

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



#### **LEAD & COPPER RULE REVISIONS**

Washington State Department of Health Office of Drinking Water

# Drinking Water Advisory Group June 28, 2021



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## LCR: Long-Term Revisions

- Published in Federal Register January 15, 2021
- Effective Date extended until December 16, 2021
- Proposed Comply by Date October 16, 2024

## **Major Changes**

- New Lead Trigger Level
- Service Line Inventory
- Sampling Plan new Tiers
- Updated Sampling Method for Lead Service Lines
- Public Notification
- Find and Fix

## Lead and Copper Rule: Action Levels (AL)

## Lead

Action Level = 0.015mg/L

New Trigger Level = 0.010 mg/L

MCLG = 0 mg/L

# Copper

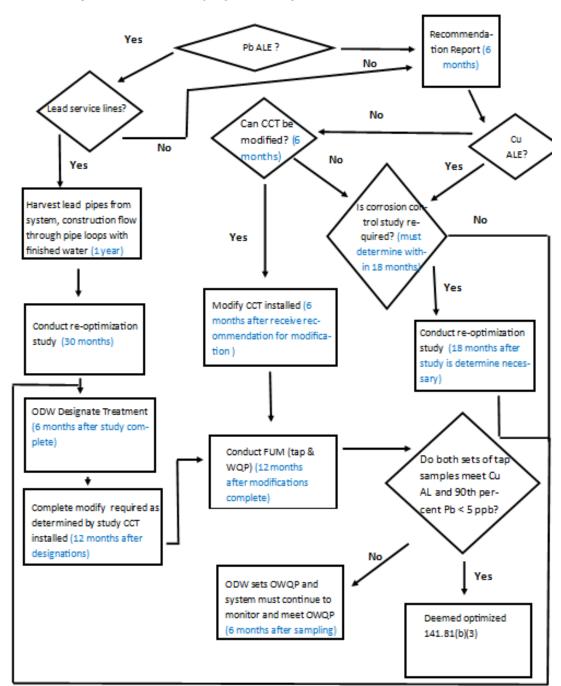
Action Level = 1.3 mg/L

MCLG = 1.3 mg/L

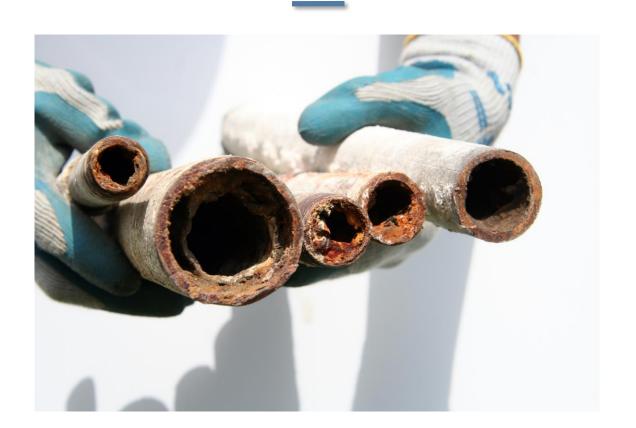
## What Does the Trigger Level Trigger?

- If you have corrosion control treatment (CCT) installed
  - Corrosion Treatment you will need to evaluate the treatment and make a recommendation on how treatment can be modified
  - May be required to conduct a new corrosion control study
  - Sample for lead at standard number of sites annually
- If you do not have CCT installed
  - Submit a treatment recommendation report to identify the optimal CCT
  - May be required to conduct a corrosion control study
  - Sample for lead at standard number of sites annually

Systems With CCT (Pop <10,000) Exceed Pb TL and/or Cu AL



## **Service Line Inventories**



#### **Materials Assessment**

- Required to be completed in 1991
- Community Water Systems were required to identify materials in their distribution system
  - Lead from piping, solder, interior lining in distribution mains, alloys and home plumbing
  - Copper from piping and alloys service lines and home plumbing
  - Galvanized piping, service lines, and home plumbing
  - Cast Iron, Steel, Asbestos Cement piping

## New LCRR Requirement: Service Line Inventory

<b>Service Line Type</b>	
Lead Service Line	Any portion of the line that connect the water main to the building inlet that is made of lead. This may be owned by the water system, the property owner, or both.
Galvanized Requiring Replacement*  *If ever downstream of lead service line	A galvanized service line that is or has ever been down stream of a lead service line. If the system is unable to demonstrate the galvanized service line was never downstream of a lead service line it must presume there was upstream lead component. If the only upstream lead component is or was a lead connector (or gooseneck) it is not considered a galvanized service line requiring replacement.

## New LCRR Requirement: Service Line Inventory

<b>Service Line Type</b>	
Non-lead	A service line that is determined, through evidence-based record, method, or technique, not to be lead or galvanized requiring replacement. The water system may wish to classify the specific material such as plastic or copper.
Lead Status Unknown	Where the service line material is unknown and there is no documented evidence to support the service line classification.

## **Developing Service Line Inventories**

- Historic construction and plumbing codes
- Existing records or documents of service line material
- Distribution maps and drawings
- Meter installation records
- Historic capital improvement and master plans
- Standard operating procedures
- Inspections and records indicating service line material





Must develop or update your sample plan from your Materials Assessment and Service line Inventory

## LCRR: Updated Sampling Tiers

Tier	Description
Tier 1	Single family structures served by lead service lines. When multifamily residences comprise at least 20% of the structures serve by the water system they can be used in your Tier 1 sampling pool.
Tier 2	Buildings, including multifamily residences that are served by lead service lines.
Tier 3	Single family structures served by galvanized service lines requiring replacement or known to be downstream of a lead connector such as a gooseneck.
Tier 4	Single family structures that contain copper pipes with lead solder installed prior to the State's lead ban. (1986)
Tier 5	Single family structures and buildings, including multifamily residences that are representative of the plumbing systems within the water system's distribution system.

## **Sample Collection**



## **Lead and Copper Sample Collection**

• For Tier 3, 4, & 5 Sample **Sites:** Collect 1-liter first-draw samples after water sits in pipes for at least 6 hours, but recommend no more than 12 hours

1 Liter First Draw

June to

September

1st & 5th **Liter First** Draw Samples

Regularly

 For Tier 1 & 2 Saple **Sites** (LSL): Collect 1st liter sample for Copper and 5<sup>th</sup> liter sample for Lead after water sits in pipes for at least 6 hours, but recommend no more than 12 hours

 Collect between June and September for annual or 3-year periods

**Used Taps** 

Collect from cold-water tap of regularly used kitchen or bathroom faucet. Consumption taps for NTNCs.

## **Customer Notifications**



#### **Public Notifications**

- Lead action level exceedance requires a Tier 1 Public Notification (24 hours) and Public Education within 60 days
- Lead trigger level exceedance required notification of person served by known or potential lead service lines within 30 days
- Notify homeowner and resident of lead result over 15 ppb within 3 days

#### **Public Notifications**

- Provide education to customer with known or potential lead service lines (includes galvanized in need of replacement) 30 days after lead service line inventory completed and then annually and to new customers at time-of-service initiation
- Provide notification to customers of a disturbance to known or potential lead service lines when service shut off, replacement of meter, meter setter, or gooseneck, or partial of full service line replacement
  - Include flushing procedures
  - Provide point of use or pitcher filters and instruction for use to customers and 6-months of replacement cartridges (not necessary if only shut off service)

## Find & Fix



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## **Find**

If an individual sample location exceeds the lead action limit

- Notify the customer within 3 days of result
- Conduct WQP monitoring at or near site (within 0.5 miles) within 5 days
  - Small systems (serving <10,000 people) without CCT have</li>
     14 days for WQP sampling
- Collect follow-up lead sample at site within 30 days
- Identify the cause of lead

## **And Fix**

#### Perform needed corrective action

- Recommend solution(s) to ODW within 6 months
  - Replace fixture
  - Replace service line
  - Perform electrical work to ensure electrical is not grounded to plumbing
- Systems can add/modify CCT, conduct spot flushing, modify distribution system operations, and/or take other actions to improve localized or system-wide water quality
  - Systems without CCT are **not** required to conduct a corrosion control study or implement CCT
- Provide information to local public health officials

## **Washington State Regional Contacts**



## **Questions?**



