



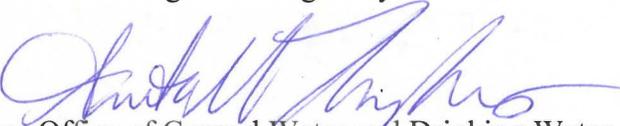
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

May 9, 2016

OFFICE OF WATER

**MEMORANDUM**

**SUBJECT:** Clarification of Drinking Water State Revolving Fund Eligibility of Service Line Replacement on Private Property

**FROM:** Anita Maria Thompkins, Director   
Drinking Water Protection Division, Office of Ground Water and Drinking Water

**TO:** DWSRF Branch Chiefs & Regional Coordinators  
Regions I-X

This memorandum clarifies that complete service line replacement is an eligible Drinking Water State Revolving Fund expense, regardless of pipe material and ownership of the property on which the service line is located. Service line replacement projects may be funded by state DWSRFs if the assistance agreements are made to an eligible entity and all other requirements of the DWSRF are met.

This eligibility supports the public health protection objectives of the Safe Drinking Water Act. The EPA Science Advisory Board [report](#) *Evaluation of the Effectiveness of Partial Lead Service Line Replacements*, September 2011, advises against partial lead service line replacement and noted that other pipe materials, including galvanized pipe, can also become compromised.

The statutory and the regulatory provisions governing the use of DWSRF funds do not require the public water system to have control over all portions of a project that is funded by the DWSRF. Continuing from the publicly-owned portion of the pipe often found under a street, the service line from the public water main to the point at which it connects with premise plumbing is DWSRF-eligible. If a PWS wishes to purchase and retain an easement so that it maintains control of such infrastructure, with the agreement of the customer, such purchase is authorized as well: "Funds shall not be used for real property or interests therein unless the acquisition is integral to the project authorized... and the purchase is from a willing seller..." SDWA §1452(a)(2).

Thank you for your continued commitment to the public health protection objectives of the SDWA and the DWSRF program. If you have questions, please contact Nick Chamberlain ([Chamberlain.Nick@epa.gov](mailto:Chamberlain.Nick@epa.gov)) of the HQ DWSRF program.

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