



We work with others to protect the health of the people of Washington State by ensuring safe and reliable drinking water.



## LEAD AND COPPER RULES— LCRR AND LCRI

DWAG June 3, 2024

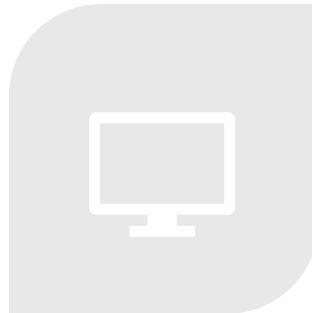
# EPA's New Lead and Copper Rules

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Applies to community and  
non-transient non-community (NTNC)  
Group A public water systems



REVIEW THE RULE  
REQUIREMENTS



AVAILABLE  
RESOURCES



HOW TO SUBMIT  
THE INVENTORY

# EPA's New Lead and Copper Rules

- **Lead and Copper Rule Revisions (LCRR)**

- Effective December 16th, 2021;  
Compliance Date October 16, 2024



- **Lead and Copper Rule Improvements (LCRI)**

- Draft rule November 30, 2023; waiting for final



*A decade later,  
Is Flint's tap water safe to drink?*

# What is DUE by the October 16, 2024

- Service line inventory and public notification
- 24hr notification for Lead action level exceedance (15 ppb)

[Lead and Copper Rule Implementation Tools | US EPA](#)

# What is NOT DUE October 16, 2024

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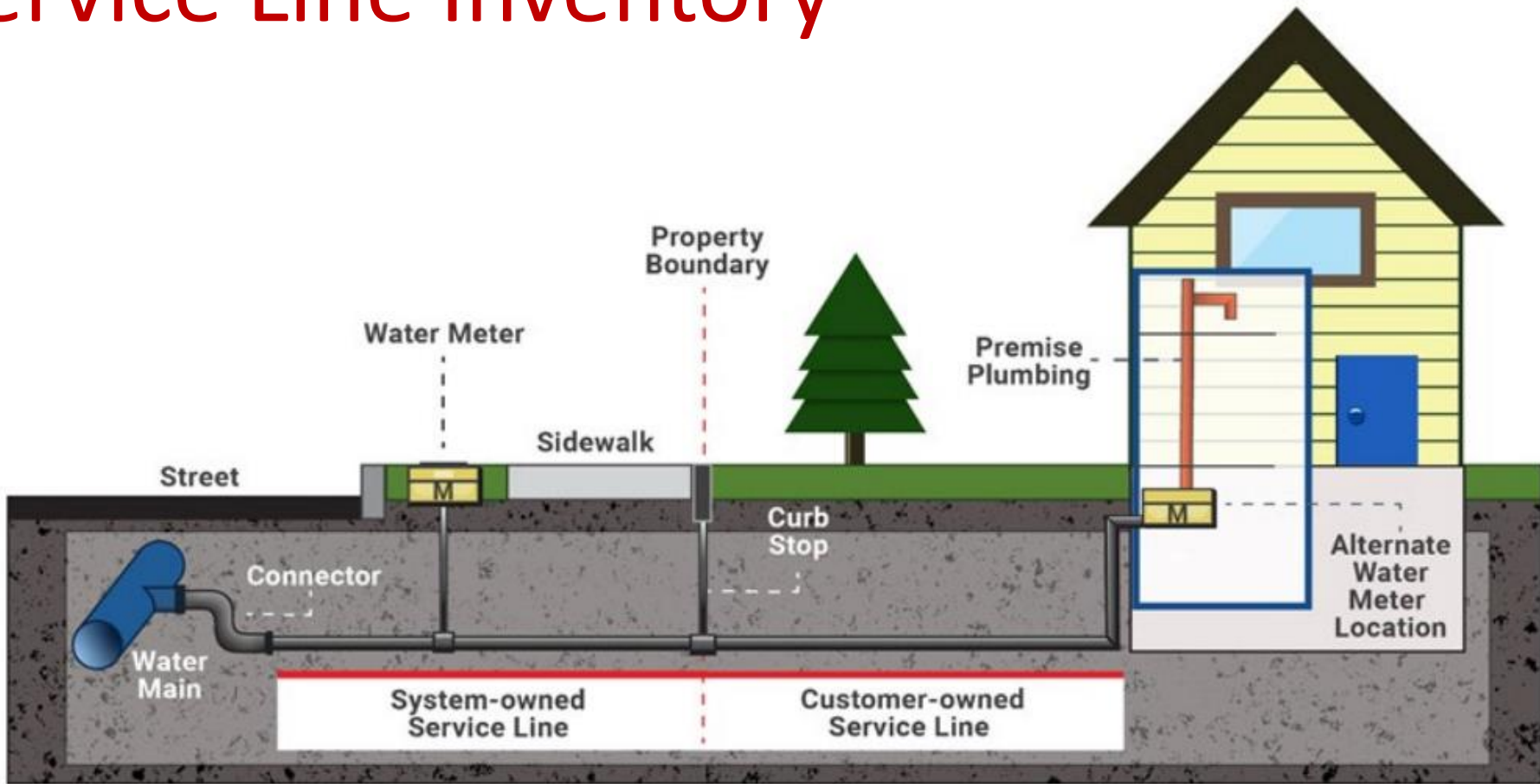
- Lead service line replacement plans
- Compliance monitoring (change)
- School sampling
- Lead action level changes

[Proposed Lead and Copper Rule Improvements | US EPA](#)

*Proposes compliance begins three years after final rule*

**NOTE: No change to tap sampling requirements for 2025; monitoring based on current WA requirements.**

# Service Line Inventory



Source: Guidance for Developing and Maintaining a Service Line Inventory (U.S. EPA, 2022)

- Utility owned and customer owned lines are to be inventoried.
- Include any service that may be used for drinking water.
- NTNC – Inventory all piping from source to building inlet.

# Classification Categories

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LCRR requires the inventory specify

**Lead**

**Galvanized Requiring Replacement (GRR)**

A galvanized service line that is or was at any time downstream of a lead service line

**Non-lead**

**Unknown**

# Summary of the Steps

## to Complete the Inventory

1. Review records – rule requires this!
2. Look for an earlier lead ban; if not, use 1986.
3. Classify all homes built after 1986 and service mains > 2 inch as “non-lead” (Obtain the year built from county assessor data).
4. Look at remaining number of unknowns and decide if you want to have customers self-report.
5. Use the statistical method to classify the remaining unknowns (random selection; one or more visual points on each portion of service line).
6. If you find lead service lines, please contact us.



# EPA Detailed Inventory Template – Elements Needed for a Valid Inventory

Detailed Inventory	
PWS Name:	
PWSID:	
Date Last Updated:	

Location Information	System-Owned Portion			Customer-Owned Portion		Entire Service Line Material Classification
	System-Owned Portion Service Line Material Classification	If Non-Lead in Column G, Was Material Ever Previously Lead?	Basis of Material Classification	Customer-Owned Portion Service Line Material Classification	Basis of Material Classification	
<i>Address or other location description</i>	<i>Non-Lead - Plastic</i>	<i>Yes</i>	<i>Installation date after lead ban</i>	<i>Non-Lead - Plastic</i>	<i>Installation date after lead ban</i>	Non-Lead
	<i>Non-Lead - Plastic</i>	<i>No</i>	<i>Installation record (e.g., tap card)</i>	<i>Galvanized</i>	<i>Installation record (e.g., tap card)</i>	Non-Lead
	<i>Non-Lead - Copper</i>	<i>Don't know</i>	<i>Service line repair or replacement</i>	<i>Galvanized</i>	<i>Installation record (e.g., tap card)</i>	Galvanized Requiring Replacement
	<i>Unknown - Likely Lead</i>			<i>Galvanized</i>		Galvanized Requiring Replacement
	<i>Unknown - Material Unknown</i>			<i>Unknown - Material Unknown</i>		Unknown
	<i>Lead-lined galvanized</i>		<i>Installation record (e.g., tap card)</i>	<i>Lead-lined galvanized</i>	<i>Installation record (e.g., tap card)</i>	Lead
	<i>Non-Lead - Copper</i>	<i>Yes</i>	<i>Service line repair or replacement</i>	<i>Galvanized</i>	<i>Installation record (e.g., tap card)</i>	Galvanized Requiring Replacement
	<i>Non-Lead - Copper</i>	<i>Don't know</i>	<i>Service line repair or replacement</i>	<i>Unknown - Material Unknown</i>		Unknown

# Available Resources

– All on DOH website

## Lead Service Line Inventory—EPA's Lead and Copper Rule Revisions | Washington State Department of Health

[EPA-InventoryTemplateEditedForWA-SWS.xlsx](#)



Operations and Maintenance

### **Lead Service Line Inventory Guidance**

331-711 • 8/10/2023

**Submit Your Inventory—This is a Two Step Process**



Contaminants

### **Water Service Line Inventory Customer Survey Form**

331-746 • 4/15/2024



Contaminants

### **Statistical Guidance for Group A PWS Evaluation of Unknown Service Lines**

331-723 • 5/31/2023



Contaminants

### **Lead Survey Line Inventory Frequently Asked Questions**

331-712 • Revised 5/31/2023

# What Water Systems Need to Submit to State

- Intake form containing summary of inventory and inventory methods
- Detailed inventory in readable electronic format

[Lead Service Line Inventory—EPA's Lead and Copper Rule Revisions | Washington State Department of Health](#)



**Department of Health, Office of Drinking Water**  
**Lead Service Line Inventory Summary**

Purpose: For water systems to provide a summary of their service line inventory for each of the required materials. This information will be submitted to Washington State Department of Health (DOH) and United States Environmental Protection Agency (EPA).

This is a two-step process. The first step is to submit this form. The second step is to submit your inventory file. After you submit this form, you will receive additional instructions by email on how to submit your inventory file. If you have questions or need support, please contact [LCRRAssistance@doh.wa.gov](mailto:LCRRAssistance@doh.wa.gov).

Information collected via this survey may be subject to release in accordance with RCW 42.56 (Public Records Act).

\* Required

Basic Information: Please fill out to the best of your ability.

Items marked with an \* are required fields. A link is provided to submit your detailed LSU at the end. Please ensure the inventory file name you submit includes both your Public Water System (PWS) name and Public Water System Identification (PWSID) in the document title.

Detailed Inventory						
PWS Name:						
PWSID:						
Date Last Updated:						
Location Information	System-Owned Portion			Customer-Owned Portion		Entire Service Line Material Classification
Location Identifier	System-Owned Portion Service Line Material Classification	If Non-Lead In Column G, Was Material Ever Previously Lead?	Basis of Material Classification	Customer-Owned Portion Service Line Material Classification	Basis of Material Classification	
Address or other location description	Non-Lead - Plastic	Yes	Installation date after lead ban	Non-Lead - Plastic	Installation date after lead ban	Non-Lead
	Non-Lead - Plastic	No	Installation record (e.g., tap card)	Galvanized	Installation record (e.g., tap card)	Non-Lead
	Non-Lead - Copper	Don't know	Service line repair or replacement	Galvanized	Installation record (e.g., tap card)	Galvanized Requiring Replacement
	Unknown - Likely Lead			Galvanized		Galvanized Requiring Replacement
	Unknown - Material Unknown			Unknown - Material Unknown		Unknown
	Lead-lined galvanized		Installation record (e.g., tap card)	Lead-lined galvanized	Installation record (e.g., tap card)	Lead
	Non-Lead - Copper	Yes	Service line repair or replacement	Galvanized	Installation record (e.g., tap card)	Galvanized Requiring Replacement
	Non-Lead - Copper	Don't know	Service line repair or replacement	Unknown - Material Unknown		Unknown

# How to Submit the Inventory

<a href="#">You &amp; Your Family</a> ▼	<a href="#">Community &amp; Environment</a> ▼	<a href="#">Licenses, Permits, &amp; Certificates</a> ▼	<a href="#">Data &amp; Statistical Reports</a> ▼	<a href="#">Emergencies</a> ▼	<a href="#">Public Health &amp; Provider Resources</a> ▼
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<a href="#">Lead and Copper Rule</a>
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<a href="#">Lead in Schools</a> ▼

## Lead Service Line Inventory—EPA's Lead and Copper Rule Revisions

### New Requirements

On January 15, 2021, the U.S. Environmental Protection Agency (EPA) issued Lead and Copper Rule Revisions (LCRR) that went into effect on December 16, 2021. Group A Community and non-transient non-community (NTNC) water systems are required to follow the LCRR, which is located in 40 CFR 141. At the same time, EPA announced that it was going to begin new rulemaking to update these same requirements, which they identified as the Lead and Copper Rule Improvements (LCRI). The part of the LCRR not expected to change in the LCRI is the requirements relating to the Lead Service Line Inventory or LSLI. All other requirements of the LCRR are subject to change under the LCRI.

[Lead Service Line Inventory—EPA's Lead and Copper Rule Revisions](#)  
[| Washington State Department of Health](#)

# Group A Public Water Systems: Submit Your Inventory—This is a Two Step Process

**Please Note: If you are a customer of a water utility, please contact your utility to share information regarding your service line. Do not use this portal.**

1. To start the process, click on the next link to fill in a summary of your information: [Department of Health Water Lead Service Line Inventory Submittal Portal](#). Fill out the form, making sure to fill out the required fields, and then submit the form.
2. You will then get an email response letting you know how to send in your detailed inventory file. Follow the instructions in the email. After uploading your inventory file, you will receive another email stating we have received your submission.

[Lead Service Line Inventory—EPA's Lead and Copper Rule Revisions  
| Washington State Department of Health](#)



# Department of Health, Office of Drinking Water Lead Service Line Inventory Summary

Purpose: For Group A public water systems to provide a summary of their service line inventory for each of the required materials. This information will be submitted to Washington State Department of Health (DOH) and United States Environmental Protection Agency (EPA). Please note: This form is not to be used by water system customers. Customers need to contact their water utility.

This is a two-step process. The first step is to submit this form. The second step is to submit your inventory file. After you submit this form, you will receive additional instructions by email on how to submit your inventory file. If you have questions or need support, please contact [LCRRAssistance@doh.wa.gov](mailto:LCRRAssistance@doh.wa.gov).

**Information collected via this survey may be subject to release in accordance with RCW 42.56 (Public Records Act).**

\* Required

Basic Information: Please fill out to the best of your ability.

Items marked with an \* are required fields. A link is provided to submit your detailed LSLI at the end. Please ensure the inventory file name you submit includes both your Public Water System (PWS) name and Public Water System Identification (PWSID) in the document title.

## 1. Water System Identification Number (PWSID). \*

As listed on the Water Facilities Inventory Form (WFI).

2. Water System Name, as listed on the WFI. \*

The water system name must match the PWSID above.

Enter your answer

3. Name of Contact for inventory related questions \*

Enter your answer

4. Contact title \*

Enter your answer

5. Contact telephone number \*

Example: 555-555-1234

Enter your answer

**NEED ONE CORRECT EMAIL ADDRESS**

6. Contact email address \*

Enter this address carefully. We will send instructions on how to submit your inventory file to the address you provide here.

Enter your answer

7. Number of Lead Service Lines \*

Where any portion of the service line that is known to be made of lead.

The value must be a number

8. Number of Galvanized Requiring Replacement Service Lines \*

The service line is not made of lead, but a portion is galvanized and the system is unable to demonstrate that the galvanized line was never downstream of a lead service line.

The value must be a number



**Thank you for your submission. We are sending a follow-up email with instructions on how to submit your Lead Service Line Inventory file. If you don't receive an email in the next few minutes, please submit the form again, ensuring your email is entered correctly.**

Important thing you can do next

~~Save my response~~

The value must be a number

11. Date the inventory was completed. \*

Please input date (M/d/yyyy)







Submit



# Look for Email

Complete your lead service line inventory submission

 DOH Drinking Water LCR Portal  
To Miller, Sheri K (DOH)

  Reply  Rep

**RE:** Office of Drinking Water - Test submittal (000000)

We received your lead service line inventory summary.

To meet the EPA's Lead and Copper Rule Revision requirements, you must submit your detailed inventory file (be sure to include your system ID in the file name)

**To submit your file**, select the "Send Now" link below.

The link opens a new, pre-formatted email. In the new email, enter your Public Water System ID in the subject line after the colon. For example, "System ID: 000000". Attach your inventory file to the email. Do not add any text or images to the body of the email. If your signature or any other text or images are added automatically, please remove them.

**If your file is 50 MB or bigger**, you cannot use this process. For instructions on how to submit large files, please email your region's administrative inbox ([g...@doh.wa.gov](#))

If you have other questions about this process, please email [LCRRAssistance@doh.wa.gov](mailto:LCRRAssistance@doh.wa.gov).

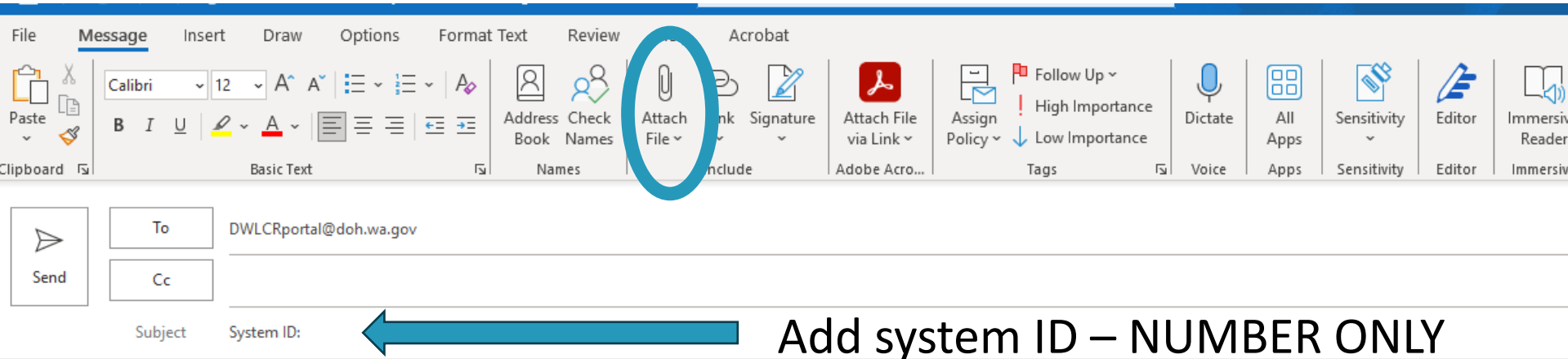
Regards,

Office of Drinking Water

[Send Now](#)



# ATTACH FILE—File Name Should Include System Name and ID



The image shows the Microsoft Word ribbon with the 'Message' tab selected. The 'Attach File' button is circled in blue. Below the ribbon, the 'Subject' field contains the text 'System ID:'. A blue arrow points from the text 'Add system ID – NUMBER ONLY' to the 'System ID:' text in the subject line.

Enter your Public Water System ID in the subject line and attach your Lead Service Line Inventory file. Remove any text or images below this line.

**REMOVE ANY IMAGES IN BODY  
OF EMAIL BEFORE SENDING**

# Submittal Complete!

We received your lead service line inventory file



DOH Drinking Water LCR Portal  
To Miller, Sheri K (DOH)



↩ Reply

↩ Reply All

→ Forward



Fri 5/31/2024 10:17 AM

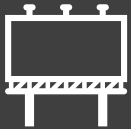
**Thank you for your submission.**

We received and logged the following file for System ID: 000000.

EPA Inventory Template Edited for WA SWS.xlsx

If you think you recieved this message in error, please contact [LCRRAssistnace@doh.wa.gov](mailto:LCRRAssistnace@doh.wa.gov).

# Public Notification



Inventories must be publicly available.  
Over 50,000 pop, must post inventories on website.



Consumer confidence report. Community water systems must indicate how customers access service line inventory information.



Must notify every person served by a lead, galvanized requiring replacement, or lead status unknown **within 30 days of** completing inventory or **October 16**.

# Violations

- ❑ What if I don't complete the initial inventory?
  - Treatment technique violation
  - Tier 2 public notice
  
- ❑ What if I don't submit an inventory to the state?
  - Reporting violation
  - Tier 3 public notice

# Lead and Copper Monitoring and Treatment

*while we wait for LCRI*

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- Continue to monitor in accordance with the Water Quality Monitoring Schedule (WQMS).
- Starting October 16, 2024 – **lead** action level exceedance requires **24-hour** (Tier 1) public notification (copper remains with 30-day (Tier 2) notification).
- For those that have corrosion control treatment - we will be working with you to document and determine optimum treatment.

# For Water Systems That Have Service Line Inventory Questions

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Questions can be emailed to  
[LCRRassistance@doh.wa.gov](mailto:LCRRassistance@doh.wa.gov)

or

contact their regional engineer  
or regional office





To request this document in another format, call 1-800-525-0127. Deaf or hard of hearing customers, please call 711 (Washington Relay) or email [civil.rights@doh.wa.gov](mailto:civil.rights@doh.wa.gov).