

## FAQ

Drinking Water and Groundwater Protection Division

## SERVICE LINE INVENTORY FREQUENTLY ASKED QUESTIONS

- If there is a lead gooseneck and both the system-owned portion of the service line is galvanized and the customer-owned portion of the service is galvanized, why isn't the spreadsheet automatically indicating "Galvanized Requiring Replacement" (GRR)?
  - a. With current regulatory definitions, the service line is just galvanized (non-lead). A GRR service line is a galvanized portion of a service line that has been downstream of a lead service line, or it is unknown whether the galvanized service line was downstream of a lead service line. Lead goosenecks (a.k.a. connectors) less than two (2) feet in length do not meet the definition of upstream service lines.
- 2) Can I edit the columns (sorting or renaming)?
  - a. No.
- 3) How do I go through the distribution system? North to south? East to west? In number order?
  - a. This does not matter and is completely up to the system. Since you will rely on the online SPAN number tool and we would appreciate receiving the latitude/longitude for the locations, it may make sense to work your way down/across a street and then back and forth as you see fit. However, the order and organization are completely up to you/the system.
- 4) What if I don't know whether there is a lead gooseneck?
  - a. Select "Unknown" for the question if a lead connector is present. Do not guess.
- 5) What if I don't trust my data/information?
  - a. Select "Unknown" for the respective aspect of the service line. Do not guess, but also do not default to "Unknown" instead of doing research.
- 6) Do I need to inventory homes on private wells in my town but not within my service area?a. No. You only need to inventory connections served by the water system.

- 7) Do I need to inventory other public water systems in my town or within my service area (but not connected to my system)?
  - a. No. You only need to inventory connections served by the water system submitting the inventory.
- 8) Brass is a metal alloy that contains trace amounts of lead. Are brass pipes considered lead pipes?
  - a. No, the current rules do not define brass pipes as lead pipes. In the inventory, select "Brass".
- 9) Are "lead packed joints" in cast iron pipes considered lead pipes?
  - a. No. This lead is not expected to contribute to the levels in the drinking water since the lead is outside of the wetted surface of the pipe.
- 10) If I know a service line is not lead but do not know the specific line material, what should I choose for service line material? Can I classify service lines as "Not Lead"?
  - a. No. Please label the non-lead service lines as "Other" and provide a comment in the Intro and Summary Table.
- 11) Can I classify the status of service lines (such as 'active/inactive')?
  - a. The Lead & Copper Rule Revisions do not differentiate between active and inactive service lines. All service lines must be inventoried. DEC does not intend to revise the inventory templates to include this additional field.
- 12) If a service line is inaccessible (i.e., the line is inside a wall that is impossible to identify the material by visible observation) but there are records proving that the service line was installed after Vermont's lead plumbing ban of July 1, 1989, can I conclude that the service line is not lead?
  - a. Yes. Please label the non-lead service lines as "Other" and provide a comment in the Intro and Summary Table.
- 13) For properties I know are non-lead based on installation date, how do I answer, "Were staff denied access to property or did the owner refuse to respond?"
  - a. Complete this field with 'No' because staff were not denied access. [Access may not have been requested, but it also was not denied.]
- 14) What is the best way to accurately answer "Was the line material ever previously lead?"
  - a. This field must be accurate with 100% confidence, which is typically accomplished through records reviews. If it is unknown, then "Unknown" must be selected. This field is used to determine if a service line meets the LCRR definition of Galvanized Requiring Replacement.

- 15) For older projects that don't have records, how should I respond to "Does this service line have a lead gooseneck, pigtail, or other connector?"
  - a. If the records review does not determine the material of the connector, then select "Unknown."
- 16) If I answer "Unknown" to the question "Was the line material ever previously lead?" will I need to submit a lead service line replacement (LSLR) plan?
  - a. If "Galvanized Iron/Steel" is the current service line material, then the program would automatically designate the service line as Galvanized Requiring Replacement (GRR). If a system has a GRR line, then a LSLR plan must be developed.
- 17) If I can't find an exact option for water main and service line diameters, what should I select?
  - a. For these service lines, select "Other" then provide an explanatory comment in the comments field of the 'Intro and Summary Table' spreadsheet.
- 18) If there is no customer-owned portion, do I need to answer, "What source(s) did you use to identify the line material?"
  - a. Yes. When the service line is either completely owned by the water system or the customer, then the question "What source(s) did you use to identify the line material?" is asking in other words: "How was it confirmed that the service line ownership is not split?"
- 19) If a service address does not have a School Property Account Number (SPAN) according to the Vermont Department of Taxes SPAN finder, what should I enter?
  - a. If the SPAN Finder database does not provide a SPAN for an E911 address, contact the municipality's administrator or Town/City Clerk.
  - b. Other databases may have a SPAN associated with a parcel containing more than one address. If the service line being inventoried is located within that parcel, the SPAN associated with that parcel can be used for each address within it. You may check the resources listed here:
    - i. <u>E911 Viewer (Vermont.gov)</u>.
    - ii. <u>Vermont ANR Natural Resources Atlas HTML5 Viewer</u>.
    - iii. <u>Parcel Viewer (Vermont.gov)</u>.
- 20) There is an "#REF!" error or other error message in the column for Galvanized Requiring Replacement or Service Line Categorization in the Excel spreadsheet, how do I fix this?
  - a. This error code may appear because text entries were **cut-pasted**. Instead, **entries should be typed**. In some cases, **copy-pasting** into the spreadsheet also works.
    - i. For inventory templates dated before April 19, 2024, these errors may have been inputted in columns A, M, N, or R.
    - ii. For inventory templates dated April 19, 2024, or after, these errors may have been inputted in columns B, N, O, or S.

- b. Other options include undoing the cut-paste actions that caused the error or downloading another copy of the template from the website and starting over.
- 21) Can you use diameter for non-lead determinations?
  - a. Vermont DEC accepts the EPA's recommendation in Section 2.4 of <u>Guidance for</u> <u>Developing and Maintaining a Service Line Inventory (epa.gov)</u>, which states that lead service lines are often 2 inches or smaller in diameter.