

LEAD AND COPPER RULE REVISIONS

Submitted by Carrie Bolton

I am sure most of you are aware that on December 16, 2021, the EPA announced that the LCRR went into effect. As Operation Specialists, we are committed to protect our communities from the possibility of lead in water systems which has been known to contribute to the decrease in children's IQ, and cause learning and behavioral problems. It also increases risk of heart disease, high blood pressure, kidney, and nervous system problems in adults.

What does this mean for you as a Water System?

Every System needs to develop an LSLI (Lead Service Line Inventory) ASAP! History is your best friend. Start gathering available records for your inventory, record Service Line (SL) materials when reading water meters or performing maintenance activities. An LSL inventory will be used for LSL replacement and a sample site plan (A good LSL inventory will make a future job easier). Try best to prepare your inventory as accurate as possible and to have as few unknown SLs in the inventory as possible. Good communication with customers and educating them is essential for identifying customer-owned SL material. All community and non-transient non-community water systems must get started on putting together an LSL inventory. By October 16, 2024, you must submit an initial LSL inventory and updated LSL inventory annually or triennially (within 30 days of monitoring periods depending on a tap sample monitoring schedule.)

How to identify Service Line Materials?

- Available Record Search
- Excavation
- Visual Observation (including inspection with a camera)
- Public Outreach - Scratch/Magnet Test - Lead Test Kit
- Other Methods for Planning (verification is required) - Tap Sampling, Predictive/Probability Model

Definitions

LSL – Lead Service Line: Any portion of pipe that is made of lead, which connects the water main to the building inlet that may be owned by the water system, owned by the property owner, or both.

GSLRR – Galvanized Service Line(s) Requiring Replacement: A galvanized service line that was or currently is downstream of an LSL, or a SL of unknown material. If a water system is unable to demonstrate that the galvanized service line was never downstream of an LSL, it must presume there was an upstream LSL.

non-LSL – Non-Lead Service Line: A service line which is determined through an evidence-based record, method, or technique not to be lead or not to be galvanized requiring replacement.

Unknown SL - Lead Status Unknown Service: A service line that has not been demonstrated to meet or not meet the SDWA Section 1417 definition of lead free.

Lead Free: A pipe, pipe fitting, plumbing fitting and fixture with no more than a weighted average of 0.25% lead across the wetted surfaces. Solder and flux with no more than 0.2 % lead.

Gooseneck, Pigtail or Connector: A short section of piping, typically not exceeding two feet, which can be bent and used for connections between rigid service piping. Lead goosenecks, pigtails or connectors (LGPC) are not considered to be part of the LSL. If the only lead piping serving the home is an LGPC, and it is not a GSLRR, the service line is not an LSL.

Acronyms

AL – Action Level

GSLRR – Galvanized Service Line(s) Requiring Replacement

LSL – Lead Service Line

LSLR – Lead Service Line Replacement

(L)GPC – (Lead) Gooseneck, Pigtail or Connector

LCRI – Lead and Copper Rule

LCRR – Lead and Copper Rule Revisions

TL – Trigger Level

You can download the Inventory Template on the website (nyruralwater.org) under "Resources", where you will click the "Download" link and choose "Templates" and find NYS DOH Approved Lead Service Line Inventory Spreadsheet. This excel spreadsheet is very easy to use and will help you manage your service line inventory. If you have any questions don't hesitate to call NYRWA at (518) 828-3155 we are here to serve "Quality on Tap". 💧💧💧

Resource: Kristine Wheeler, P.E. & Min-Sook Kim, Ph.D., P.E. New York State Department of Health Bureau of Water Supply Protection

Carrie Bolton
Training Specialist
bolton@nyruralwater.org

