

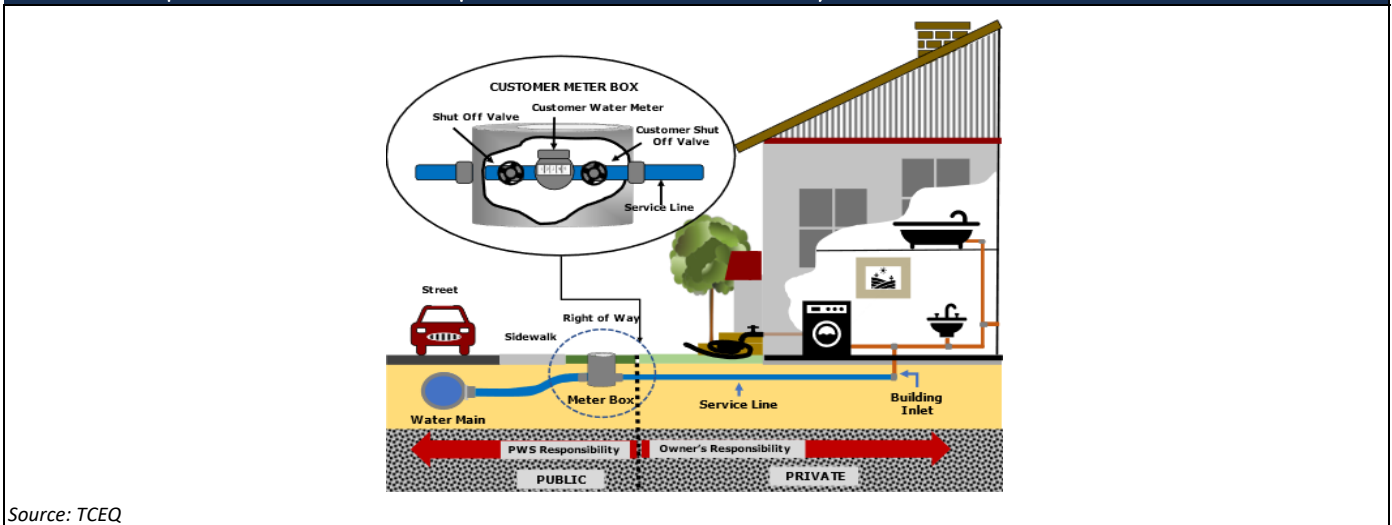
Classifying the Entire Service Line When Ownership Is Split

Purpose of this worksheet : Summarizes requirements for classifying the entire service line (SL) when ownership is split (i.e., when the system owns a portion and the customer owns a portion).

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 refer to the Lead and Copper Rule Revisions in 40 CFR § 141 Subpart I and the EPA's Guidance for Developing and Maintaining a Service Line Inventory.

Exhibit 1. Example of Service Line Ownership Distinction between the Water System and Customer



Source: TCEQ

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	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Lead Status Unknown	Lead	Lead
Galvanized	Lead	Lead
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized	Galvanized Requiring Replacement
Lead Status Unknown	Galvanized	Galvanized Requiring Replacement
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Lead Status Unknown	Non-lead	Lead Status Unknown
Non-lead	Lead Status Unknown	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown

Source: Modified from Exhibit 2-3 of Guidance for Developing and Maintaining a Service Line Inventory (USEPA, 2022).