



ATCAVE March 4, 2025

Final Lead and Copper Rule Improvements (LCRI) Highlights

Cindy Sek

Supervising Environmental Engineer
Rule Implementation Unit
Drinking Water Section

Environmental Health and Drinking Water Branch

Final LCRI

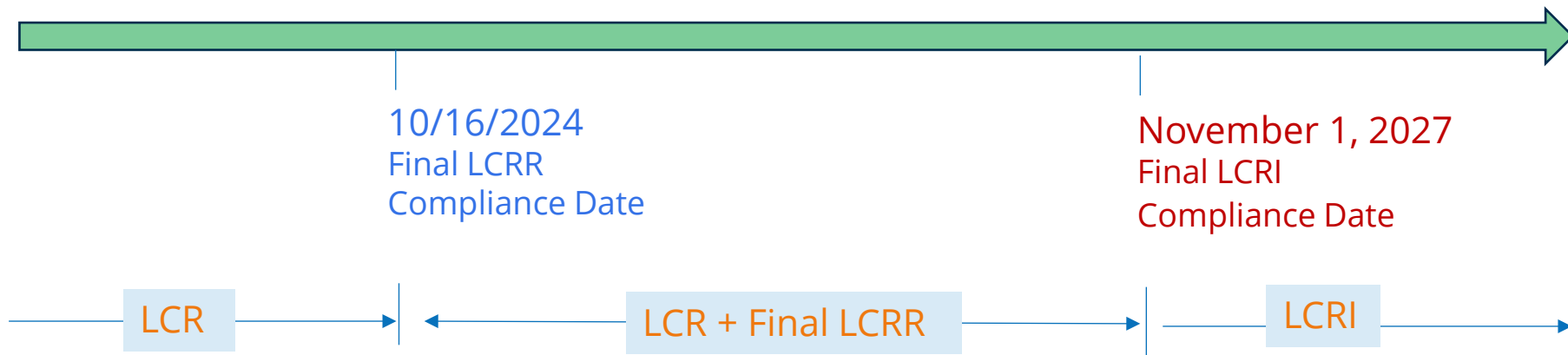
The LCRI strengthens the LCR and LCRR to protect the public from lead in drinking water. The following are key provisions:

- 1) Lower lead action level
- 2) Locate existing lead pipes
- 3) Replace lead service lines within 10 years
- 4) Strengthen tap sampling
- 5) Strengthening protections to reduce exposure
- 6) Improve communication

Final LCRI

- Effective Date: December 30, 2024
- Compliance Date: **November 1, 2027**

Lead and Copper Rules Compliance Timeline



Action Level (AL)

- No lead trigger level, action level only
 - New Lead AL: 0.010 mg/L (10 ppb)  Lowered from 15 ppb
 - Copper AL: 1.3 mg/L
- 90th percentile AL exceedance (ALE)
- Notify the public
 - Lead: Tier 1 public notification
 - Copper: Tier 2 public notification
 - Conduct public education (PE) with lead ALE
 - Install or adjust corrosion control treatment

Locate Existing Lead Pipes

- LCRI Baseline service line inventory due November 1, 2027
 - ✓ Identify gooseneck, pigtail, and connector (Connector) materials
 - ✓ Include street address for each service line and connector, if available, in the publicly accessible inventory
- Made inventory, includes connector, publicly accessible
- Update inventory by January 30, 2029, and annually thereafter
- Notification to customers with lead, GRR, or unknown service lines within 30 days after completion and after the deadline of each update
- Respond to customer inquiries on incorrect material categorization within 30 days
- Identify all unknown service lines by the replacement deadline
- Validate non-lead service line within 7 years

Service Line Replacement

- Submit service line replacement plan by November 1, 2027
 - Required with at least one lead, GRR, or unknown service line
 - Plan must be publicly accessible
- 100% mandatory full service line replacement of all lead and/or galvanized requiring replacement (GRR) service lines under the water systems control* within 10 years beginning November 1, 2027
 - ❑ At least 10% cumulative average annual replacement rate
 - ❑ State sets a shortened deadline for system with lower # of lead and/or GRR service lines
 - ❑ System with high proportion of lead service line may be eligible for a deferred deadline

*Under the LCRI, a service line is “under control” of a system wherever the system has access (e.g., legal access, physical access) to conduct full service line replacement.

Service Line Replacement

- Conduct at least 4 attempts of reasonable effort to solicit participation/consent in replacement
- Must replace lead connectors under systems control when encountered during planned or unplanned infrastructure work
- Prohibit partial replacement, except
 - Emergency repair
 - Infrastructure project that impacts service line not under control of water system
- Must offer to replace customer-owned lead or GRR service line within 45 days after an emergency partial replacement
- Include in Consumer Confidence Report (CCR) a statement about the inventory and how to access the inventory and replacement plan

Strengthen Tap Sampling

- 5 sampling site tier for both community and NTNC systems
- All samples collected from highest tier available
- Collect 1st and 5th liter samples from LSL sites (Tier 1 and Tier 2)
 - Higher result of the 1st and 5th liter samples use for 90% calculation
- Two outreach attempts at a site to solicit sampling participation
 - Document and submit to State the # of refusal and non-responses
- New compliance tap sampling requirement starts in monitoring period following the LCRI compliance date of November 1, 2027
- Deliver Lead and copper consumer notice within 3 business days after receiving results

Strengthen Tap Sampling

Lead and Copper Monitoring

- Return to standard monitoring beginning January 1, 2028
 - System with lead or GRR service line
 - System exceeds lead AL of 0.010 mg/L or copper AL of 1.3 mg/L as of November 1, 2027
 - System not meeting any tap or WQP monitoring requirements as of November 1, 2027

Strengthen Tap Sampling

Water Quality Parameters (WQP)

- Medium and Large Systems with CCT
 - ❑ Conduct regular WQP at entry point and distribution system
- Small and Medium Systems without CCT exceeding lead or copper AL
 - ❑ Conduct WQP monitoring for **2 consecutive 6-month** periods **following** the exceedance monitoring period
- State may require additional WQPs and any system with CCT to monitor
- WQP sites must be included in sample site plan

Distribution System and Site Assessment (DSSA)

- Required at site with lead results >10 ppb
 - System with CCT, conduct WQP monitoring within 5 days
 - Collect sample at the same tap sample site within 30 days

Lead Testing in Schools and Childcare Facilities

- Schools and childcare facilities that are customers of a CWS
- CWS must collect samples at 20% of elementary schools and 20% of childcare facilities per year in their service area over a five-year period. (Not include facilities built or entire plumbing replaced after 1/1/2014 with non-lead SL)
 - ❑ 5 samples per school at specific locations
 - ❑ 2 samples per childcare facility at specific locations
- CWS must conduct sampling at secondary schools upon request during first 5-year testing cycle.
- CWS conduct sampling at all schools and childcares upon request after the 1st 5-year testing cycle.
- Include a statement about the opportunity for schools and childcare facilities to be sampled in the Consumer Confidence Report (CCR)

Reducing Lead Exposure

💧 Multiple Lead Action Level Exceedance

- 2nd lead ALE in a rolling 5-year period, submit filter plan to State for review and approval within 60 days
- At least 3 lead ALE in a rolling 5-year period, system must:
 - Make available to all consumers pitcher filters or POU devices
 - Conduct public outreach

💧 Lead or potential lead SL disturbance or replacement

- Provide pitcher filters or POU devices

Federal LCRI Compliance Timelines

Compliance Date

November 1, 2027



January 1, 2028



Submit to CT DPH:

- ☐ Baseline Service Line Inventory
- ☐ Service Line Replacement Plan
- ☐ List of School and Childcare Facilities

Begin LCRI:

- Service Line Replacement
- Treatment Technique Req.



Submit to CT DPH:

- ☐ Sampling Site Plan
- ☐ Tap Sampling Protocol

Begin LCRI:

- Compliance Sampling
- WQP Monitoring
- Lead Testing in Schools and Childcare Facilities by CWS

Resources

- 💧 [Lead and Copper Rule Improvements | US EPA](#)
- 💧 [EPA: Final LCRI. Fact Sheet: General Information](#)
- 💧 [EPA: LCRI Questions and Answers](#)
- 💧 [LCRI: Supporting Materials | US EPA](#)

Questions??

Questions and LCRI submittals:

DPH.LeadandCopper@ct.gov

Submit Public Education, Public Notification to:

DPH.PNCoordinator@ct.gov