

LCRR Non-Transient Non-Community (NTNC) and Small Community (COM) PWS Service Line Identification Guidance

Massachusetts Department of Environmental Protection Drinking Water Program's (MassDEP DWP) guide on common service line configurations in NTNC and small COM Public Water Systems (PWS).

What is a Service Line?

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, the customer, OR ownership may be split between the two.

Which Service Lines Must PWS Include in the Initial Service Line Inventory?

Under the Lead and Copper Rule Revisions (LCRR) the initial service line inventory must include all service lines connecting:

- **the water main to the interior plumbing in a building regardless of ownership status.** This also includes service lines regardless of actual or intended use, for example, service lines:
 - with **non-potable applications** such as fire suppression or those designated for emergency use
 - connected to **vacant or abandoned buildings**, even if they are unoccupied and water service is turned off because they could be repurposed in the future for a potable or non-emergency use.
- **multiple structures or buildings on a property**
- **a well to a single building such as when the system meets the definition of a Community Water System (COM) or Non-Transient Non-Community Water System (NTNC) but does not have an extensive distribution system.**

The water main is NOT a service line and is not included in the service line inventory.

EPA recommends that systems include in their inventory any pipes not connected to buildings that have the potential to be lead, such as **Goosenecks, Pigtails and Connectors**. **Goosenecks, pigtails, and connectors are not required in the LCRR Initial SLI but will be required in the Lead and Copper Rule Improvements (LCRI) Baseline SLI, based on the proposed LCRI.**

Goosenecks, Pigtails and Connectors

A gooseneck/pigtail/connector is defined as a piece of pipe typically not exceeding two feet in length that connects the water main to the service line or the service line to the water meter of a building. While EPA states that a gooseneck/pigtail/connector is not considered a part of a service line, MassDEP retains the right to include goosenecks/pigtails/connector in its definition of service lines. MassDEP expects all public water suppliers to remove any lead pigtails/goosenecks/connectors when discovered.

Many examples provided throughout this guidance have been discovered through the *MassDEP / UMass Amherst Free Small Systems SLI / LSLRP Technical Assistance (TA) Program*. Small COM PWS and NTNCs are recommended to apply for SLI assistance through the TA Program here:

<https://www.mass.gov/forms/massdep-service-line-inventory-and-lead-service-line-replacement-plan-technical-assistance-survey>.

Examples of NTNCs and Small COM PWS on a Single Property that have service line(s)

PWS must include all service lines in their inventory, regardless of the actual or intended use. These include service lines with non-potable applications such as **fire suppression or those designated for emergency, seen in Figure 1.** These service lines could be repurposed in the future for a potable or non-emergency use.

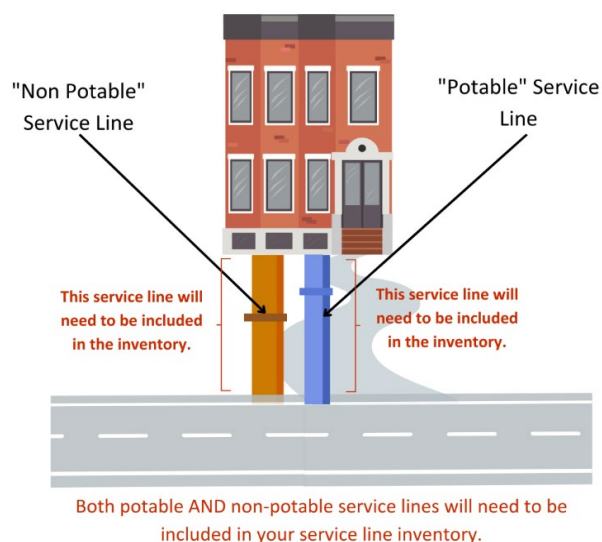


Figure 1 - Potable and Non-Potable Service Lines Must be Inventoried.

Figure 2 is a school, which is served by either a well or water main, and has multiple service lines. This PWS has a service line connecting the water source to the school's main building, and a service line connecting the school to an outdoor concession stand, which is located next to a football field and used during games to provide refreshments. This PWS then, if it only consists of what is shown in the figure, **has two service lines to inventory.**

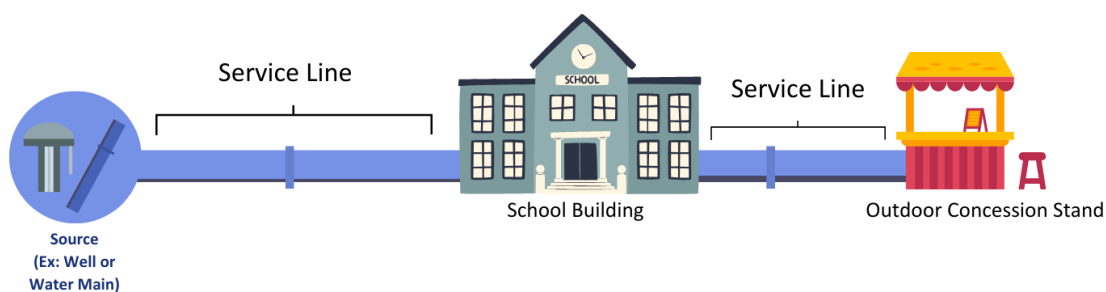


Figure 2 - A School NTNC with an Outdoor Concession Stand

Figure 3 includes a water source which is connected to the schools only building, but then is also connected to an outdoor water storage tank. This PWS then, if it only consists of what is shown in the figure, **has two service lines to inventory**.

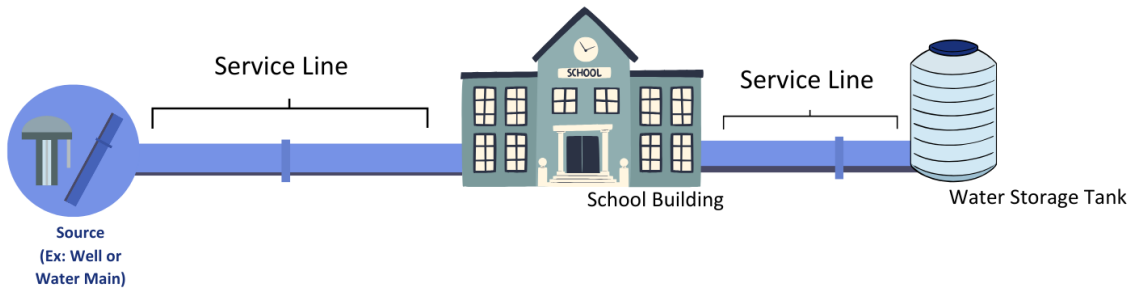


Figure 3 - A building with an Outdoor Finished Water Storage Tank

Figure 4 includes a single school building, which is connected to the source through one service line, then has another service line connecting the school to an outdoor water fountain. This may be a water fountain used for drinking water, or a decorative water fountain. In this scenario, **both service lines pictured below must be included in your SLI**.

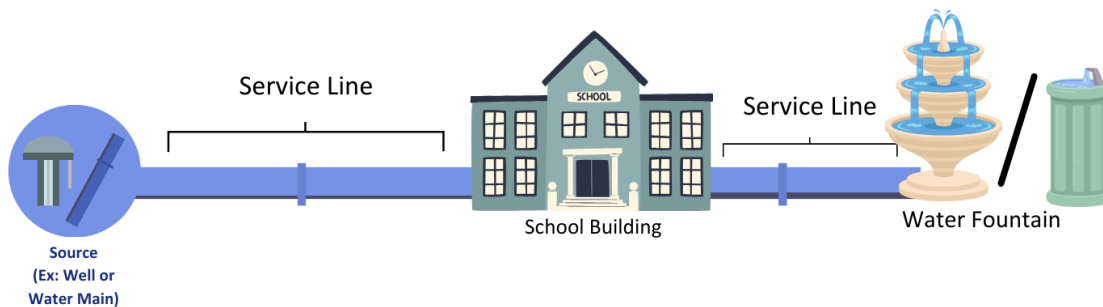


Figure 4 - A School Building with an Outdoor Water Fountain

Figure 5 shows a multiple building system, with one source and then two buildings. The pipes connecting the buildings and/or structures are considered service lines that will need to be included in the SLI. **This PWS has two service lines to inventory.**

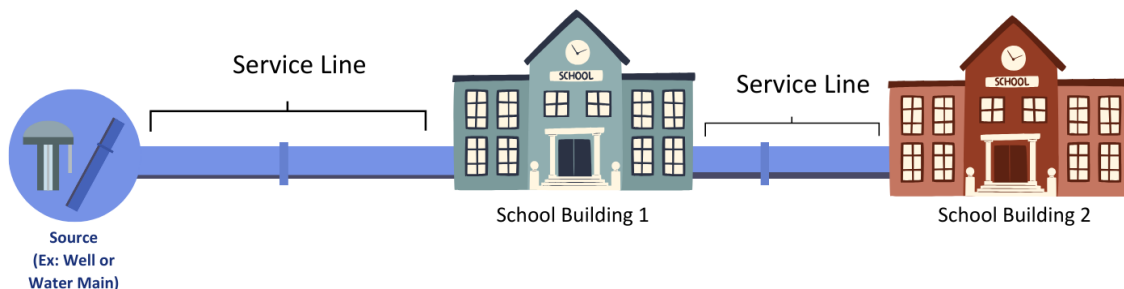


Figure 5 - A PWS with Multiple Buildings

Figure 6 includes a building which has a well within the premise, and then is connected to another source with a service line. In this case, there is **one service line**, which is connecting to the secondary source. It does not matter if the outdoor source was inactive or no longer used, as long as there is a service line that can be repurposed in the future, **it must be included in the Inventory.**

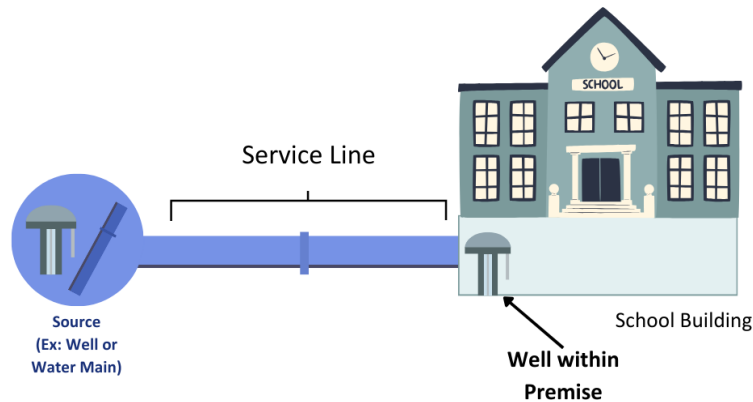


Figure 6 - A Building with a Well within the Premise, and a Service Line Connection to a Water Main/another Well.

Figure 7 is a multi-building scenario, with a well within the premise, in the basement of the building. In this scenario, there are **two service lines**, one from building 1 to building 2, and another connecting building 2 to the parking garage. The use of the parking garage service line does not matter, whether it is for potable or non-potable use, it still must be included in your inventory.

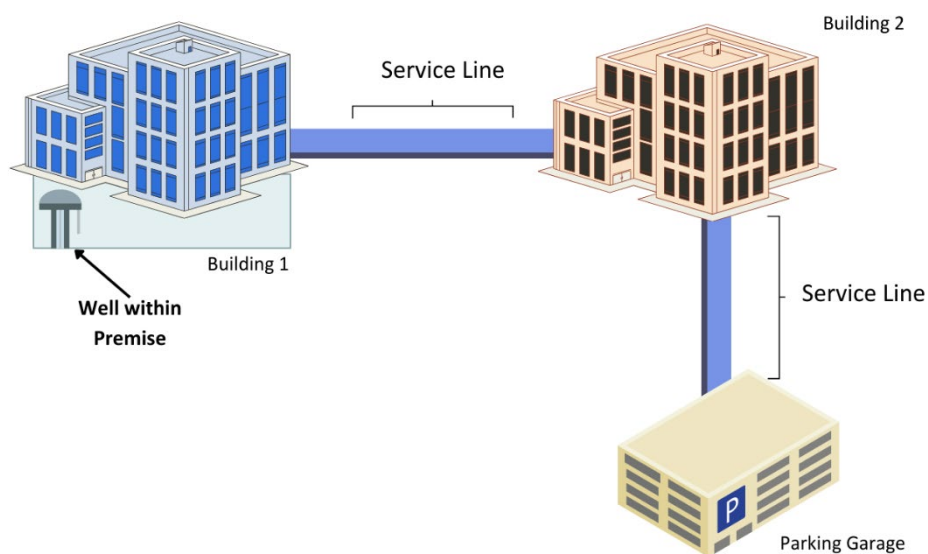


Figure 7 - This PWS has 1 Main Building with a Well within the Premise, which feeds 2 more Buildings.

An example of an NTNC PWS Map of Service Lines

Figure 8 (below) provides an example of an NTNC PWS with multiple service lines on the property. This example consists of two buildings, a parking garage, a water storage tank, and a football field which consists of multiple drinking water fountains and a concession stand. The PWS also contains non potable service lines in the form of their fire suppression system at the two main buildings and parking garage. Counting all service lines included, this example contains nine service lines that must be included in the SLI.

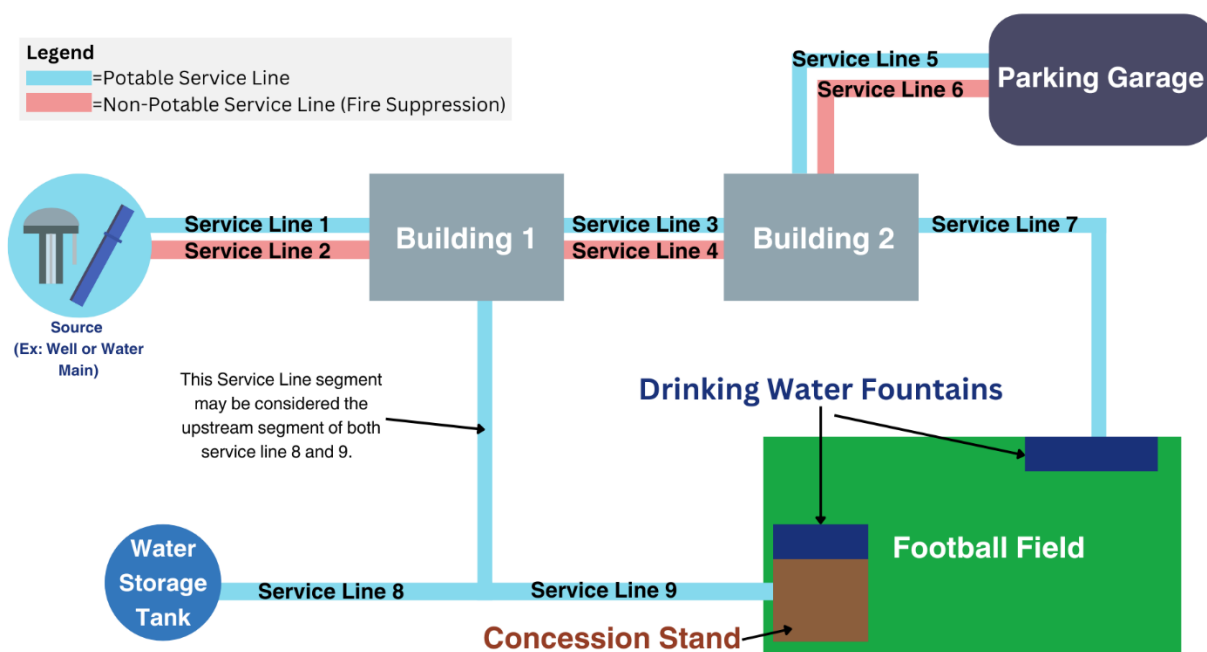


Figure 8 - An NTNC PWS Map of Service Lines

For more examples of service line configurations, and examples of how to enter service lines into your service line inventory, see the full *LCRR Service Line Identification Guidance* on the [MassDEP Lead and Copper Rule Revisions webpage](https://www.mass.gov/info-details/lead-and-copper-rule-revisions) [https://www.mass.gov/info-details/lead-and-copper-rule-revisions].

Examples of PWS that do NOT have Service Lines

Figure 9 is of a PWS that is a consecutive system, meaning that it receives its water from another PWS. This consecutive PWS then treats its water within the building. If a PWS receives water, and treats it prior to it being used for consumption, then service lines prior to treatment are not considered service lines. Since this PWS does not have any service lines after treatment, **this system would then not have any service lines to inventory.**

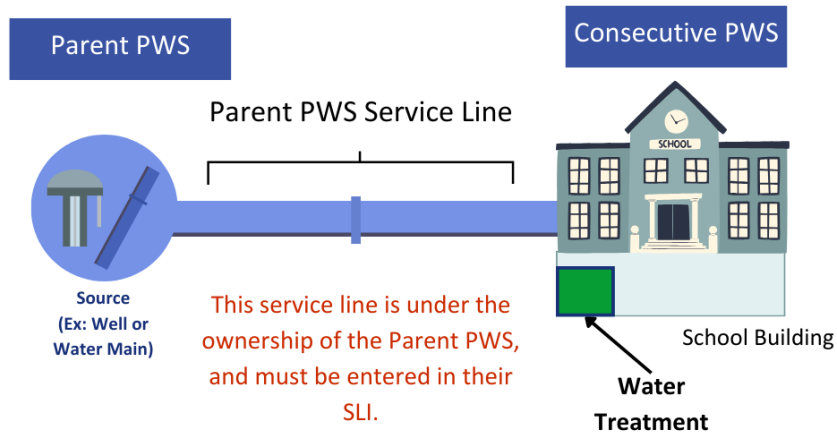


Figure 9 - A consecutive NTNC PWS which Treats its Water from the Parent PWS within the Premise. This PWS has no Service Lines.

Figure 10 is similar to figure 9, in the case that it has treatment in the building. It is however, the PWS receives its own water from a well, not a parent PWS. This does not change the case that since the water is treated prior to consumption, and there are no service lines after treatment, that **this PWS has no service lines to inventory**. The piping connecting the well to treatment are considered raw water distribution lines, and not service lines.

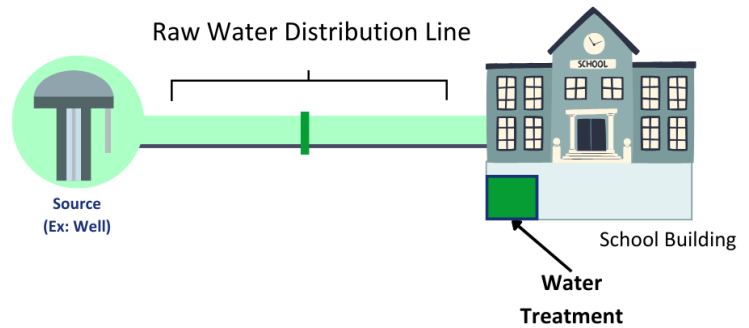


Figure 10 - A PWS which Feeds from a Well and Receives Treatment within the Premise. This PWS has no Service Line.

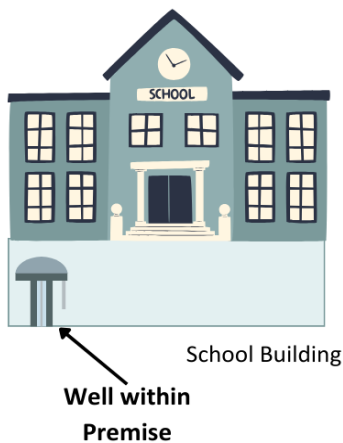


Figure 11 - A Building with a Well within the Premise. This PWS has no Service Lines.

Figure 11 is a scenario in which the PWS receives its water from a well within the building, in the basement, and has no buildings/structures that receive water from outside of the main building. In this scenario then, any piping connecting the well to this building is considered premise plumbing, since it is within the premise. **This PWS does not have any service lines to inventory.**