

Iowa Department of Natural Resources

FAQs About EPA's Lead and Copper Rule Improvements

November 2025

This FAQ document is intended to provide information and clarity around future requirements from EPA's Lead and Copper Rule Improvements (LCRI). Additional frequently asked questions and responses may be added at a later date.

EPA webpages with additional resources include:

<https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements>
<https://www.epa.gov/dwreginfo/lead-and-copper-rule-improvements-supporting-materials>

Q1. What is the LCRI compared to the LCRR?

The LCRR is the Lead and Copper Rule Revisions.

The EPA made an update to the LCRR, called the LCRI, which is the Lead and Copper Rule Improvements, shortly before the compliance date of the LCRR. The LCRI was set up so that parts of the LCRR went into effect starting in October 2024, and the LCRI compliance date would follow.

The compliance date for the LCRI is November 1, 2027.

LCRI Baseline Inventory

Q2. When is the baseline inventory due?

A: November 1, 2027

Q3. What is the baseline inventory? How does it differ from our initial LCRR inventory?

A: The baseline inventory is the first inventory due under the [Lead and Copper Rule Improvements \(LCRI\)](#). It is the second service line inventory to be reported to the Iowa DNR. It builds upon the October 16, 2024 initial LCRR inventory. The baseline inventory adds the requirement to identify all service line connector materials, and that a street address be associated with each service line.

The baseline inventory (LCRI) replaces the initial inventory (LCRR). There is not a requirement to submit annual updates to the initial inventory to the DNR before the baseline inventory is due, except where a system no longer has lines besides non-lead lines. (See Question 7.)

Q4. What will be required in order to have a completed baseline inventory?

A: A baseline inventory for the LCRI will need to be submitted according to future instructions (see Q7, below) and must include:

1. Service line material identification (for private and public lines) of either lead, non-lead, galvanized requiring replacement (GRR), or lead status unknown.
2. Connector material identification of either lead, non-lead, lead status unknown, or no connector present.
3. Street address for each service line, if not already included.
4. Resolution of any data errors in the Iowa Drinking Water Data Portal (IDWDP) from the October 2024 inventories as identified by DNR.

It is required that the baseline inventory for the LCRI includes updates to materials where new or updated information is available.

Q5. How often will I need to update this baseline inventory?

A: After the baseline inventory is submitted, there will be an annual, updated inventory submittal required by January 30th of each year starting in 2029.

Q6. Do I have to keep submitting my inventory after the baseline inventory is submitted?

A: Each year following the baseline inventory, it is required to submit updates annually, unless your inventory consists of only non-lead service lines and non-lead connectors, or no connectors present. If you have any lead status unknown service lines or lead status unknown connectors, an annual update will be required. Updated inventory submittals are required by January 30th each year starting in 2029.

Q7. When, where, and how do we make updates to our inventory?

A: The Iowa Drinking Water Data Portal now has a new Service Line Inventory Manager feature to allow inventory updates to be made directly online at any time instead of only via Excel template upload. Inventory templates can still be uploaded in the portal, but we encourage users to try the SLI Manager feature to edit their existing inventories online. Instructions on use of these new features are posted to the lead & service line inventories webpage:

<https://www.iowadnr.gov/environmental-protection/water-quality/drinking-water/lead-service-line-inventories>.

Public water supply administrators can make updates to your local initial inventory now by updating your local copy of the Lead Service Line Inventory template/Excel spreadsheet.

If your system has previously been required to provide public notice because your inventory reported lead, galvanized requiring replacement (GRR), or lead status unknown lines, but have since updated your inventory and only have non-lead lines, it is important that you submit an updated inventory file reflecting the revised service line materials through the Iowa Drinking Water Data Portal (IDWDP). This will help to avoid unnecessary public notice requirements. At this time, the DNR is not requesting any additional inventory updates beyond this.

Q8. Is there a way I don't have to make my baseline inventory publicly accessible?

A: Yes - your inventory must have all unknown service lines and connectors identified, your system cannot have any remaining lead service lines or lead connectors, or galvanized requiring replacement service lines AND you must provide a written statement to that effect with a description of sources used in the inventory in the Consumer Confidence Report.

Q9. What is a connector?

As defined by the LCRI, connectors, also referred to as goosenecks or pigtails, means a short segment of piping not exceeding three feet that can be bent and is used for connections between service piping, typically connecting the service line to the main. The baseline inventory must categorize each connector as either lead, non-lead, unknown, or no connector present.

Q10. Does a lead connector make an otherwise non-lead service line a lead service line?

A: No.

Q11. Does a lead connector make a galvanized line a GRR line?

A: No.

Q12. What is the difference between galvanized and galvanized requiring replacement (GRR)?

A: A galvanized service line is a service line that is made of iron or steel that has been dipped in zinc to prevent corrosion and rusting. A galvanized requiring replacement (GRR) service line is:

1. a galvanized service line that currently is or ever was downstream of a lead service line, or
2. is currently downstream of a lead status unknown service line.

Q13. What is considered downstream within this rule?

A: Downstream is in the context of the direction of flow through the service line (meaning only the flow between the connection at the main and the connection to the building).

Q14. What should the galvanized line be classified as in the inventory if we are not sure if it was never downstream of lead within the same service line?

A: If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it is a galvanized requiring replacement (GRR) service line for purposes of the service line inventory and replacement requirements.

Q15. Can a galvanized line be classified as non-lead?

A: Yes, if you can demonstrate that it was never downstream of lead within the same service line.

Q16. When do I have to complete identification of service lines of lead status unknown materials?

A: Identification of lead status unknown lines must be completed within 10 years of the compliance date of the LCRI, or November 1, 2037.

Q17. I have a privately-owned service line of unknown material at an address where a customer is non-responsive or unwilling to help identify the material. Do I still have to identify the material of this line?

A: Yes, the LCRI requires that all lead status unknown service lines be identified. In such a scenario, it may be necessary to pothole at the curb stop where a system has legal access and visually inspect the material on both sides. If the water meter is inside the house and the water system owns the meter, that may be an opportunity for water system staff to identify privately owned service line materials. It is strongly recommended that local ordinances and attorneys guide water system actions for identification of privately-owned service line materials.

Replacement Plan

Q18. When is the service line replacement plan due?

A: November 1, 2027

Q19. Will there be a template available for service line replacement plans?

A: A template is in development for Iowa public water supplies to use. When available, resources and details will be included. The Iowa DNR intends to only accept replacement plans using this template.

Q20. What needs to be included in the service line replacement plan?

A: The information that is required to be included in the service line replacement plan includes:

1. A description of a strategy to identify the material composition of all unknown service lines in the inventory.
2. A standard operating procedure for conducting full service line replacement.
3. A communication strategy for informing consumers and customers before a full or partial lead or GRR service line replacement.
4. A procedure for consumers and customers to flush service lines and premise plumbing of particulate lead following a disturbance of a lead, GRR, or unknown service lines or following full or partial replacement.
5. A strategy to prioritize service line replacement based on factors such as known lead and GRR service lines and community-specific factors.
6. A funding strategy for conducting service line replacement that includes ways to accommodate customers that are unable to pay to replace the portion of the service line they own.
7. A communication strategy to inform both consumers and customers served by the water system about the replacement plan and program.
8. Identification of any laws, regulations, and/or water tariff agreements that affect the water system's ability to gain access to conduct full replacement.
9. For water systems that identify any lead-lined galvanized service lines in the inventory, a strategy to determine the extent of their use in the distribution system.

Q21. What is the deadline for water systems to replace all lead and galvanized requiring replacement (GRR) service lines under the control of the water system?

A: November 1, 2037