

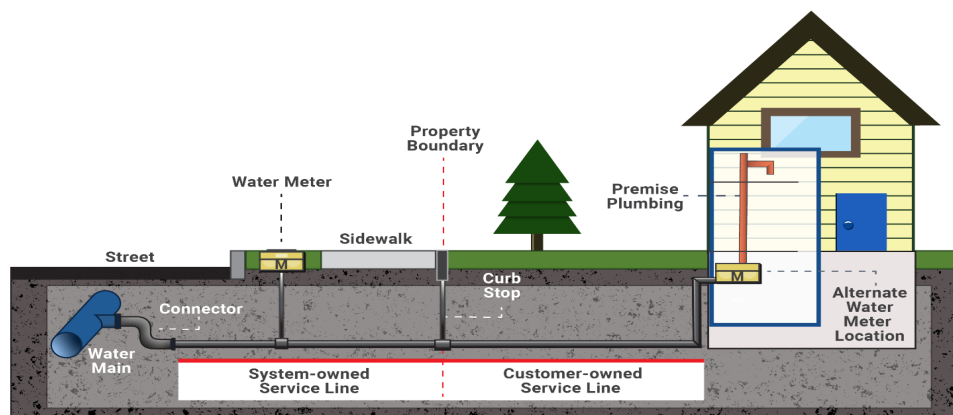
Classifying the Entire Service Line When Ownership Is Split

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).

PWS Information

Purpose of this worksheet: For water systems to document basic system information.

Facility Information

Water System Name:

S&K HOUSING AUTHORITY

PWSID:	Population Served (number of people):	Number of Service Connections:	PWS Type:
083090317	75	2	<input type="checkbox"/> CWS <input checked="" type="checkbox"/> NTNCWS

If you are a CWS, do multi-family residences comprise at least 20% of the structures you serve? *No*

Mailing Address

Street or P.O. Box:

PO BOX 38

City or Town:	State:	Zip Code:
Pablo	MT	59855

System Contact Person

Name:	Title:
Raquel Davis	Water and Sewer Operations Manager
Telephone:	Email:
406-675-4491	rjdavis@skha.org

Person Who Prepared Inventory (if different from above)

Detailed Inventory

PWS Name: S&K HOUSING AUTHORITY
 PWSID: 083090317

Date Last Updated:

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
	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.	<i>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.</i>		<i>Select Yes if sensitive subpopulation, e.g., day care, school, multifamily home. If Yes-Other, describe in the Notes field.</i>	<i>Does location meet state affordability guidelines or other measures?</i>	<i>Dropdown list includes recommended subclassifications. If "Non-Lead Other", describe in Notes field</i>	<i>Select Yes, No, or Don't know. Important for determining if downstream/ customer-owned galvanized service line requires replacement</i>	<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 the record was updated</i>	<i>Can use this field for documenting additional relevant information, including when classification changes.</i>
11815374	56243 Hwy 93 N Main Building, PABLO, MT 59855		Yes - Other	No	Non-Lead - Other	No	1994	1"	Installation record (e.g., tap card)	Yes	Customer self-identification	9/3/2020	
11815375	56243 HWY 93 N, PABLO, MT 59855		Yes - Other	No	Non-Lead - Other	No	1994	1"	Installation record (e.g., tap card)	Yes	Customer self-identification	9/3/2020	

Customer-Owned Portion								Entire Service Line Material Classification	Other Potential Sources of Lead			Additional
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?	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
					Describe the Field Verification Method	Enter the Date of Field Verification						
<i>Dropdown list includes recommended subclassifications. If non-lead other, describe in Notes field.</i>	<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 inform</i>
Non-Lead - Other	1994	1"	Installation record (e.g., tap card)	Yes	Customer self-identification	9/3/2020		Non-Lead	Don't Know	Don't Know		Building
Non-Lead - Other	1994	1"	Installation record (e.g., tap card)	Yes	Customer self-identification	9/3/2020		Non-Lead	Don't Know	Don't Know		Building

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
<p><i>Information may be helpful for identifying lead tap monitoring locations.</i></p>				
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		
<i>Unknown</i>	<i>Unknown</i>	<i>Yes</i>		