

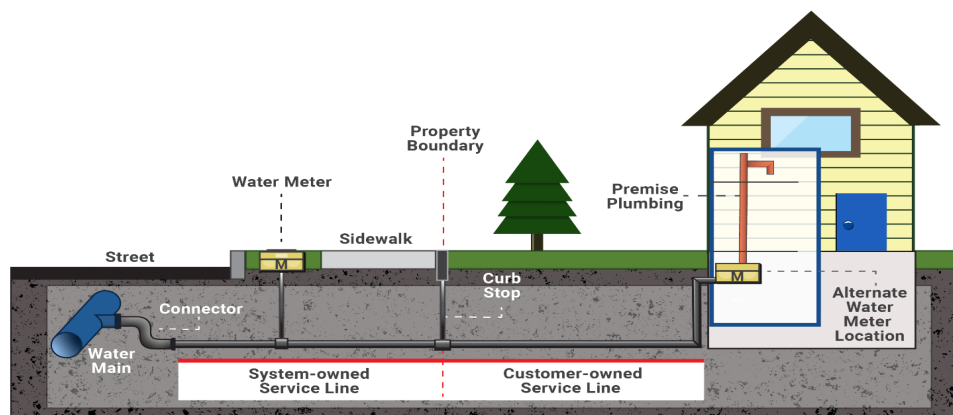
Classifying the Entire Service Line When Ownership Is Split

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).

Detailed Inventory

PWS Name: DIXON AGENCY

PWSID: 083090023

Date Last Updated: 10/16/2024

Purpose of this worksheet: To provide a customizable format water systems can use to track materials for each service line in their distribution system.

General Instructions: Each row in this worksheet represents one service line connecting the water main to the customer's plumbing. The worksheet includes required and recommended elements; the columns with the aqua shading are required by the LCRR. Systems can customize by adding or deleting columns. Important notes for each column are in Row 12; also see the **Template Instructions** worksheet for detailed instructions. Note that users can freeze panes to enable them to see the headings and notes when entering data. The worksheet includes examples in rows 13 - 20 and is formatted for approximately 10,000 entries.

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	Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified:		Notes	Customer-Owned Portion Service Line Material Classification
	Street Address	Other Location Identifier									Describe the Field Verification Method	Enter the Date of Field Verification		
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	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.
11814362	213 ALEX CULLOYAH STREET, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814339	708 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814359	403 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814346	310 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814352	307 SAMWEL ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814349	316 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814356	312 PENMAE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814350	315 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814353	303 SAMWEL ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814363	702 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814340	309 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814343	306 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814344	709 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814347	303 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown

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	Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified:		Notes	Customer-Owned Portion Service Line Material Classification
	Street Address	Other Location Identifier									Describe the Field Verification Method	Enter the Date of Field Verification		
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	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.
11814351	311 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814354	304 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814357	509 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814360	401 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814341	415 BLANKET HAWK, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814338	109 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814364	214 FRANK MCCLURE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814342	405 BLANKET HAWK RD, DIXON, MT 59831	Community Center	Yes - Other	No	Non-Lead - Other	No	2021		Installation date after lead ban	No				Non-Lead - Other
11814348	209 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814345	109 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814358	104 LOUIS CAMILLE ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1972		Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814361	107 ALEC CULLOYAH ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know			Installation record (e.g., tap card)	No				Unknown - Material Unknown
11814355	308 PENAME ST, DIXON, MT 59831		No	No	Unknown - Material Unknown	Don't Know	1983		Installation record (e.g., tap card)	No				Unknown - Material Unknown

Customer-Owned Portion							Entire Service Line Material Classification	Other Potential Sources of Lead			Additional Information to Assign Tap Monitoring Tiering				Lead Service Line Replacement (LSLR)		
Service Line Installation Date	Service Line Size	Basis of Material Classification	Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified:		Notes		Is there a Lead Connector?	Is there Lead Solder in the Service Line?	Describe Other Fittings and Equipment Connected to the Service Line that Contain Lead	Building Type Connected to Service Line	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	
				Describe the Field Verification Method	Enter the Date of Field Verification												
<i>Date, year, or estimated date range when the service line was installed or replaced</i>	<i>Diameter in inches</i>	<i>Select option from drop down list. If "Other," describe in the Notes field</i>	<i>Select Yes or No</i>	<i>Select option from drop down list. If "Other," describe in the Notes field</i>	<i>Enter approximate date of field verification or date that record was updated</i>	<i>Can use this field for documenting additional relevant information, including when classification changes.</i>	<i>Dropdown list includes four required service line classifications of Lead, Non-lead, Galvanized Requiring Replacement, or Unknown</i>	<i>For example, lead gooseneck or pigtail where the water main is connected to the service line</i>	<i>Select Yes, No, or Don't Know</i>	<i>For example, backflow preventer or meter containing lead</i>	<i>Note: This information may be helpful for identifying lead tap monitoring locations.</i>						
1972		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes			
1972		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes			
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes			
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No			

Customer-Owned Portion							Entire Service Line Material Classification	Other Potential Sources of Lead			Additional Information to Assign Tap Monitoring Tiering				Lead Service Line Replacement (LSLR)	
Service Line Installation Date	Service Line Size	Basis of Material Classification	Was the Service Line Material Field Verified?	If "Yes" Service Line Material Was Field Verified:		Notes		Is there a Lead Connector?	Is there Lead Solder in the Service Line?	Describe Other Fittings and Equipment Connected to the Service Line that Contain Lead	Building Type Connected to Service Line	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
				Describe the Field Verification Method	Enter the Date of Field Verification											
<i>Date, year, or estimated date range when the service line was installed or replaced</i>	<i>Diameter in inches</i>	<i>Select option from drop down list. If "Other," describe in the Notes field</i>	<i>Select Yes or No</i>	<i>Select option from drop down list. If "Other," describe in the Notes field</i>	<i>Enter approximate date of field verification or date that record was updated</i>	<i>Can use this field for documenting additional relevant information, including when classification changes.</i>	<i>Dropdown list includes four required service line classifications of Lead, Non-lead, Galvanized Requiring Replacement, or Unknown</i>	<i>For example, lead gooseneck or pigtail where the water main is connected to the service line</i>	<i>Select Yes, No, or Don't Know</i>	<i>For example, backflow preventer or meter containing lead</i>	<i>Note: This information may be helpful for identifying lead tap monitoring locations.</i>					
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
1972		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes		
1972		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
2021		Installation date after lead ban	No				Non-Lead	Don't Know	Don't Know		Other			No		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			Yes		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
1972		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		
1983		Installation record (e.g., tap card)	No				Unknown	Don't Know	Don't Know		Single Family Residence			No		