



Lead and Copper Rule Improvements

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Background

Rule History

Proposed Updates

Questions

Agenda

Has it been longer since:

- A: Congress banned the use of new lead pipes in water systems?
- OR
- B: The Cowboys played in a Super Bowl game?

Prior to the recent 2020 amendments, when was the last time the Lead and Copper Rule was updated?

- **A: Barack Obama administration**
- **B: George H. W. Bush administration**
- **C: Ronald Reagan administration**

Background

- Lead exposure at any level creates a risk of adverse health effects.
- Contamination typically caused by lead pipes, faucets, fixtures, or pipes.
- Rarely found in source water.



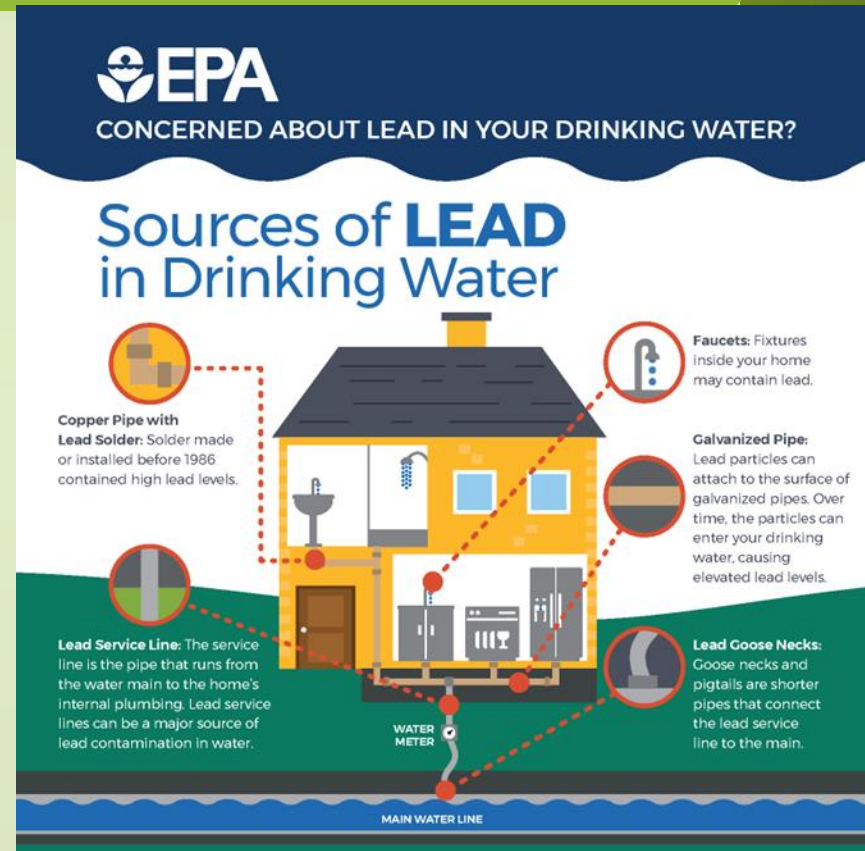
Lead and Copper Rule (LCR)



- 1991.
- Set Maximum Contaminant Level Goal (MCLG) of zero for lead.
- 7% replacement of lead service lines each year.
- Focused on treatment techniques.
- Action level exceedances have decreased by over 90%.

Lead and Copper Rule Revisions (LCRR)

- Trump-EPA.
- January 15, 2021.
- Required 3% annual replacement of service lines.
- Requires a service line inventory.
- Provide a list of K-12 schools and childcare facilities served.



Service Line Inventory

***Galvanized
Steel***

Copper

Lead



- **Due October 16, 2024.**
- Classify each service line.
 - Lead;
 - Galvanized requiring replacement;
 - Non-lead; or
 - Unknown.
- System- ***and*** customer-owned portions.

Lead and Copper Rule Improvements (LCRI)

- More stringent sampling requirements.
- Inventory validation due within 7 years.
- Replace ***all*** lead pipes within 10 years.
- Install or adjust corrosion control treatment.
- **Final rule expected October 16, 2024.**



Updates from LCRR to LCRI

LCRR:

- Trump-EPA.
- 30-year timeline to replace lines (3% annually).
- Inventory of lines with location identifier.
- Action level: 15 µg/L.

LCRI:

- Biden-EPA.
- **10**-year timeline to replace lines.
- Service line inventory with **connectors and addresses**.
- Action level: **10** µg/L.
- **Verify all non-lead lines within 7 years.**

LCRI Public Education

- Notice of action level exceedances within 24 hours.
- Public education within 60 days.
- Encourage customers to allow full replacement of lead lines while replacing lead service lines.
- Provide filters certified to reduce lead for multiple action level exceedances or any disturbances (incl. inventory/replacements).
- Additional information for Consumer Confidence Reports.



Service Line Replacement Plan

LCRR:

- Strategies for identifying unknowns;
- Procedures for full-service line replacement;
- Customer communication strategy;
- Flushing instructions;
- Strategy to prioritize replacements; and
- Funding strategy.

LCRI adds:

- Identify any State/local laws relevant to the ability to gain access to conduct service line replacements; and
- Communication strategy to inform both consumers and owners of rental properties about the replacement program.

Exceptions to Ten-Year Deadline

- Public Water Systems may request a deferred deadline to complete service line replacements in two scenarios:
 - More than 39 lead/galvanized requiring replacement service lines per 1,000 households; **OR**
 - Over 100,000 lead/galvanized requiring replacement service lines (not counting unknown lines) **and** replacing 10,000 lead and/or galvanized requiring replacement lines per year.



State Obligations

- LCRR is in effect with a compliance date of October 16, 2024.
- Continue to implement current sampling, compliance, and reporting requirements in 30 Tex. Admin. Code § 290.117.
- TCEQ plans to provide state-specific rule language in Spring of 2025.
- States have the authority to require a shorter replacement timeline.



Questions?

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