

LEAD AND COPPER RULE REVISIONS CHECKLIST

Your Step By Step Guide to Managing LCRR Readiness and Compliance

LCRR has set a new standard for compliance, and the list of requirements is long. The below checklist outlines what is expected of water systems across the country at a federal level as of October 2022 (this checklist is not inclusive of state-specific regulatory guidelines regarding LCRR). Use this as a tool to assess your system's compliance readiness and track your compliance journey

Service Line Inventory

Gather and Manage Service Line Information

- Assemble paper records that can inform service line materials (i.e. tap cards, master building plans, capital improvement project plans, etc.)
- Gather digital records that can inform service line materials (where applicable)
- Connect with local plumbers, contractors, city managers and others to acquire plumbing records and relevant code information to determine usage of various service line materials
- Determine if galvanized service lines are or ever were at any time downstream of a lead service line (LSL) or are currently downstream of a lead status unknown service line. If the water system is unable to demonstrate that a galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL
- Procure a solution that will help you record and organize service line information from print and digital sources into an electronic format to begin building your preliminary inventory. Consider something that is easy to use in the field or the office, can integrate with other electronic platforms your system may use and can potentially enable reporting to your state when the time comes

LSL Replacement Plan

- Document verification strategy for identifying the material of unknown lines
- Identify priorities within your utility's service area for locating and removing LSL, taking into consideration that pregnant women, children and the elderly are most severely impacted by lead contamination
- Document strategies for communicating with homeowners about your replacement program
- Develop a course of action for replacing LSLs, inclusive of both the utility and customer-owned portions of the line. The plan should include an annual replacement percentage in the event of a trigger-level lead exceedance and a strategy for pitcher/filter distribution post-replacement as well as flushing procedures
- Detail funding opportunities to assist with replacement specific to your state, especially customer-owned sections of the line

Build and Verify Your Service Line Inventory

- Compile applicable records into your chosen electronic solution to build your preliminary inventory, including a locational identifier for each LSL (intersection, landmark, etc.)
- Connect with representatives in your state to determine acceptable verification methods for identifying unknown service line materials (such as interior inspection, excavation, predictive modeling, etc.) in your state
- Establish a strategy for identifying the material of unknown service lines on the utility and customer-owned portions of the line using the approved verification methods within your state
- Partner with professionals in the community (plumbers, realtors, general contractors, etc.) who may have access to customer-side portions of service lines to support verification efforts. Consider resident outreach to assist in verification efforts as well
- Define and document your internal process for updating the service line inventory annually. The EPA is requiring either an annual or triennial submission of updated inventories (dependent upon your LCR monitoring schedule) until the material of all service lines is accurately identified.

- Develop an internal (documented) process for the following scenarios:

- Removal of LSLs, galvanized, lead goosenecks, pigtails or connectors, or lead status unknown lines during planned or unexpected infrastructure work, including necessary filter, flushing and sampling procedures post-replacement (if applicable)
- Service disruption to LSLs, galvanized or lead status unknown lines, including internal response and customer communication and instructions
- Customer replacement of an LSL, including filter and flushing instructions. LCRR requires utilities to replace their portion of a line within 45 days of customer-driven replacement

□ Public Transparency and Notification

- Develop an interactive, digital map of your service line inventory if your water system serves over 50,000. The EPA is requiring that systems serving more than 50,000 people make their inventories accessible online. Although a digital format is not required for smaller utilities, all systems should make their inventories available to the public in some format
- Establish an annual notification process for customers served by LSLs, galvanized lines, and unknown service lines
- Send notification to affected customers within 24 hours if the lead action level for the 90th percentile concentration is above 15 ppb
- Send notification to affected customers within 3 days if their individual residential compliance sample exceeds 15 ppb
- Send notifications within 30 days of receipt regarding school and childcare sampling results to facilities involved, state agencies and health departments
- Develop communication plans to inform your customers about your system's inventory and LSL replacement efforts (if replacement is needed)
- Develop communication plans for schools and daycares in your utility's service area, focusing on those built before 2014. Elementary schools and daycares should be provided with a proposed sampling plan. Secondary schools are not required to be sampled under LCRR, but information on how to request sampling if desired should be provided

Sampling and Treatment

□ Residential Sampling

- Prepare for Find and Fix provision requirements, which require utilities to provide follow-up sampling to any home with lead levels above 15 ppb within 30 days, perform a site analysis, recommend remediation methods and add site to regular WQP sampling
- Update sampling procedures to include 1-liter wide mouth bottles and evaluate adding 5th-liter sampling to your procedural routine
- Revise tier sampling pools to include all LSLs if applicable. If there are not enough LSLs to fill each pool, move on to galvanized downstream of lead or lead goosenecks, then copper with lead solder

□ School and Daycare Sampling


- Create a list of all schools and licensed daycare facilities in your utility's service area
- Develop a 5-year sampling schedule that includes sampling 20% of elementary schools each year, 20% of childcare facilities each year and secondary schools by request. All elementary schools and daycare facilities should be sampled by the end of the 5-year cycle, and must be sampled again after the 5 years by request
- Report to your appropriate state agency by July 1 of each year identifying that information regarding the health risks of lead was provided to all schools and childcare facilities, and the sampling and notification requirements were met

□ WQP Sampling


- Sample WQPs at the locations, frequency and parameters required by your state
- Add new WQP sample sites under Find and Fix where lead exceedances are found

□ Corrosion Control Treatment (CCT)

- Establish if you are or are not considered to have CCT under LCRR
- Review historic water quality and tap sample data as a baseline CCT evaluation method
- Under the new trigger level of 10ppb, systems currently using CCT will need to re-optimize CCT protocols using a lower threshold
- Any system with an action level exceedance (15 ppb) will be required to implement CCT



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- Developing preliminary inventories
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