

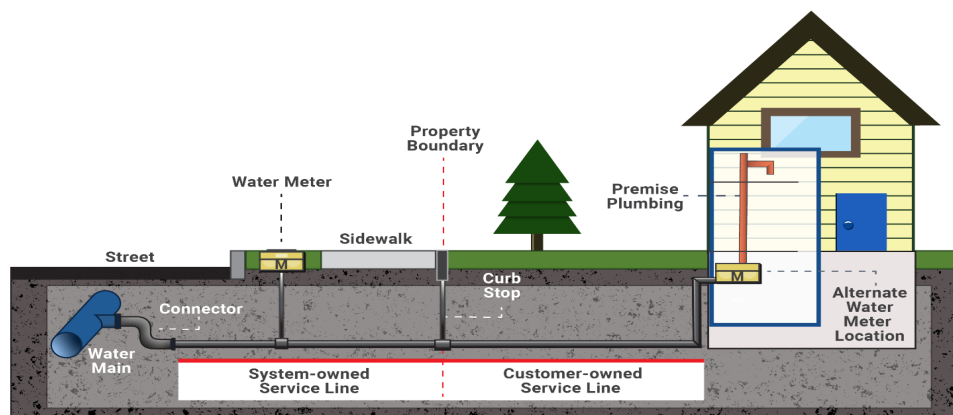
Classifying the Entire Service Line When Ownership Is Split

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).

Location Information					System-Owned Portion				
Unique Service Line ID	Location Identifier		Sensitive Population? (Yes/No)	Disadvantaged Neighborhood? (Yes/No)	System-Owned Portion Service Line Material Classification	If Non-Lead in Column G, Was Material Ever Previously Lead?	Service Line Installation Date	Service Line Size	Basis of Material Classification
	Street Address	Other Location Identifier							
A Unique ID is recommended for each service line.	Water systems must track addresses of all service lines in their internal inventory. For the publicly accessible version, location identifiers are required for lead and galvanized requiring replacement. If the system does not use addresses for their location identifier, other options could include GPS coordinates, landmark, intersection, block, or other details to specify service line locations.		Select Yes if sensitive subpopulation, e.g., day care, school, multifamily home. If Yes-Other, describe in the Notes field.	Does location meet state affordability guidelines or other measures?	Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field	Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement	Date, year, or estimated date range when the service line was installed or replaced	Diameter in inches	Select option from drop down list. If "Other," describe in the Notes field
11813848	48612 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	2004		Installation date after lead ban
11813845	48615 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813851	48341 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813853	48581 CLARICE PAUL, RONAN, MT 59864	Safe Harbor	Yes - Other	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813843	48555 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813846	48498 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813842	48509 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813852	48649 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813849	48350 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813841	48379 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813844	48435 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813850	48431 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813847	48471 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)
11813854	48638 CLARICE PAUL, RONAN, MT 59864		No	No	Unknown - Unlikely Lead	Don't Know	1996		Installation date after lead ban

tion				Customer-Owned Portion				
Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified:		Notes	Customer-Owned Portion Service Line Material Classification	Service Line Installation Date	Service Line Size	Basis of Material Classification	Was the Service Line Material Field Verified?
	Describe the Field Verification Method	Enter the Date of Field Verification						
Select Yes or No	Select option from drop down list. If "Other," describe in the Notes field	Enter approximate date of field verification or date that the record was updated	Can use this field for documenting additional relevant information, including when classification changes.	Dropdown list includes recommended subclassifications. If non-lead other, describe in Notes field.	Date, year, or estimated date range when the service line was installed or replaced	Diameter in inches	Select option from drop down list. If "Other," describe in the Notes field	Select Yes or No
No				Unknown - Unlikely Lead	2004		Installation date after lead ban	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Material Unknown	1972		Installation record (e.g., tap card)	No
No				Unknown - Unlikely Lead	1996		Installation date after lead ban	No

Additional Information to Assign Tap Monitoring Tiering			Lead Service Line Replacement (LSLR)	
Point-of-Entry or Point-of-Use Treatment Present?	Does the Interior Building Plumbing Contain Copper Pipes with Lead Solder Installed Before Your State's Lead Ban (Generally 1986 - 1988)?	Current LCR Sampling Site?	Date of System-owned LSLR	Date of Customer-owned LSLR

Information may be helpful for identifying lead tap monitoring locations.

<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>No</i>		