



ATCAVE March 4, 2025

Final Lead and Copper Rule Improvements (LCRI) Highlights

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Final LCRI

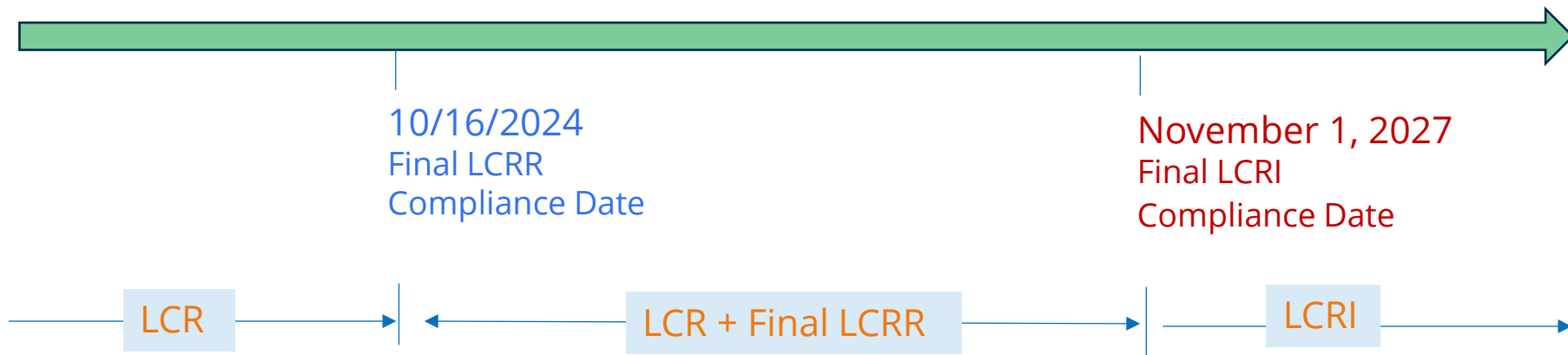
The LCRI strengthens the LCR and LCRR to protect the public from lead in drinking water. The following are key provisions:

- 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:

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Submit Public Education, Public Notification to:

DPH.PNCoordinator@ct.gov