
When a Service Line Replacement Plan is Required

(Under Lead and Copper Rule Improvements - LCRI, 40 CFR 141.84(c))

A Service Line Replacement Plan is required under the following circumstances:

- If any lead service lines (LSLs) are present in the baseline service line inventory.
- If any galvanized service lines requiring replacement (GRRs) are present (galvanized pipes that are or were downstream of lead).
- If any service lines are classified as "unknown material".
- If new LSLs, GRRs, or unknowns are discovered after the initial inventory — water systems must create a replacement plan (if none existed prior) or update their replacement plan.
- Regardless of whether a lead action level exceedance occurs — the requirement is based on pipe material, not water sampling results.

Key Points:

- Under LCRI, the presence of lead, galvanized requiring replacement, or unknown service lines automatically triggers the requirement for a Service Line Replacement Plan. It is no longer dependent on exceeding the lead or copper action level.
- Unknowns are currently being treated as LSLs in that they must be added to the replacement plan and calculated into the replacement rate.
- The plan must demonstrate a replacement rate of at least 10% per year beginning in 2028, even if the only service lines currently identified on the plan are unknowns.

In the coming months, Division of Water will be providing guidance and templates for creating a Service Line Replacement Plan.

For further information, refer to EPA's Lead and Copper Rule Improvements resources at:
<https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements>