

Lead and Copper Rule Revisions(LCRR)

Lake Erie Users Group February 9, 2021

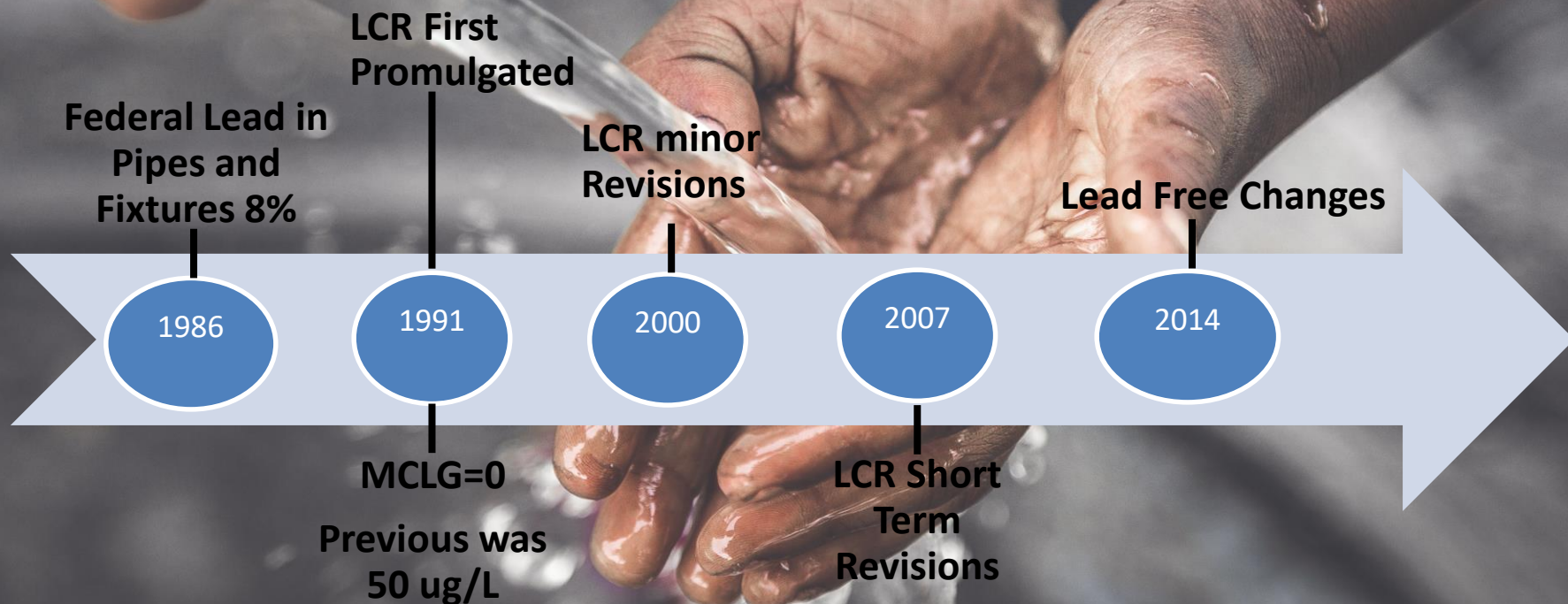
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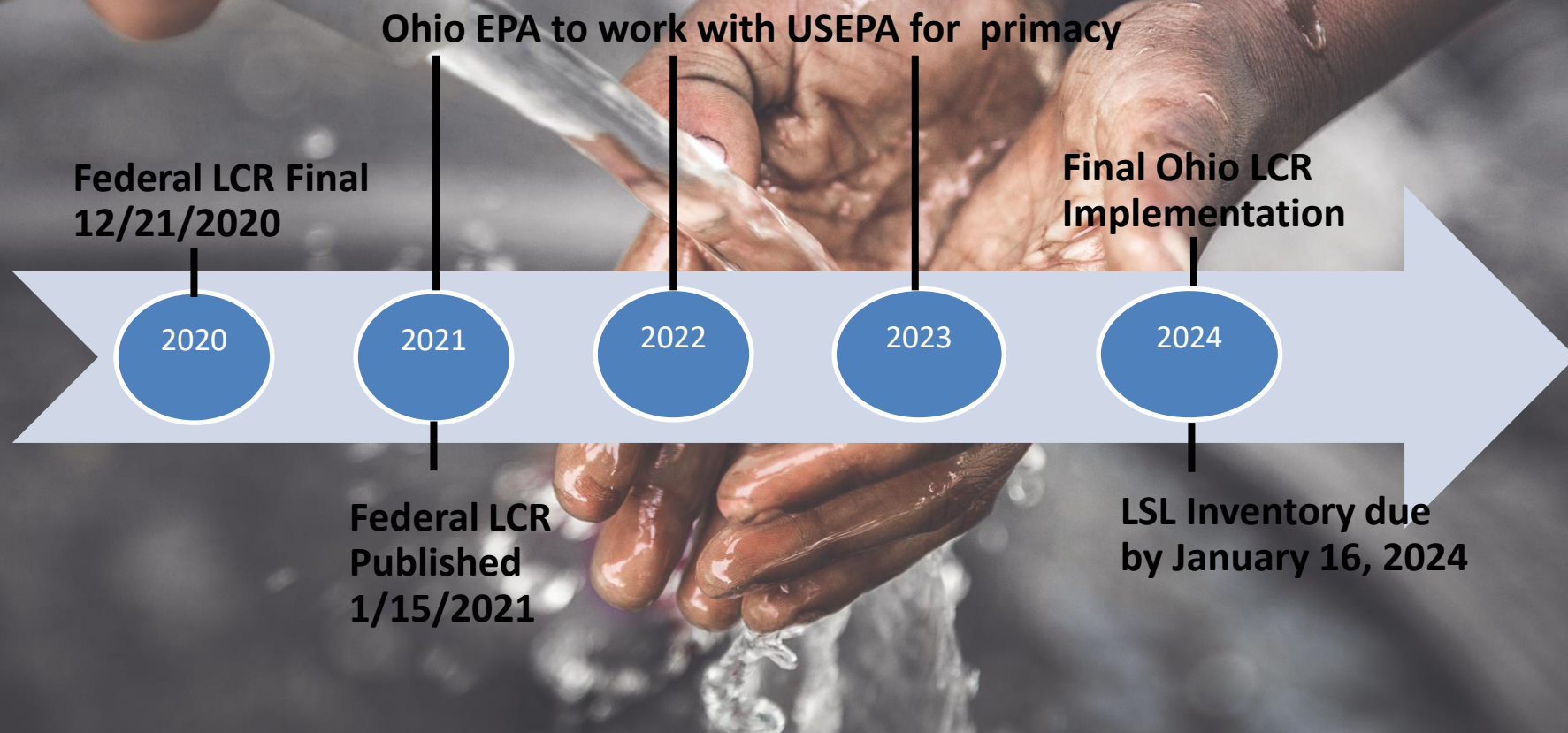
Overview

- Lead and Rule History
- LCRR Timeline
- Significant Rule Changes
- Questions

Lead and Copper Rule History



LCR Timeline Compliance January 16, 2024



Rule Changes

- Action Level Trigger of 10 $\mu\text{g/L}$
- Sample Site Selection
- Collection Procedures
- Corrosion Control Treatment if trigger level achieved
- Water Quality Parameter Monitoring
- Lead Service Line Inventory and Replacement Plan
- Sampling of Schools and Daycares
- Notification of Results and Education
- Small System Flexibility



Action Level Trigger Change

- If 90th percentile is >10 ug/L, additional
 - Planning
 - Monitoring (annually)
 - Treatment
- Small System Flexibility CWSs <10K and NTNCs



Sample Site Selection

- Focus on Lead Service Lines (LSLs)
- All samples to be collected from sites with LSLs, if available
- Changes to Tier definitions
- NTNC Tiers simplified



Tier Definitions Summarized CWSs

- Tier 1 = SFR with LSLs
- Tier 2 = MFR with LSLs
- Tier 3 = SFR with galvanized downstream of LSL or connector
- Tier 4 = SFR with Cu pipe with Pb solder installed prior to effective date of state's lead ban
- Tier 5 = Representative samples



Collection Procedures

- With homes with LSLs – **Fifth** liter sample for Lead and **First** liter sample for copper
- With homes without LSLs – **First** liter sample for lead and copper
- Wide Mouth Bottles
- Prohibits flushing and aerator removal or cleaning

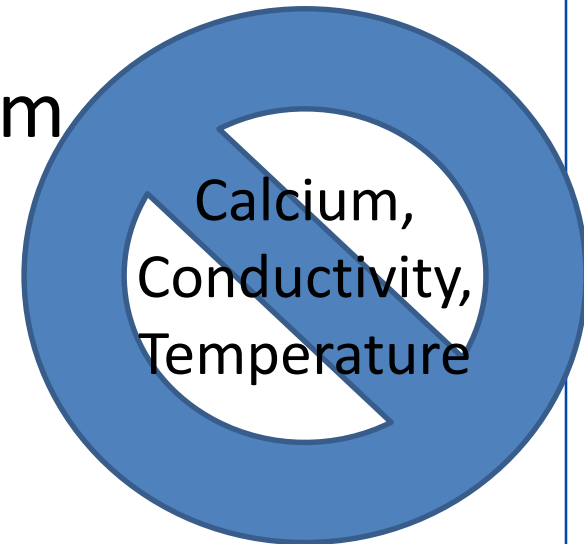


Corrosion Control Treatment if Trigger Achieved

- If trigger or AL exceeded
 - For systems with CCT installed – **re-optimize**
 - For systems with no CCT installed – **CCT study**
 - Sanitary Surveys will review CCT and WQPs
- Calcium precipitation removed as an option for achieving corrosion control
- Phosphate inhibitors must be Orthophosphates

Water Quality Parameter (WQP) Monitoring

- Removes WQPs related to calcium
- Systems serving
 - $\geq 50K$ = WQP at entry and distribution
 - $\leq 50K$ = WQP until 2-six months Pb/Cu < AL
 - Reduction WQP in distribution possible



Lead Service Line Inventory

- All CWSs and NTNCs must identify service line materials
 - Lead
 - Galvanized Requiring Replacement
 - Non-lead
 - Lead Status Unknown
 - Update annually or triennially if on reduced monitoring
 - If no LSLs, no updates needed, unless found later
- Lead Service Line Replacement Plan (LSLR)
 - If >10 ug/L plan to replace LSLs

Lead Service Line Replacement (LSLR) Plan

- Strategy for determining unknown lead lines
- Procedure for LSLR
- Strategy for informing customers
- LSLR goal rate
- Procedure for customers to flush
- Prioritization

LSL Inventories and LSLR Plans

DUE

January 16, 2024

Replacing LSLs

- Population > 10K and ALE=
 - Mandatory replacement of full LSLs if Action Level (AL > 15 ug/L)
 - ALE and > 10K = 3% replacement/yr
 - Must begin immediately following exceedance ALE
- Population > 10K and Trigger=
 - Goal based replacement based on State approval
 - Must begin immediately following exceedance of Trigger
- Provide filters for 6 months

Find and Fix

- Resample taps >15 ug/L within 30 days
- Resamples not included in ALE calculations
- WPQ samples to be collected near high lead locations
- Determine if fix is needed
- Provide info to local health departments

Sampling Schools and Daycares

- All elementary schools and daycares to be tested 1X over 5-year period
 - 20%/year at elementary schools (5 samples/school)
 - 20%/year at daycares (2 samples/daycare)
- After 5 years, annual outreach
- Secondary schools upon request
- Provide EPA's 3T (Training, Testing, Take Action)

Notification of Results and Education

- LSL inventory publicly available
- Notification about ALE = 24 hr notification
- Individual locations >15 ug/L = 3 day notification
- Risks to exposure and financial assistance to removing for homeowners
- Public Education to impacted consumers during disturbance of line work
- New Consumer Confidence Reporting

Small System Flexibility

- CWSs <10K and NTNC
 - Full LSL replacement within 15 yrs
 - Install and maintain OCCT
 - Point of Use (POU) treatment devices
 - Plumbing replacement with lead bearing materials
- When TL is exceeded, select option for when they exceed AL

Ohio EPA LSL Funding

- \$20 million
- Must be executed prior to 7/1/22
- 0% planning and design loans
- Can fund public and private LSLs and restoration
- \$1 million per program year/PWS

Final Message

- Rules may change
- If you don't know – inventory LSLs
- If you know – Get Lead Out!
- Stay Informed

Questions

USEPA to host LCRR webinar 2/23/2021

<https://attendee.gotowebinar.com/register/7705771525098393869>

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