

Lead and Copper Rule Improvements: Baseline Inventory

Lead and Copper Rule Unit



October 7, 2026

Lead and Copper Rule (LCR) Unit

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- Unit team
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All of us can be reached at ddw-lcr@waterboards.ca.gov

Lead and Copper Rule Improvements (LCRI) Trainings

Training 1: October 7, 2026

Baseline Inventory

Training 2: December 16, 2026

Service Line Validations

Additional LCRI trainings in 2027

Lead and Copper Unit Office Hours

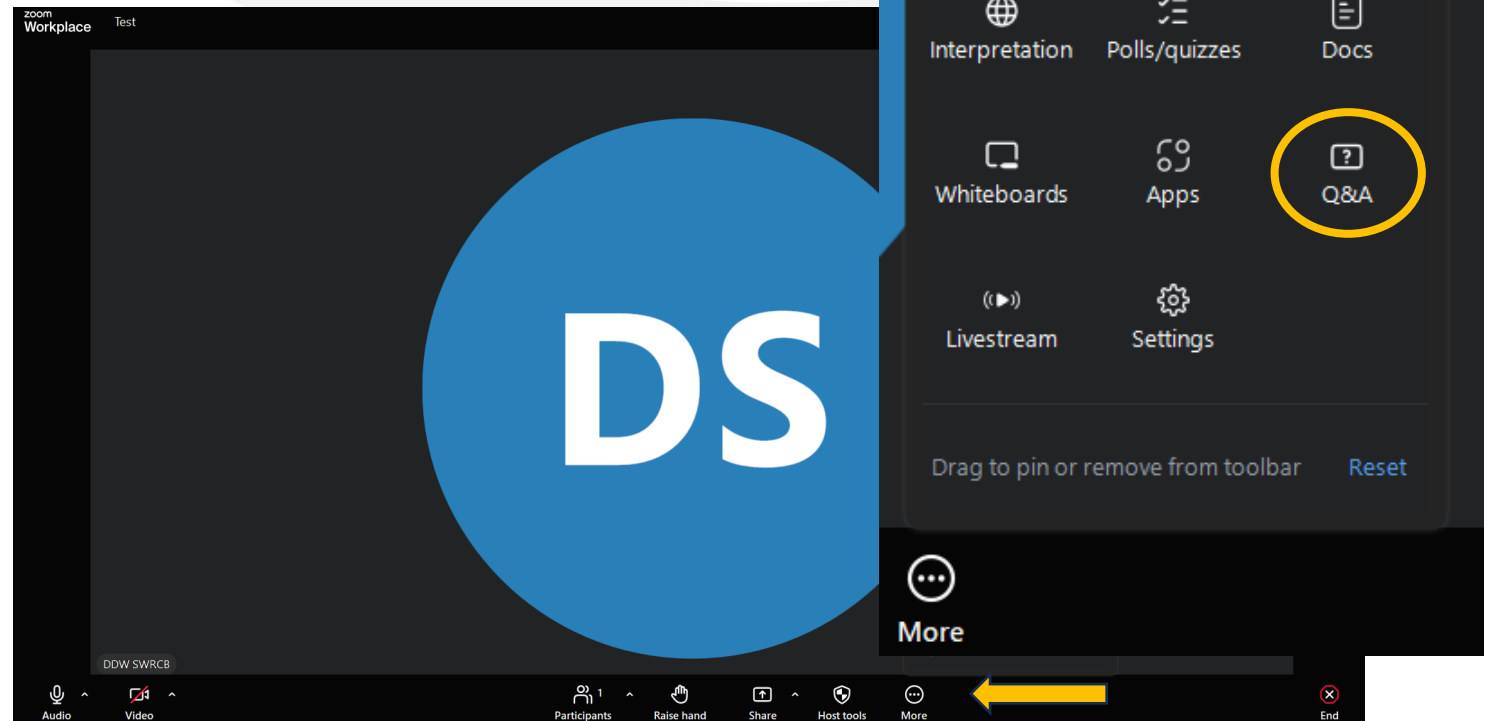
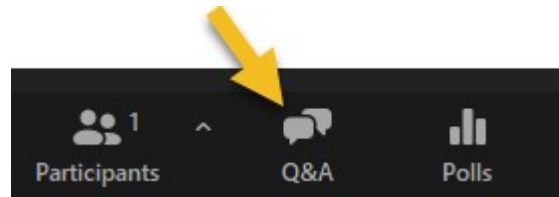
Office hours begin January 2027!

*** Thursdays at 9:00 am ***

Bring any questions about meeting LCRI requirements
to the LCR Unit team

Housekeeping

Please submit questions using the Q & A function. We will answer questions at the end of the presentation.



Overview

- Completing the Baseline Inventory
 - Preparation (gathering and transferring data)
 - Walk-through of new template
 - Demonstration of template completion
 - Submission of a completed inventory
- Follow-up on the Baseline Inventory
 - Accessibility, updates, notifications, and certifications
- Break
- Q & A

Purpose of the LCRI

There is no safe level of lead exposure

Strengthens nationwide public health requirements to protect children and adults from lead and copper in drinking water by

- Achieving identification and replacement of lead and lead-contaminated pipes within 10 years
- Improving tap sampling, in part by lowering the lead action level
- Strengthening protections and communicating with consumers to reduce exposures

Baseline Inventory – *due November 1, 2027*

- Documents materials of service lines and connectors
- Foundational for meeting additional LCRI requirements

Tap Sampling Plan

Informs selection of new tap sampling sites and
Corrosion Control Treatment planning

Inventory Validation Pool

Indicates service lines to include and exclude
from the pool

Public Education

Determines notifications to be sent
to consumers at taps

Service Line Replacement Plan

Identifies service lines
for replacement

Orientation to this Training

- Systems should have completed an Initial Service Line Inventory that was due on October 16, 2024
 - Presentation highlights differences in data and reporting requirements between the Initial and Baseline Inventories
- If you are still completing an Initial Inventory for your system and need additional support, please reach out to us at ddw-lcr@waterboards.ca.gov

Comparison of Service Line Inventories

Initial Inventory

- Due October 16, 2024
- Records review
- Service line material and location
 - Upstream /System portion
 - Downstream / Customer portion
- Publicly accessible
- Location identifier

*New
requirements*



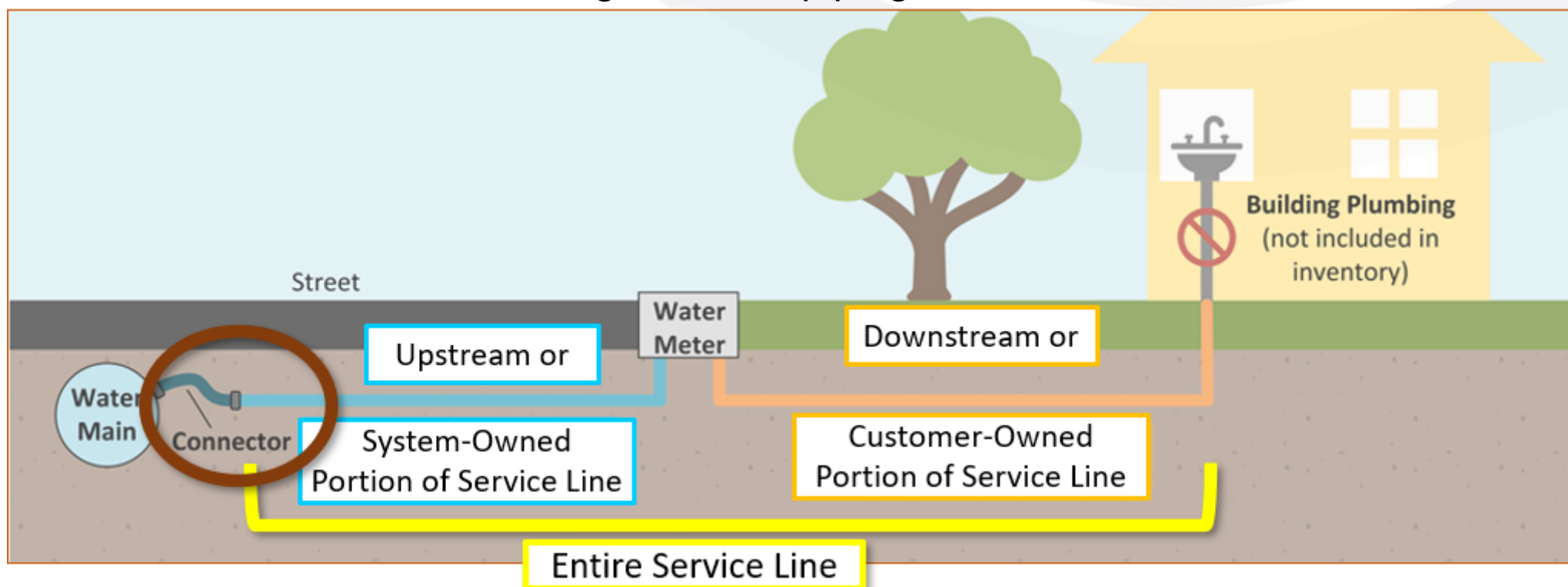
Baseline Inventory

- Due November 1, 2027
- Records review
- Service line material and location
 - Upstream / System portion
 - Downstream / Customer portion
- Publicly accessible

- **Unique locational identifiers** (street address)
- **Connector materials**
- **Annual updates** beginning January 30, 2029 (unless all Non-lead)

New Requirement to Classify Connectors

- **Service Line** - The pipe connecting the water main to the building inlet that may have sole or split ownership by the water system and/or customer
- **Connector, Gooseneck, or Pigtail** - A short segment of pipe (3 ft or less) that can be bent and used for connections between rigid service piping



See [40 CFR 141.2](#) for full definitions.

Transfer of Data to New Inventory Template

- Initial Inventory data, if available, will need to be transferred to the new Baseline Inventory template
 - **LCR Unit transfers data for you (preferred)**: Request via the Template Transfer Form. We will reformat the most recently approved inventory into the new Baseline Inventory template.
 - Template Transfer Form: <https://bit.ly/3Tq1SHj>
 - **Transfer data yourself**: Copy and paste data manually into the new template.
 - Download previous Inventories: <https://bit.ly/3WbTyvq>
 - **Updating a custom database**: Use metadata guide to add new columns, column order, dropdown options that are required for the Baseline Inventory
 - For the metadata guide: <https://bit.ly/4y9uSRI>

Records Review and Inspections

Conduct records review and classify all service lines possible

Use best available information to determine connector presence and classify connector materials

If Unknown service lines are present

- Visually inspect all Unknowns, or
- Apply a statistical method to classify

Optional Statistical Methods

Application of statistical method based on number of unknown service lines

≤ 1500 Unknowns: Interpolation

- Inspect 20% of unknown service lines (randomly selected)
- If no lead is found, classify remaining unknown lines as Non-Lead - Other
- See <https://bit.ly/476n8F7> for more information

> 1500 Unknowns: Stratified Random Sampling

- Group service lines based on decade of installation or other shared characteristic
- Inspect a defined number of service lines (proportionate to/randomly selected from each group)
- If no lead is found, classify remaining Unknown lines as Non-Lead - Other
- See <https://bit.ly/4yuykr2> for more information

Requires LCR Unit-approved workplan

Workplan Details

Workplan should include

- Basic system information (e.g., PWS #, number of service connections)
- If any service lines have been classified, methods used and materials found
- Relevant characteristics (e.g., different build dates, locations, contractors across system, historical presence of lead in the system)
- Numbers of unknowns and proposed inspections of those unknowns
- Inspection methods and actions to take if lead is discovered

For any questions and to submit a workplan, email

ddw-lcr@waterboards.ca.gov

Contact us! We will work with you to develop the workplan

Baseline Inventory Template

- Baseline Inventory template format (2-tab spreadsheet)
 - Inventory Report Sheet
 - Cleaner formatting with service line summary data
 - Detailed Inventory Sheet
 - Data collection to meet LCRI Baseline Inventory requirements
- Use the appropriate Baseline Inventory template size
 - Number of service lines: 100, 500, 5000, or 20000
 - For > 20000 lines contact LCR Unit
- Templates will be available at <https://bit.ly/4y9uSRI>

Inventory Report Sheet

SERVICE LINE AND CONNECTOR INVENTORY REPORT LEAD AND COPPER RULE IMPROVEMENTS (LCRI)

*Note: Required fields are marked with an asterisk * and a thick, red border. Fillable fields are highlighted in blue. Auto-populated fields are highlighted in light gray and cannot be edited directly. Please submit completed inventories to DDW-LCR@waterboards.ca.gov for review.*

- Information for submission

1. Submission Type*
Select

2. Reporting Period*
Select

WATER SYSTEM INFORMATION

3. Water System Number (PWSID)*
CA0000000

4. Water System Name

5. Water System Mailing Address
Address
City, State Zip Code

6. Water System Type
Select

7. Population Served (number of people)

8. Number of Service Connections*

9. Number of Service Lines in Detailed Inventory
0

a. Service Line Ownership Type*
Select

b. Other Service Line Information
e.g., explain service line ownership or any discrepancy between the number of service lines and service connections

10. System Administrative Contact*
Full Name*
Title / Affiliation
Phone*
Email*

11. Inventory Preparer (if different from above)
Full Name
Title / Affiliation
Phone
Email

INVENTORY METHODOLOGY

12. Describe Historical Records Reviewed* (enter "NA" if not available)

Note: Water systems are required to review all historical records that may indicate service line or connector materials or other information.

a. Construction Records and Plumbing Codes*
e.g., local ordinance adopting an international plumbing code, permits for replacing service lines, etc.

b. Water System Records*
e.g., capital improvement plans, standard operating procedures, engineering standards, etc.

c. Distribution System Records*
e.g., distribution system maps, tap cards, line repair or replacements, inspections, meter installations, etc.

d. Other Records
e.g., county assessor, geographic timeline maps, etc.

13. Data Collection During Normal Operation Activities

Note: Water systems are required to identify and update the materials and addresses of service lines and connectors as they are encountered in the course of normal operations. Indicate the normal operation activities during which service line and connector information is collected.

Water Meter Reading	Select
Water Meter Repair or Replacement	Select
Water Main Repair or Replacement	Select
Service Line Repair or Replacement	Select
Backflow Prevention Device Inspection	Select
Other (describe)	

14. Service Line and Connector Investigation Methods Used

Note: Information in the light gray fields will auto-populate based on the Detailed Inventory worksheet.

Records	No
Field Inspection	No
Pipe Dating	No
Pipe Diameter	No
Statistical Analysis or Predictive Models	No
Recent Replacement or Removal	No
Interviews (water system staff, operators)	Select
Other or Emerging Methods (describe)	

Inventory Report Sheet

PUBLIC ACCESSIBILITY DOCUMENTATION

Note: Information from this worksheet AND the Detailed Inventory worksheet must be publicly accessible. Water systems serving over 50,000 people must provide the inventory online. Only water systems with ALL non-lead service lines AND connectors may make a written non-lead statement publicly accessible in place of the inventory.

15. How is the system making the inventory publicly accessible?*

Note: Various forms of the inventory can be provided to the public to meet the accessibility requirement. Indicate the method(s) used to make the inventory publicly accessible.

Online interactive service line map	Select
Online static service line map	Select
Online spreadsheet/tabular data	Select
Printed service line map	Select
Printed spreadsheet/tabular data	Select
Printed information in utility mailings or newsletter	Select
Printed information in water system office	Select
Inventory provided upon request	Select
Written Non-lead Statement	Select
Other (describe) e.g., other formats used, other locations where inventory information is made available, link to webpage if posted online, etc.	

OTHER INVENTORY INFORMATION

16. Provide any additional information about the inventory.

Inventory Report Sheet

- Summary data for communication with system customers

DETAILED INVENTORY SUMMARY

Note: Information in the light gray fields of this section will auto-populate based on the Detailed Inventory worksheet.

17. Materials Reported for Service Lines

Note: Systems must count each entire service line once with a single material categorization. Where service line ownership is shared between the system and customer or split between an upstream and a downstream portion, the entire line is categorized based on the material of each portion.

a. Summary of Entire Service Lines

Material Classification	Number of Entire Service Lines
Lead	0
Galvanized Requiring Replacement	0
Lead Status Unknown	0
Non-Lead	0
Total Entire Service Lines Reported	0

b. Summary by Service Line Portion / Ownership

Material Classification	Upstream / System-Owned	Downstream / Customer-Owned
Lead	0	0
Galvanized	0	0
Galvanized Requiring Replacement	0	0
Non-Lead - Copper	0	0
Non-Lead - Plastic	0	0
Non-Lead - Other	0	0
Unknown	0	0
Total	0	0

18. Materials Reported for Connectors

Note: The Detailed Inventory worksheet allows two connector entries to be reported per service line, so the total number of connectors reported should equal twice the total number of entire service lines reported. Please consult with the DDW Lead and Copper Unit if there is a service line in the distribution system that has more than two connectors present.

Material Classification	Number of Connectors
Lead	0
Unknown	0
Non-Lead	0
No Connector Present	0

INVENTORY CERTIFICATION FOR FINAL SUBMISSION

Note: Information in the light gray fields of this section will auto-populate based on this worksheet and the Detailed Inventory worksheet.

19. Minimum Submission Completeness Check

Note: The Division of Drinking Water may request revisions or additional information after conducting a full review of the inventory submission for quality and completeness.

a. All required fields answered in this sheet	No
b. All service lines accounted for	Enter service connections in Q8
c. All material classifications valid	No
d. All addresses/other locational IDs entered	No

20. Inventory Maintenance and Follow Up Actions*

The water system is required to take the following actions after completion of the inventory:

- a. Make the inventory publicly accessible and provide it to the public upon request.
- b. Collect and update service line and connector information during normal operations.
- c. Send notification of known or potential lead service line to customers and all persons served at the service connection with a Lead, Galvanized Requiring Replacement, or Lead Status Unknown service line within 30 days.
- d. Replace any lead connector encountered during planned or unplanned infrastructure work.
- e. For all non-lead systems, if a Lead or Galvanized Requiring Replacement service line or lead connector is discovered, notify the Division of Drinking Water (DDW) within 60 days and update the inventory.
- f. If a consumer or customer notifies the system of a suspected incorrect categorization of their service line material, respond within 30 days to make an offer to inspect the service line.

Inventory Report Sheet

- Check on submission readiness
- Reminder of required follow-up actions

I acknowledge the above requirements.*

Select

21. Inventory Submission Certification*

Note: Please submit completed inventories to DDW-LCR@waterboards.ca.gov for review.

I,

Enter Certifier Full Name

, reviewed the information in this submission and hereby certify that, to the best of my knowledge, the provided information is true and accurate.*

Select

Enter Date

Detailed Inventory Sheet

Unique Location Identifier			System ID	Up/Sys - Upstream / System-Owned Portion (closest to source/water main)												Down/Cus - Downstream / Customer-Owned Portion (closest to building plumbing)												Entire Service Line	
Required	Required if street address is not available	Optional	Required	Required unless material is unknown	Required if basis is other	Required	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required	Required unless material is unknown	Required if basis is other	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required (auto-calculated)			
Street Address	Other Locational Identifier	System Service Line Identifier	Up/Sys Connector Material	Up/Sys Connector Basis of Material Classification	Up/Sys Connector Notes	Up/Sys Was Service Line Ever Previously Lead?	Up/Sys Service Line Material	Up/Sys Service Line Basis of Material Classification	Up/Sys Service Line Installation Year	Up/Sys Service Line Diameter (inches)	Up/Sys Service Line Field Verification Method	Up/Sys Service Line Field Verification Date	Up/Sys Service Line Replacement Date	Up/Sys Service Line Notes	Down/Cus Connector Material	Down/Cus Connector Basis of Material Classification	Down/Cus Connector Notes	Down/Cus Service Line Material	Down/Cus Service Line Basis of Material Classification	Down/Cus Service Line Installation Year	Down/Cus Service Line Diameter (inches)	Down/Cus Service Line Field Verification Method	Down/Cus Service Line Field Verification Date	Down/Cus Service Line Replacement Date	Down/Cus Service Line Notes	Entire Service Line Material Classification			
B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB			
1234 Test St., City, State, Zip Code	Building A	Meter/Customer 678432	Unknown			Don't know	Unknown								No connector present			Unknown								Lead Status Unknown			
	Intersection of Test and Main St.	Meter 645194	No Connector Present			No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997						No connector present			Non-Lead - Plastic	Field inspection		0.75	Visual inspection at meter pit	4/9/2026		unkwn	Non-lead			

Upstream / System-Owned

Downstream / Customer-Owned

Familiar format, with a few additions

Unique Identifier Information

Unique Location Identifier			System ID	Up/Sys - Upstream / System-Owned Portion (closest to source/water main)											Down/Cus - Downstream / Customer-Owned Portion (closest to building plumbing)											Entire Service Line	
Required	Required if street address is not available	Optional	Required	Required unless material is unknown	Required if basis is other	Required	Required	Required unless material is unknown	Required if basis is installation at lead box	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required	Required unless material is unknown	Required if basis is other	Required	Required unless material is unknown	Required if basis is installation at lead box	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required if basis is other	Required (auto-calculated)
Street Address	Other Locational Identifier	System Service Line Identifier	Up/Sys Connector Material	Up/Sys Connector Basis of Material Classification	Up/Sys Connector Notes	Up/Sys Was Service Line Ever Previously Lead?	Up/Sys Service Line Material	Up/Sys Service Line Basis of Material Classification	Up/Sys Service Line Installation Year	Up/Sys Service Line Diameter (inches)	Up/Sys Service Line Field Verification Method	Up/Sys Service Line Field Verification Date	Up/Sys Service Line Replacement Date	Up/Sys Service Line Notes	Down/Cus Connector Material	Down/Cus Connector Basis of Material Classification	Down/Cus Connector Notes	Down/Cus Service Line Material	Down/Cus Service Line Basis of Material Classification	Down/Cus Service Line Installation Year	Down/Cus Service Line Diameter (inches)	Down/Cus Service Line Field Verification Method	Down/Cus Service Line Field Verification Date	Down/Cus Service Line Replacement Date	Down/Cus Service Line Notes	Down/Cus Service Line Notes	Entire Service Line Material Classification
B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	
1234 Test St., City, State, Zip Code	Building A	Meter/Customer 678432	Unknown			Don't know	Unknown								No connector present			Unknown								Lead Status Unknown	
	Intersection of Test and Main St.	Meter 645194	No Connector Present			No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997						No connector present			Non-Lead - Plastic	Field inspection	0.75	Visual inspection at meter pit	4/9/2026		unknown	Non-lead		

Unique Location Identifier		System ID
Required	Required if street address is not available	Optional
Street Address	Other Locational Identifier	System Service Line Identifier
B	C	D
1234 Test St., City, State, Zip Code	Building A	Meter/Customer 678432
	Intersection of Test and Main St.	Meter 645194

- Address is required
 - If no Street Address assigned at service line, provide Other Locational Identifier
 - System Service Line Identifier is optional

Connector Information

Unique Location Identifier			System ID	Up/Sys - Upstream / System-Owned Portion (closest to source/water main)												Down	Cus - Downstream / Customer-Owned Portion (closest to building plumbing)											Entire Service Line	
Required	Required if street address is not available	Optional	Required	Required unless material is unknown	Required if basis is other	Required	Required	Required unless material is unknown	Required if basis is installation after lead test	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required	Required unless material is unknown	Required if basis is other	Required	Required unless material is unknown	Required if basis is installation after lead test	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required (auto-calculated)			
Street Address	Other Location Identifier	System Service Line Identifier	Up/Sys Connector Material	Up/Sys Connector Basis of Material Classification	Up/Sys Connector Notes	Up/Sys Service Line or Previously Lead?	Up/Sys Service Line Material	Up/Sys Service Line Basis of Material Classification	Up/Sys Service Line Installation Year	Up/Sys Service Line Diameter (inches)	Up/Sys Service Line Field Verification Method	Up/Sys Service Line Field Verification Date	Up/Sys Service Line Replacement Date	Up/Sys Service Line Notes	Down/Cus Connector Material	Down/Cus Connector Basis of Material Classification	Down/Cus Connector Notes	Down/Cus Service Line Material	Down/Cus Service Line Basis of Material Classification	Down/Cus Service Line Installation Year	Down/Cus Service Line Diameter (inches)	Down/Cus Service Line Field Verification Method	Down/Cus Service Line Field Verification Date	Down/Cus Service Line Replacement Date	Down/Cus Service Line Notes	Entire Service Line Material Classification			
B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB			
1234 Test St., City, State, Zip Code	Building A	Meter/Customs 678432	Unknown			Don't know	Unknown								No connector present			Unknown								Lead Status Unknown			
	Intersection of Test and Main St.	Meter 645194	No Connector Present			No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997						No connector present			Non-Lead - Plastic	Field inspection		0.75	Visual inspection at meter pit	4/9/2026		unknown	Non-lead			

Required	Required unless material is <u>unknown</u>	Required if basis is <u>other</u>
Connector Material	Connector Basis of Material Classification	Connector Notes
E	F	G
Unknown		Don't know
No Connector Present		No
Non-Lead - Other	Historical records	No, Was Present in the Past

- Response required for connector material
 - Columns in both up/downstream portions
- Responses from Initial Inventory will appear in Notes column to assist
- Use best available information

Material Classification Categories

Connector (up/downstream sides)

- Lead
- Non-lead
- Unknown
- No Connector Present

Connector-specific Requirements

	Replacements required
Lead connectors*	<i>Only as part of planned or unplanned infrastructure work</i>
Lead or Galvanized Requiring Replacement (GRR) service lines*	By 2037 under the Service Line Replacement Program

** Notify LCR Unit within 60 days of discovery*

If any connector on a Lead, GRR, or Unknown service line is replaced, notifications and risk mitigation measures are required

- Provide public education
- Make pitcher filter or ANSI-certified point-of-use device, instructions, and 6 months of filter replacements available

Service Line Information

Unique Location Identifier			System ID	Up/Sys - Upstream / System-Owned Portion (closest to source/water main)											Down/Cus - Downstream / Customer-Owned Portion (closest to building plumbing)			Entire Service Line								
Required	Required if street address is not available	Optional	Required	Required unless material is unknown	Required if basis is other	Required	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required	Required unless material is unknown	Required if basis is replaced	Required if basis is other	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is replaced	Required if basis is other	Required (auto-calculated)	
Street Address	Other Locational Identifier	System Service Line Identifier	Up/Sys Connector Material	Up/Sys Connector Basis of Material Classification	Up/Sys Connector Notes	Up/Sys Was Service Line Ever Previously Lead?	Up/Sys Service Line Material	Up/Sys Service Line Basis of Material Classification	Up/Sys Service Line Installation Year	Up/Sys Service Line Diameter (inches)	Up/Sys Service Line Field Verification Method	Up/Sys Service Line Field Verification Date	Up/Sys Service Line Replacement Date	Up/Sys Service Line Notes	Down/Cus Connector Material	Down/Cus Connector Basis of Material Classification	Down/Cus Connector Notes	Down/Cus Service Line Material	Down/Cus Service Line Basis of Material Classification	Down/Cus Service Line Installation Year	Down/Cus Service Line Diameter (inches)	Down/Cus Service Line Field Verification Method	Down/Cus Service Line Field Verification Date	Down/Cus Service Line Replacement Date	Down/Cus Service Line Notes	Entire Service Line Material Classification
B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB
1234 Test St., City, State, Zip Code	Building A	Meter-Customer 678432	Unknown			Don't know	Unknown								No connector present			Unknown							Lead Status Unknown	
	Intersection of Test and Main St.	Meter 645194	No Connector Present			No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997						No connector present			Non-Lead - Plastic	Field inspection	0.75	Visual inspection at meter pit	4/9/2026		unknown	Non-lead	

Response required, system-side only*



Required								
Required	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is other
Up/Sys Was Service Line Ever Previously Lead?	Service Line Material	Service Line Basis of Material Classification	Service Line Installation Year	Service Line Diameter (inches)	Service Line Field Verification Method	Service Line Field Verification Date	Service Line Replacement Date	Service Line Notes
H	I	J	K	L	M	N	O	P
Don't know	Unknown							
No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997					
Yes	Non-Lead - Copper	Replaced - previously Lead			Visual inspection at meter pit	4/10/2026	10/1/2026	

“Replaced” as new basis

Date (year) only

Numbers only

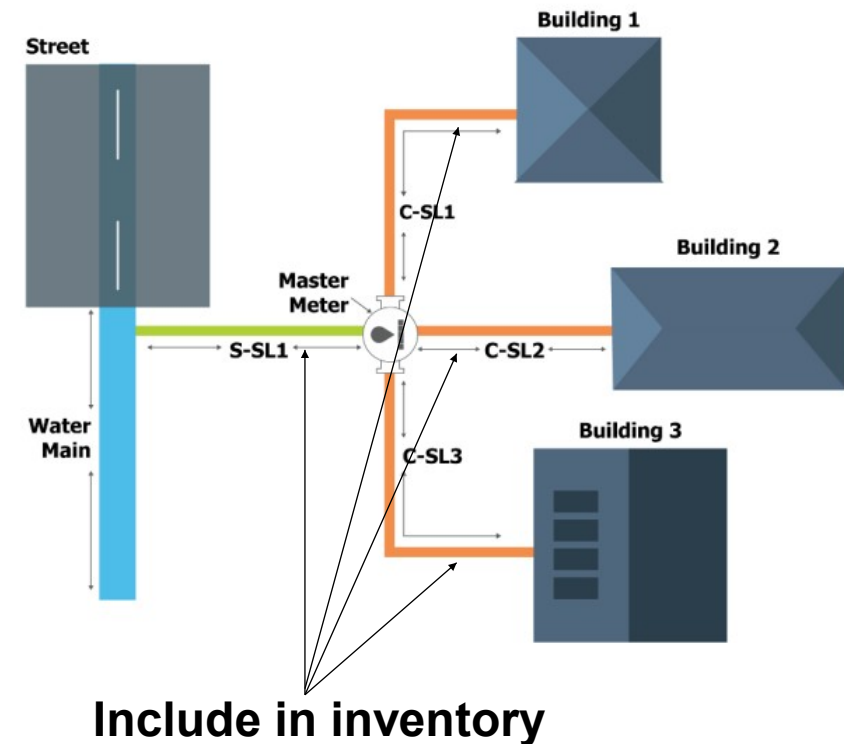
Date (year) only

- Material and basis are required on both sides
- Requirement for other columns is dependent on basis
- But provide if available

Service Lines to Include

Inventory must include **all service lines**, including lines

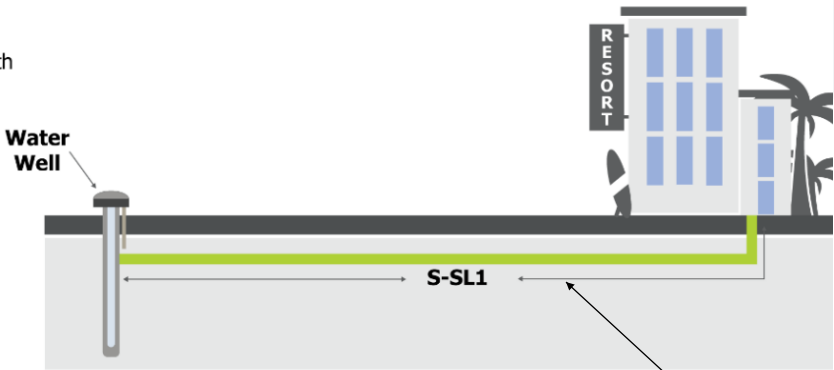
- With non-potable applications (e.g., fire suppression)
- Connected to vacant or abandoned buildings
- Connecting multiple buildings via master meter



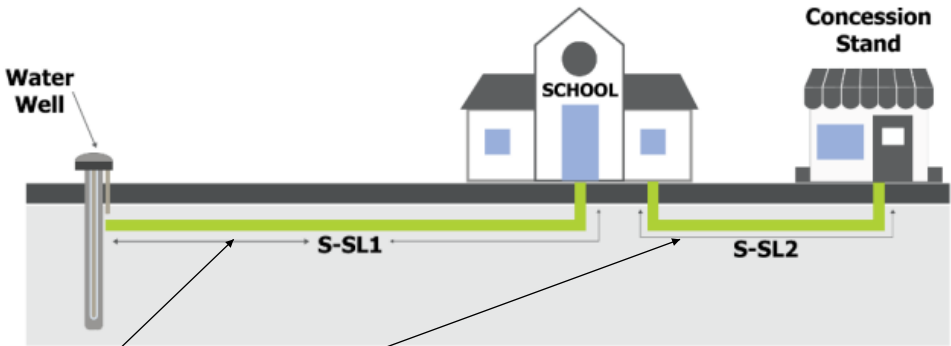
NTNC Examples

Inventory all piping from source to building

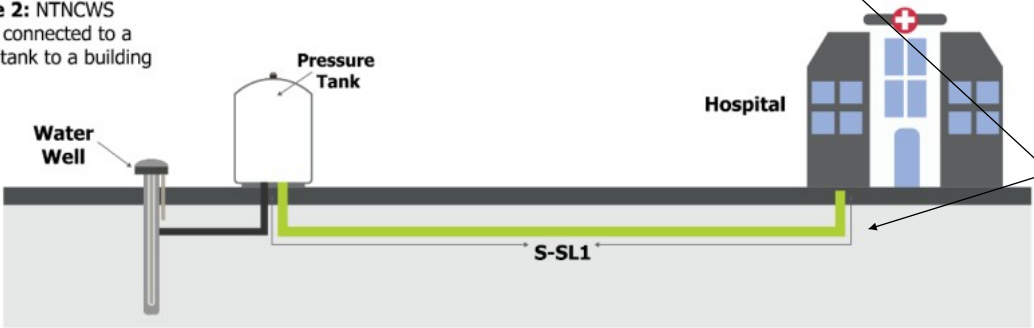
Example 1: NTNCWS with well pumped directly to a building



Example 3: NTNCWS with well connected to a building connected to another building



Example 2: NTNCWS with well connected to a pressure tank to a building



Include in inventory

KEY

NTNCWS=Non-transient non-community water system

S=System-owned

SL=Service Line

System-owned Service line= 

Meter 

Pressure Tank 

Well 

*Developing and Maintaining a Service Line Inventory:
Small Entity Compliance Guide (U.S. EPA, 2023)*

Material Classification Categories

Service Line (up/downstream sides)

- Lead
- Non-lead
 - Galvanized, Copper, Plastic, Other
- Galvanized Requiring Replacement
 - “GRR”
 - Downstream side only*
- Lead Status Unknown
 - “LSU” or “Unknown”

Was Line Ever Previously Lead?*

If the system is able to demonstrate with an evidence-based record that a galvanized service line was never downstream of a lead service line, it can be considered Non-lead (Galvanized rather than GRR)

- Carefully review records for previous lead history and consider questions relevant to your system, for example:
 - Do you have detailed records over many years since installation?
 - Do you have extensive long-term operator knowledge?
 - Has lead ever been encountered over many years of work?
- If new evidence suggests a GRR was never downstream of lead, the line can be reclassified as Galvanized
- If new evidence of lead history is found, a downstream Galvanized line must be reclassified as a GRR

Basis of Material Classification for Service Lines

- Historical records
- **Installation date is after state or local lead ban***
- Service line diameter 4 inches or greater
- Service line repair or replacement record
- Statistical analysis or predictive models
- Interpolation
- **Field inspection***
- Other (Explain in Notes)

Choose **highest confidence*** option if multiple bases apply. This will be important later for determining the non-lead validation pool.

- If the service line was inspected, choose "Field inspection"
- If a non-inspected service line was installed after lead ban, choose "Installation date is after state or local lead ban," even if there are also historical records of line material or diameter

Entire Service Line Classification

Unique Location Identifier		System ID	Up/Sys - Upstream / System-Owned Portion (closest to source/water main)												Down/Cus - Downstream / Customer-Owned Portion (closest to building plumbing)												Entire Service Line	
Required	Required if street address is not available	Optional	Required	Required unless material is unknown	Required if basis is offset	Required	Required	Required unless material is unknown	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is offset	Required	Required unless material is unknown	Required if basis is offset	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required if basis is field inspection	Required if basis is replaced	Required if basis is offset	Required if basis is installation after lead ban	Required if basis is service line diameter	Required if basis is field inspection	Required (auto-calculated)	Required (auto-calculated)
Street Address	Other Location Identifier	System Service Line Identifier	Up/Sys Connector Material	Up/Sys Connector Basis of Material Classification	Up/Sys Connector Notes	Up/Sys Was Service Line Ever Previously Lead?	Up/Sys Service Line Material	Up/Sys Service Line Basis of Material Classification	Up/Sys Service Line Installation Year	Up/Sys Service Line Diameter (inches)	Up/Sys Service Line Field Verification Method	Up/Sys Service Line Field Verification Date	Up/Sys Service Line Replacement Date	Up/Sys Service Line Notes	Down/Cus Connector Material	Down/Cus Connector Basis of Material Classification	Down/Cus Connector Notes	Down/Cus Service Line Material	Down/Cus Service Line Basis of Material Classification	Down/Cus Service Line Installation Year	Down/Cus Service Line Diameter (inches)	Down/Cus Service Line Field Verification Method	Down/Cus Service Line Field Verification Date	Down/Cus Service Line Replacement Date	Down/Cus Service Line Notes	Entire Service Line Material Classification	Entire Service Line Material Classification	
B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AB	
1234 Test St., City, State, Zip Code	Building A	Meter/Customer 678432	Unknown			Don't know	Unknown								No connector present			Unknown								Lead Status Unknown		
Intersection of Test and Main St.		Meter 645194	No Connector Present			No	Non-Lead - Plastic	Installation date is after state or local lead ban	1997						No connector present			Non-Lead - Plastic	Field inspection	0.75	Visual inspection at meter pit	4/9/2006			unknown	Non-lead		

- Once a row is completed, entire service line is classified automatically
 - Lead, GRR, Lead Status Unknown, or Non-Lead
 - Error messages prompt needed corrections

Entire Service Line

Required (auto-calculated)

Entire Service Line Material Classification

AB

Error: Missing Response in Column E or Q

Non-lead

Error: Column T considered GRR

Lead Status Unknown

Error: Missing Column H

Error: Missing Response in Column B or C

Inventory Submission

- ***Email submission preferred***

- Submit Baseline Inventory by email (ddw-lcr@waterboards.ca.gov) for review and approval
- LCR Unit will upload approved inventories to the online portal
- Online portal will remain a repository to view and download approved inventories

- **Portal submission acceptable**

- Portal open for Baseline Inventory submissions on January 11, 2027
- Updated Inventory Report tab in new template must be submitted separately by email

Baseline Inventory Template Walkthrough



The Baseline Inventory Template Walkthrough Video is located on the [LCR Water System Resources webpage](#).

Inventory Follow-Up Actions

- Inventory accessibility
- Inventory updates
- Public notifications
- Annual certifications

Inventory Accessibility

- Systems with any Lead, GRR, or Unknown service lines or connectors
 - Must make the Inventory publicly accessible
 - Post Inventory online if population served > 50,000
- Systems with all Non-Lead service lines and connectors
 - May make a *written non-lead statement* publicly accessible instead of the Inventory
- Inventory accessibility method required in Inventory Report Sheet
- Note how to access the inventory in Consumer Confidence Report

Baseline Inventory Updates

- Continue to collect service line and connector information during normal operations
- If required, submit Baseline Inventory updates by January 30, 2029, and annually thereafter
 - **Note:** Annual Inventory updates are **not** required for systems with only Non-Lead service lines and with all Non-Lead connectors or no connectors present
- If a Lead or GRR service line or Lead connector is discovered, notify LCR Unit within 60 days and update the inventory

Public Notifications That May Apply

Known or potential Lead service lines	Disturbance to Lead, GRR, or Unknown service lines	Late Baseline Inventory
Notifies consumers of Lead, GRR, or Unknown service lines • Issue to consumers at specific lines within 30 days of Inventory completion and annually until replaced or identified • Certify annually by January 30	Notifies consumers of potential for elevated lead levels • Issue to consumers at specific lines before return to service or within 24 hours if no water shutoff/bypass • Certify notification or no disturbances annually by January 30	Notifies consumers of failure to develop (Tier 2) and submit (Tier 3) Inventory by November 1, 2027 • Issue to all consumers within 30 days of November 1, 2027 • Certify within 10 days of issuance

New templates and certification forms will be available at www.waterboards.ca.gov/lead-copper-rule/water_system_resources.html

Additional Annual Certifications

- Lead connectors – *certify by January 30, 2029, and annually thereafter*
 - Certify no Lead connectors were encountered or that any encountered were replaced
- Suspected incorrect service line categorization – *certify by January 30, 2029, and annually thereafter*
 - Certify no reports of incorrect categorization or that inspection of service lines was offered within 30 days of receiving customer notification

Potential Funding

- Funding for Baseline Inventory development may be available through the Lead Service Line Replacement (LSLR) Funding Program: <https://bit.ly/4AOPkKI>
 - For more information, please contact the Division of Financial Assistance (DFA) at DFA-LSLR@waterboards.ca.gov.

Baseline Inventory: Key Due Dates

LCRI Requirement	Due Date
Baseline	November 1, 2027
Updates	January 30, 2029, and annually thereafter
Certifications	January 30, 2029, and annually thereafter

Thank you!

We'll resume in 5 minutes for Q & A

Q & A

Contact the LCR Unit at ddw-lcr@waterboards.ca.gov