

Division of Drinking Water LCRR – LSL Inventory

October 24, 2022



Outline

- LCRR and LCRI overview
- Lead Service Line (LSL) Inventory
 - SB1398
 - Water System Documentation
 - Data Collection
 - Service Line Material Classifications
 - Public Accessibility
 - Inventory Methods
 - Child Care and Schools
 - Funding

Final Revisions: Highlights

- The Lead and Copper Rule Revisions (LCRR) strengthens every aspect of the LCR to better protect children and communities from the risks of lead exposure.
- The rule aims to
 - **Better protect children** at schools and child care facilities
 - **Get the lead out** of our nation's drinking water
 - **Empower communities** through information

Lead and Copper Rule Revision (LCRR)

Background

- Published January 2021, effective December 16, 2021, compliance date of October 16, 2024
- LCRR Revisions
 - School and child-care center sampling
 - New tap sampling procedures
 - Lead trigger level at 10 ug/L
 - Lead service line inventory (LSL) and replacements
 - New public notification requirements

Lead and Copper Rule Improvements (LCRI)

- On December 17, 2021, following U.S. EPA engagement activities, U.S. EPA published Docket No. EPA-HQ-OW-2021-0255 in the federal register.
 - U.S. EPA committed to propose and revise the LCRR by October 2024 with the Lead and Copper Rule Improvements (LCRI)
 - The LCRI is expected to delay the implementation of portions of the LCRR beyond the October 16, 2024, compliance date.
 - **The U.S. EPA will not delay the service line material inventory requirements in the LCRR**
 - **Anticipated release of the draft LCRI in summer 2023**

Latest on LCRR & LCRI

Lead and Copper Rule Revisions (LCRR)

- U.S. EPA inventory guidance released August 2022
- DDW released update FAQ and inventory template
- Systems should start understanding their records now
 - What systems have and don't have
 - Plan on how to reduce unknowns
- **Initial inventories due October 16, 2024**

NOTE: Tap sampling required summer 2024 should be based on current CA LCR

Lead and Copper Rule Improvements (LCRI)

- Several elements that will undergo review and possible revisions:
 - Regulatory requirement for % of lead service line replacements
 - Compliance sampling
 - Action level/trigger level
 - Prioritization of replacements in disadvantaged communities
- **Do not go into effect until after October 16, 2024, or possibly later**

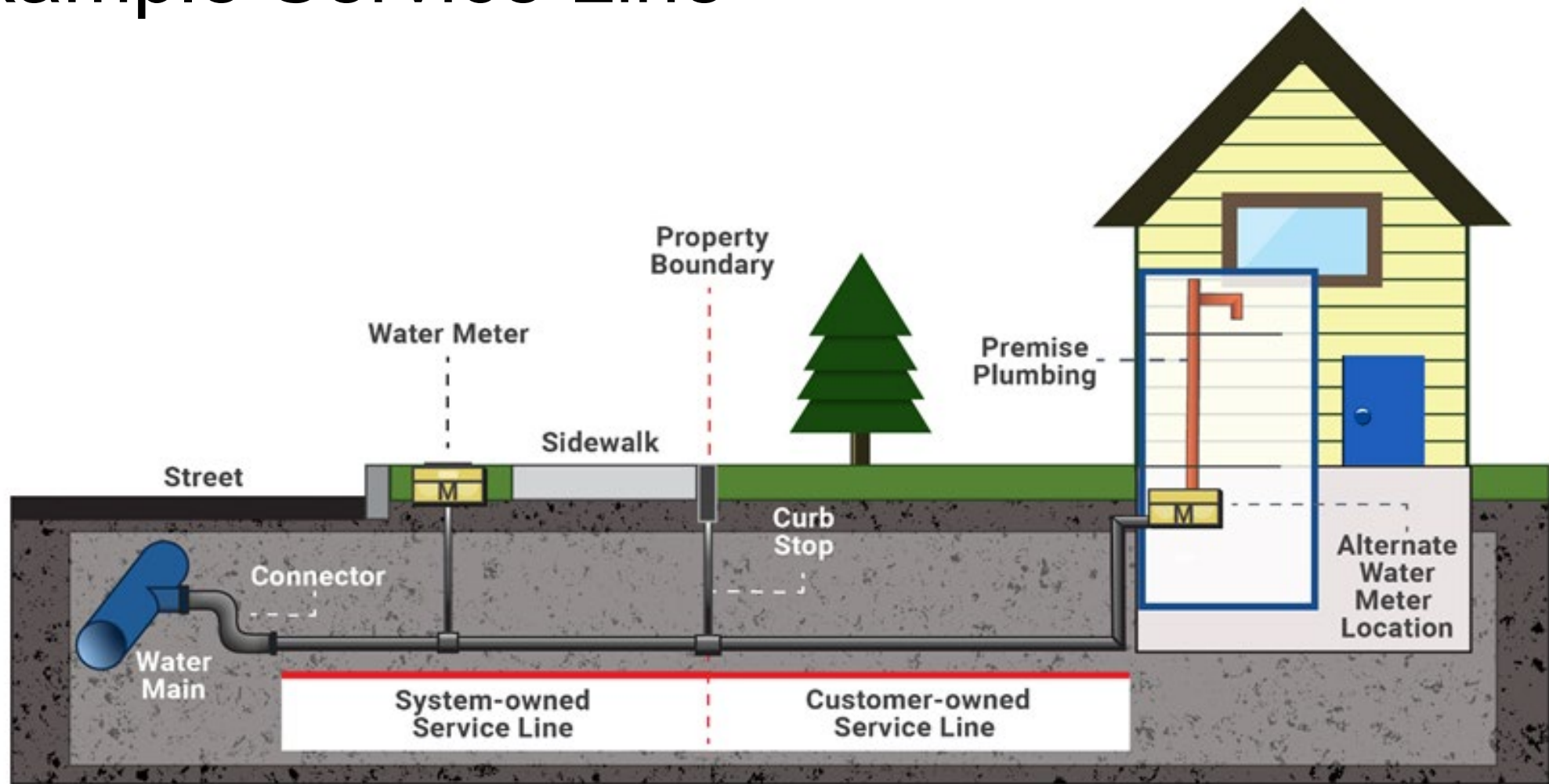
SB 1398: California HSC 116885

- Senate Bill (SB) No. 1398 added California Health and Safety Code (HSC) section 116885, Lead Service Lines in Public Water Systems
- The definition of “user service line” in HSC 116885 includes the service line from the water main to the meter, which is typically the water-system-owned portion of the line.
- The results from the SB 1398 inventory can be used to complete a portion of the LCRR LSL inventory requirements, but LCRR must also include portion of service line from meter to building inlet (typically customer-owned portion)

HSC 116885: Lead User Service Line Replacements

- A water system with an approved Lead User Service Line Replacement Plan must continue to replace lead user service lines per the required timeline
- **Replacements must continue in accordance with the approved timelines and permit amendments regardless of tap sample results.**
In contrast, under the LCRR, replacements are not required unless tap sample results exceed certain levels.

Example Service Line



Source: Guidance for Developing and Maintaining a Service Line Inventory (U.S. EPA, 2022)

Service Line Material Classifications

- “Lead” where the service line is made of lead.
- Galvanized Requiring Replacement” (GRR) where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a “Lead Status Unknown” service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.

Note from the LCRR definitions above: A galvanized line that is connected downstream of a lead gooseneck, pigtail, fitting, or connection is not considered a GRR and does not require replacement

Service Line Material Classifications (Cont'd)

- “Non-lead” where the service line is determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement.
- “Lead Status Unknown” where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification.

Inventory Methods

- LCRR FAQ/Fact Sheet contains:
 - Methods approved by DDW to use
 - Physical visual inspection
 - Dating (1/1/1986: HSC 300.6 or other Municipal Code)
 - Pipe diameter (4 inches or greater – Non-lead)
 - Methods approved on case-by-case basis
 - Water quality sampling
 - Predictive models/Machine Learning
 - Interpolation
 - Interviews (Not to be used alone)
 - Other/Emerging methods
 - NTNC – Inventory all piping from source to building

Lead Service Line Inventory: Records Review

- The LCRR inventory requirement directs water systems to undergo a record review of information pertaining to service lines
- The water system may use other sources of information not listed below if approved by the State.
 - 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.

Resources

- USEPA Guide: <https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule>
 - Recorded training on Guide is on the same page.
 - **DDW developing an updated Fact Sheet**
- LSLR Collaborative: <https://www.lslr-collaborative.org/>
- Association of State Drinking Water Administrators (ASDWA) hosting webinar series: Implementation Tools and Best Practices for Lead Inventories and Replacements:
<https://www.asdwa.org/2022/09/19/register-now-asdwa-webinar-series-on-implementation-tools-and-best-practices-for-lsli-and-lslr/>

How to Document LSL Inventory

- DDW template spreadsheet provided with instructions
 - Auto populates the summary section and entire service line material classification based on your inputs
 - Available at DDW Lead and Copper Rule page:
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/leadandcopper.html
- Systems allowed to use alternative inventory format, but will need to collect and save same critical information required
- Displaying Public Information
 - DDW will display all water system inventory summary data on webpage
 - **DDW will display all addresses or locational identifiers of LSL, GRR and goosenecks**
 - Important: DDW will not protect what is submitted

Inventory Template

- DDW will collect the inventory template spreadsheet
 - If a system wishes to use an alternative format for detailed inventory, DDW will only collect the summary information
 - Recommended to use fillable forms in Tab #1, #2, #4, and #5
- Template contains five tabs:
 - Tab #1 – PWS Information
 - Tab #2 – Inventory Methods
 - Tab #3 – Detailed Inventory (Can use an alternative)
 - Tab #4 – Inventory Summary
 - Tab #5 – Public Accessibility Documentation

DDW Data Collection

- DDW will collect specific address or locational identifier for all
 - LSL, GRR and goosenecks
 - Unknowns (will **not** be publicly displayed)
 - **NOTE: Unknowns are treated as Lead in most of the LCRR. Tracking for the water system includes annual notices, disturbance notices (construction or dewatering), pitcher filters, and flushing instructions. Replacement plans are required for all Lead Service Lines (LSLs), GRR and unknowns October 16, 2024 .**
- DDW will be auditing some water system inventories
 - During Sanitary Surveys
 - During special auditing events done by new LCRR Unit

Public Accessibility Requirements

- Water system must make the inventory available to the public.
 - 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 using a written statement in lieu of the inventory.
- Instructions to access the service line inventory (including inventories consisting only of a written statement) must be included in Consumer Confidence Report

LCRR Sampling and Education at Schools & Child Care Facilities

Community Water Systems will

- Develop a list of customers or service connections that provide water to schools or licensed childcare providers and verify this list every five years
 - **October 16, 2024, need inventory of facilities**
- CDSS has developed regulations to require childcare providers to sample every tap for lead every five years. Water systems do not need to conduct the sampling. DDW will provide a waiver of sampling following EPA final review.
- School sampling will be required based on LCRR after October 16, 2024.
 - No U.S. EPA commitment yet to accept sampling prior to October 2024

Available Funding

- U.S.EPA will provide funding to states to help pay for utility service line inventory development and replacement of lead service lines. U.S. EPA funding will go to the State Water Board. The State Water Board, Division of Financial Assistance (DFA) administers the implementation of the State Water Board's financial assistance programs, including loan and grant funding.
- BIL money Intended Use Plans (IUPs) have been approved by the Board.
- Drinking Water State Revolving Fund
- Questions, email: DrinkingWaterSRF@waterboards.ca.gov
- For more information:
https://www.waterboards.ca.gov/water_issues/programs/grants_loans/

Thank you for your attention.

Questions?