



Statistical Guidance for Evaluating Unknown Service Lines

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Oregon public water systems (PWSs) are required to develop a complete inventory of all service lines to comply with the 2021 Revised Lead and Copper Rule. This includes both public and private portions of the service lines.

In this document, *known* service lines are defined as a service line where the pipe materials are categorized using records or other means. *Unknown* service lines are defined as line of unknown material with no documented material history.

The statistical approach provides a method to complete a service line inventory, eliminating the need to inspect every unknown service line. The water system's statistical approach will need to demonstrate a minimum 95 percent level of statistical confidence. A key factor in the success of this strategy is the use of a randomly generated list of unknown service lines to be physically inspected.

Identification process

Before using the statistical approach to identify unknown service lines, the PWS must first use other approved methodologies (records review, including post-1985 construction and larger pipe diameters, and optionally, customer data) to categorize service lines. If no lead service lines are identified using those methodologies, a statistical approach may be used. Methodologies for identifying service line materials can be found in OAR 333-061-0036 (10)(h).

Note: If ANY service line is found to be a lead service line, then the statistical method for determining unknowns may not be able to be used. Contact your regulator for further guidance.

Statistical method

Step 1: Identify all service lines of unknown material

Identify all water service lines that could not be categorized using another approved methodology. Determine the total number of these partially or fully unknown service lines.

Step 2: Identify how many service lines must be physically inspected

- PWSs with fewer than 1,500 unknown service lines must physically verify at least 20 percent of the total number of unknown lines.
- PWSs with more than 1,500 unknown service lines must physically verify enough lines to reach a minimum 95 percent confidence level. See Appendix A to determine the number of service lines requiring verification. The Appendix A table uses a confidence level of 95 percent.

Step 3: Randomly select service lines for physical inspection

From the list of unknown service lines identified in Step 1 and the number from step 2, randomly select service lines to be physically inspected as determined in Step 2. Selection must be uniformly random and not selected based on any specific criteria which can introduce bias. In other words, each unknown service line must have an equal chance of being chosen for verification.

See Appendix B for an easy way to generate a uniformly random set of service lines for inspection.

Note: It may be tempting to introduce a “logic” to the site selection process, such as selecting within periods of construction or targeting portions of town. However, doing so can unintentionally bias the data set. Be certain to use a truly random selection method such as the one described in Appendix B.

Step 4: Conduct a one-point (or more, if needed) physical inspection

At least one-point physical identification is required for each portion of unknown service line. If the service line is jointly owned, each portion that is unknown (public and/or customer) must be inspected. Physical identification methods include excavation, televising, in-home inspections, and other emerging methods and must be conducted or overseen by water system personnel. OHA-DWS recommends the actual material observed be recorded for each point. If inspecting near the meter, ensure the observed material is the actual service line and not part of the metering components. Refer to EPA’s “Guidance for Developing and Maintaining a Service Line Inventory,” Chapter Five, for typical methods of service line identification.

If one or more of the original randomly selected sites cannot be physically inspected, the PWS must replace it by randomly generating a new site using the process described in Appendix B.

Step 5: Record results of the physical inspection process

In the dropdown list on the DWS spreadsheet, enter the service line category and material observed at each point. The four service line category types are: lead, non-lead, galvanized requiring replacement and unknown. The OHA-DWS spreadsheet has further subclassification categories of material types that is recommended the water system utilize.

Step 6: Enter results for unknown service lines

- For the unknown lines that are inspected for the statistical sampling, record the water system material identification method (physical). It is recommended the water system list the exact line material type in the inventory spreadsheet.
- For the unknowns not needing to be inspected, record the material identification method as *statistical* and service line material as *non-lead/other*.

Step 7: Retain identification records

Create, compile, and retain documentation of all service line identification efforts. DWS may ask PWSs to produce or submit these records.

Appendix A
Minimum number of service lines requiring physical inspection

Number of Unknown Service Lines	Number to Physically Inspect
Fewer than 1,500	20% of unknown lines
1,500	306
1,600	310
1,700	314
1,800	317
1,900	320
2,000	322
2,200	327
2,400	331
2,600	335
2,800	338
3,000	341
3,500	346
4,000	351
4,500	354
5,000	357
6,000	361
7,000	364
8,000	367
9,000	368
10,000	370
15,000	375
20,000	377
30,000	379
40,000	381
60,000	382
90,000	383
225,000 or more	384

*For the purposes of this process, this number represents the number of service lines that cannot be categorized from records, installation date, diameter, previous physical inspection, or customer data. If the number of unknowns falls between two values on the chart, either interpolate or round up to the higher number.

Appendix B

Generating a uniformly random set of service lines for inspection

You can use a spreadsheet (such as Microsoft Excel or Google Sheets) or DWS-supplied spreadsheet to generate a uniformly random set of locations of unknown service lines for inspection using the following Microsoft Excel steps (the same formulas and method work for Google Sheets):

1. In the first column of a spreadsheet, list every unique service line of unknown material. They can be listed by address, service line ID, or other identification method.
2. In the second column, generate uniformly random numbers, so that each service line is associated with a randomly generated number. Follow these steps:
 - a. Enter the formula =RAND() into the second column next to each location and press Enter. This generates a number between 0 and 1 for each service line.
 - b. Select the second column (the column with the random values) and copy it, using the spreadsheet's Copy feature.
 - c. With the second column still selected, use the Paste Special option to Paste Values Only into that same column. This will ensure your random numbers remain static.
 - d. Use the Sort feature to list the randomly generated numbers from lowest to highest. If the Sort Warning appears, select Expand the Selection, then Sort.
3. Select only the top N service lines, where N is the number requiring inspection. For example, if you need to inspect 20 service lines, select the first 20 service lines on the list. These are the 20 uniformly random service lines to be inspected.

See the brief [online tutorial](#) for generating random samples in Microsoft Excel.