



LEAD & COPPER RULE IMPROVEMENTS

December 2, 2024

LCRI – Review and Discussion

- Highlights from the Final Publication
- Current Requirements
- Timeline for New Requirements

Lead and Copper Rule Improvements

KEY HIGHLIGHTS

Service Line Replacement Within 10 Years

- Systems must replace all identified LSL and GRR service lines under their control
- All unknown service lines must be identified and replaced if determined to be LSL or GRR
- Systems must identify and track all connector materials and replace those composed of lead when encountered during normal operations
- Within 10 years unless subject to a shortened or deferred timeline

Service Line Replacement Within 10 Years

- Systems must develop and make public their lead service line replacement (LSLR) plan by November 1, 2027
- All water systems with non-lead service lines in their inventory must validate the methods they used to make those determinations as non-lead (with some exceptions)

Lowered Lead Action Level Exceedance

- The threshold for a lead action level exceedance has been reduced from 0.015mg/L to 0.010 mg/L
- Effective date for ALE change is November 1, 2027
- Systems that exceed the ALE three times in a 5-year period will have additional public education requirements and must provide filters to customers

Changes to Sampling Protocol

- Sites with LSLs must have first- and fifth-liter samples taken, and the highest of the two results must be used for calculating compliance
- Tiering criteria has been revised to target sites containing lead or are more likely to contain lead
- Most systems with LSL or GRR service lines will be required to start (or continue) standard monitoring

OWQPs and OCCT for Medium Systems

- The State is required to set Optimal Water Quality Parameters for any medium systems (10,000-50,000 persons served) that are required to optimize or re-optimize OCCT
- These systems must meet OWQPs to demonstrate that OCCT is being maintained
- These systems may opt to defer this requirement if they can replace all LSL and GRR service lines within a 5-year period (and meet an approved minimum annual replacement rate).

Updates to Public Education Requirements

- Changes to public education requirements revises content of notices and frequency of delivery of materials for more proactive messaging about lead in drinking water
- Increases requirements to make public education materials more accessible to individuals with limited English-language proficiency
- Additional public education requirements for both lead and copper were introduced

Small System Flexibility Options

- Lead service line replacement (LSLR) has been eliminated as a compliance option for small water systems as all applicable systems under LCRI must fully replace LSL and GRR service lines
- The eligibility threshold for flexibility of Community Water Systems has been reduced to those serving 3,300 or fewer persons

Monitoring in Schools and Childcare Facilities

- The requirements to sample in schools and childcare facilities has been maintained from the 2021 LCRR requirements
- Additional waiver criteria has been introduced to include sampling conducted prior to the compliance date, including sampling conducted under the Water Infrastructure Improvements for the Nation (WIIN) Act grant
- WA Office of Drinking Water will be working to assess potential waiver criteria for schools that have already been sampled under an existing State program in recent years

Lead and Copper Rule Improvements

CURRENT REQUIREMENTS

Lead and Copper Rule: Current Requirements

- Systems must comply with the pre-July 2021 Lead and Copper Rule requirements until November 1, 2027
- Certain requirements of the LCRR must also be complied with as of October 16, 2024, which include:
 - Completion and submission of the initial Lead Service Line Inventory, including public accessibility and CCR requirements
 - Consumer Notices for persons served by an LSL, GRR, or Unknown Service Line
 - 24-hour Tier 1 Public Notice for action level exceedances

Expected Timelines



Through Nov 1, 2027

DOH will work to adopt the LCRI and establish primacy

PWS should work to include additional inventory elements

PWS must develop and publish an LSLR



November 1, 2027

All elements of LCRI become effective

Monitoring changes including sampling from revised sites

7 years to complete LSLR unless otherwise approved by State

Questions?

<https://www.federalregister.gov/documents/2024/10/30/2024-23549/national-primary-drinking-water-regulations-for-lead-and-copper-improvements-lcri>



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