40 CFR 141.90(e)(1))

The water system located and reviewed the following records in order to complete the service line inventory: previous materials evaluations such as those required by 40 CFR 141.42(d); any available construction and plumbing codes, permits, and existing records; water system records, distribution system maps and drawings, meter installation records, historical records on each service connection, historical capital improvement or master plans, standard operating procedures; and all inspection records of the distribution system. If not already submitted with the Inventory, attach a description of what was done and what the future procedures will be. (40 CFR 141.84(a)(3))

Each service line in the distribution system was categorized as either Lead, Galvanized Requiring Replacement, Non-Lead (or list the actual material), or Lead Status Unknown; and the Inventory lists the date of submission to DOW. (40 CFR 141.84(a)(4))

The water system identified and tracked service line materials in the inventory as they were encountered in the course of normal operations, and has a plan to continue to do so. If not already submitted with the Inventory, attach a description of what was done and what the future procedures will be. (40 CFR 141.84(a)(5))

If service lines of unknown material are listed in the inventory, the water system has provided to DOW a plan to identify the unknowns, including the annual rate of identification planned. (40 CFR 141.84(b)(1))

A brief description of service line ownership, available records that were reviewed and other methods or information used, and methods used to communicate with the public, have been provided to DOW.

If the Initial Service Line Inventory lists lead or galvanized requiring replacement service lines, or service lines of unknown material, letters will be sent to all customers served by those connections within 30 days of the date at the top of this document, in accordance with 40 CFR 141.85(e).

The water system has made the inventory publicly available, and will include instructions for the public to find the inventory in the next Consumer Confidence Report (CCR). (40 CFR 141.84(a)(8))

Name: Title:

Signature: Date:

PWSID: \_\_\_\_\_

Person who prepared the inventory: \_\_\_\_\_ Title: \_\_\_\_\_

Preparer's email: \_\_\_\_\_ Phone: \_\_\_\_\_

## Inventory Methodology

**Date Submitted:** \_\_\_\_\_

**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	1) Describe the Records Reviewed for Your Inventory. 2) Indicate Your Level of Confidence (e.g., Low, Medium, or High). 3) If a code system was applied to record types, describe here.
1. Previous Materials Evaluation <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 <i>Examples: Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.</i>	
3. Water System Records <i>Examples: Capital improvement plans. Standard operating procedures. Engineering standards.</i>	
4. Distribution System Inspections and Records <i>Examples: Distribution system maps. Tap cards. Service line repair/replacement records. Inspection records. Meter installation records.</i>	
5. Other Records	

## Inventory Methodology

### 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 | Water main repair or replacement      |
| Water meter repair or replacement            | Backflow prevention device inspection |
| Service line repair or replacement           | Other                                 |

If "Other", please explain:

2. Did you develop or revise standard operating procedures to collect service line material information during normal operation?

If "Yes", please describe:

## Inventory Methodology

### 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. See EPA document "Guidance for Developing and Maintaining a Service Line Inventory" (August, 2022) for a description of the various water quality sampling options. **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.**

- |  |                                |
|--|--------------------------------|
| Visual Inspection at the Meter Pit     | Water Quality Sampling - Other |
| Customer Self-Identification           | Mechanical Excavation          |
| CCTV Inspection at Curb Box - External | Vacuum Excavation              |
| CCTV Inspection at Curb Box - Internal | Statistical Method             |
| Water Quality Sampling - Targeted      | Other                          |
| Water Quality Sampling - Flushed       |                                |
| Water Quality sampling - Sequential    |                                |

If "Other", please explain:

2. If "Statistical method", please provide the date and list of documents submitted to DOW:

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 or a statistical method, and/or did you target areas with a high number of unknowns or LSLs?

# Inventory Summary

**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**? *Select One*

2a. Who **owns the service lines\*** in your system? *If other, please explain below.*

\* A 'Service Line' is the pipe connecting the water main to the interior plumbing in a building. The service line may be owned wholly by the water system or customer, or in some cases, ownership may be split between the water system and the customer. (Defined by USEPA (August 2022): [Guidance for Developing and Maintaining a Service Line Inventory.](#))

2b. Is there documentation that defines service line ownership in your system, such as a local ordinance? *Please describe below and explain where ownership is split (e.g., property line, curb stop).* *Select "Yes" or "No"*

3a. If relevant, describe when lead service lines were generally installed in your system, including information available used to determine those dates.

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. Note that lead service lines were banned statewide on January 1, 1988.

## Inventory Summary

Select "Yes" or "No" or "Don't know"

4. Do you have lead goosenecks, pigtails or connectors in your system?

5. What is your overall level of confidence in the inventory (e.g., "Low", "Medium", or "High.") Please explain your rationale below.

## Part 2. Inventory Format

1. Describe your inventory format in the space provided below (e.g., the DOW LSL Inventory template, custom spreadsheet, GIS map). Provide the filename and/or web address if applicable.

2. Describe the method used to collect geographic coordinates, including the types of devices used. For example, describe whether locations were recorded at each water meter using a mobile device, or recorded by geocoding the address using a web service.

Inventory Summary		
System Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Non-lead	Lead Status Unknown	Lead
Non-lead and never previously lead	Lead	Lead
Non-lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead, but system is unable to demonstrate it was not previously Lead	Lead Status Unknown	Lead Status Unknown
Lead Status Unknown	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

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

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

Enter the number of service lines in the aqua-colored cells. **Remember this is the classification for the entire service line.** See definitions in the **Inventory Summary** section above for details.

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>	
<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.	
<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.	
<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.	
<b>TOTAL<sup>3</sup></b>		

#### 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> 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.

<sup>3</sup> Note: Total should match the number of service connections listed in Drinking Water Watch

## Public Accessibility Documentation

**Purpose of this worksheet:** For systems to provide documentation to DOW 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. 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:*