

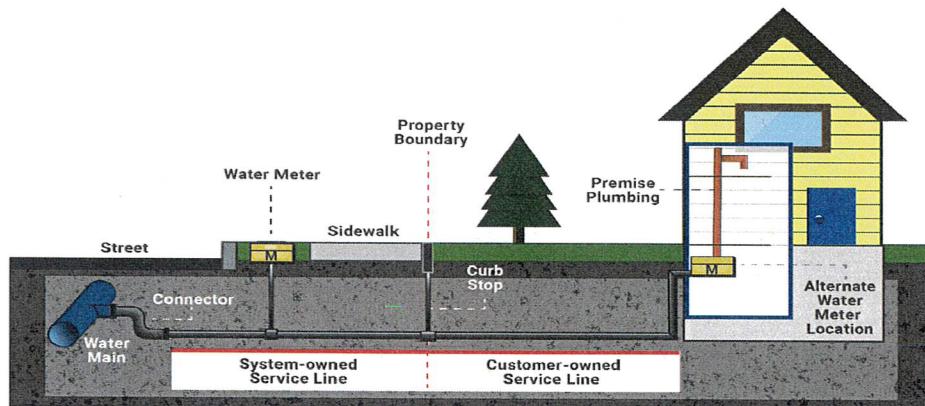
Classifying the Entire Service Line When Ownership Is Split

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 | 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).