



# LCRR/LCRI Compliance Updates

# Presentation Outline

- Presentation Purpose
- Rule Promulgation Timeline
- Lead and Copper Rule Revision (LCRR) Requirements
- Current Processes
- Lead and Copper Rule Improvements (LCRI)
- Resources
- Q&A

# Presentation Purpose

- Learn how past and future rules intersect
- Explain LCRR requirements
- Highlight additional reminders related to LCR compliance
- Summarize what's to come with the LCRI
- Share resources from TCEQ and EPA

**To learn about the future, let's talk about the past**

# Timeline of Rule Promulgation

Promulgation  
dates:

1991 -  
LCR

2000 -  
LCR  
minor rev.

2007-  
LCR short  
term rev.

2021 -  
LCRR

2024 -  
LCRI

Compliance dates:

October 16, 2024 -  
LCRR

November 1, 2027 -  
LCRI

Proposed Rule → Promulgated (Finalized) Rule → (+3YRs) Compliance Date for Rule

# What's new as of October 16, 2024



# LCRR Requirements <sup>(1)</sup>

- Initial lead service line inventory - due October 16, 2024
- Public notice requirements
  - Deliver to customers with known or potential lead service lines within 30 days of inventory submission
  - Tier 1 notice (within 24-hours of a 90<sup>th</sup> percentile Lead Action Level Exceedance)

# LCRR Requirements <sup>(2)</sup>

## Initial Lead Service Line Inventory (LSLI)

**§141.84(a) *Lead service line inventory.*** All water systems must develop an inventory to identify the materials of service lines connected to the public water distribution system.

Service lines must be categorized in the following manner:

- Lead
- Galvanized Requiring Replacement (GRR)
- Lead Status Unknown
- Non-Lead



# LCRR Requirements <sup>(3)</sup>

## Notification of Known or Potential Lead Service Line

**§141.80(g)(4)** Any water system with lead service lines, galvanized requiring replacement or lead status unknown service lines in their inventory as specified in § 141.84(a) shall inform all consumers with a lead service line, galvanized requiring replacement or a lead status unknown service line in accordance with § 141.85(e).

# LCRR Requirements (4)

## Tier 1 Public Notice for Lead Action Level Exceedance (ALE)

**§141.31(d)(2)** For Tier 1 notices for a **lead** action level exceedance, public water systems must provide a copy of any Tier 1 notice to the Administrator and the head of the primacy agency as soon as practicable, but not later than 24 hours after the public water system learns of the violation or exceedance

# LCRR Requirements <sup>(1)</sup>

- Initial lead service line inventory - due October 16, 2024
- Public notice requirements
  - Deliver to customers with service lines other than non-lead within 30 days of inventory submission
  - Tier 1 notice (within 24-hours of a 90<sup>th</sup> percentile Lead Action Level Exceedance)

# Additional Service Line Inventory Information

- Overall Classification of a Service Line
- Records
- Making the Inventory Accessible
- How to Submit a Service Line Inventory

# Overall Classification of a Service Line

Table 1: Classification of Entire Service Line When Ownership is Split.

System-Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Lead Status Unknown	Lead	Lead
Galvanized	Lead	Lead
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized	Galvanized Requiring Replacement
Lead Status Unknown	Galvanized	Galvanized Requiring Replacement
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Lead Status Unknown	Non-lead	Lead Status Unknown
Non-lead	Lead Status Unknown	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown

**Source:** Modified from Exhibit 2-3 of *Guidance for Developing and Maintaining a Service Line Inventory* (USEPA, 2022).

# Records

40 CFR 141.84(a)(3) - A water system must use any information on lead and galvanized iron or steel that it has identified when conducting the inventory of service lines in its distribution system for the initial inventory. The water system must also review the sources of information listed below to identify service line materials for the initial inventory.

- All construction and plumbing codes, permits, and existing records or other documentation which indicates the service line materials used to connect structures to the distribution system.
- All water system records, including distribution system maps and drawings, historical records on each service connection, meter installation records, historical capital improvement or master plans, and standard operating procedures.
- All inspections and records of the distribution system that indicate the material composition of the service connections that connect a structure to the distribution system.
- Any resource, information, or identification method provided or required by the State to assess service line materials.



# Making the Inventory Accessible

40 CFR141.84(a)(8) The service line materials inventory must be publicly accessible.

- The inventory must include a location identifier, such as a street address, block, intersection, or landmark, associated with each lead service line and galvanized requiring replacement service line. Water systems may, but are not required to, include a locational identifier for lead status unknown service lines or list the exact address of each service line.
- Water systems serving greater than 50,000 persons must make the publicly accessible inventory available online.
- When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply by using a written statement, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines. The statement must include a general description of all applicable sources used to make this determination.

# How to Submit a Service Line Inventory

- Submit via TCEQ LSLI online portal using GEC SWIFT Submittals
  - [Registration Link](#)
  - [Training Video](#)

# What's new as of October 30, 2024



# LCRI Requirements

- Baseline Inventory
- Lead Service Line Replacement
- Tiering Structure
- Sampling Changes
- Lowered Action Level for Lead
- Public Notice and Education
- Distribution System and Site Assessment
- Schools and Child Care Facility Testing

# LCRR To LCRI Transition

**What happens in the time between October 16, 2024, and the compliance date of the LCRI on November 1, 2027?**

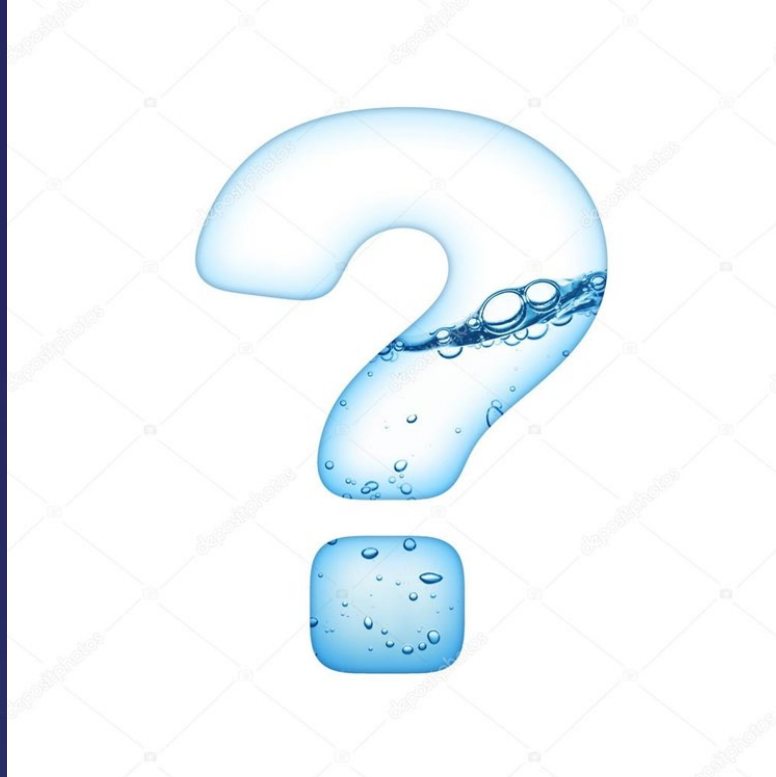
- **30 TAC § 290.117 Regulation of Lead and Copper**
  - Continue to follow the current LCR rules in addition to the 3 provisions of the LCRR previously discussed
    - 40 CFR 141.80(a)(4)

# Additional Resources

- TCEQ LCRR and LCRI Webpage:  
<https://www.tceq.texas.gov/drinkingwater/chemicals/lcrr>
- EPA's Lead and Copper Rule Implementation Tools:  
<https://www.epa.gov/dwreginfo/lead-and-copper-rule-implementation-tools>
- EPA's Lead and Copper Rule Improvements Webpage:  
<https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements>



# Questions?



# Contact Information

Lead and Copper Monitoring Team

[LCRR@tceq.texas.gov](mailto:LCRR@tceq.texas.gov)

Questions regarding registering for TCEQ's LSLI portal

[SWIFT@tceq.texas.gov](mailto:SWIFT@tceq.texas.gov)