

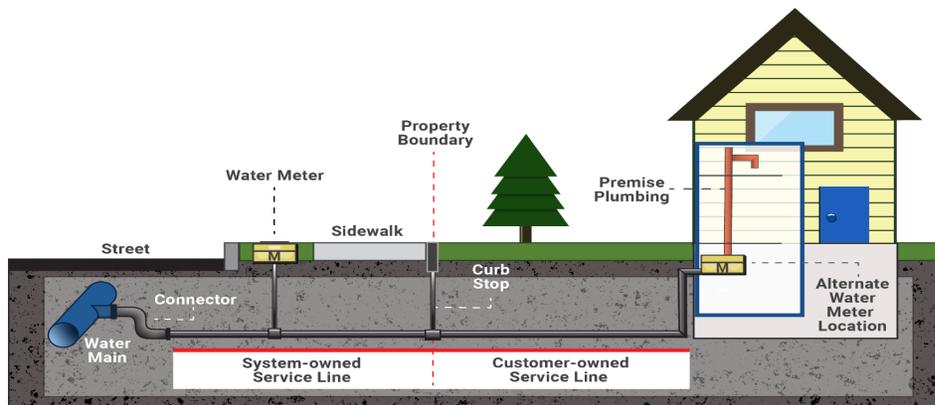
# Classifying the Entire Service Line When Ownership Is Split

**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	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).

# PWS Information

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

## Facility Information

Water System Name:

City Of Manvel

PWSID:	Population Served (number of people):	Number of Service Connections:	PWS Type:
TX0200407	5,409	1808	<input checked="" 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? No

## Mailing Address

Street or P.O. Box:

20025 Morris Ave.

City or Town:	State:	Zip Code:
Manvel	TX	77578

## System Contact Person

Name:	Title:
Ernie Means	Operations Superintendent
Telephone:	Email:
(281) 489-0630 Ext 5	<a href="mailto:ernie.means@cityofmanvel.com">ernie.means@cityofmanvel.com</a>

Person Who Prepared Inventory (if different from above)

# Inventory Methodology

PWS Name: City Of Manvel

PWSID: TX0200407

Enter Date Last Updated: **06/12/24**

**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 <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. Additional Records Required by Your State	
6. Other Records	Physical examinations at the Meter box

## 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 checked="" type="checkbox"/> Water meter reading                | <input checked="" type="checkbox"/> Water main repair or replacement      |
| <input checked="" type="checkbox"/> Water meter repair or replacement  | <input checked="" type="checkbox"/> Backflow prevention device inspection |
| <input checked="" type="checkbox"/> Service line repair or replacement | <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? 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 checked="" type="checkbox"/> Visual Inspection at the Meter Pit | <input type="checkbox"/> Water Quality Sampling - Other   |
| <input type="checkbox"/> Customer Self-Identification                  | <input checked="" type="checkbox"/> Mechanical Excavation |
| <input type="checkbox"/> CCTV Inspection at Curb Box - External        | <input type="checkbox"/> Vacuum Excavation                |
| <input type="checkbox"/> CCTV Inspection at Curb Box - Internal        | <input type="checkbox"/> Predictive Modeling              |
| <input type="checkbox"/> Water Quality Sampling - Targeted             | <input type="checkbox"/> Other                            |
| <input type="checkbox"/> Water Quality Sampling - Flushed              |   |

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?

We started with the older part of town where we were unsure of the materials used.

# Inventory Summary

PWS Name: City Of Manvel

PWSID: TX0200407

Enter Date Last Updated: **10/08/24**

**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 <b>Initial Inventory</b> or an <b>Inventory Update</b> ?	<i>Initial Inventory</i>
2a. Who <b>owns the service lines</b> in your system? <i>If other, please explain below.</i>	<i>Ownership is split, meaning that the system owns and portion and the customer owns a portion</i>
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>	Yes
<b>The city owns everything from the main to the meter, customer maintains everything from building to meter</b>	
3a. Describe when lead service lines were generally installed in your system.	
<b>We have no Lead lines, everthing was installed after lead ban</b>	
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.	
<b>1989</b>	
4. Do you have lead goosenecks, pigtails or connectors in your system?	
<i>No</i>	
5. What is your overall level of confidence in the inventory ( <i>i.e.</i> , "Low", "Medium", or "High.") Please explain your rationale below.	
<b>High, everything was field verified</b>	

## 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.**

**Detailed inventory worksheet**

## 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>	0
<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.	0
<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.	1,808
<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.	0
<b>TOTAL</b>		1,808

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.

# Public Accessibility Documentation

PWS Name: City Of Manvel

PWSID: TX0200407

Enter Date Last Updated:

10/08/24

**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:

## State Checklist for Initial Inventory Submittal

PWS Name: City Of Manvel

PWSID: TX0200407

Enter Date Last Updated:

10/8/2024

**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:
Ernie Means	Utilities Superintendent
Telephone:	Email:
(281) 489-0630 Ext 5	<a href="mailto:ernie.means@cityofmanvel.com">ernie.means@cityofmanvel.com</a>

### Part 2: Review for Timely Submission

1. Was the initial inventory submitted by the deadline of October 16, 2024?	Yes
<i>Consider post-mark or date sent via email or reported into a state data system.</i>	

### Part 3: Review for Required Elements

1. Does the inventory include <b>all</b> service lines connected to the distribution system?	Yes
<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>	
2. Does the inventory include portions owned by the water system and the customer?	Yes
<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>	
3. Did the system classify all service lines as either Lead, Galvanized Requiring Replacement (GRR), Non-Lead, or Lead Status Unknown?	Yes
<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>	
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.	No
<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>	
2. Is the system collecting service line material information during normal operations?	Yes
<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>	
3. Has the system conducted investigations to verify service line material?	Yes
<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>• <input checked="" type="checkbox"/> the system checked one or more of the investigative methods on the <b>Inventory Methods</b> worksheet, Part 3.</li> <li>• <input checked="" type="checkbox"/> in their inventory, the system indicated that the materials classification was based on investigations.</li> <li>• <input checked="" type="checkbox"/> 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>	
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**

1. Does the inventory include location identifiers for each service line that is lead or galvanized requiring replacement? Yes

*Consider checking the inventory for location identifiers and reviewing the system's answers in the **Public Accessibility Doc.** worksheet, Questions 1 and 2.*

2. Did the system make its inventory publicly accessible? Yes

*Consider reviewing the method by which the water system is making its inventory publicly accessible as identified in the **Public Accessibility Doc.** worksheet, Question 3. Check that systems serving more than 50,000 people have posted their service line inventories online.*

3. In the space below, provide additional comments/documentation related to public accessibility of the system's initial inventory.

