



Frequently Asked Questions

Staff-Led Workshop – June 11, 2026 Proposed Lead and Copper Rule Improvements Regulation Adoption and Assembly Bill 1096 Policy Handbook

**DISCLAIMER: This document is intended to provide answers to questions that arose during the June 11, 2026, staff-led workshop. This document is non-regulatory and nothing in this document supersedes any statutory or regulatory requirements or permit provisions for public water systems. The Division of Drinking Water has not yet received guidance materials from U.S. EPA, so some answers may be subject to change in the future.*

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Overview

State Water Board staff held a virtual staff-led workshop on June 11, 2026, to inform and obtain public input regarding the proposed adoption of the Lead and Copper Rule Improvements (LCRI) regulation and the development of a policy handbook implementing Assembly Bill 1096. This document is intended to provide answers to frequently asked questions during the staff-led workshop. Similar questions have been consolidated for clarity. If your question is not addressed, please email the Lead and Copper Rule Unit at DDW-LCR@waterboards.ca.gov.

Questions received during the staff-led workshop addressed a range of topics, including schools and child care facilities, lead service line inventory and baseline inventory, tap sampling, corrosion control treatment, funding, and other related topics.

Resources

June 11, 2026, Staff-Led Workshop

- Presentation Slides ([English](#) | [Spanish](#))
- Video Recording ([English](#) | [Spanish](#))

U.S. Environmental Protection Agency (U.S. EPA) Resources

- [U.S. EPA LCRI Supporting Materials](#)

Division of Drinking Water (DDW) Lead and Copper Rule Unit Resources

- Email: DDW-LCR@waterboards.ca.gov
- [DDW Lead and Copper Rule Website](#)
- [Assembly Bill 1096 Policy Handbook Webpage](#)
- [California LCRI Regulation Webpage](#)

Federal LCRI Regulation

- [Federal LCRI Regulation](#)

Proposed California LCRI Regulation

- [Proposed California LCRI Regulation Text](#)
- [Proposed California LCRI Summary of Changes](#)

California Legislation

- [Assembly Bill 2370 \(AB 2370\)](#)
 - Requires lead testing at child care centers in buildings constructed before January 1, 2010.
- [Assembly Bill 1096 \(AB 1096\)](#)
 - Strengthens public transparency of lead sampling efforts in schools and child care facilities conducted under the LCRI.

Funding Programs

- [California State Water Board Lead Service Line Replacement Funding Program](#)
 - Funding is available to community water systems and non-profit non-community systems to complete lead service line inventory and replacement.
- [Lead in Drinking Water Testing Assistance Program for Child Care Centers \(CCCs\)](#)
 - Funding is available for child care centers for lead testing and remediation.

- [Lead in Water Testing and Remediation Program](#)
 - Funding is provided for the testing and remediation of lead in water outlets used for drinking and preparing food within public K-12 schools.

Lead Tap Sampling

- [Childcare Center Lead Sampling Program](#)
- Search for an Inspector/Assessor or Sampling Technician in your area on the [Index of Lead-Certified Professionals website](#)

Data

- [Statewide Service Line Inventory Data](#)
- [California Water Systems and Child Care Centers Lead Testing Map](#)

California Department of Social Services Provider Information Notices (PIN)

- Statewide Lead Testing Data Map and Reminder of Funding Opportunities: [PIN 26-05-CCP](#)
- Written Directives for Lead Testing of Water in Licensed Child Care Centers Pursuant to AB 2370 Chapter 676, Statutes of 2018: [PIN 21-21.1-CCP](#)

Schools and Child Care Facilities

1. Will the LCRI and AB 1096 requirements apply to licensed family child care homes (in-home daycare providers), or only to child care centers and schools?

Family child care homes are expected to be included in federal LCRI requirements. Additional U.S. EPA guidance clarifying which California-licensed facility types are included is anticipated in mid- to late-2026.

2. What is the difference between AB 2370 and AB 1096?

AB 2370 requires licensed child care centers located in buildings constructed before January 1, 2010, to test drinking water for lead on or before January 1, 2020, but no later than January 1, 2023, and every five years after the date of the initial test. AB 2370 also requires the State Water Board to make all test results available to the public via the State Water Board website and requires follow-up actions if a sample exceeds 5 parts per billion.

AB 1096 strengthens public transparency of lead sampling efforts in schools and child care facilities conducted under the LCRI by requiring lead testing information collected by community water systems to be made publicly available on the State Water Board's website.

3. What will be required of child care facilities, and when will compliance be required?

If your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols.

The State Water Board is exploring options for issuing waivers for sampling under the LCRI for child care centers sampled under AB 2370 to avoid duplicate efforts and reporting.

The LCRI compliance date is November 1, 2027. Child care facilities not sampling under AB 2370 should expect to work with their community water system to confirm water provider and service information, and they have the option to accept or decline lead sampling from the water system. However, the State Water Board strongly recommends that child care providers accept sampling for lead in the interest of public health, regardless of whether they are required to do so. Please refer to slide 20 of the [June 11 Staff-led Workshop Presentation](#) for more information.

4. Where can we look to see if my daycare was sampled?

You can find child care center lead sampling data using the [California Water Systems and Child Care Centers Lead Testing Map](#). First, identify the water system that serves the child care center. Then, select that water system in the map, choose the child care center from the list of associated facilities, and view its lead sampling results.

5. Could you clarify how the 20 percent of schools and child care facilities are selected? Also, if a school or child care center is not included in that group, is there a process to request that they be considered?

Each community water system will be responsible for determining when to offer testing to specific schools and child care facilities. We recommend that you contact your water provider directly if you have a preferred year for testing. Community water systems are only required to test child care facilities and elementary schools. Secondary schools are not included in the 20 percent minimum sampling frequency for schools and are only sampled upon request. If you are outside of the facilities mandated for testing, the water system is not required to test. We recommend reaching out to your water system to determine whether testing will be offered to your site.

6. What happens if water systems do not comply with testing at least 20 percent of schools and child care facilities per year?

Compliance is based on a combination of sampling, facilities declining sampling, and facilities not responding. Water systems need to document their outreach efforts and will remain in compliance as long as they demonstrate that sampling was completed, sampling was declined, or two outreach attempts did not result in a response from at least 20 percent of facilities in a year. If the water system cannot demonstrate that they completed the required sampling and/or outreach to at least 20 percent of facilities in a year, they will receive a monitoring violation.

7. What happens if a school or child care facility declines testing or does not respond to outreach attempts?

Schools and child care facilities are allowed to decline testing and may provide a reason for doing so. The decision to decline sampling and reason for doing so will be shared publicly as part of the requirements of Assembly Bill 1096. A community water system may count a refusal or non-response to sampling as part of the minimum 20 percent sampled per year.

- 8. How are water systems expected to identify all child care facilities in their system? Aren't child care facilities registered with the state? In which case couldn't the State Water Board Division of Drinking Water (DDW) provide each water system with a list of facilities in their service area that we would then be required to reach out to for sampling?**

The State Water Board Division of Drinking Water is developing a mapping tool for community water systems that identifies schools and child care facilities within the water system's service area. The results will be downloadable and will need to be confirmed by the water system. The addresses of family child care homes are confidential and cannot be directly displayed on a mapping tool. The Division of Drinking Water and California Department of Social Services are developing a process to provide the necessary information to community water systems while protecting confidentiality.

- 9. If a community water system does not have any lead, galvanized requiring replacement, or unknown service lines, do they still need to sample child care facilities?**

Yes. The LCRI requires sampling at schools and child care facilities even if the service line inventory has been determined to be non-lead. Sampling in schools and child care centers is intended to protect the most vulnerable populations from exposure to lead that may enter drinking water from premise plumbing and/or fixtures.

- 10. A child care center has already taken lead samples under AB 2370 and sampling will be due again soon. How will this change the lead testing requirements for child care centers that went into effect with AB 2370?**

AB 2370 requires sampling once every 5 years. More information about AB 2370 can be found on the [Childcare Center Lead Sampling Program website](#).

If your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols.

The LCRI requires water systems to sample schools and childcare facilities they serve for lead – once between November 1, 2027, and October 31, 2032, and upon request after October 31, 2032. A water system is not required to sample more than once every 5 years.

The State Water Board is exploring options for issuing waivers for sampling under the LCRI for child care centers sampled under AB 2370 to avoid duplicate efforts and reporting.

11. If our child care center has passed the water testing both times, are we required to change pipes?

Mandatory service line replacements under the LCRI are based on service line inventory data and are required for service lines in the water system that are identified as lead or galvanized requiring replacement. Results of tap sampling can trigger public notification and education requirements, but not mandatory service line replacement.

Please contact the California Department of Social Services for guidance on if your child care center needs to change in-home pipes associated with their requirements.

12. Does testing depend on the age of the building and if so, will having an extensive 5 filtering system with reverse osmosis process make any difference?

Community water systems are not required to test for lead in schools and child care facilities that were constructed or had full plumbing replacement on or after January 1, 2010, and are not served by a lead, galvanized requiring replacement, or unknown service line.

A school or child care center may decline sampling under the LCRI and AB 1096 allows schools or child care facilities to provide a reason for declining. For example, a school or facility may state that it uses an ANSI certified device to remove lead for all drinking water and food preparation purposes.

Even though the water is filtered, the State Water Board encourages all schools and child care facilities to participate in lead sampling in the interest of public health to verify the water is lead free.

13. How can child care centers, and their tech support, access test results taken by the public water system via LCRI and compare them to individual outlet results labeled/sampled via AB 2370 requirements?

The LCRI requires the water system to provide the sampling results to the child care facility no later than 30 days after it receives them. AB 1096 requires the State Water Board to make the results for samples taken at schools and child care centers under the LCRI requirements publicly available and searchable on the State Water Board website by July 2028.

However, if your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols.

Historic sample results and more information about AB 2370 can be found on the [Childcare Center Lead Sampling Program website](#).

14. AB 2370 had much more stringent sampling requirements for day care facilities. Are day care facilities required to sample again 5 years after the initial sample? Our staff performed sampling at some of the facilities in our service area and expect to request to sample again. Is there reconciliation between these two bills are sampling requirements?

AB 2370 requires sampling once every 5 years. More information about AB 2370 can be found on the [Childcare Center Lead Sampling Program website](#).

If your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols.

The State Water Board is exploring options for issuing waivers for sampling under the LCRI for child care centers sampled under AB 2370 to avoid duplicate efforts and reporting.

15. There are so many different agencies that provide testing. Which one is specifically designed to facilitate the process for child care facilities?

The answer depends on the type of facility.

If your child care facility is required to sample under AB 2370: You should continue sampling under that program following all frequency and sampling protocols. You can search for an Inspector/Assessor or Sampling Technician in your area on the [Index of Lead-Certified Professionals website](#).

If you are a school, or a child care facility not currently sampling under AB 2370: The LCRI differs from testing under AB 2370 in that public water systems are responsible for testing child care facilities. Water system representatives may conduct the sampling, or they may provide training for someone at the facility or elsewhere to obtain these samples. Your water system will be in contact with you, or you can reach out to them to determine a sampling schedule.

16. Are public water agencies required to conduct follow up sampling should a school lead sample result exceed the new action level of 10 parts per billion?

There is no requirement to resample if a result exceeds the action level, if the school is not also a public water system. However, additional sampling by the school may be a prudent action to help evaluate the extent of the problem and consider remediation alternatives.

17. What if we only have 1 testing station available? My school has 1 kitchen faucet and the bathroom sink faucets. For drinking water, we use bottled water.

The kitchen faucet will need to be sampled. We also highly recommend taking a sample from the bathroom faucet since water from this tap could be used for consumption.

18. How do we get a lead testing exemption if children do not consume water from the sink but from a filtered water station? There is no food preparation on the premises either.

There is no exemption for lead testing, however you may decline sampling with the reason that the facility “uses bottled water, a certified point-of-use device, or both, for all drinking water and food preparation purposes.”

Even though the water is filtered, the State Water Board encourages all schools and child care facilities to participate in lead sampling in the interest of public health to verify the water is lead free.

19. If the child care facility is on an elementary school campus, which sampling requirement will be followed?

If the child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols.

The U.S. EPA will be issuing guidance on specific areas of the LCRI later this year. As this guidance becomes available, the information will be included in Division of Drinking Water (DDW) training sessions. Please watch for announcements of these trainings, as well as office hours to ask specific questions about your facility on the [DDW Lead and Copper Rule webpage](#).

20. What are the requirements for local education agencies?

Requirements under the LCRI are directed at public water systems, not local education agencies. However, water providers will reach out to schools and child care facilities that they serve to meet both LCRI and AB 1096 requirements for tap sampling. These facilities should confirm service, accept or decline sampling when offered, and, if declining, provide a reason. These responses, as well as lead testing results, will be made publicly available by the State Water Board.

21. During the renovation of a child care facility, when is it most appropriate to have testing done: before construction, after construction or both?

The LCRI does not require a certain time period for testing based on renovations. As a matter of public health, if there is any chance that the pipes contain lead (e.g., pre-2010 infrastructure with pipes, solder, or fixtures containing lead), sampling both before and after construction is recommended. Also, during construction, lead products can be released with the disturbance of pipes. On a case-by-case basis, it may be appropriate to use pitcher filters to remove lead that may be released during construction or if there are elevated lead levels prior to construction.

22. If I run a family daycare but the house I live in is rented, how do I carry out the inspection?

Your water system will contact and work with you to schedule sampling and testing for lead between November 1, 2027, and October 31, 2032. The LCRI does not make a distinction between locations with child care provided by homeowners and those provided by home renters in the requirements for sampling and testing.

23. Will there be a cost for the lead tests at schools and child care facilities performed by the water systems?

Under the LCRI, public water systems are responsible for lead testing; however, the regulation does not state who is financially responsible for lead testing.

If your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols. More information about AB 2370 can be found on the [Childcare Center Lead Sampling Program website](#).

Lead Service Line Inventory and Baseline Inventory

24. How do we know if our pipe source was reported? Who is expected to do these reports—the schools/centers or a sampler?

Please contact your water provider. The service line that serves your building would be reported in the water provider's service line inventory, which they are required to report and make publicly available.

A summary of service lines reported by water systems is available on the [California Lead Service Line Inventory Dashboard](#).

25. Does the baseline inventory need to include service line materials for small entities such as universities, schools, hospitals, etc. with service lines downstream of master meters (3-inch or larger)? And, also, if the public water system already conducted 2-point field verification as part of the statistical analysis, will the public water system be eligible to submit a validation waiver?

Yes, the baseline inventory should include service line and connector materials for entities with service lines downstream of a master meter. Water systems should coordinate with administrators of entities that have service lines downstream of a master meter to identify those service line materials. Under the LCRI, service line means the portion of pipe that connects the water main to the building inlet or to the outlet if a building is not present.

Water systems may apply for a validation waiver by submitting documentation to the State showing that inventory validation was completed at least according to LCRI protocols before November 1, 2027. Verifications conducted for statistical analysis in the initial inventory may or may not be sufficient for a validation waiver because the criteria for establishing the inventory validation pool is different from the minimum verification pool required for statistical analysis.

26. Can you clarify the "connectors" required to be identified for purpose of reporting?

The inventory must report all connectors identified. The LCRI defines a connector as a short segment of piping not exceeding three feet that can be bent and is used for connections between service piping, typically connecting the service line to the main. The U.S. EPA will be issuing guidance on specific areas of the LCRI later this year. As this guidance becomes available, the information will be included in Division of Drinking Water (DDW) training sessions. Please watch for announcements of these trainings, as well as office hours to ask specific questions about your facility, on the [DDW Lead and Copper Rule webpage](#).

27. Our system used a "Non-Lead" statement to make our initial inventory publicly available since all of our service lines were determined to be non-lead. If our connectors are unknown when we submit the baseline inventory, will we still be able to use a "Non-Lead" statement?

No. If the baseline inventory contains unknown connectors, a non-lead statement cannot be used.

Starting November 1, 2027, only water systems with no lead, galvanized requiring replacement, or lead status unknown service lines, no known lead connectors, and no unknown connectors in their baseline inventory may utilize a written non-lead statement in lieu of making the entire baseline inventory publicly available. Additionally, water systems with only non-lead service lines and non-lead connectors or no connectors present in their baseline inventory are not required to submit updated baseline inventories to the State.

28. What would be a unique identifier for a duplex that is served from the same service line on public water system side, but 1) splits after the meter, or 2) splits right before the meter?

Unique locational identifiers for service lines at the same street address (e.g., a duplex, campus, mobile home/RV park, etc.) can be noted by including the number, name, or other descriptor for an individual unit, building, or space. Where a street address is not available, other unique locational identifiers such as block, GPS coordinates, intersection, or landmark, may be used.

29. Are public water systems going to be responsible for identifying customer plumbing materials?

Yes, community and non-transient non-community water systems must report customer-owned service line and connector materials (if present) in the baseline service line inventory. For lead and copper tap sampling, water systems must develop an updated tap sampling plan based on the new sample site tiering criteria under the LCRI, which includes service line, premise plumbing, and other plumbing materials for residential buildings or structures.

30. What happens if it's determined that lines that need to be replaced by the preschool are on a cement slab? How do we even inspect our lines when they are encased in cement?

If the service line is under cement, it may be possible to inspect it where it enters the building. There are also several ways to determine if lead is present without a physical inspection, such as through historical planning records, pipe dating, and targeted water sampling.

Contact your water provider to see if they have identified the service line material. Under the LCRI, the water provider is responsible for replacing lead-containing service lines (i.e., lead or galvanized requiring replacement), but the regulation does not state who is financially responsible for replacing the customer side of a service line.

31. Does the landlord have an obligation to fix, mend, or replace pipes?

The LCRI does not discuss obligations to fix, mend, or replace pipes that do not contain lead or are inside a customer's home or business. Tenant resources and legal aid organizations may provide clarity on specific landlord legal requirements.

32. If a system replaces its side of a service line, and this part of the line may have contained lead, is the water system required to inform customers of possible lead in the downstream portion of this line (e.g., that a remaining galvanized portion will also need to be replaced)?

The service line inventory requires identification of customer-owned service line materials. If the customer's service line is identified as lead or potentially containing lead (e.g., galvanized requiring replacement, or GRR), the water system is required to notify the customer of the service line material on an annual basis until the service line is replaced. The water provider is also required to make the service line inventory publicly available. As a new requirement under the LCRI, systems are required to conduct full service line replacements except under specific circumstances.

33. If all service lines were inspected in the field, and no lead or galvanized requiring replacement lines were found, does a validation pool need to be made?

A validation pool may be required if all service lines were inspected at only one point along the line and found to be non-lead. Where ownership of the service line is shared, one point of inspection must be on the system- or utility-owned portion and the other point must be on the customer- or privately-owned portion. If only one portion is included in the validation pool, water systems must inspect the unconfirmed portion of the service line to complete the validation.

The validation pool consists of all non-lead service lines in the inventory excluding those that are identified by: (1) installation date on or after the January 1, 1986, California lead ban compliance date; (2) visual inspection of the pipe exterior at a minimum of two points; or (3) previously replaced lead or galvanized requiring replacement service lines.

34. Do community water systems need to validate all service line and connector materials by November 2027 or develop a plan for validation of material only?

Community and non-transient non-community water systems do not need to validate all service line and connector materials or submit a plan for validation by November 1, 2027.

Starting November 1, 2027, inventory validation will be required under the LCRI, and water systems must complete validation by December 31, 2034, or other deadline established by the State. Validation only applies to certain non-lead service lines and does not include connectors. Water systems may apply for a validation waiver by submitting documentation to the State showing that inventory validation was completed at least according to LCRI protocols before November 1, 2027.

35. Are California water systems directly governed by the Lead and Copper Rule Revisions (LCRR) and LCRI and who enforces the regulations?

California water systems have been and continue to be governed by the retained elements of the LCRR through enforcement by the U.S. EPA. The U.S. EPA has and continues to administer enforcement actions to California water systems for related violations. In addition, California water systems will be directly governed by the LCRI through the State Water Board once primacy is obtained by the State Water Board ideally by November 1, 2027.

36. Why have so many California water utilities chosen not to conduct service line inventories?

Statewide inventory data, including the number of California water systems with submitted inventories, are available on the [DDW Statewide Service Line Inventory Data webpage](#) and can be tracked through the [California Lead Service Line Inventory Dashboard](#). As of January 2026, 3,792 out of 4,279 (~89%) water systems completed initial inventories consisting of approximately 10 million total reported service lines.

37. Can you clarify where the 2-point visual inspection validation can be conducted? From the inventory validation slide, it looks like one point can be validated from the utility owned service line.

Under the LCRI, two-point visual inspection for validation of service line materials must be conducted at a minimum of two points along the service line exterior. Visual inspection of the service line could be conducted by excavation (such as potholing), viewing the service line material in the meter pit or stop box, or viewing the service line entering the building.

If the water system has already conducted a one-point visual inspection, then one additional visual inspection at a different point along the line is required to complete validation of a service line. Where ownership of the service line is shared, one point of inspection must be on the system- or utility-owned portion and the other point must be on the customer- or privately-owned portion.

Tap Sampling

38. Regarding notification to customers of results from tap sampling within 3 business days, can letters be postmarked within 3 business days or does notification need to be delivered within that time frame?

Notification by mail must be postmarked within three business days of the water system learning of the results.

39. My water system is on a triennial lead and copper tap sample schedule (2026-2028 monitoring period). We will be conducting lead and copper tap sampling in 2028. When do we need to submit a new sampling plan?

The LCRI requires a new sampling plan to be submitted before the start of the first monitoring period after the compliance date of November 1, 2027.

In this scenario, the 2026-2028 triennial monitoring period began before the LCRI compliance date, so tap samples taken in 2028 for that monitoring period would follow current (pre-LCRI) sampling plans and tiers. The water system would need to submit a new sampling plan using the updated tiers by December 31, 2028, before beginning its next monitoring period in 2029 after the LCRI compliance date.

Please refer to slide number 73 of the [June 11 Staff-led Workshop Presentation](#) "Tap Sampling Plan" or contact us at DDW-LCR@waterboards.ca.gov if you have a question about when an updated sampling plan is due.

40. Since our utility's lead and copper inventory does not show any lead service lines, how are we selecting single family homes in Long Beach to test for lead and copper to comply with the LCRI?

The LCRI revises the tiering criteria based on which sampling sites have the greatest likelihood of capturing the highest lead levels at the tap. Water systems must identify locations in the site sample plan by selecting from sites in the highest tiers available. Tier 1 is the highest priority tier and Tier 5 is the lowest.

If you have specific questions, please email your [DDW field office](#) or Local Primacy Agency, or the LCR Unit at DDW-LCR@waterboards.ca.gov.

41. If a water provider has completed a lead service line survey, has found no lead lines or has replaced what they have found, and provides lead free water to the meter of these facilities, why are they required to sample inside these facilities? At that point, sources of lead inside the building are beyond the utility's ownership and control.

Some sources of lead may be outside the control of water systems, but systems can still influence water quality parameters, for example through pH levels, to decrease the corrosivity of the water delivered to the customer's plumbing materials for the protection of public health. Even if a system has no lead service lines, a lead action level exceedance may occur due to corrosion of premise plumbing. Tap sampling monitoring for lead action level exceedances informs systems of when corrosion control may be needed to reduce lead exposure through drinking water.

42. Curious if the new rule will require utilities on reduced monitoring to switch back to standard monitoring or even initial monitoring if new sample sites are chosen based on the new tier system.

40 Code of Federal Regulations section 141.86, subsection (c)(2) describes the scenarios under which standard monitoring must be conducted under the LCRI. These include scenarios in which water systems have lead or galvanized requiring replacement service lines in their inventory. Since the sampling tiers are related to service line materials, it may be possible that selecting new sample sites could trigger a return to standard monitoring.

43. Are the water sources also being tested and regulated?

Water sources used or treated for drinking water use are regulated by the U.S. EPA and California through other regulations under the Safe Drinking Water Act. In addition, source water sampling for lead and copper is required for some systems under certain circumstances according to the existing Lead and Copper Rule and similar requirements will continue under the Lead and Copper Rule Improvements. Typically, source water sampling for lead and copper is required after an Action Level Exceedance or as part of the process of installing and evaluating source water treatment for lead and copper.

44. I'm on a well and have a company come out for maintenance every year. Do I need to check for lead?

Based on the question, we are assuming that you are not a customer of a community water system and would not be required to sample. However, it is recommended that you have the water tested from fixtures where water is used for human consumption.

If the school or child care facility is a regulated non-transient-non-community water system, then tap sampling is required by the LCRI. If it is a licensed child care center, lead sampling is required under AB 2370.

45. I am interested in what is different from previous lead testing guidance. Please share the information in the most straightforward way possible. We want to be in compliance and it is sometimes difficult to determine what we should do.

Slide 36 of the [June 11 Staff-led Workshop Presentation](#) provides a broad overview of differences between the Lead and Copper Rule, Lead and Copper Rule Revisions, and LCRI, and slides 55 to 101 highlight key changes with the new regulation. Beginning in late 2026, the Lead and Copper Rule Unit will provide trainings on implementing the LCRI. Through these, we aim to make changes happening in 2027 clear for water systems and interested consumers. Please watch for announcements on the [DDW Lead and Copper Rule webpage](#).

46. Please go over the changes for sampling/testing requirements for laboratories.

Laboratories that conduct testing to meet LCRI requirements should refer to the Environmental Laboratory Accreditation Program (ELAP) for related laboratory-specific changes in sample receiving, testing, and reporting.

47. Will DDW's Lead and Copper Unit create Tap Sampling Plan templates for water systems to submit?

Over the next year, the Lead and Copper Rule Unit will develop various templates to support implementation of the LCRI. A Tap Sampling Plan template is under consideration.

Corrosion Control Treatment

48. What is the definition of Corrosion Control Treatment (CCT) for a large system?

The LCRI defines a "System without corrosion control treatment," but does not provide a definition of a system with corrosion control treatment directly. Therefore, a system with corrosion control treatment is implied as those that do not meet the following definition:

40 Code of Federal Regulations section 141.2: "System without corrosion control treatment" - for the purpose of subpart I of this part, means a water system that does not have or purchases all of its water from a system that does not have:

- (1) An optimal corrosion control treatment approved by the State; or*
- (2) Any pH adjustment, alkalinity adjustment, and/or corrosion inhibitor addition resulting from other water quality adjustments as part of its treatment train infrastructure."*

49. What is the optimum range for water quality parameters?

Optimal Water Quality Parameters are determined on a case-by-case basis. There is no universal optimum range for water quality parameters. For the current Lead and Copper Rule regulation, the U.S. EPA has published guidance related to water quality parameters that can be found in ["Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems."](#) DDW anticipates new guidance that reflects updates from the LCRI to be published by the U.S. EPA in the future.

50. How does DDW determine whether an upcoming addition of a new source or long-term change in treatment is significant for lead and copper compliance purposes and, if so, what potential actions may be required? (40 C.F.R. § 141.86(d)(4)(iii)(G) & 40 C.F.R. § 141.90(a)(4).)

The LCRI does not provide details on how to review and evaluate: i) whether an upcoming addition of a new source or long-term change in treatment is considered significant or not, and ii) the actions that may be required of the system in response. DDW is developing a general process for doing so, but due to the complex nature of drinking water treatment and distribution, each evaluation will always need to be tailored to the specific scenario in question with determinations made on a case-by-case basis. Generally, it will involve an overall review of the system, including lead and copper compliance data, existing corrosion control treatment, Water Quality Parameter compliance data, overall water quality, service line material, configuration of the distribution system, nature of the proposed change, overall impact of the proposed

change, additional changes that may be implemented in the near future, and many other factors. Systems are encouraged to consult with DDW to discuss specific scenarios at any time.

51. If a system has DDW-approved WQP/OWQP ranges for orthophosphate in the distribution system, but distribution system orthophosphate residuals are sometimes below the approved range or reported as non-detect, how would DDW evaluate that situation if the system has consistently met the lead and copper action levels and has no lead detections? Would DDW generally expect the system to increase or adjust orthophosphate treatment to maintain the approved range, or could the system use lead/copper results and other supporting water quality data to request a revised WQP/OWQP range?

When a system has designated Optimal Water Quality Parameters, 40 Code of Federal Regulations section 141.82, subsection (g) describes the requirement to comply with the designated Optimal Water Quality Parameters, and this requirement exists regardless of the lead and copper tap sampling results. The system has no more than 9 days of daily value excursions according to section 141.87.

The LCRI gives States some discretion to re-evaluate optimal corrosion control treatment and designated Optimal Water Quality Parameters in order to ensure that optimal corrosion control treatment is maintained. Any determinations would be made on a case-by-case basis for a specific water system.

52. The new list for WQPs will be in effect in 2027. Until that time, should we collect the old list?

Existing WQP monitoring will remain in place as defined by permit and operations plans until DDW approved changes (e.g., permit amendment, operations plan update). There are some scenarios that allow the State to require systems monitor additional parameters if it deems this necessary to ensure optimal corrosion control treatment.

53. The 90th percentile greater than the lead DLR was noted in a previous slide. Can you clarify the triggered monitoring requirements if the copper P90 >0.65 mg/L? Does it apply to all systems or is it dependent on type, size, or existing CCT?

The LCRI provides a pathway for any size system to switch from standard monitoring to triennial monitoring if they achieve two consecutive 6-month monitoring periods with lead 90th percentile levels that do not exceed 0.005 mg/L and copper 90th percentile levels that do not exceed 0.65 mg/L and additional criteria found in 40 Code of Federal Regulations section 141.86, subsection (d)(2)(iii).

Funding

54. Is there still a grant for lead testing for preschools?

Funding is currently available for child care centers for lead testing and remediation, however funding is limited. For more information, please refer to the [Lead in Drinking Water Testing Assistance Program for Child Care Centers \(CCCs\)](#) and California Department of Social Services' [PIN 26-05-CCP](#) regarding the statewide lead testing data map and reminder of funding opportunities.

55. Will there be financial reimbursements for schools and/or child care providers who need to correct issues found?

The California Department of Social Services has received limited U.S. EPA grant funds to provide financial assistance for lead testing and remediation in child care centers. For more information, please refer to the [Lead in Drinking Water Testing Assistance Program for Child Care Centers \(CCCs\)](#) and California Department of Social Services' [PIN 26-05-CCP](#) regarding the statewide lead testing data map and reminder of funding opportunities.

56. If a child care facility accepts water sampling, who pays for that service?

If your child care facility is currently sampling under the requirements of AB 2370, you should continue sampling under that program following all frequency and sampling protocols, as some sampling funding may be available.

For child care facilities that are not sampled under AB 2370, the community water system that serves the child care facility is responsible for sampling and testing under the LCRI. However, the LCRI does not state who is financially responsible for lead tap sampling.

57. We just had lead testing done last week. Since that was completed for free, will we need to pay for the copper test, or will there be a free program available for it as well?

Only lead testing is required for schools and child care facilities under the LCRI and AB 2370. Copper is not required to be sampled at schools and child care facilities, unless it is also a public water system.

58. Is there access to funding to change lead pipes over to either PVC or copper?

The California Department of Social Services has received U.S. EPA grant funds to provide financial assistance for lead testing and remediation in child care centers. For more information, please refer to the [Lead in Drinking Water Testing Assistance Program for Child Care Centers \(CCCs\)](#) and California Department of Social Services'

[PIN 26-05-CCP](#) regarding the statewide lead testing data map and reminder of funding opportunities.

Funding is also available to community water systems and non-transient non-community water systems to complete lead service line replacement. For more information, please refer to the [Lead Service Line Replacement Funding Program webpage](#).

Additional Topics

59. Thank you for the renumbered names/sections in the proposed California LCRI regulation text! Clarity is very much appreciated.

Thank you for your comment. We appreciate the feedback.

60. Is this a new law? Has it been implemented? Is there any help for repairing water lines?

The LCRI is new regulation and the most recent update to the 1991 Lead and Copper Rule. The LCRI became effective on December 20, 2024, with a compliance date of November 1, 2027. For compliance dates relating to specific requirements within the LCRI, please refer to slide 101 of the [June 11 Staff-led Workshop Presentation](#).

The State Water Boards has funding available to replace service lines classified as lead or galvanized requiring replacement for community water systems and non-transient non-community water systems that are schools. For more information, please refer to the [Lead Service Line Replacement Funding Program webpage](#).

61. What type of infrastructure changes are being proposed to make these changes in family childcare and childcare center programs? If changes are required, will the state provide grants?

No infrastructure changes are required per the LCRI. If there are elevated lead levels, please contact the California Department of Social Services as soon as possible for additional guidance.

The California Department of Social Services has received U.S. EPA grant funds to provide financial assistance for lead testing and remediation in child care centers. For more information, please refer to the [Lead in Drinking Water Testing Assistance Program for Child Care Centers \(CCCs\)](#) and California Department of Social Services' [PIN 26-05-CCP](#) regarding the statewide lead testing data map and reminder of funding opportunities.

62. How would adopted LCRI regulations affect small Special District's initiatives moving forward?

LCRI compliance dates will need to be included in overall planning for districts and systems. If your district has specific initiatives that you would like to discuss in the context of LCRI compliance, please reach out to us directly at DDW-LCR@waterboards.ca.gov.

63. How much is this legislation and regulation going to cost business owners and building owners as these issues are coming from water producers, faucet producers, and city water systems. This makes it more difficult to lease buildings.

The U.S. EPA has conducted a cost analysis for the LCRI. Currently, the State Water Board is not adding any additional state requirements. Key resources include:

- Summary: [EPA's Final Lead and Copper Rule Improvements Technical Fact Sheet: Summary of Benefits and Costs](#)
- Full analysis: [Economic Analysis for the Final Lead and Copper Improvements](#)
- Appendices to full analysis: [Economic Analysis Appendices for the Final Lead and Copper Rule Improvements](#)

64. What is the best bottled water recommendation?

The LCRI was created to improve efforts to reduce lead and copper levels at consumer taps. It does not address use of bottled water. Additionally, the State Water Board does not regulate bottled water; it is regulated by the California Department of Public Health's Food and Drug Branch.

65. I would like to understand what kind of requirements there are for water.

In addition to the requirements under the LCRI, public water systems must meet many sampling and operational regulations. Please refer to our presentation materials for a full understanding of LCRI requirements. If you have further general questions, you can reach the Lead and Copper Rule Unit at DDW-LCR@waterboards.ca.gov and we will connect you to additional resources specific to your request.

66. I would like to get the updated regulations and policies regarding water purification.

The State Water Board provides updates and information on future regulations and policy updates. Subscribe to the [California Water Boards Email Subscription Signup](#) to receive email notifications about upcoming events, regulatory updates, and announcements.