FACT SHEET

LCRI Service Line Replacement Access – Tips
April 2026

The 2024 Lead and Copper Rule Improvements (LCRI) require water systems to replace all lead and GRR service lines ***under the control of the water system*** unless a replacement would leave in place a partial lead service line.[1] The LCRI does not specify or limit the reasons that a system does or does not have access. Water systems make this decision.[2]

Factors That Can Affect and Prevent Access

Many factors can impact a water system's ability to access service lines, and these factors can change over time. This Tips document provides information for water systems to consider as they determine if they have access. While not every possible factor is described, below are some examples that that may be helpful.

Property owner permission: A water system may need permission to access private property to replace a service line. For purposes of the LCRI, permission takes multiple forms. For example:

- If the system needs permission from the property owner to replace the service line, the system must try four times (*i.e.*, reasonable effort) to get permission. If permission is not given after this effort, the system does not have access and is not required to replace the service line.[3]
- If the system decides to make customers pay for replacements and a customer does not agree to pay, the system does not have access and is not required to replace their line (Example 1).
- If a system learns about a change in ownership at a location where they previously did not have permission, the system is required to make a reasonable effort to ask the new owner for access.[3]

What's a reasonable effort? A "reasonable effort" is **four** attempts using at least **two** different methods of communication (*e.g.*, phone call, text message, email, written letter, door hanger, postcard).[3]

Laws, ordinances, or water tariff agreements: State and local governments may limit a water system's access to replace service lines. For example:

- A local ordinance may prohibit a water system from closing roads to access service lines.
- An ordinance may restrict access to service lines to only when the water system is simultaneously replacing a water main or when other infrastructure work is happening (Example 2).
- A state may pass a law limiting access to service lines until the state contractor is available to replace lines in that community (Example 3).

Physical access: Safety of water system personnel is essential and of upmost importance and issues related to safety may prevent access. For example:

- Environmental hazards: conditions that need to be addressed prior to service line replacement.
- Electrical hazards: exposed wires near the service line could pose electrocution risks.
- Structural hazards: collapse risks or obstructions to access the service line.
- Other unsafe conditions: for example, an aggressive animal is in the yard.

[1] 40 C.F.R. 141.84(d)(1).

[2] 40 C.F.R. 141.84(d)(2).

[3] 40 C.F.R 141.84(d)(3).

Example 1: Access by customer consent with newly available funding

Community: Orange Grove Water System

Situation: By 2027, Orange Grove has identified the material of all of their service lines. For their LCRI replacement program, they plan to share costs with the property owners. A local ordinance says that the Orange Grove Water system can only replace a service line if the property owner agrees to pay their share or if the cost is covered by a source other than user fees.

Actions: In 2027, 50% of property owners are unwilling or unable to pay the cost to replace their portion and the system does not have any external source of funding to cover the cost. As a result, Orange Grove does not have access to replace these service lines. Orange Grove replaces the lead and GRR service lines they can access at the required replacement rate. Orange Grove also applies for funding from the state to help pay replacement costs.

Important Dates

Baseline Service Line Inventory: November 1, 2027

LSLR replacement plans due to State: November 1, 2027

Updated Inventory: January 30, 2029 (annually)

10-year replacement deadline: December 31, 2037

Results: By 2037, Orange Grove has replaced the 50% of service lines that they had access to replace.

What Next? In 2037, Orange Grove gets funding from the state to pay for any remaining replacements. The system now has access to service lines at the remaining homes because of the available funding.[4] The system continues replacing lead and GRR service lines each year until all their replacements are completed in 2041.

Example 2: Access by ordinance for main replacement

Community: Middle Valley Water System

Situation: Middle Valley is planning a 10-year water main replacement project beginning in 2030. Residents and the local government are concerned about significant traffic disruption from the replacements. To increase cost efficiency and minimize disruption, the local government passes an ordinance that says service line replacement must happen in conjunction with water main replacement. This ordinance will be in effect from 2031 to 2041. Prior to 2031 and after 2041, the local ordinance does not limit access to replace service lines.

Actions: Middle Valley begins service line replacement at the LCRI compliance date on November 1, 2027. In 2031, the ordinance takes effect. When a water main is being replaced on a specific street, the system has access to replace service lines on that street. Otherwise, the system does not have access.

Results: From 2027-2030, the system complies by meeting the required replacement rate and replacing 30% of their lead and GRR service lines.[5] From 2031 - 2041, the system complies by replacing the service lines they have access to when they are also replacing a water main. During this time, Middle Valley continues identifying the material of all unknown service lines as required by the rule. At the 10-year replacement deadline, Middle Valley is in compliance even though lead and GRR service lines remain because, due to the ordinance, the system did not have access to service lines that were not connected to the water mains being replaced.

What Next? Once the ordinance expires, the water system continues to replace the remaining lead and GRR service lines.[6] The system remains in compliance with the LCRI replacement requirements even though the LCRI's replacement deadline has passed if it continues replacing lines it can access at the required rate.[7]

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[4] Service lines must be replaced at a rate consistent with 40 C.F.R. 141.84(d)(5)(vi). EPA intends to provide additional guidance on service line replacement requirements, including information on replacement rates.

[5] 40 C.F.R. 141.84(d)(5).

[6] 40 C.F.R. 141.84(d)(5)(vi)(A)

[7] 40 C.F.R. 141.84(d)(5)

Example 3: Access by state law

Community: Shady Springs Water System

Situation: Shady Springs is a small water system located in a state that passed a law requiring small water systems to use state-approved contractors for service line replacement. This restricts Shady Springs from accessing the service lines until the state-approved contractor is available to the system.

Actions: The state determines that a service line contractor is available to conduct replacements in Shady Springs from 2035 to 2038. From 2027 through 2034 the Shady Springs system identifies the unknown service lines to ensure that the state contractor can replace all the lead and GRR service lines.

Result: Due to the state law, Shady Springs does not have access to conduct service line replacements until the contractor is available in 2035. Once the state contractor is available, the system must replace all lead and GRR service lines at the rate required by LCRI, barring other access issues. Since Shady Springs is a small system and had less than 100 LSLs lead and GRR service lines in total, the contractor is able to replace 95% of those LSLs by the end of 2038.

What Next? If the system replaced all of the lead and GRR service lines they were able to access, identified all unknown lines, and complied with the inventory validation requirements, the system is in compliance with the LCRI service line replacement requirements.

Available Support for Replacements

The EPA provides many ways to support water systems conducting service line replacement. Both federal and non-federal funding sources available to support service line replacement are highlighted on the EPA's website.

Full replacement of lead and GRR service lines is an eligible expense under the Drinking Water State Revolving Fund. (See Implementing LSLR Projects Funded by the DWSRF). The EPA provides free Real Water Technical Assistance (RealWaterTA) to identify lead service lines, plan for removal, and assist water systems in applying for federal funding. Additional information about the LCRI, including fact sheets and recorded webinars, are provided on the EPA's LCRI website and the EPA's lead and copper rule implementation website.