

FACT SHEET

“Baseline Inventory” Cheat Sheet

Summary

The EPA’s Lead and Copper Rule Revisions (“LCRR”) required systems to submit an “Initial Inventory” of the material of every service line connected to the public water distribution system. Initial lead service line inventories were due no later than **October 16, 2024**.

Soon after, the EPA finalized an updated regulation, the Lead and Copper Rule Improvements (“LCRI”) which systems must comply with starting **November 1, 2027**.

The LCRR’s Initial Inventory was continued under the new LCRI’s “Baseline Inventory” that has some additional requirements (e.g., connectors designations) and clarifications.

LCRI Inventory Requirements

Applies to all community and non-transient, non-community public water systems.

Water systems must develop a service line inventory that identifies the material and location of each *service line* connected to the public water distribution system.

The inventory must include all *service lines* connected to the distribution system regardless of ownership status (e.g., **where service line ownership is shared, the inventory includes both the portion of the service line owned by the water system and the portion of the service line owned by the customer**).

For each *service line* connected to the public water distribution system, every applicable water system must report the following:

1. The street address*, and
2. Material composition of:
 - a. The connector (if any), and
 - b. The *service line*, or both portions of the *service line* where ownership is split

Single-Entity Ownership: Inventories should have **one** material for each individual *service line*. These service lines are assumed to have the same pipe materials on both sides of the curb stop/meter pit.

Split-Ownership: Inventories must report **two** separate materials for each portion of a *service line* (publicly and privately owned portions).



*Street addresses are required where possible. Where not possible, systems should use an appropriate alternative locational identifier (i.e., latitude/longitude).

Baseline Inventory Due: **November 1, 2027**

Updated Inventories Due: **January 30, 2029**, and annually thereafter

Service Line Materials Designations

Each *service line*, or portion of a *service line* where ownership is shared, must be categorized as one of the following materials:

1. Lead Service Line

A *service line* that is made of lead or where a portion of the *service line* is made of lead. A lead-lined galvanized service line is defined as a lead service line.

2. Galvanized Requiring Replacement Service Line

A *galvanized service line* that currently is or ever was downstream of a [portion of a] *lead service line*; or is currently downstream of a [portion of a] *lead status unknown service line*. For this definition, downstream means in the direction of flow through the *service line*.

3. Unknown or Lead Status Unknown Service Line

A *service line* whose pipe material has not been demonstrated to be a *lead service line*, *galvanized requiring replacement service line*, or a non-lead service line.

4. Non-Lead Service Line

Where the *service line* is determined through an evidence-based record, method, or technique not to be a *lead* or *galvanized requiring replacement service line*.

Water systems are not required but encouraged to record the material of the service line in lieu of a non-lead designation (i.e., copper, plastic, etc.).

Connector Materials Designations

Inventories must include one connector (defined on page 3) material designation for each *service line*. Connectors must be categorized as one of the following materials:

1. Lead Connector

Where the system has **record** that a connector is made of lead.

Systems must immediately remove and replace any lead connector encountered during planned or unplanned maintenance (**WEE**Fact: Replacing Lead Connectors).

❖ Lead connectors do not trigger the *service line* into being a *lead service line*.

2. Non-Lead Connector

Where the connector is determined through an evidence-based record, method, or technique not to be made of lead. Water systems are not required but encouraged to record the material of the connector in lieu of a non-lead designation.

3. Unknown Connector

Where the material or presence of a connector is unknown.

4. No Connector Present

Where there is no connector at the location (e.g., the *service line* is tapped directly on to the main).

Inventory Records Review Requirements

To prepare the Baseline Inventory, systems must conduct a thorough review of the following records:

1. All construction and plumbing codes, permits, records or other documentation that indicate the *service line* and connector materials used to connect structures to the distribution system,
2. All water system records on *service lines* and connectors, including distribution system maps and drawings, recent or historical records on each service connection and connector, meter installation records, historical capital improvement or master plans, and standard operating procedures, and
3. All records of inspection of the distribution system that indicate the material composition of the service connections and connectors that connect a structure to the distribution system

Inventory Public Access Requirements

- ❖ All systems must make their **full inventory** publicly accessible
- ❖ Systems serving a daily population greater than 50,000 persons must make the publicly accessible inventory available online
 - Exception: 100% known non-lead systems may use a written statement in lieu of a publicly accessible inventory. The statement must include a general description of all applicable sources used in the inventory
- ❖ Consumer Confidence Reports: Must include instructions to access the publicly accessible inventory (including public inventories consisting of only a statement)

Definitions

Service line: A portion of pipe that connects the water main to the building inlet. Where a building is not present, the *service line* connects the water main to the outlet.

Connector: Also referred to as a gooseneck or pigtail, means a short segment of pipe not exceeding three feet that can be bent and is used for connections between service piping, typically connecting a *service line* to the main. Lead connectors are not considered part of the *service line*.

100% Known Non-Lead System: When a water system has no *lead*, *galvanized requiring replacement*, or *lead status unknown service lines*, no known lead connectors, and no connectors of unknown material.