Frequently Asked Questions About the Lead and Copper Rule Improvements (LCRI)

November 2026

EPA updated the Lead and Copper Rule in October 2024. Oregon Drinking Water Services (DWS) will adopt and implement the Lead and Copper Rule Improvements (LCRI) rule beginning **November 1, 2027**. Key updates in the rule include a lower lead action level, revisions to the service line inventory, follow up actions for elevated lead levels, non-lead validation requirements, and improved communication between public water systems (PWS) and their customers.

The lead and copper rule only applies to NTNC and CWS water systems. This FAQ summarizes LCRI requirements for Oregon systems.

• REQUIRED BY NOVEMBER 1, 2027

Systems must submit or complete the following:

- Updated initial inventory known as the "Baseline inventory" including:
  - lead, galvanized requiring replacement (GRR), non-lead, and unknown (pipe material) service lines
  - Connector material classification
  - Physical location/address of each service line
- Non-lead validation waiver (if qualified, based on acceptable methodologies).
- List of all schools (public/private) and licensed childcare facilities served (for community water systems (CWS only)
- Service Line Replacement Plan (**only for systems with lead, GRR, or unknown service lines**)

1. LEAD ACTION LEVEL REDUCED TO 10PPB

What is the new lead action level under the LCRI?
The lead action level will drop from 15ppb to 10ppb beginning Nov 1, 2027. This action level applies to the compliance sampling rounds collected after this date.

2. SERVICE LINE INVENTORY

What are the key updates for the baseline inventory?
PWSs were required to conduct and submit a service line inventory, on both the system side and customer side of the meter and submit this initial service line inventory to DWS by October 16, 2024.

Public water systems (PWSs) must now develop an updated version of their initial service line inventory, known as the "**baseline inventory**".

Systems must:

- Update and submit a baseline inventory by November 1, 2027
- Include physical service address/location
- Include connector material classification. Can all be non-lead if system complied with lead ban and removed all known lead components in ~1985. Use the updated Baseline Inventory template (available late 2026 on the DWS Lead & Copper Rules page: www.oregon.gov/lcrr)

What is a connector?
More commonly referred to as goosenecks or pigtails, a connector is a short segment of piping not to exceed 3 feet in length that can be bent and is used for connections between service piping, typically connecting the service line to the water main (most common are pigtails and goosenecks). It serves as a flexible connection between the rigid water main and the service line, allowing for ground settling or thermal expansion without breaking the pipe.

How should connector materials be classified in the baseline inventory?
Connector materials must be classified as one of the following:

- Lead – a known leaded gooseneck or pigtail for example

- Non-lead – if Oregon standard in 1985 to remove all known lead components was met, or there is other evidence to confirm it is not lead.
- Unknown – there is no documentation and Oregon's lead removal standard was not followed, or if lead connectors are suspected or commonly found during construction.
- Not Applicable (NA) – no connector is needed (for example, a straight pipe from a well to a building or your piping install standards uses a coupler that does not meet the definition of a connector). This category also applies if the type of connector does not meet the connector definition above.

If the initial service line inventory has not been submitted, can the statistical method still be used for the baseline inventory?
Yes, the statistical method is still available for CWSs for determining service line material. The guidance document can be found here: www.oregon.gov/lcrr

Is free assistance available for developing the baseline inventory?
Yes, the circuit rider program can assist water systems with this effort in 2027.

Is validation of non-lead service lines required?
If a water system completed their inventories by visual inspection and/or statistical method (or the water system was built post 1985), then a written request can be sent to DWS by November 1, 2027 to waive this validation requirement. DWS plans to provide a template for this waiver request later this year.

If the method used to determine non-lead lines was "records only" and the connection was constructed prior to 1985, then the water system will need to validate a subset of these lines. Instructions on how to do this will be available by the end of the year and will be included in the baseline inventory spreadsheet. Validations must be completed by 2034.

3. REPLACEMENT PLAN REQUIREMENTS

Does my system need to submit a replacement plan?
A Service Line Replacement Plan is required by November 1, 2027, if your baseline inventory contains any:

- Lead
- Galvanized requiring replacement (GRR)
- Unknown service lines

What must be included in the Service Line Replacement Plan?

A complete plan must describe:

- Methods to identify unknowns
- Full replacement procedures
- Customer communication processes
- Strategies to prioritize high-risk populations
- Funding strategies and customer support options
- Legal considerations affecting access and cost-sharing

4. TAP SAMPLING PLAN – METHODS & SCHEDULE:

When will the new sampling schedule be in effect?

Effective January 2028, all systems with **lead or GRR** service lines in their inventory will be reset to 6-month lead and copper tap sampling. Systems must complete at least 2 rounds before qualifying for reduced monitoring.

If my inventory contains unknowns, will my system be put back on 6-month sampling?

No. Only systems with **lead or GRR** lines return to 6-month sampling. Having service lines classified as unknown will only change the type and frequency of consumer notices the system must provide to its consumers.

Will the homeowner tap sample locations change under the new rule?

Homeowner tap sample locations may change. Systems must:

- Reevaluate sampling sites using new tiering criteria (see below)
- Prioritize highest-risk homes first.
- Submit a revised sampling plan by **Jan. 1, 2028**

A template for updating sample sites will be available on the baseline inventory spreadsheet. Once finalized, it will be posted here: www.oregon.gov/lcrr.

What are the updated tiering criteria to evaluate tap sample locations?

- Tier 1: Single family structures with premise plumbing made of lead and/or served by a lead service line
- Tier 2: Buildings, including multi-family residences, with premise plumbing made of lead and/or served by a lead service line
- Tier 3: Single family structures served by a lead connector. Sites also include those served by a galvanized line or containing galvanized premise plumbing that had ever been downstream of a lead service line.
- Tier 4: Single family structures that contain copper premise plumbing with lead solder installed prior to 1985.
- Tier 5: Sites that are representative of sites throughout the distribution system. A representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the water system.

How should lead and copper samples be collected under LCRI?

Most Oregon systems will continue using **the standard 1st-liter sampling method for sites without lead service lines.** For Tier 4 and Tier 5 homes—typically those with copper plumbing and lead solder—the required protocol remains a first-liter draw. Only Tier 1–3 sites use an alternative sampling method; because Oregon does not expect to identify Tier 1–3 locations, that method is not addressed in this FAQ.

5. CONSUMER NOTIFICATIONS:

When must customers be notified of service line material?

If served by a lead, GRR, or unknown service line, customer notification is required by Dec 1, 2027, within 30 days of the baseline inventory submittal deadline of Nov 1, 2027.

The water system must continue to notify them every year until that line is replaced or identified as non-lead.

- **New Customer Notification (Service Initiation):** If a person moves into a home served by a lead, GRR, or unknown line, the PWS must notify them at the time-of-service initiation (when they sign up for their water account).

- **Disturbance Notifications (Short-Term):** If the water system performs work that disturbs a lead, GRR, or unknown line (such as a meter replacement or a leak repair), the water system must provide notification and a pitcher filter at the time of the disturbance.

When must consumers be notified of elevated lead levels at their tap?

Customers served by taps that exceed the lead action level must be notified within 24 hours of when the water system receives the results. Tap sample results under the action level will need to be sent to the individual homeowners within 3 days of the water system receiving the results.

What must customer notifications include?

To be compliant, each letter must include:

- **Material Type:** Clearly state if the service line is lead, GRR, or unknown
- **Health Effects:** Mandatory EPA language regarding lead risks
- **Reduction Steps:** Simple steps to reduce lead exposure (flushing, filters)
- **Verification Info:** For "unknown" material service lines, explain how the customer can check the material or how the utility plans to identify it

Public notice templates are available on the webpage here: www.oregon.gov/lcrr

What happens if my system discovers a lead service line after previously reporting no lead service lines?

The system must:

- Notify the state within 60 days
- Update its inventory
- Replace the line according to required timeline

6. TESTING IN SCHOOLS AND LICENSED CHILDCARE FACILITIES:

How can water systems develop a list of all schools and licensed childcare facilities in their service area?

DWS is coordinating with both Oregon Department of Education and Department of Early Learning and Care to get public schools and licensed daycare provider information. Community systems will need to search their customer lists for any private schools served by the water system. More information to come as it is finalized. Please do not contact these state agencies for information.

Are schools and licensed childcare facilities required to be tested under the LCRI?

Yes. However, public schools and licensed daycares already have lead sampling programs in Oregon that are more stringent than requirements in the LCRI. Oregon is planning to apply for a waiver from this component of the LCRI, which is likely to be approved by EPA. Private schools will need to be sampled by water systems per the LCRI. More information will be provided as it is finalized.

7. ADDITIONAL MISC. QUESTIONS:

Does the Consumer Confidence Report (CCR) need to be updated with certain service line inventory information?

Yes. There is new language required for the CCRs. DWS will have updates to the CCR checklist to include this information starting with the 2027 CCR. The checklist can be found here under Tools and Resources: https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/MONITORING/Pages/ccr.aspx

What is the next step when a homeowner refuses to assist in identifying their service line?

The water system should make diligent efforts to work with the homeowner on service line identification and replacement and provide sufficient educational and outreach materials on the health effects of lead. The water system should be

keeping records of outreach attempts and homeowner responses. Should the homeowner refuse to assist in identifying their service line, the water system will need to document it and then continue consumer notification until the service line is identified.

Are any major changes expected for corrosion control (CCT) or water quality parameters (WQP)?

Not significant for most systems, though requirements remain in place and should be reviewed periodically.

For more information, please contact:

Amy Word, REHS
541-966-0901
Amelia.a.word@oha.oregon.gov