

Lead and Copper Rule Improvements Quick Guide: Baseline Inventory May 2026

What is the baseline inventory?

Under the Lead and Copper Rule Improvements (LCRI), water systems must develop and maintain an updated inventory known as the “baseline inventory.” Water Systems must submit the baseline inventory to the division by Nov. 1, 2027, and update it at least annually thereafter. Water Systems must:

- Document the street address or location of each service line and connector, regardless of ownership, and identify its material type (even if unknown).
- Identify each service line material as lead, galvanized requiring replacement (GRR), non-lead, or unknown material type.
 - A service line is the portion of pipe that connects the water main (or other conduit for distributing water to individual consumers or groups of consumers) to the building inlet.
- Document the material of identified connectors as lead, non-lead (or the type of non-lead material), unknown, or indicate no connector is present.
 - A connector, also known as a gooseneck or pigtail, is 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. A lead connector is not part of the service line.
- Make the baseline inventory available to the public.
 - The material and street address of each service line and connector must be included.
 - Systems serving more than 50,000 people must post it online.
- Meet certain validation requirements for non-lead service lines.

Requirements, details, and deadlines.

Requirement	Details	Date(s)
LCRR initial inventory	- Water Systems are required to meet the 2021 Lead and Copper Rule Revision (LCRR) requirements to develop and submit an initial service line inventory, which must include all service lines, regardless of ownership. - Service lines must be categorized as: - Lead; - Non-lead; - Galvanized requiring replacement (GRR); or, - Unknown.	Oct. 16, 2024
Baseline inventory	Water Systems must develop a baseline inventory that expands upon the LCRR inventory, including connector information, as well as updates or new information about service line materials and locations of every service line.	Nov. 1, 2027
Ongoing inventory updates	- Water Systems must submit an updated inventory annually. This update must include: - Total counts of each service line material, known lead connectors, connectors of unknown material, and the number of full and partial replacements that occurred in the past year. - Water Systems with all non-lead service lines and connectors are not required to submit inventory updates unless lead or GRR service lines or lead connectors are discovered at a later date.	First update due by Jan. 30, 2029. Updates are required by Jan. 30 annually thereafter.
Identification of unknown service lines	Water Systems must identify the material of all service lines currently in the “unknown” category.	By Dec. 31, 2037
	Water Systems without lead or GRR service lines must identify unknown service lines by the end of Program Year 3 to achieve compliance with the lead service line replacement rate requirements.	By Dec. 31, 2030
	Water Systems with lead or GRR service lines must identify unknown service lines by the end of Program Year 10.	By Dec. 31, 2037
Service line validation	- Water Systems must verify a random subset of non-lead service lines. - Systems do not need to verify non-lead service lines that were: - Installed after July 1, 1988, or an earlier local law or ordinance prohibiting the use of lead service lines. - Physically verified already. - Installed in place of a removed lead or GRR line.	By Dec. 31, 2034

Questions?

To learn more, visit the TDEC [Lead & Copper Rule webpage](#). Email questions to DWRWater.Compliance@tn.gov.

This document is subject to change pending updates to the US EPA Lead and Copper Rule Improvements (LCRI) and the promulgation of TDEC’s LCRR regulation. Version May 2026.