



## EPA Region 8 Drinking Water Unit Tech Tips

### LCRR Inventory Requirements

The initial service line inventory requirements under the LCRR are summarized in the table below. This same table can be found as Exhibit 2: LCRR Inventory Requirements, in EPA's *Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide* and Exhibit 1-1: LCRR Inventory Requirements in EPA's *Guidance for Developing and Maintaining a Service Line Inventory*.

EPA is currently developing a revision to the LCRR, called the Lead and Copper Rule Improvements (LCRI). All LCRR requirements aside from the initial inventory are subject to change under the LCRI. The requirements in the table below apply to the initial inventory.

Inventory Requirement	40 CFR Citation
<b>Inventory Specifications</b>	
<b>Material Classification:</b> Classify each service line or portion of the service line where ownership is split as lead, galvanized requiring replacement (GRR), non-lead, or lead status unknown.	§141.84(a)(4)
<b>All Service Lines and Ownership:</b> Prepare an inventory that includes the system- and customer-owned portions of all service lines in the system's distribution system.	§141.84(a), (a)(2)
<b>Information to Identify Material:</b> Use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal operations, and State-specified information.	§141.84(a)(3)
<b>Deadlines for Submission</b>	
<b>Initial Inventory:</b> Submit an initial inventory by October 16, 2024.	§141.80(a)(3) <sup>1</sup>
<b>Updates to State:</b> Submit updated inventories to your State annually or triennially based on lead tap sampling frequency, but not more frequently than annually.  Water systems that have demonstrated the absence of lead service lines (LSLs) by October 16, 2024, are not required to provide an update. However, if these systems subsequently find any LSLs or GRR service lines, they have 30 days to notify the State and prepare an updated inventory on a schedule established by the State.	§141.90(e)(3), §141.90(e)(3)(ii)
<b>Public Accessibility and Consumer Confidence Report</b>	
<b>Public Accessibility:</b> Make the inventory publicly available and include a location identifier for LSLs and GRR service lines. Water systems serving more than 50,000 people must provide inventories online.	§141.84(a)(8)

<b>Consumer Confidence Report (applies to CWSs only):</b> Include a statement that a service line inventory has been prepared (including inventories consisting only of a statement that there are no LSLs) and instructions on how to access it.	§141.153(d)(4)(xi)
<b>Service Line Consumer Notification</b>	
<p>Provide notification to persons served by the water system at the service connection with a lead, GRR, or lead status unknown service line. If the water system serves communities with a large proportion of non-English speaking consumers, as determined by the State, public education materials must be in appropriate languages or contain a telephone number or address where persons served may contact the water system to obtain a translated copy of the materials or to request assistance in the appropriate language.</p> <p><b>Timing:</b> Notification within 30 days after completion of the initial inventory and repeated annually until only non-lead remains. For new customers added after the initial inventory, water systems must also provide this notice at the time-of-service initiation.</p> <p><b>Content:</b> Statement about service line material, lead health effects, and steps to minimize lead exposure in drinking water. If the service line is:</p> <ul style="list-style-type: none"> <li>• Confirmed LSL, must include opportunities to replace the LSL, any available financing programs, and statement that the system must replace its portion if property owners notify the system they are replacing their portion.</li> <li>• GRR, must also include opportunities for service line replacement.</li> <li>• Lead status unknown, must also include opportunities to verify the material of the service line.</li> </ul> <p><b>Delivery:</b> By mail or by another method approved by the State [EPA R8 for WY and R8 Tribal systems].</p> <p><b>Reporting to States</b> [EPA R8 for WY and R8 Tribal systems]: Demonstrate that the water system delivered the notification and provide a copy of the notification and information materials to its State annually by July 1 for the previous calendar year.</p>	§141.85(a)(1)(ii), §141.85(e) & §141.90(f)(4)

**Notes:**

<sup>1</sup> On June 16, 2021, EPA published a rule to extend the compliance date from January 16, 2024, to October 16, 2024 (40 CFR §141.90(e)(1)). Federal Register 86(114): 31939. June 16, 2021. Washington, D.C.: Government Printing Office.