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.

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 (LSR), 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

Introduction

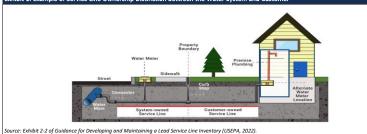


Table 1: Classification of Entire Service Line When Ownership is Split

System-Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Lead	Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead - galvanized	Non-lead
Non-lead	Non-lead - material other than galvanized	Non-lead
Non-lead	Unknown	Unknown
Non-lead, but may have previously been lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Unknown	Lead	Lead
Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Unknown	Non-lead	Unknown
Unknown	Unknown	Unknown
Source: Exhibit 2-3 of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).		

Drop Down Lists for Detailed Inventory

Lead Lead-lined galvanized Non-Lead galvanized Non-Lead plastic Non-Lead other Unknown- likely lead Unknown- unlikely lead Unknown material unknown Records Installation date after lead ban Service line diameter > 2 inch Field inspection Statistical method Other Records Service line diameter > 2 inch Build/installation date after lead ban Customer report Field inspection Statistical method