

# LCRR COMPLIANCE PIPELINE

## Your Yearly Guide to Success

The revised Lead and Copper Rule is here—the clock is ticking, and it's time to prepare.

If you're feeling uncertain about the contents of the rule, you're not alone. We pored through its pages to create a suggested ten-year timeline of to-dos and best practices to help utilities gear up for the significant challenges ahead.

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### PREPARATION

*Deadlines go into effect in 2024,* but the three years leading up to that date are absolutely critical to prepare for compliance. In order to achieve compliance across the various requirements, systems must develop action plans, audit and revise current processes, get their data in order, and, perhaps most importantly, begin to create and validate their Lead Service Line inventory (LSLI).

### LSL INVENTORY AND REPLACEMENT

Utilities are required to conduct a "location-based" inventory of publicly-owned and privately-owned LSL material information. The LSLI must be initially submitted within three years, made public and resubmitted alongside annual or triennial monitoring results. Systems must also develop a **Replacement Plan** with identifying both an LSLI validation strategy & annual replacement goal.

### TIER SITE MONITORING

Tier Lists will be based on the inventory, and in any systems with LSLs, all "Tier 1" samples must be collected from LSL homes, requiring a 1st and 5th liter draw and analysis. There are now five tiers rather than three. The "Action Level" of 15 µg/L remains the same, but the Rule adds a new "Trigger Level" of 10 µg/L that serves as a new treatment target for Corrosion Control Treatment.

### FIND-AND-FIX

Utilities are required to resample for both lead and Water Quality Parameters at any home with lead levels above 15 µg/L within 5 days of receiving the result and must attempt to determine what caused the elevated lead level.

### SCHOOL AND CHILDCARE SAMPLING

Utilities must sample at 20% of elementary schools and 20% of all childcare facilities in the service area each year, all non-elementary schools by request during that time and then all schools and childcare facilities upon request after five years.

### COMMUNICATIONS

Any customers with an LCR sample result greater than 15 µg/L must be notified within three days. If the 90th percentile levels are greater than 15 µg/L, all customers must be notified within 24 hours.

### REPORTING

Water systems must report LSLIs, updated tier sites, monitoring results, school and daycare testing results, public notification templates, and water quality parameter results to their state primacy agency.

### PREPARATION 2021-2023

- Develop an LCRR Action Plan that addresses:
  - LSLI/LSLR strategy & funding sources
  - Tier site & sampling impacts
  - Trigger Level/Action Level impacts
  - Rapid communications methods & strategies
  - School/childcare sampling & education approach
  - CCT evaluation
  - Primary risk areas
- Identify LCRR internal team and external partners
- Develop a data management plan to support:
  - School/Childcare and Tier site sampling
  - Public communication
  - Sample results for Lead, Copper, and Water Quality Parameters
  - LSLI & Tier Site Lists and ongoing updates as LSLs are replaced
- Review LSL data. Develop preliminary inventory, and consider working with customers to obtain private side material info. Common sources include:
  - Local plumbing & municipal codes
  - GIS/Tap card data
  - Main and service line install dates
  - Photo/inspection records from customers
- Create a draft LSLR Plan & identify pitcher/filter supply source
- Identify all K-12 schools and childcare facilities in your system so you can be prepared to sample required and requested locations
- Educate schools and childcare facilities on upcoming sampling in 2024
- Educate your utility and customers about the changes
- Review and update customer contact information with phone/email data
- Update Tier Sites & identify 1st/5th Liter sampling supplies
- Review CCT plan and determine if reoptimization is needed
- Identify Find-and-Fix and WQP monitoring sampling supplies and approach

### LCRR TAKES EFFECT Q4 2024

#### COMPLIANCE PHASE 1 2024-2025

##### ANNUAL ACTIONS:

- Depending on your monitoring schedule, sample at updated Tier Sites. Take 1st and 5th liter samples at LSLs.
- Communicate results over 15 ppb within 3 days (individual home) or within 24 hours (90th percentile > 15 ppb)
- In 2024: Submit first LSLI or prove you have zero LSLs
  - Notify any customer served by an LSL or service connection with unknown materials
  - Recommendation: Validate 1/3 of the inventory annually
  - Make LSLI publically available
- Conduct Find-and-Fix & WQP sampling at any homes > 15 ppb
- Complete 20% of Elementary schools and childcare facilities. Share results with facilities and public health departments. Sample Middle-High schools by request.  
**2024: Sample 20% of Facilities**  
**2025: Sample 40% of Facilities**

#### COMPLIANCE PHASE 2 2026-2028

##### ANNUAL ACTIONS:

- Depending on your monitoring schedule, sample at updated Tier Sites. Take 1st and 5th liter samples at LSLs
- Communicate results over 15 ppb within 3 days (individual home) or within 24 hours (90th percentile > 15 ppb)
- Submit annual or triennial LSLI (based on monitoring schedule)
  - Notify any customer served by an LSL or service connection with unknown materials
  - Recommendation: Validate 1/3 of the inventory annually
- Conduct Find-and-Fix Sampling at any homes > 15 ppb
- Complete 20% of Elementary schools and childcare facilities. Share results with facilities and public health departments. Sample Middle-High schools by request.  
**2026: Sample 60% of Facilities**  
**2027: Sample 80% of Facilities**  
**2028: Sample 100% of Facilities**

#### ONGOING COMPLIANCE 2029-ONWARD

- Sample all K-12 schools and childcare facilities by request
- Depending on your monitoring schedule, sample at updated Tier Sites. Take 1st and 5th liter samples at LSLs.
- Communicate results over 15 ppb within 3 days (individual home) or within 24 hours (90th percentile > 15 ppb)
- Conduct Find-and-Fix Sampling at any homes > 15 ppb
- Submit annual or triennial LSLI (based on monitoring schedule)
- Notify any customer served by an LSL or service connection with unknown materials

LCRR represents a pivotal shift in the way EPA asks water systems to manage lead in drinking water. Our suggestions focus on three years of focused planning, especially in the areas of data preparation, Lead Service Line inventorying, and facilities sampling logistics. We'll be updating this resource periodically as EPA and state agencies continue to clarify aspects of the rule.

Note that these recommendations do not encompass every aspect of the LCRR and are based on the timeline EPA lays out in the federal register—please confirm exact due dates with your state regulator.

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