

November 2027 checklist for small water systems

What EPA's Lead and Copper Rule Improvements ask of community and non-transient non-community water systems, in the order you will meet it. Checked against the rule text (40 CFR part 141, subpart I) on October 13, 2026.

Key dates

DATE	WHAT HAPPENS	RULE
Oct. 16, 2024	Initial inventory due under the 2021 rule. Yearly notices to people on lead, galvanized requiring replacement (GRR) or unknown lines start.	141.84(a)(1), 141.85(e)
Nov. 1, 2027	Baseline inventory and service line replacement plan due to the state. Replacement program starts.	141.80(a)(3), 141.84
+30 days	Notice to every address on a lead, GRR or unknown line.	141.85(e)(2)
Jan. 30, 2029	First yearly inventory update and plan update to the state, then every January 30.	141.90(e)(3), (e)(4)
Dec. 31, 2034	Validation sample of lines marked non-lead complete, for most systems.	141.84(b)(5)
2037	Lead and GRR lines under your control replaced (10 program years), unless your state sets another date.	141.84(d)(4)

1. Now Before you start

- ☐ Find your 2024 initial inventory and confirm what your state received. A missed inventory shows in EPA's records as violation code 2E or 4G.
- ☐ Keep the yearly notices going to every address on a lead, GRR or unknown line. 141.85(e)
- ☐ Ask your state: which inventory template it wants, which "other sources" it accepts for identifying materials, whether the plan needs an engineer's signature, and whether it has its own notice template or review step.
- ☐ Call your state's Drinking Water State Revolving Fund office. EPA says service line inventories are eligible for lead service line money, whether or not lead is found.

2. Build the baseline inventory Due Nov. 1, 2027

- ☐ Pull the records the rule names: plumbing codes and permits; maps and drawings; tap cards and other records on each connection; meter installation records; capital plans; standard operating procedures; inspection records. 141.84(b)(2)
- ☐ List every service line, whoever owns it. Where you and the customer each own part, list both parts. 141.84(a)(2)
- ☐ List every connector (gooseneck or pigtail) as lead, non-lead, unknown, or no connector present. 141.84(a)(2)(ii)
- ☐ Give every line and connector a street address, or a block, GPS point, intersection or landmark. 141.84(a)(4)
- ☐ Put every line in one category: lead, galvanized requiring replacement, non-lead, or lead status unknown. Write down the evidence. 141.84(a)(3)
- ☐ Shrink the unknown list: installation records after June 19, 1988 or your earlier state ban date; materials seen during meter reads and repairs; customer photos where your state accepts them; field checks last.
- ☐ Count the totals the state wants: lead, GRR, unknown and non-lead lines, lead connectors, unknown connectors. Count each full line once. 141.90(e)(2)

3. Write the replacement plan If any line is lead, GRR or unknown

Due with the baseline inventory. It must describe: 141.84(c)(1)

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| 1. How you will identify unknown lines | 6. How you will pay, including help for owners who cannot pay their part |
| 2. Your procedure for full replacement | 7. How you tell everyone about the plan and program |
| 3. How you tell people before a replacement | 8. Laws, rules and tariffs that affect access to private property |
| 4. How people flush after a disturbance or replacement | 9. Lead-lined galvanized lines, if you have any |
| 5. How you set replacement priorities | 10. Deferred deadline documents, only if you will use one |

4. On November 1, 2027 and the 30 days after

- ☐ Submit the baseline inventory and, if needed, the replacement plan to your state.
- ☐ Start the replacement program. 141.84(d)(4)(i)
- ☐ Within 30 days, mail the notice to every address on a lead, GRR or unknown line, using the rule's required content. 141.85(e)
- ☐ Make the inventory and plan publicly accessible. Systems over 50,000 people must post them online; smaller systems may use another method, such as a copy at the office or by mail. Your Consumer Confidence Report must say how to find the inventory. 141.84(a)(5), (c)(2)

5. Every year after

- ☐ By January 30, starting 2029: send the updated inventory, and an updated plan or a statement that nothing changed. 141.90(e)(3), (e)(4)
- ☐ Within 30 days of each update deadline, send notices again to addresses still on lead, GRR or unknown lines.
- ☐ Record service line and connector materials whenever your crew sees them during normal work. 141.84(b)(2)(v)
- ☐ Where you need the owner's consent to replace a line, make a "reasonable effort": at least 4 attempts using at least 2 different methods. 141.84(d)(3)
- ☐ By December 31, 2034 for most systems: inspect a random sample of lines marked non-lead at two points (20 percent of the pool if it has fewer than 1,500 lines). 141.84(b)(5)

About the court case. The 2024 rule is being challenged in the U.S. Court of Appeals for the D.C. Circuit (*American Water Works Association v. EPA*, No. 24-1376), argued September 30, 2026. As of October 13, 2026 the rule is in effect and its dates stand. The duty to keep a service line inventory also exists under the 2021 rule.

Sources: 40 CFR part 141, subpart I, current text at [ecfr.gov](https://www.ecfr.gov); EPA Technical Fact Sheet "Service Line Inventory and Replacement Requirements" (October 2024); EPA IJIA SRF Questions and Answers (updated October 27, 2025).

Prepared by Lead Inventory Desk, operated by 1414618 B.C. Ltd., Vancouver, British Columbia, Canada. A private company, not affiliated with EPA or any state agency. This checklist summarizes the federal rule; your state may add requirements. It is not legal advice. Questions: hello@leadinventorydesk.com