



Preparing for Proposed Lead and Copper Rule Improvements

December 2023

All drinking water systems must now comply with two EPA regulations. This breakdown simplifies what components of the Lead and Copper Rule Revisions (LCRR) will remain when the proposed Lead and Copper Rule Improvements (LCRI) are finalized.

LCRR Compliance Requirements Due by October 16, 2024:

- Submit initial service line (SL) inventory.
- Make initial SL inventory publicly available and searchable. Large systems (serving > 50,000 customers) must post inventory online.
- Notify all customers with SLs categorized as “lead (LSL),” “galvanized requiring replacement (GRR),” or “unknown” within 30 days after initial inventory is submitted.
- Prepare to notify all customers within 24 hours if 90th percentile lead level exceeds the AL of 15 µg/L.

LCRI Compliance Requirements Expected in January 2028:

SL Inventory

- **Baseline inventory including lead connectors**
- Validate accuracy of non-lead SLs within 7 years
- Identify all unknown SLs within 10 years
- 60 days to verify SL material if customer notifies of incorrect classification

SL Replacements

- Submit prioritized SL replacement plan and make publicly available
- **Replace all LSLs and GRR within 10 years**
- Only full SL replacements count
- Replace lead connectors when found

School and Child Care Testing

- **Waivers granted if sampling since Jan. 2021 followed protocols**
- 20% of schools and 20% of child care facilities tested annually (5-year completion)
- Notification within 30 days of results to any facility with remediation options

LCRI Sampling and Notification

- **Lead action level (AL) decreases from 15 to 10 µg/L**
- Submit new Tier monitoring sites (prioritizes LSLs)
- Highest of 1st & 5th liter samples at sites with LSLs used in 90th percentile calculation
- Follow-up sampling at sites with lead > AL
- Notification within 3 days of results to any customer
- Notify all customers within 24 hours if lead AL exceedance

Corrosion Control Treatment

- Lead AL exceedance requires installation /re-optimization of CCT
- **Can defer optimizing CCT if all LSLs and GRR are replaced within 5 years (20% annually)**
- CCT options include pH/alkalinity adjustment or add orthophosphate

Simplify Compliance with Black & Veatch

Predictive Modeling

- Eliminate unknowns from the SL inventory
- Calibrated with field investigations
- Accuracy checked with verified SL materials
- Confirms approach with Primacy Agencies
- Helps prioritize SL replacements with environmental justice

Data Management and Tracking Dashboards

- Facilitates complex compliance requirements
- Real-time updates of status linked to GIS maps
- Defined user profiles allow for internal and public facing information
- Integrated into utility's system with training and no subscription fees

Manage Field Verifications and Replacements

- Field collector apps link to tracking dashboards
- Local contractors are trained to complete activities
- Customer notification and approval tracking

Public Transparency

- Development of content and graphics to describe activities
- Assistance with stakeholders' meetings, townhalls, and council/board meetings
- Dashboards help customers track progress, ask questions, and request testing

Funding Assistance

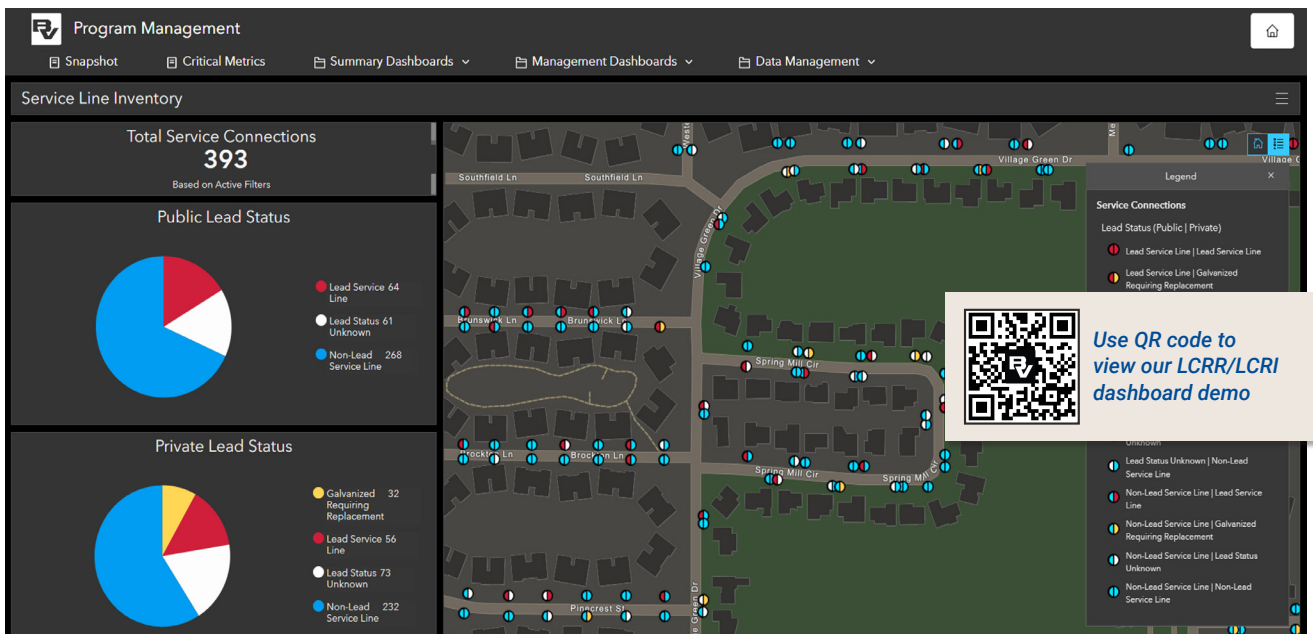
- Identify funding options
- Apply for funding/financing

CCT Optimization

- Experts available to design studies
- Desktop, bench-scale, pipe loop testing experience

SOP Development and Training

- Ensure all compliance requirements are accounted for (pitcher filters, notification, sampling, etc.)
- Contingency plans for all scenarios



Contact us to learn more about the Proposed LCRI and how your utility might be impacted.

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