LCRI Service Line Replacement Access – Tips
August 2026

The 2024 Lead and Copper Rule Improvements (LCRI) require water systems to replace all lead and galvanized requiring replacement (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 specifies that service lines are under control of the water system if the system has access to conduct a full service line replacement,[2] and that water systems make the determination of whether they have access.[3] The LCRI does not specify or limit the reasons that a system does or does not have access. Where a system determines it does not have access, the LCRI requires the system to provide documentation to their primacy agency.[4]

Factors That Can Affect 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 and prepare required documentation where they determine that they lack access.

While not every possible factor is described, below are some examples to provide clarity. Keep in mind the system's access may change over time. If a water system gains access to service lines that it previously could not access, the water system must replace the lines.[5]

> The EPA encourages water systems to attempt to gain access and complete the replacement as quickly as feasible to protect from exposure to lead in drinking water. See the Appendix for strategies and case studies on how systems have overcome barriers to gain access to conduct full replacements.[6]

Property owner permission: Some water systems may be required to obtain the property owner's consent for service line replacement. In such cases, water systems are required to make a reasonable effort to get the property owner's consent. This means:

- The system must try four times (*i.e.*, reasonable effort) to get the property owner's permission by the system's applicable replacement deadline. If permission is not given after these four attempts, the system does not have access to conduct full replacement and is not required to replace the service line at this time.[7]
- If property owners are required to pay for replacements and they do not agree to pay, the system does not have access to conduct full replacement and is not required to replace the line (Example 1). Systems are required to include a strategy for funding service line replacements in their replacement plan.[9]

> **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).[8]

[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)(2)(i)
[4] 40 C.F.R. 141.90(e)(10)
[5] 40 C.F.R. 141.84(d)(5)(iv)(A)
[6] 89 FR 86449-86450
[7] 40 C.F.R. 141.84(d)(3)
[8] 40 C.F.R. 141.84(d)(3)(i)
[9] 40 C.F.R. 141.84(c)(1)(vi)

- Within six months of a change in ownership at a location where they previously did not have permission, the system must offer full replacement to the new owner. Within one year, the system is required to make a reasonable effort to ask the new owner for access.[10]

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

- A local ordinance that prohibits a water system from closing roads to access service lines.
- A local ordinance that restricts 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 local ordinance that limits access to service lines until a state contractor is available to replace lines in that community (Example 3).
- A state or local ordinance that allows systems to obtain any required consent from a renter when the property owner is not able to be contacted.
- A state law that prohibits a public water system from using ratepayer dollars to replace privately owned service lines.
- A public utility commission that approves a public water system to use ratepayer dollars to replace privately-owned service lines.
- A state law or local ordinance that provides access to a public water system to replace lead service lines.

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.

Keep in Mind: The LCRI prohibits water systems from conducting a partial lead service line replacement unless it is conducted as part of an emergency repair or in coordination with planned infrastructure work that impacts service lines, excluding planned infrastructure work solely for the purposes of service line replacement.

The examples below highlight ways access may be affected under various scenarios. For simplicity, each example highlights just one access barrier. In real world situations, the system may face multiple barriers simultaneously.

[10] 40 C.F.R. 141.84(d)(3)(ii)

Example 1: Access by customer consent with newly available funding

Community: Orange Grove Water System

Situation: At the LCRI compliance date in 2027, Orange Grove has identified the material of all service lines in their inventory. 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: At the start of their mandatory replacement program, 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 determines that it does not have access to replace these service lines. Orange Grove replaces the lead and GRR service lines they can access to conduct full replacements 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

Service Line 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 50% of its lead and GRR service lines. For the remaining service lines, that Orange Grove could not access and conduct full lead service line replacement, Orange Grove sent required documentation to the State.[11] Orange Grove is in compliance with the replacement requirement, even though lead and GRR service lines remain because the system does not have access to conduct full replacements.

What's Next? In 2038, Orange Grove gets funding from the State to pay for any remaining replacements (does not create taxable income for property owner)[12]. The system now has access to service lines at the remaining homes because of the available funding from a source other than user fees. As required by the LCRI, the system continues replacing lead and GRR service lines each year at the required rate and all lines are replaced by 2041.[13]

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 restricts access to service line replacement unless it is done at the same time as a water main replacement. When the main replacement happens, the ordinance gives the system access. 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.

[11] 40 C.F.R. 141.90(e)(10)

[12] For additional information, please see Announcement 2024-10 (IRS, 2024).

[13] When lead and GRR service lines come under control of systems, service lines must be replaced at a rate consistent with 40 C.F.R. 141.84(d)(5)(vi)(A). The EPA intends to provide additional guidance on service line replacement requirements, including information on replacement rates.

Results: From 2027-2030, the system prioritizes efficiency by choosing locations for replacements on streets that are not scheduled for water main replacements. At the end of program year three, the water system has replaced 30% of their lead and GRR service lines and complies with the required replacement rate.[14] From 2031 - 2041, the system complies by replacing service lines 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 and identifies the ordinance as the reason for its lack of access. 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's Next? Once the ordinance expires, the water system continues to replace the remaining lead and GRR service lines. The system remains in compliance with the LCRI replacement requirements even though the LCRI's replacement deadline has passed if it continues replacing lines that it can access at the required rate after the deadline.

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 that does not allow small water systems to conduct planned service line replacement unless it uses State-approved contractors for replacement that are provided at no cost to the system on a schedule decided by the State. As a condition to use this contractor, the system is not able to hire its own outside contractor. Shady Springs cannot access its service lines for planned full replacement until the State-approved contractor is made available to the system by the State.

Actions: The State determines that a service line contractor is available to conduct replacements in Shady Springs from 2035 to 2036 and notifies the system of this in 2027. From 2027 through 2034 the Shady Springs system hires their own contractor to identify 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 planned service line replacements until the contractor is made available to the system in 2035. Shady Springs identifies this law in its replacement plan as the reason it does not conduct any service line replacements through 2034.[15] Once the State contractor is available, the system must replace all lead and GRR service lines at the rate required by LCRI. Since Shady Springs is a small system and had less than 100 lead and GRR service lines in total, the contractor is able to replace those lines by the end of 2035.

What's Next? If the system identified all unknown service lines in their inventory and replaced all the lead and GRR service lines 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 (Implementing LSLR Projects Funded by the DWSRF) and the Drinking Water Infrastructure Grants Tribal

[14] 40 C.F.R. 141.84(d)(5)

[15] 40 C.F.R. 141.84(d)(2)

Set-Aside (DWIG-TSA), which provides funds for water systems serving federally recognized Tribes. Additional funding sources can be found on EPA's Funding LSLR website. 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.

Disclaimer: This document is being provided for informational purposes only to assist members of the public, States, Tribes, and/or public water systems in understanding the Lead and Copper Rule Improvements (LCRI). It includes summary descriptions of regulatory requirements. Although the EPA has made every effort to ensure the accuracy of the discussion in this document, the legally binding requirements applicable to public water systems are determined by statutes and regulations. In the event of a conflict between the discussion in this document and any applicable statute or regulation, this document would not be controlling. This document does not impose any legally binding requirements on the EPA, States, Tribes, or the regulated community. Further, this document does not confer legal rights or impose legal obligations on any member of the public. Note that the water systems named in the Examples given refer to hypothetical water systems and are not real, regulated PWSs. Any resemblance to a real water system is purely coincidental.