

# Proposed Lead and Copper Rule Improvements & Assembly Bill 1096 Policy Handbook

Public Workshop

June 11, 2026, 9:00 AM – 12:00 PM

**9 AM** – Introduction & Information for Schools and Child Care Professionals

**9:50 AM** – Information for Water System Professionals

**11:30 AM** – Public Comment Session

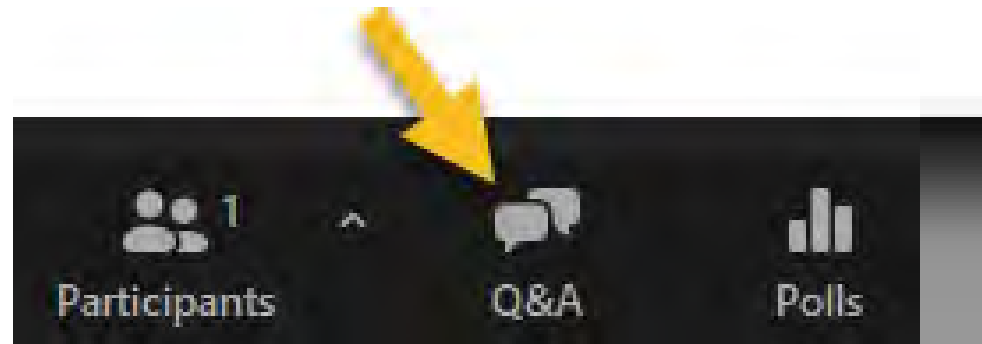
## We will begin soon

For English, click the "Interpretation" icon on the Zoom control panel and select "English"

Para Español, clic en el ícono de interpretación en su pantalla de Zoom, y luego clic en "Español"

# Welcome

- We will begin with providing language access directions
- You can watch live in English or Spanish through the CalEPA webcast: [video.calepa.ca.gov](https://video.calepa.ca.gov)
- Questions/comments submitted via Zoom's Q&A will be answered after the presentation and emailed to all attendees in English and Spanish

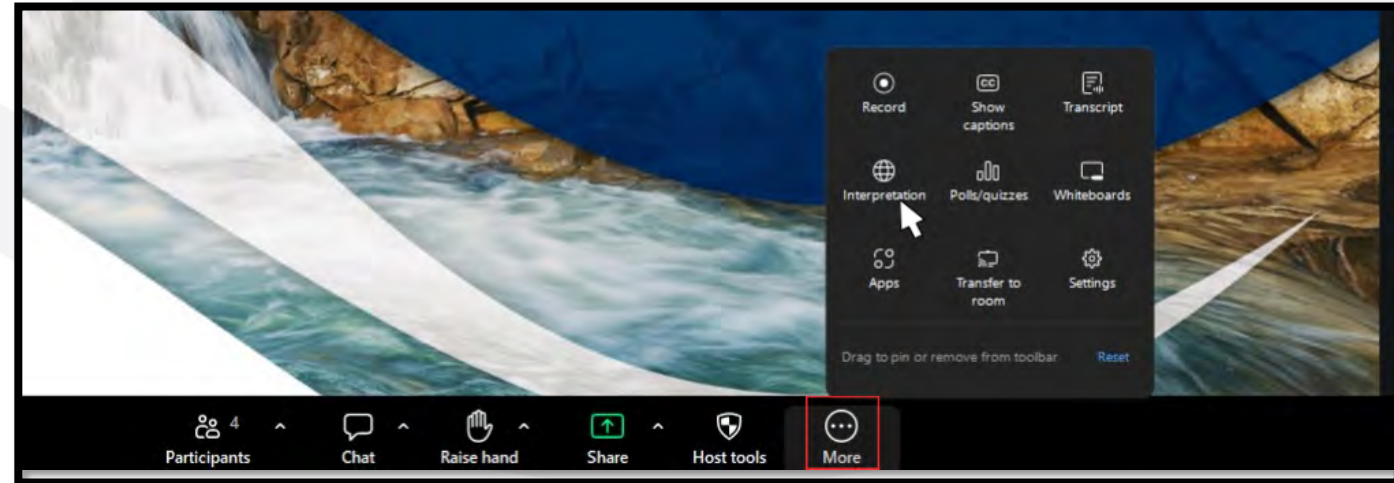


# Language Interpretation through Zoom

Locate the **options bar** at the bottom of your screen.

Click the **three dots** and select the **Interpretation** icon in your meeting controls

- Navigate to Language Channels
- **Everyone must select a language: English or Spanish**
- If listening in Spanish, click **Mute Original Audio**

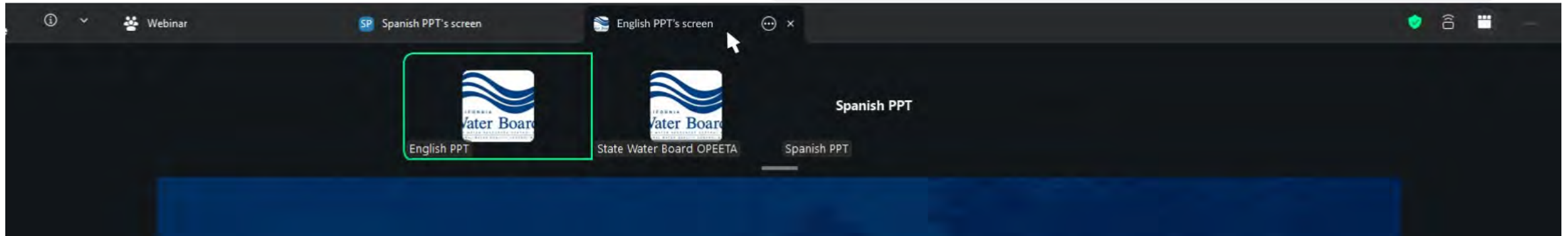


For technical assistance, email: [DDW-LCR@waterboards.ca.gov](mailto:DDW-LCR@waterboards.ca.gov)

# View Presentation Options

Click on one of the **Tab Options** at the top of your screen:

- Choose "**Spanish PPT's screen**" OR "**English PPT's screen**"



For technical assistance, email: [DDW-LCR@waterboards.ca.gov](mailto:DDW-LCR@waterboards.ca.gov)

# Proposed Lead and Copper Rule Improvement (LCRI) Regulation Adoption and AB 1096 Policy Handbook

Division of Drinking Water  
Staff-led Workshop



Lead and Copper Rule Unit, June 11, 2026

# Agenda

- 9:00 AM 1. Using Zoom & Translation Services
- 9:10 AM 2. Introduction
- 9:15 AM 3. Information for Schools & Child Care Professionals
- 9:50 AM 4. Information for Water System Professionals
  - Lead and Copper Rule Improvements (LCRI) Adoption
  - New LCRI Requirements
  - Assembly Bill 1096 Policy Handbook Outline
- 11:20 AM 5. Break
- 11:30 AM 6. Public Comment Session

# Housekeeping

- Watch live through CalEPA webcast: [video.calepa.ca.gov](https://video.calepa.ca.gov)
- Recording and slides will be made available on the CA LCRI webpage at [bit.ly/42ZRven](https://bit.ly/42ZRven)
- Questions/comments submitted via Zoom's Q&A will be answered after the presentation and emailed to all attendees
- Public comment session will occur after the presentations
- Written comments in PDF format to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)
  - Include "Control of Lead and Copper Regulation and AB 1096 Policy Handbook" in the subject line
  - Please submit by **June 22, 2026**



## Water Boards' Mission

*Preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses, and to ensure proper water resource allocation and efficient use, for the benefit of present and future generations.*

# Information for Schools and Child Care Professionals

**Matt Vedrin, PhD**

Water Resource Control Engineer

**Division of Drinking Water (DDW)**

Lead and Copper Rule Unit



June 11, 2026

# Sources of Lead

- Environment: air, soil, water
- Paint, ceramics, gasoline, batteries, ammunition, cosmetics
- Pipes & plumbing materials (including solders)



# Lead and Copper in Drinking Water

- Enters water through corrosion of pipes and plumbing
- Lead
  - No safe level of exposure in drinking water
  - Negative and irreversible health effects
- Copper
  - High levels can cause harmful health effects



# Summary of CA Initial Inventory

## Data as of January 2026

- 3,792 out of 4,279 water systems completed initial inventories
- ~ 10 million total service lines reported
  - **Zero lead service lines**
  - ~ 12 thousand galvanized requiring replacement service lines
  - ~ 590 thousand unknown service lines
- Access the CA Initial Inventory Data Webpage at [bit.ly/3QoSdz1](https://bit.ly/3QoSdz1)

The screenshot shows the State Water Resources Control Board website. The main heading is "LEAD AND COPPER RULE FOR DRINKING WATER". Below this, there is a navigation menu with options like "Home", "Drinking Water", "Certificates and Licenses", and "Lead and Copper Rule (LCR)". The main content area is titled "Statewide Service Line Inventory Data" and includes an "Overview" section. The overview text states: "The federal Lead and Copper Rule Revisions (LCRR) required all community and non-transient non-community water systems to develop and submit an initial inventory of all water service lines to their State by October 16, 2024. The State Water Resources Control Board, through the Division of Drinking Water (DDW), collects the lead service line inventory data submitted by California public water systems. The objective of collecting this information was to begin identifying and locating existing lead-containing service lines in the State of California for future replacement, a requirement under the Lead and Copper Rule Improvements (LCRI). Visit Lead and Copper Rule - Regulatory Background for more information on the history of the lead and copper rule, revisions, and improvements. Of the nearly 10 million service lines in the inventories collected across the state, no lead lines have been reported. Approximately 12,000 lines classified as galvanized requiring replacement (GRR), will be replaced over the decade following the LCRI compliance date of November 1, 2027. While some service lines still need to be classified and lead in internal building plumbing continues to present a challenge, the number of lead and GRR service lines is low in California relative to that of many other states in the US. The initial inventory is required to include all service lines connected to the public water distribution system, regardless of whether they are located in a building or in the ground." To the right of the overview is a "CA LSLI Dashboard" featuring a map of California and a "California Service Line Inventory Summary" table. Below the dashboard are "Quick Links" for "Lead and Copper Home Regulatory Framework" and "CALCRI Regulations".

# History of Lead Sampling in CA Schools

- **Domestic Water Supply Permit Amendments (2017)**
  - Required community water systems to create a K-12 school inventory and conduct lead testing to all K-12 schools, upon request
- **Assembly Bill 746 (2017)**
  - Required community water systems to test lead levels in drinking water at all public K-12 schools constructed before January 1, 2010
  - **One-time testing mandate completed by July 1, 2019**

# History of Lead Sampling in CA Child Care Facilities

- **Assembly Bill 2370 (2018)**

- Requires licensed child day care centers\* located in a building that was constructed before January 1, 2010, to test drinking water for lead:
  - On or after January 1, 2020, but no later than January 1, 2023
  - Every five years after the date of the initial test
- Requires the State Water Board to make all test results available to the public via the State Water Board website
- Requires follow-up actions if a sample exceeds 5 parts per billion, equivalent to 0.005 mg/L

\*As defined in [HSC 1596.76](#) - “Day care center” means a child day care facility **other than a family day care home**, and includes infant centers, preschools, extended day care facilities, and school age child care centers, and includes child care centers licensed pursuant to Section 1596.951

# Lead and Copper Rule Improvements (LCRI)

- New federal lead and copper regulation that builds on the existing Lead and Copper Rule
- Published by U.S. Environmental Protection Agency on October 30, 2024, with an effective date of December 30, 2024, and compliance begins November 1, 2027
- Strengthens requirements to protect children and adults from lead in drinking water
  - Public education
  - Identification of service line materials
  - Lead sampling for applicable schools and child care facilities

# Adopting the Lead and Copper Rule Improvements (LCRI)

- The State Water Board proposes to adopt the federal LCRI into the California Code of Regulations through the rulemaking process pursuant to California Health and Safety Code section 116365.03
- Cannot be more stringent or materially different than the federal regulation

# Lead and Copper Rule Improvements (LCRI) School and Child Care Facility Definitions

- **School** - Any building(s) associated with public, private, or charter institutions that primarily provides teaching and learning for **elementary** or **secondary** students
  - **Elementary school** - A school classified as elementary by State and local practice and composed of any span of grades (including pre-school) not above grade 8
  - **Secondary school** - A school comprising any span of grades beginning with the next grade following an elementary school (usually 7, 8, or 9) and ending with grade 12; Secondary schools include both junior and senior high schools and typically span grades 7 through 12
- **Child care facility** - A location that houses a provider of child care, day care, or early learning services to children, as licensed by the State, local, or Tribal licensing agency

# Types of Child Care Facilities

- California licenses multiple types of child care facilities
- The State Water Board is coordinating with U.S. Environmental Protection Agency (U.S. EPA) and CA Department of Social Services to understand which types of facilities are included in Lead and Copper Rule Improvements (LCRI) requirements
  - U.S. EPA is anticipating guidance to be released this summer.
- Family child care homes (also known as family day care homes) will likely be included in the federal LCRI requirements, but AB 2370 (2018) excluded them

# Lead Sampling at Schools and Child Care Facilities served by a Community Water System\*

## Included

### Schools and child care facilities:

- Constructed (or had full plumbing replacement) **before** January 1, 2010
- Served by a lead, galvanized requiring replacement, or unknown service line

## Not Included

### Schools and child care facilities:

- Constructed (or had full plumbing replacement) **after** January 1, 2010, and
- Served by a non-lead service line

\*If your facility is a non-transient-non-community (NTNC) water system, it is subject to the entirety of the LCRI, and lead and copper sampling is handled differently. You should also attend the water system professional's portion of this presentation.

# LCRI Requirements for Lead in Schools and Child Care Facilities

LCRI Requirement	Community Water System Responsibility	What Included Schools & Child Care Facilities Can Anticipate
<b>List of Schools and Child Care Facilities</b>	Develop a list of schools and child care facilities served by the water system by November 1, 2027	To be contacted by your water system to confirm water provider and service information by November 1, 2027
<b>Annual Public Education</b>	Provide schools and child care facilities with information about health risks from lead in drinking water	To receive lead health risk information from your water system annually, including steps to reduce exposure
<b>Notification about Sampling Program</b>	Notify schools and child care facilities that they are eligible to be sampled for lead by the water system and propose a schedule for sampling	<ul style="list-style-type: none"> <li>• To receive notification from your water system of opportunities for lead sampling</li> <li>• Accept or decline lead sampling</li> </ul>
<b>Lead Sampling</b>	Sample at least 20% of elementary schools and child care facilities served annually from November 1, 2027 – October 31, 2032, then on request	Elementary schools and child care facilities, to be sampled at least once between November 1, 2027 – October 31, 2032, unless sampling is declined

# Lead Sampling Requirements

	Schools	Child Care Facilities
Frequency	<ul style="list-style-type: none"> <li>The water system must sample at least <b>20% of elementary schools served annually</b> from November 1, 2027 – October 31, 2032, then on request</li> <li><b>Sampling for secondary schools is on request only</b></li> </ul>	<ul style="list-style-type: none"> <li>The water system must sample at least <b>20% of child care facilities served annually</b> from November 1, 2027 – October 31, 2032, then on request</li> </ul>
Number of Samples and Locations	<p><b>5 samples:</b></p> <ul style="list-style-type: none"> <li>2 at drinking water fountains</li> <li>1 at kitchen faucet for food/drink preparation</li> <li>1 at classroom faucet (or other drinking outlet)</li> <li>1 at nurse's office faucet, as available</li> </ul>	<p><b>2 samples:</b></p> <ul style="list-style-type: none"> <li>1 at drinking water fountain</li> <li>1 at kitchen faucet for food/drink preparation, or 1 at classroom faucet (or other drinking outlet)</li> </ul>
Protocol	First-draw 250 mL samples from a cold water tap after an 8 to 18 hours stagnation period	
Results	<ul style="list-style-type: none"> <li>The water system must send the lead testing results to the facility, local/state health departments, and the State no later than 30 days after receipt</li> <li>If elevated lead levels are detected, facilities may take corrective actions, such as replacing fixtures</li> </ul>	

# Mapping Tool

- Division of Drinking Water is creating a mapping tool for public water system overlaying schools and child care facilities
- Family child care home addresses are confidential
- Coordinating with CA Department of Social Services to ensure both privacy and public health requirements are met

The screenshot displays a web-based mapping application. On the left, a map shows the Sacramento area with a blue-shaded water service area and various colored markers representing facilities. On the right, a metadata table provides details for the selected 'CITY OF SACRAMENTO MAIN' water service area. Below the table, a 'Layers' panel is visible, showing two checked layers: 'Child Care Centers' (247 features) and 'K-12 Schools' (129 features). Both layer names and their respective counts are circled in red.

Property	Value
Boundary Type	Water Service Area
Verification Status	Verified
Verified By Name	J. Bird
Date Verified	6/11/2025, 12:00 AM
Water System Number	CA3410020
Water System Name	CITY OF SACRAMENTO MAIN
County	SACRAMENTO
Population	527979
Regulating Agency	DISTRICT 09 - SACRAMENTO
State Classification	COMMUNITY
Address Line 1	1395 35TH AVENUE
Address Line 2	
City	SACRAMENTO
State	CA
Zip Code	95822
Feature Count	146000

# California Assembly Bill 1096

- Passed in 2025
- Strengthens **public transparency** of lead sampling efforts in schools and child care facilities conducted under the LCRI
  - Tracks reasons schools and child care facilities decline lead sampling
  - Ensures information collected for these sampling efforts is made publicly available online
  - Raises consumer awareness on health risks and how to access information online in the water system's Consumer Confidence Report

# Assembly Bill 1096 Policy Handbook

- State Water Board is developing a policy handbook for implementation and is seeking early public input on:
  - Process for submitting school and child care information
  - Sampling waiver process
  - Adding additional reasons for declining lead testing

# Assembly Bill 1096 Requirements

- **Community water systems** must compile and submit the number and names of schools and child care facilities:
  - Served by the water system
  - Sampled in the previous year and the sampling results
  - Declined sampling and reason for declining
  - Did not respond to outreach attempts for sampling
- **State Water Board** must make this information publicly available on a website by June 30, 2028

# Reasons for Declining Lead Testing

## Drinking water and food preparation

- All outlets tested for lead within the last five years under an independent program
- All outlets installed after January 1, 2010 and connected to plumbing installed or replaced after January 1, 2010
- Uses bottled water, a certified point-of-use device, or both, for all drinking water and food preparation purposes

## Construction or modernization

- Constructed after January 1, 2010
- Modernized after January 1, 2010 and was fully replumbed
- Currently undergoing major modernization or construction

## Water quality testing

- Already maintains a routine water quality testing program
- Participating in another government-funded water quality program
- Opted to coordinate testing for lead in drinking water with a third-party vendor for operational reasons

## Logistical barriers

- Timing, access, or personal coordination prevent participation in offer to test

**The State Water Board may add additional reasons for declining lead testing to this list and is seeking input today!**

# Registrant Questions

Question	Answer
What is required of home day care providers?	<ul style="list-style-type: none"> <li>• Work with community water system to confirm service information</li> <li>• Accept or decline lead sampling from water system</li> </ul>
Is financial assistance available if lead is present and plumbing fixtures need to be replaced?	<ul style="list-style-type: none"> <li>• The CA Department of Social Services (CDSS) has received some federal U.S. EPA grant funds to assist child care facilities with replacing plumbing fixtures and is applying for additional funding.</li> </ul>
How are the lead testing requirements under Assembly Bill 2370 (AB 2370) different from the LCRI?	<ul style="list-style-type: none"> <li>• Under AB 2370, only child day care centers are required to be sampled, and child day care centers are responsible for sampling.</li> <li>• Under the LCRI, community water systems are responsible for sampling. The LCRI includes a broad definition of child care facility, and DDW is coordinating with U.S. Environmental Protection Agency and CDSS to determine which type of CA facilities are included.</li> </ul>
Who conducts the lead sampling at child care facilities under the LCRI?	<ul style="list-style-type: none"> <li>• Community water systems or appropriately trained individuals can collect samples in accordance with LCRI requirements.</li> </ul>

# Registrant Questions (Continued)

Question	Answer
<p>What type of infrastructure changes are being proposed in family child care and child care center programs?</p>	<ul style="list-style-type: none"> <li>• There are no infrastructure changes required. If elevated lead levels are found, then the school or child care facility may take corrective actions, such as replacing plumbing or fixtures. Point-of-use-devices (for example pitcher filters) can also be utilized to reduce lead. California certified devices for lead removal can be found on the State Water Board's website at: <a href="https://bit.ly/4umvl0U">bit.ly/4umvl0U</a></li> </ul>
<p>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 prep on the premises either.</p>	<ul style="list-style-type: none"> <li>• There is no exemption, 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.”</li> </ul>

# Registrant Questions (Continued)

Question	Answer
<p>During renovation of a facility, when is it most appropriate to have testing done, before construction, after construction or both?</p>	<ul style="list-style-type: none"> <li>• The rule does not require a certain time period 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), it is recommended to sample before and after construction. Also, during construction, lead products can be released in the disturbance of pipes. On a case-by-case basis, it may be appropriate to use pitcher filters that remove any lead during construction or if there are elevated lead levels from initial sampling.</li> </ul>
<p>I'm on well and have a company come out and do maintenance every year, do I need to check for lead?</p>	<ul style="list-style-type: none"> <li>• 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 under the LCRI requirements. However, it is recommended that you have the water tested from fixtures where water is used for human consumption.</li> <li>• If the school or child care facility is a regulated non-transient-non-community water system, then tap sampling is required by the LCRI.</li> </ul>

# Next Steps for Schools and Child Care Facilities

- **Submit public comments or questions**
  - Return to workshop today at 11:30 AM for Public Comment Session
  - Submit written comments by June 22, 2026
  - Additional reasons for declining sampling or other feedback on LCRI and AB 1096
- **Your water system will be reaching out to your facility to**
  - Confirm service information by November 1, 2027
  - Provide lead health risk outreach and education annually
  - Notify you of opportunities for lead sampling and confirm if you accept or decline and ask for a reason if you decline
  - Propose a sampling schedule, if applicable
- **What to expect for lead sampling**
  - If accepting – Be sampled at least once between November 1, 2027 and October 31, 2032
  - If declining – Opportunity to provide reason for declining
  - Results will be publicly available on the State Water Board website starting 2028.

# Additional LCRI Training and Guidance



- U.S. EPA LCRI implementation guidance document is expected this summer
- This workshop is to get input on the State Water Board's approach to adopting the federally mandated LCRI
- Additional technical trainings will occur late 2026 and throughout 2027

# Information for Water System Professionals

**Michelle dela Cruz**  
Environmental Scientist

**Wes Stieringer-Sisneros**  
Sr. Environmental Scientist, LCR Unit Lead

**Division of Drinking Water**  
Lead and Copper Rule (LCR) Unit



June 11, 2026

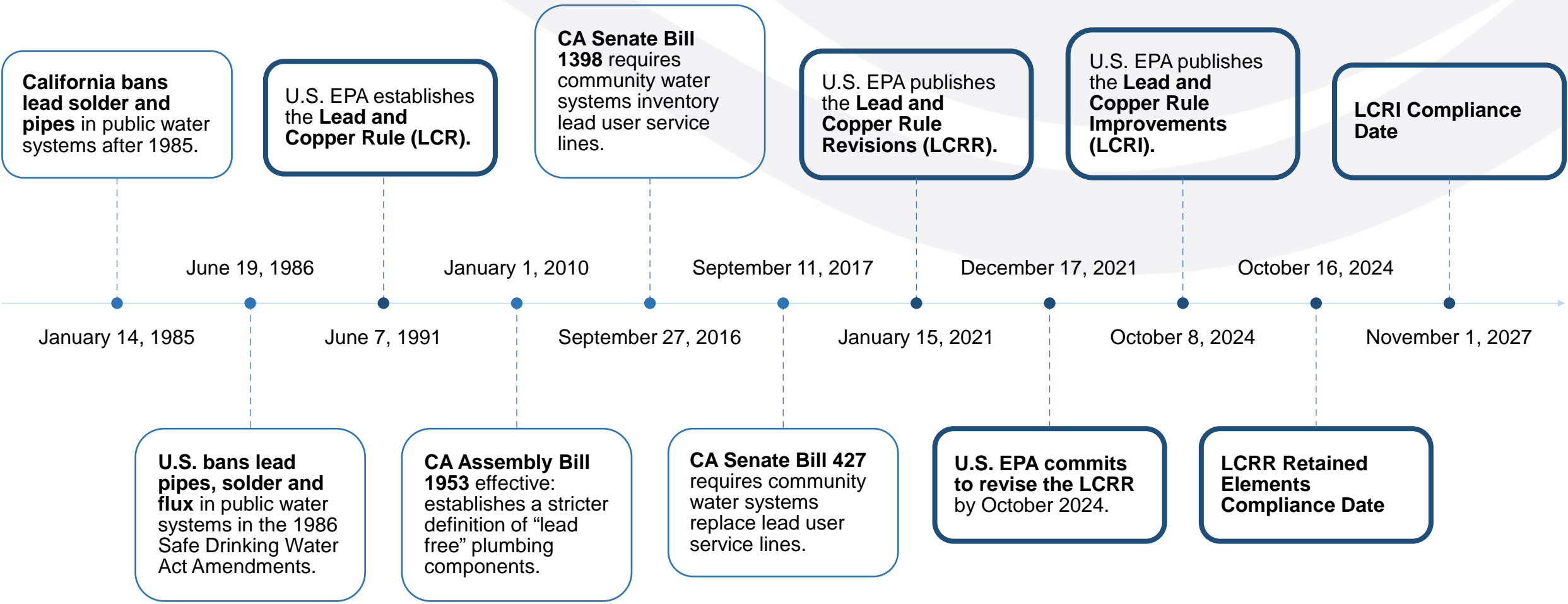
# Lead and Copper Rule Background

# Lead and Copper in Drinking Water

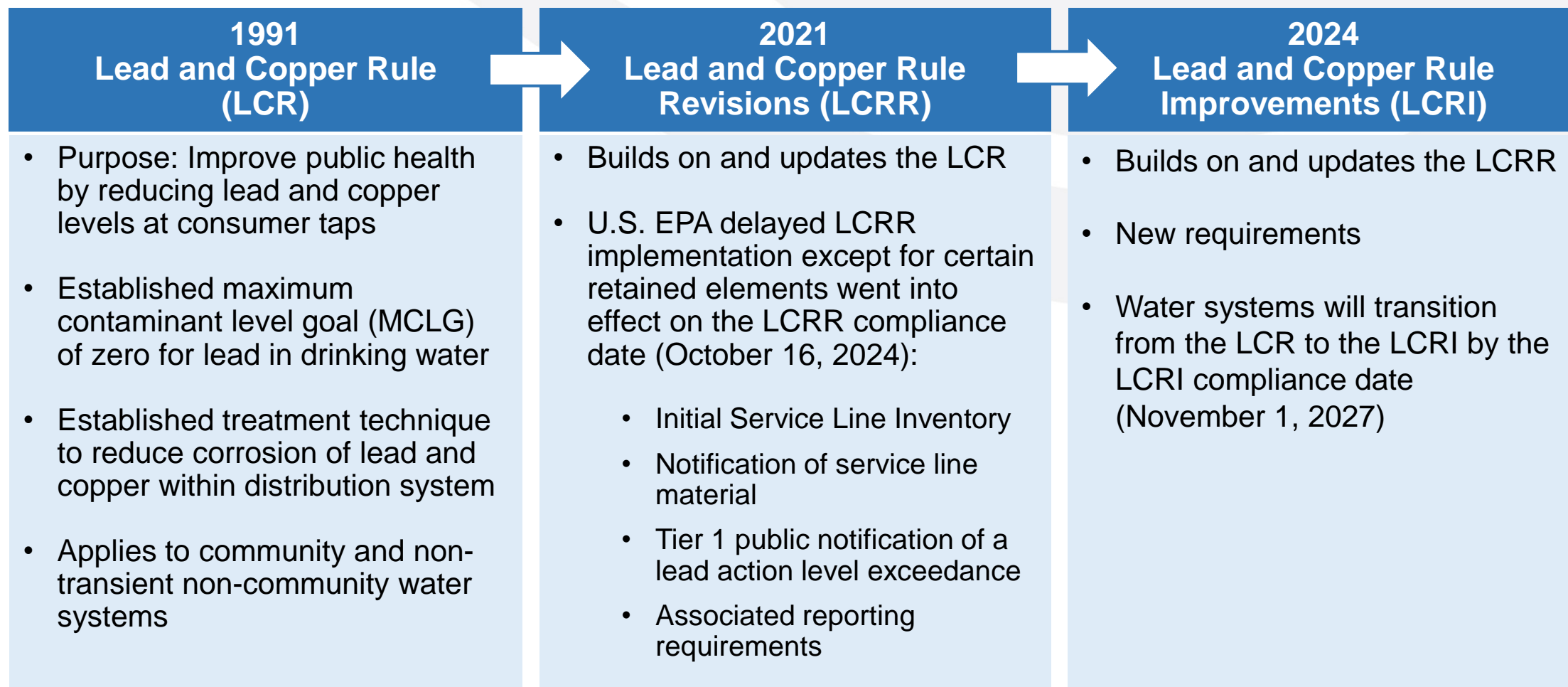
- Lead
  - No safe level of exposure in drinking water
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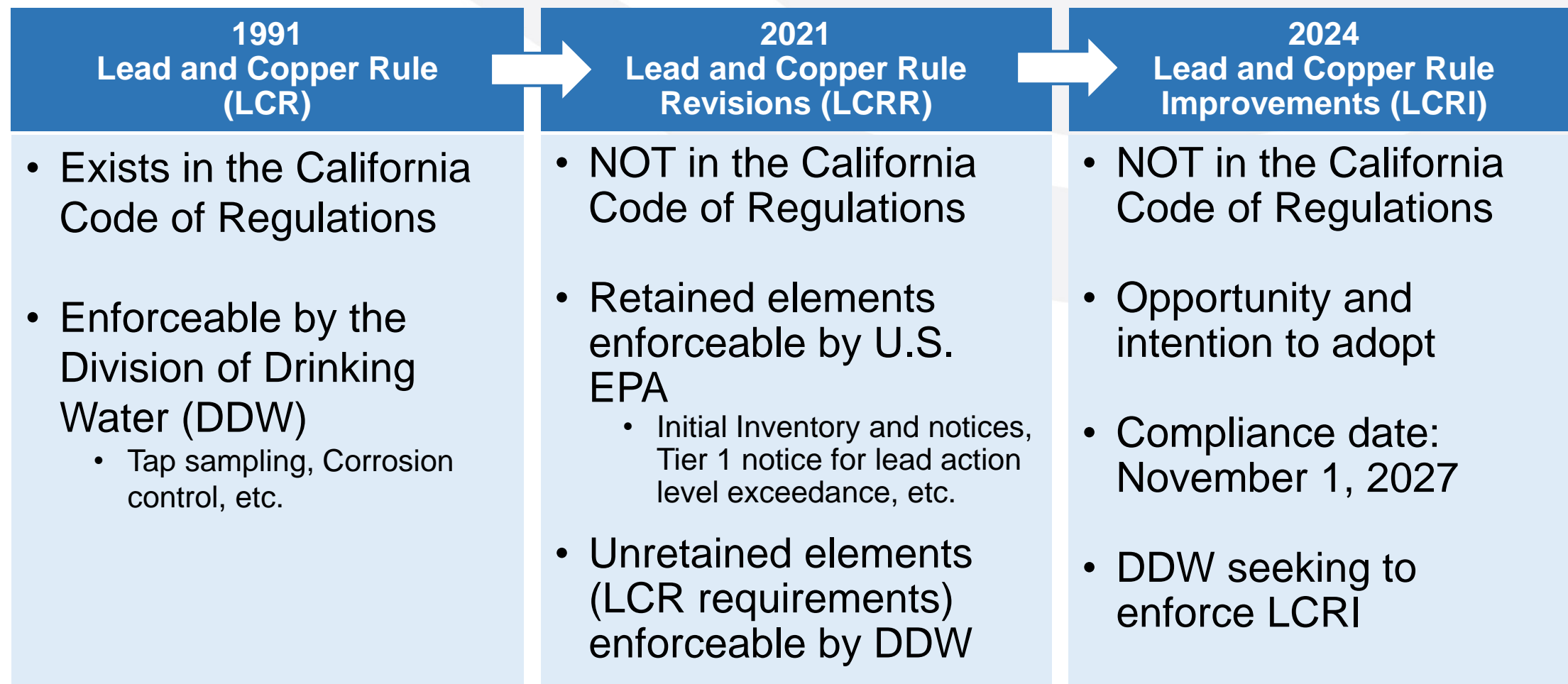
# Lead and Copper Rule Background



# Lead and Copper Rule Background



# Lead and Copper Rule Background



# **Adoption and Primacy of the Federal LCRI**

# State LCRI Primacy Requirements

- Primary Enforcement Responsibility (Primacy)
  - The authority granted by the U.S. EPA to states, tribes, or territories to implement and enforce the LCRI
- States must adopt regulations that are at least as stringent as the federal LCRI to obtain primacy
- Coordination with U.S. EPA to verify all adopted regulations fulfill all federal requirements

# California Health and Safety Code

## Section 116365.03

- Allows the requirements of a regulation officially enacted pursuant to the federal Safe Drinking Water Act to be adopted as an emergency regulation
- Cannot be more stringent or materially different than the federal regulation

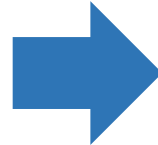
# Planned LCRI Adoption & Primacy Process



# State Primacy Timeline

## Until November 1, 2027

- California has primacy of the 1991 LCR
  - Chapter 17.5, titled “Lead and Copper,” of the CA Code of Regulations
- U.S. EPA has primacy of the 2021 LCRR retained elements



## Starting November 1, 2027

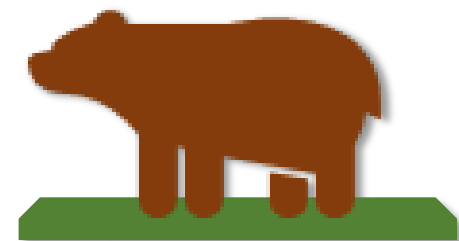
- California plans to take primacy of the LCRI
  - New adopted Chapter 17.6 “Control of Lead and Copper” goes into effect
- Division of Drinking Water replaces U.S. EPA as the enforcing agency

# Tentative Timeline

- **May 27, 2026 – June 22, 2026:** Public comment period
  - Proposed California LCRI regulation text: [bit.ly/4ve1nNA](https://bit.ly/4ve1nNA)
  - Federal LCRI regulation text: [bit.ly/4vSyhEy](https://bit.ly/4vSyhEy)
- **June 11, 2026:** Staff-led workshop
- **August 19, 2026:** Board meeting
- **Late 2026:** Staff submit the regulations to the Office of Administrative Law (OAL) for filing with the Secretary of State
- **November 1, 2027:** LCRI regulation effective date

# Future Rulemaking and Public Input

- Regular rulemaking process may occur in the future to incorporate California-specific enhancements
- Public comments received now will help inform any future rulemaking efforts



# **Adapting the Federal LCRI to the California Code of Regulations Without Material Changes**

# Preparing Proposed Regulation Text

## Current State Regulations

Various chapters in CA Code of Regulations, Title 22, Division 4

- Primarily Chapter 17.5. Lead and Copper
- Chapter 15. Domestic Water Quality and Monitoring Regulations
- Other chapters that reference Chapter 17.5

## Federal Regulations

Various subparts and sections in the National Primary Drinking Water Regulations

- Primarily Subpart I – Control of Lead and Copper
- Subpart O – Consumer Confidence Reports
- Subpart Q – Public Notification Rule
- Other subparts

# Preparing Proposed Regulation Text

- Address the current state requirements for lead and copper and the transition to new requirements
  - Amend or repeal existing regulations
- Incorporate new requirements without being more stringent or materially different from the federal regulation
  - Copy/paste federal regulation text
- Format to fit the CA Code of Regulations
  - Required nonsubstantive changes to federal regulation text

# Preparing Proposed Regulation Text

- **Nonsubstantive changes** - Changes or clarifications that do not materially alter requirements of the regulation
  - Renumbering, reordering, or relocating regulations to be consistent with Cal. Code Regs.
  - Changes to syntax, cross-references, grammar, and punctuation
  - Addressing provisions that do not apply in the context of the Cal. Code Regs.
  - Exercising state discretion where applicable
- The federal requirements are not being rewritten
  - Reorganized / restructured
  - Retain federal language
  - Majority of requirements added to new Chapter 17.6 Control of Lead and Copper

# Organization of Federal LCRI into CA Code of Regulations

- Code of Federal Regulations sections are relocated to different chapters in the California Code of Regulations

Code of Federal Regulations from Crosswalk		Topic	Corresponding Location in Cal. Code Regs. tit. 22, div. 4	
Subpart	Section		Section	Chapter
C	141.28	Certified Laboratories	64415	15
D	141.31	Public Notice Reporting Requirements	64469	
O	141.152 - 141.154	Consumer Confidence Reports	64465, 64481, 64482	
Q	141.201, 141.202	Public Notification	64463.1, 64463.4, 64463.7, 64465, 64469	
A	141.2	Definitions	New Sections in 64700s	New 17.6
F	141.51	Maximum Contaminant Level Goals		
I	141.80 - 141.93	Control of Lead and Copper		

# Nonsubstantive Changes to Federal LCRI

- Chapter 17.6 Control of Lead and Copper

CFR	Proposed California Code of Regulations, Chapter 17.6		
Section	Section	Section Title	Article
141.2	64700.xx	Definitions.	Article 1. Definitions and General Requirements
141.51	64701	Maximum Contaminant Level Goals.	
141.80	64710	General Requirements and Action Level.	
141.89	64711	Analytical Methods.	
141.84	64720	Service Line Inventory and Replacement Requirements.	Article 2. Service Line Requirements
141.86	64730	Monitoring for Lead and Copper in Tap Water.	Article 3. Monitoring Requirements
141.87	64731	Monitoring for Water Quality Parameters.	
141.88	64732	Monitoring for Lead and Copper in Source Water.	
141.92	64733	Monitoring for Lead and Copper in Schools and Child Care Facilities.	
141.81	64740	Applicability of Corrosion Control Treatment.	Article 4. Water Treatment Requirements
141.82	64741	Corrosion Control Treatment Requirements.	
141.83	64742	Source Water Treatment Requirements.	
141.85	64750	Public Education and Supplemental Monitoring and Mitigation Requirements.	Article 5. Public Education and Notification
141.90	64761	Reporting Requirements.	Article 6. Reporting and Recordkeeping
141.91	64762	Recordkeeping Requirements.	
141.93	64770	Small Water System Compliance Flexibility.	Article 7. Small Water System Compliance Flexibility

CFR – Code of Federal Regulations

# Nonsubstantive Changes to Federal LCRI

- Renumbered subsection levels, tables, and figure names to California Code of Regulations format

Code of Federal Regulations	California Code of Regulations
§ 141.90 Reporting requirements.	§ 64761. Reporting Requirements.
(a) (b) (c) ...	(a) (b) (c) ...
(1) (2) (3) ...	(1) (2) (3) ...
(i) (ii) (iii) ...	(A) (B) (C) ...
(A) (B) (C) ...	1. 2. 3. ...
(1) (2) (3) ...	A. B. C. ...

Table 1 to 141.86(c)(1)	Table 64730-A. Standard Tap Sampling Sites
Table 2 to 141.86(d)(1)	Table 64730-B. Reduced Tap Sampling Sites

# Nonsubstantive Changes to Federal LCRI

- Inserted calculated compliance dates, such as:
  - The compliance date in § 141.80(a)(3) → [November 1, 2027](#)
  - December 31 following seven years after the compliance date in § 141.80(a)(3) → [December 31, 2034](#)
- Omitted inapplicable provisions, such as:
  - The requirement for systems to follow some LCRR elements before November 1, 2027
  - U.S. EPA oversight of the State, rather than water systems
- Exercised state discretion, such as:
  - Added California-specific lead ban date and adoption of “lead free” standards
  - Allowed small system compliance flexibility options in accordance with existing Health and Safety Code section 116380

# Key Updates in Proposed Regulation Text

- Add majority of federal LCRI requirements in Chapter 17.6
- Add other LCRI requirements (e.g., public notice, consumer confidence reports) to Chapter 15
- Add repeal date of Chapter 17.5 and effective date of Chapter 17.6
- Update cross-references to Chapter 17.5
- Nonsubstantive changes to federal language

For a complete list of updates, please see the Proposed CA LCRI Summary of Changes document at [bit.ly/3Ry3sW8](https://bit.ly/3Ry3sW8)

# New LCRI Requirements

# New LCRI Requirements

## Service Line Inventory

- Baseline Inventory
- Inventory validation

## Service Line Replacement

- Replace lead and galvanized requiring replacement service lines within 10 years
- Service Line Replacement Plan

## Lead and Copper Tap Sampling

- Reduced lead action level
- Possible change in monitoring period
- New sampling tiers and revised protocol

## Corrosion Control Treatment (CCT)

- Stricter CCT requirements overall
- Stricter monitoring and follow-up assessment
- Additional flexibility for select systems

## Public Education & Notification

- Improved messaging about lead in drinking water
- Updates to lead health effects language
- Tier 1 public notification

## School/Child Care Facility Lead Sampling

- List of schools and child care facilities
- Sample schools and child care facilities annually
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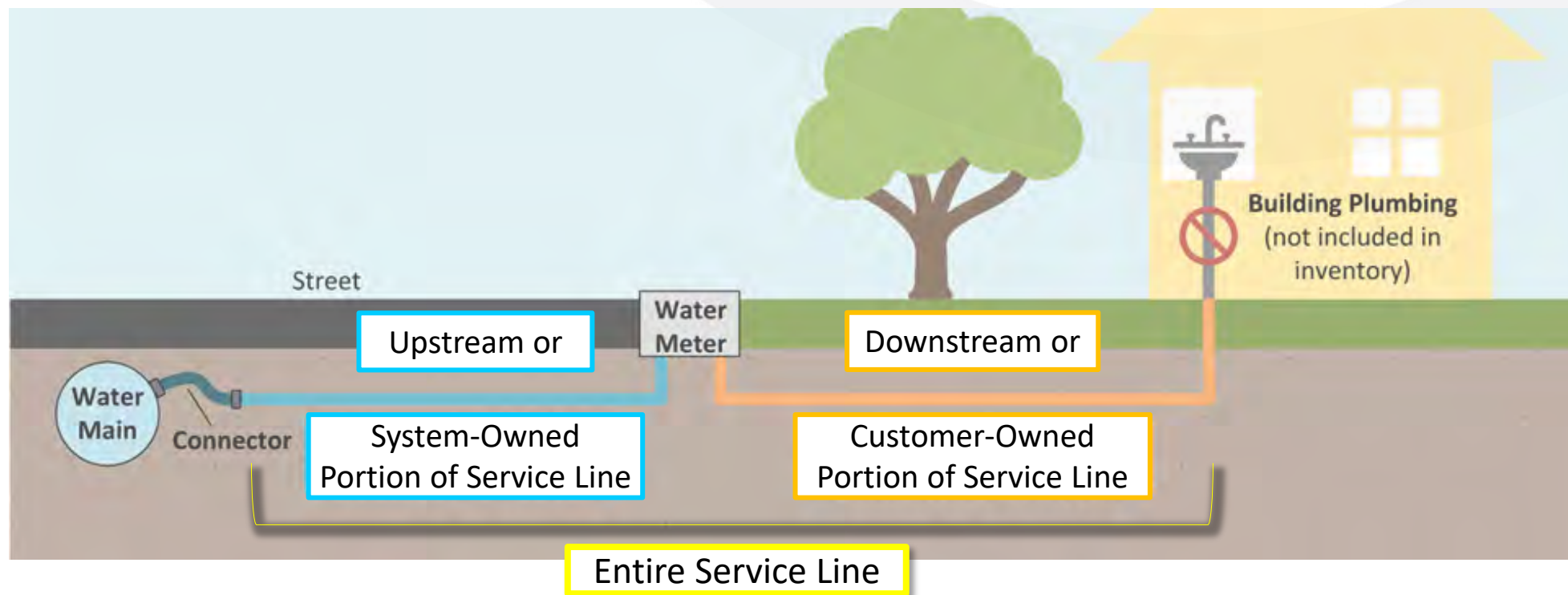
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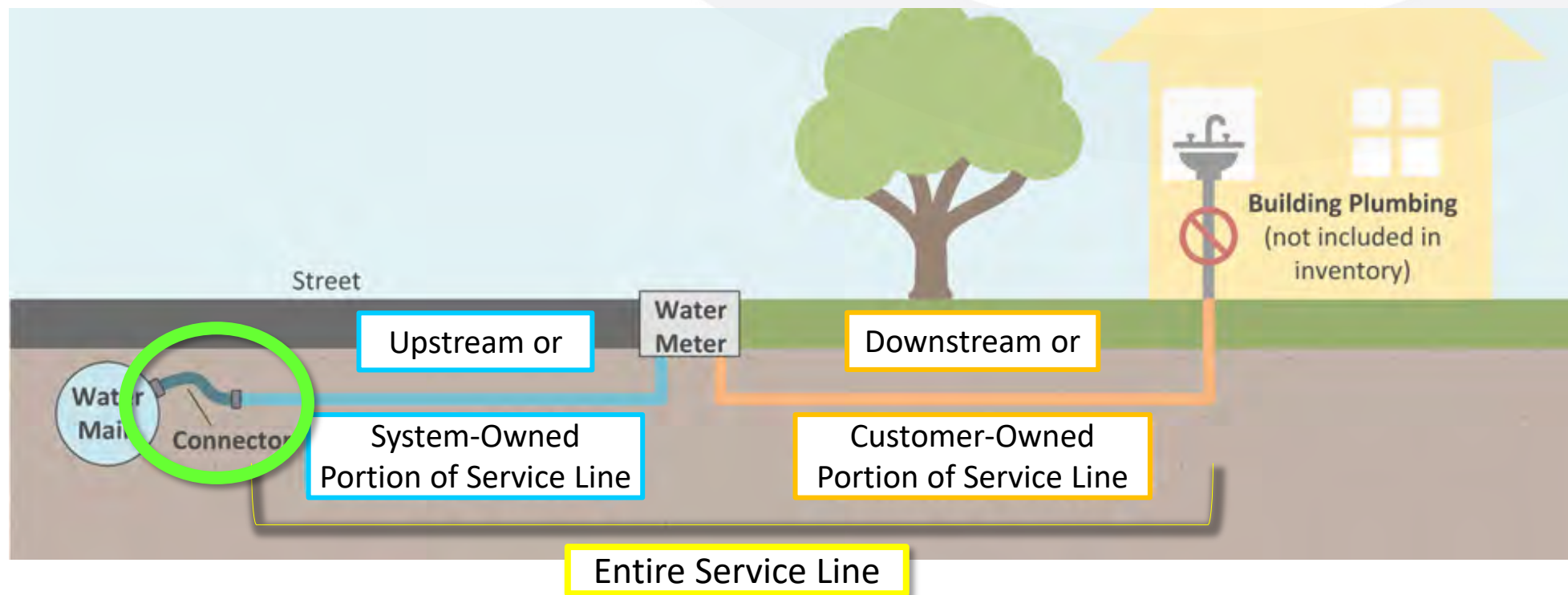
# Service Lines and Connectors

- **Service Line** - The pipe connecting the water main to the interior plumbing in a building that may have sole or split ownership by the water system and/or customer



# Service Lines and Connectors

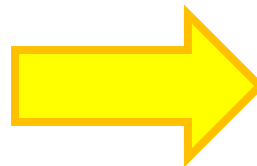
- **Connector, Gooseneck, or Pigtail** - A short section of pipe that can be bent and used for connections between rigid service piping.



# Baseline Inventory of Service Lines

## Initial Inventory

- **Due October 16, 2024**
- Records review
- Service line material and location
  - System-owned (upstream)
  - Customer-owned (downstream)
- Publicly accessible
- Location identifier



## Baseline Inventory

- **Due November 1, 2027**
- Records review
- Service line material and location
  - System-owned (upstream)
  - Customer-owned (downstream)
- Publicly accessible
- **Unique location identifier (street address where available)**
- **Connector material and location**
- **Updated annually (unless all non-lead)**

# Material Classifications

## Entire Service Lines

- Lead (including lead-lined)
- Galvanized Requiring Replacement (GRR)
- Lead Status Unknown (unknown)
- Non-lead

## Connectors

- Lead
- Non-lead
- Unknown
- No Connector Present

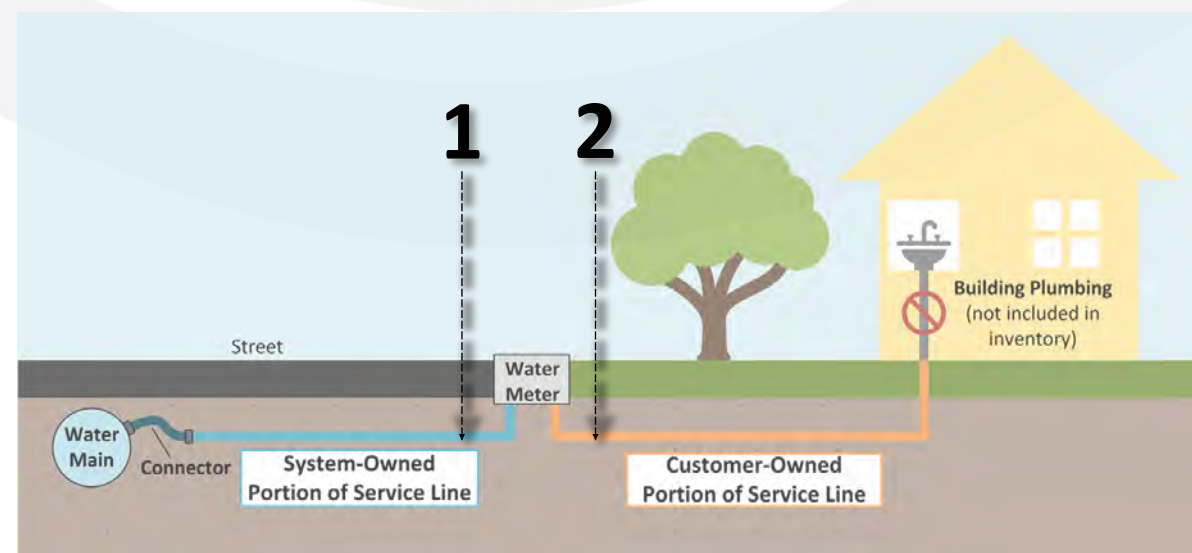
# Inventory Validation

## **Validate a subset of non-lead service lines in the inventory**

- Confirm that certain methods for identifying service line materials are accurate and/or reliable
- Methods where material is not physically/visually confirmed or only partially confirmed
  - Historical records
  - Pipe diameter
  - Statistical analysis or interpolation

# Inventory Validation

1. Establish validation pool of certain non-lead service lines
2. Determine minimum validations required based on size of validation pool
3. Randomly select service lines within the pool for validation
4. Validate the service line material with a 2-point visual inspection
5. Complete validations by December 31, 2034



# Basis for Other LCRI Requirements

- Systems with **lead**, **GRR**, or **unknown** service lines
  - Service line material public notification
  - Service line replacement program
  - Tap sampling
  - Certain Corrosion Control Treatment following lead Action Level Exceedance
  - Report on schools and child care facilities for lead sampling, if applicable

# Summary of CA Initial Inventory

## Data as of January 2026

- 3,792 out of 4,279 water systems completed initial inventories
- ~ 10 million total service lines reported
  - **Zero lead service lines**
  - ~ 12 thousand galvanized requiring replacement service lines
  - ~ 590 thousand unknown service lines
- Access the CA Initial Inventory Data Webpage at [bit.ly/3QoSdz1](https://bit.ly/3QoSdz1)

The screenshot shows the State Water Resources Control Board website. The main heading is "LEAD AND COPPER RULE FOR DRINKING WATER". Below the heading, there is a navigation menu with links for Home, Drinking Water, Certificates and Licenses, and Lead and Copper Rule (LCR). The main content area is titled "Statewide Service Line Inventory Data" and includes an "Overview" section. The overview text states: "The federal Lead and Copper Rule Revisions (LCRR) required all community and non-transient non-community water systems to develop and submit an initial inventory of all water service lines to their State by October 16, 2024. The State Water Resources Control Board, through the Division of Drinking Water (DDW), collects the lead service line inventory data submitted by California public water systems. The objective of collecting this information was to begin identifying and locating existing lead-containing service lines in the State of California for future replacement, a requirement under the Lead and Copper Rule Improvements (LCRI). Visit Lead and Copper Rule - Regulatory Background for more information on the history of the lead and copper rule, revisions, and improvements. Of the nearly 10 million service lines in the inventories collected across the state, no lead lines have been reported. Approximately 12,000 lines classified as galvanized requiring replacement (GRR), will be replaced over the decade following the LCRI compliance date of November 1, 2027. While some service lines still need to be classified and lead in internal building plumbing continues to present a challenge, the number of lead and GRR service lines is low in California relative to that of many other states in the US. The initial inventory is required to include all service lines connected to the public water distribution system, regardless of whether they are located in a building or in the ground." To the right of the overview is a "CA LSLI Dashboard" which includes a "California Service Line Inventory Summary" map and a "Quick Links" section with links to "Lead and Copper Home Regulatory Framework" and "CALCRI Regulations".

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- List of schools and child care facilities
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# Service Line Replacement Program

For water systems containing any **lead**, **GRR**, or **unknown** service lines:

- **Mandatory Service Line Replacement Program** begins November 1, 2027
- **Within 10 years** by December 31, 2037 (unless an alternate deadline is approved):
  - All **lead** and **GRR** service lines under water system control **must be replaced**
  - All **unknown** service lines **must be identified**

# Service Line Replacement Program

For water systems containing any **lead**, **GRR**, or **unknown** service lines:

- A **service line replacement plan** must be submitted to DDW by November 1, 2027
  - Must be made publicly accessible (and available online for systems serving over 50,000 persons)
  - Update plan annually and submit it to DDW

# Service Line Replacement Plan

- **Strategies**

- Communicating with customers and consumers
- Funding and prioritizing replacements
- Addressing unknown service lines or extent of lead-lined galvanized service lines

- **Plans and procedures**

- Conducting lead and GRR service line replacements
- Instructions for customers to flush service lines and premise plumbing when needed

- **Any legal restrictions**

- That affect access to service lines for replacement

- **Documentation for alternate replacement deadline**

- If applicable

# Additional Service Line Replacement Requirements

- Meet a cumulative average annual replacement rate of 10%
- Replace lead connectors as encountered
- Offer full replacement to new property owners
- Document reasonable effort to obtain consent for replacement of customer-side service lines
- Conduct notification and risk mitigation to customers

# New LCRI Requirements

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# Tap Sampling Action Levels

- Lead action level reduced from **0.015 mg/L** to **0.010 mg/L**
  - Tier 1 notification required for 90<sup>th</sup> percentile lead Action Level Exceedance
    - Public notification required within 24 hours
    - U.S. EPA enforcement – October 16, 2024, to October 31, 2027
    - CA DDW enforcement – Beginning November 1, 2027
- Copper action level remains 1.3 mg/L
- Reduced tap monitoring and some corrosion control requirements are based on thresholds lower than the lead and copper action levels
- 90<sup>th</sup> percentile level calculation
  - Based on available samples from highest tiered sites
  - Includes only the highest sample from each site

# Tap Sampling Plan

- All water systems must submit an updated sampling plan that includes
  - A pool of tap sampling sites from the highest tier available
  - A list of all entry point and distribution system sampling locations

Highest  
Priority



Lowest  
Priority

Tier	Description
1	<ul style="list-style-type: none"> <li>• Single-family structures with premise plumbing made of lead and/or served by a lead service line</li> </ul>
2	<ul style="list-style-type: none"> <li>• Buildings, including multi-family residences, with premise plumbing made of lead and/or served by a lead service line</li> </ul>
3	<ul style="list-style-type: none"> <li>• Single-family structures served by a lead connector</li> <li>• Single-family structures served by a galvanized service line or containing galvanized premise plumbing identified as having been downstream of a lead service line</li> </ul>
4	<ul style="list-style-type: none"> <li>• Single-family structures with premise plumbing containing copper with lead solder installed before 1986 (CA lead ban)</li> </ul>
5	<ul style="list-style-type: none"> <li>• Single-family structures or buildings with plumbing materials that would be commonly found at other sites served by the water system</li> </ul>

# Tap Sampling Plan

- Due by the start of the first tap monitoring period under the LCRI **after November 1, 2027**
  - Based on monitoring period as of October 31, 2027

Monitoring Frequency	Monitoring Period as of October 31, 2027	Updated Sampling Plan Due		
		December 31, 2027	December 31, 2028	December 31, 2029
Standard Monitoring	Every 6 Months	X		
Annual	Annual	X		
Triennial	2025-2027	X		
	2026-2028		X	
	2027-2029			X

# Tap Sampling Monitoring Period

- Possible change in monitoring period
- Standard monitoring (at least two consecutive six-month periods) required **beginning January 1, 2028**, if water system has
  - A baseline inventory containing **lead** or **GRR** service lines
    - Unless system following LCRI tap sampling protocols prior to November 1, 2027
  - A 90<sup>th</sup> percentile **lead** or **copper** Action Level Exceedance in the most recent tap monitoring period as of November 1, 2027
    - Lead action level: 0.010 mg/L
    - Copper action level: 1.3 mg/L

# New Tap Sampling Protocol

- New elements to LCRI sampling collection protocol
  - Samples collected in one-liter, wide mouth bottles (44 mm diameter)
  - 1<sup>st</sup> and 5<sup>th</sup> liter paired samples for lead at sites **served** by **lead** service lines
  - 1<sup>st</sup> liter sample only for lead at sites **without** lead service lines and for copper
  - Collection instructions cannot direct collector to remove/clean aerator or flush taps prior to stagnation period

## TESTING WHERE THE LEAD IS

For homes with lead service lines, the 1st and 5th liter of water must be tested for lead.



# Tap Sampling Protocol

- Other elements in LCRI sampling collection protocol
  - Collection from interior kitchen or bathroom sink cold water tap, or interior cold water tap in a non-residential building
  - Water has stood motionless in the plumbing and/or service line for 6 hours
- Sampling protocol may be different for consumer-requested sampling



# New LCRI Requirements

## Service Line Inventory

- Baseline Inventory
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## Service Line Replacement

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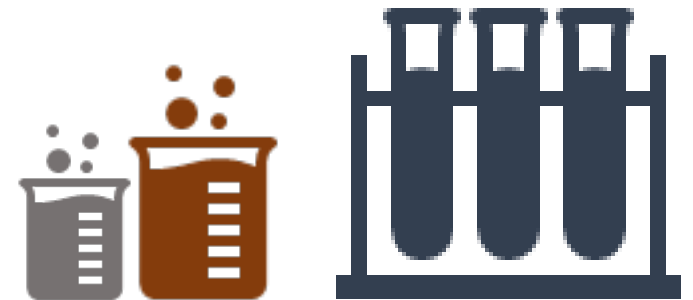
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# Corrosion Control Treatment (CCT)

- **Fewer acceptable Corrosion Control Treatments**
  - Calcium and polyphosphate are no longer approved CCT
- pH & alkalinity adjustment, orthophosphate, and silicate remain CCTs



# Corrosion Control Treatment (CCT)

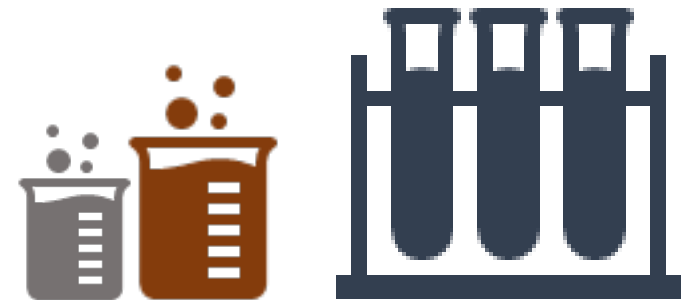
- **Stricter CCT study and installation requirements overall**

- Triggered by the new 0.010 mg/L lead action level for all systems
- Large systems without CCT must maintain 90th percentile lead level  $\leq 0.005$  mg/L to avoid CCT study and installation
- Some medium systems\* with CCT must maintain 90th percentile lead level  $\leq 0.005$  mg/L to avoid re-optimizing CCT
- Re-optimization of CCT required (once) after Action Level Exceedance, even if CCT was already optimized prior to LCRI
- Systems with **lead**, **GRR**, or **unknown** service lines with lead Action Level Exceedance must harvest pipes and conduct CCT study

\*Reminder: Medium systems under LCRI are those serving 10,001-50,000 people. Systems serving 3,301-10,000 people—previously considered medium under the LCR—are now categorized as Small systems under the LCRI.

# Water Quality Parameters (WQPs)

- **Fewer acceptable Water Quality Parameters**
  - Calcium, conductivity, temperature are no longer WQPs
- pH, alkalinity, orthophosphate, and silicate remain WQPs



# Water Quality Parameters (WQPs)

- **Stricter WQP monitoring**

- More systems with CCT must routinely monitor WQPs and must meet designated Optimal Water Quality Parameters
  - Reduced monitoring still possible for systems if no Action Level Exceedances
- Longer duration of monitoring after an Action Level Exceedance
  - At least 2 consecutive 6-month monitoring periods

# Distribution System and Site Assessment

- **New follow-up assessment for individual tap sampling sites that exceed the 0.010 mg/L lead action level**
  - Requires:
    - Systems with CCT to conduct WQP analyses
    - All systems to propose remedial action(s)
  - Potentially required:
    - Add a WQP site
    - Re-optimize CCT
    - Additional follow-up sampling

# Additional Flexibility for Select Systems

- **Any system can:**
  - Avoid CCT study, installation and optimization, or re-optimization by meeting consistently low Lead and Copper tap levels
  - Defer CCT installation by replacing applicable service lines within 5 years
- **Community water systems serving  $\leq 3,300$  people and non-transient non-community water systems can:**
  - Implement alternative actions
    - Replace lead service lines/plumbing
    - Install point-of-use filters



# Confirmation of CCT and Documentation

- CCT related requirements are more stringent under the LCRI
- Therefore, DDW field staff will be working with some water systems to confirm existing CCT designations and documentation of OWQPs leading up to the LCRI compliance date

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# Public Education & Notification

- **Clearer** and more **proactive messaging** about lead in drinking water
  - Updated lead health effects language
  - Updated steps consumers can take to reduce exposure
  - Strengthened translation requirements for public education
- Systems must provide any **individual** lead and copper **tap sampling results** to the consumer within 3 business days
  - Lead and copper tap monitoring
  - Consumer-requested tap sampling
    - Served by **lead**, **GRR**, or **unknown** service line
    - Following lead Action Level Exceedance

# Consumer Confidence Reports

- Reports distributed after **November 1, 2027**, must include the following information:
  - How to access lead tap sampling data and service line inventory
  - How to access service line replacement plan for systems with **lead**, **GRR**, or **unknown** service lines
  - Explanation of corrosion control efforts
  - Information on sampling in schools and child care facilities
  - A statement about lead in drinking water and its effects on children
  - Updated lead health effects language

# Systems with a Lead Action Level Exceedance (ALE)

- **Issue Tier 1 Public Notice**

- For 0.015 mg/L lead ALE - effective October 16, 2024
- For 0.010 mg/L lead ALE - beginning November 1, 2027
- Use updated lead health effects language
- Continue notifying DDW and U.S. EPA within 24 hours of exceedance

- **Provide Public Education materials within 60 days**

- Include updated lead information

# Systems with a Lead Action Level Exceedance (ALE)

- Offer consumer tap sampling for lead on request
  - 1<sup>st</sup> and 5<sup>th</sup> liter samples
- Multiple exceedances in 5 years requires additional outreach
- Sample for lead and copper at each entry point to the distribution system representative of source water(s)

# Systems with **Lead, GRR, or Unknown** Service Lines

- Provide notification:
  - That service line is known to or may potentially contain lead
  - If there is a disturbance to the service line
  - If there is a service line replacement
- For replacements and certain disturbances
  - Provide ANSI certified pitcher filter or point-of-use device
- Offer consumer tap sampling for lead on request to any person served by a **lead, GRR, or unknown** service line
  - 1<sup>st</sup> and 5<sup>th</sup> liter samples

# Information to Local and State Health Agencies

- Community water systems must provide public education materials to local and State health agencies including:
  - **Distribution System and Site Assessment** results for sample sites that exceeded 0.010 mg/L for lead
  - Copies of **service line replacement** outreach materials for systems that did not meet annual replacement rate
- Due **annually** by **July 1** for actions conducted in previous calendar year

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# LCRI School Definitions



- **School** - Any building(s) associated with public, private, or charter institutions that primarily provides teaching and learning for elementary and secondary students
- **Elementary school** - A school classified as elementary by State and local practice and composed of any span of grades (including pre-school) not above grade 8
- **Secondary school** - A school comprising of any span of grades beginning with the next grade following elementary school (usually 7, 8 and 9) and ending with grade 12; Secondary schools include both junior and senior high schools and typically span grades 7 through 12

# Types of Child Care Facilities

- LCRI definition
  - **Child care facility** - A location that houses a provider of child care, day care, or early learning services to children, as licensed by the State, local, or Tribal licensing agency
- State definition
  - California licenses multiple types of child care facilities
- State Water Board is coordinating with U.S. EPA and CA Department of Social Services to understand which types of facilities are included in required sampling



# List of Schools and Child Care Facilities

By the LCRI compliance date (November 1, 2027), community water systems must:

- Develop a list of schools and licensed child care facilities served that
  1. Were constructed or did not have full plumbing replacement before January 1, 2010
  2. Are served by a **lead, galvanized requiring replacement, or unknown** service line.
- Submit list of schools and child care facilities to DDW

If no schools or child care facilities are served:

- Submit certification to DDW by November 1, 2027
- Certify annually by January 30 (starting in January 2029)

# Public Education & Outreach

Facility Type	Timing	Notification Description
<b>Elementary Schools &amp; Child Care Facilities</b>	November 1, 2027 to October 31, 2032	<ul style="list-style-type: none"> <li>• Inform schools/facilities they are eligible to be sampled for lead by the water system</li> <li>• Include a proposed schedule for sampling at the facility, and provide information about sampling for lead</li> </ul>
<b>Elementary Schools &amp; Child Care Facilities</b>	Starting November 1, 2032	<ul style="list-style-type: none"> <li>• Inform schools/facilities they are eligible to be sampled for lead by the water system on request</li> </ul>
<b>Secondary Schools</b>	At least once per year starting November 1, 2027	<ul style="list-style-type: none"> <li>• Provide information about how to request and perform sampling for lead</li> </ul>

# School and Child Care Lead Sampling Requirements

	Schools	Child Care Facilities
Frequency	<ul style="list-style-type: none"> <li>At least <b>20% of elementary schools annually</b> from November 1, 2027 – October 31, 2032, then on request</li> <li><b>On request for secondary schools</b></li> </ul>	<ul style="list-style-type: none"> <li>At least <b>20% of child care facilities annually</b> from November 1, 2027 – October 31, 2032, then on request</li> </ul>
Number of Samples and Locations	<p><b>5 samples:</b></p> <ul style="list-style-type: none"> <li>2 at drinking water fountains</li> <li>1 at kitchen faucet for food/drink preparation</li> <li>1 at classroom faucet (or other drinking outlet)</li> <li>1 at nurse's office faucet, as available</li> </ul>	<p><b>2 samples:</b></p> <ul style="list-style-type: none"> <li>1 at drinking water fountain</li> <li>1 at kitchen faucet for food/drink preparation, or 1 at classroom faucet (or other drinking outlet)</li> </ul>
Protocol	First-draw 250 mL samples from a cold water tap after an 8 to 18 hours stagnation period	
Results	Send to facility, local/state health departments, and the State no later than 30 days after receipt	

- Note:* A water system is not required to sample any facility more than once in a 5-year period

# School and Child Care Lead Sampling Annual Report

Starting **January 30, 2029**, an annual report, due to DDW must include the following:

- Certification of good faith effort to identify schools and child care facilities
- Certification of completion of public education and sampling requirements notification
- Certification that sampling results were provided
- Number and names of schools and child care facilities sampled in the previous year, declined sampling\*, or did not respond
- Information about outreach attempts that were declined or not responded to by the elementary school or child care facility

\*AB 1096 discussed in subsequent slides requires systems to collect additional information

# School and Child Care Lead Sampling Waivers

The State Water Board is evaluating the potential for sampling waivers, allowed under 40 CFR 141.92 (h)(5):

- **Eligibility**

- Schools and child care facilities sampled under State/local lead sampling programs must be at least as stringent as LCRI requirements
- Sampling must have been completed between January 1, 2021 and November 1, 2027
- Only applies to lead sampling requirements, but does not waive public education

- **Child care sampling completed under Assembly Bill 2370 (AB 2370)**

- Only includes sampling at a subset of child care facilities
- AB 2370 requires sampling at child care facilities every five years – so it may be better to ensure correct sampling protocols going forward and allow future samples to be dual purpose for AB 2370 and LCRI rather than a waiver

# LCRI Compliance Deadlines

LCRI Requirement	Due Date
<b>Service line inventories</b>	
Initial	October 16, 2024
Baseline	November 1, 2027
Updates	January 30, 2029, and annually thereafter
Validation	December 31, 2034
<b>Service line replacement</b>	
Replacement plan	November 1, 2027
Replacements	December 31, 2037
<b>Tap sampling</b>	
Tier 1 notifications for Lead ALEs	Effective October 16, 2024
Sampling plan	December 31, 2027 (for some systems)
Revised monitoring, if needed	Beginning January 1, 2028
School/child care list	November 1, 2027
School/child care report	January 30, 2029, and annually thereafter

# Additional LCRI Training and Guidance



- U.S. EPA LCRI implementation guidance document is expected this summer
- This workshop is to get input on the State Water Board's approach to adopting the federally mandated LCRI
- Additional technical trainings will occur late 2026 and throughout 2027

# **Lead Testing at School and Childcare Facilities**

## **California Assembly Bill (AB) 1096**

### **Policy Handbook**

# AB 1096 Background

- Passed in 2025
- Added section 116277 to the Health and Safety Code
- Strengthens public transparency of lead sampling efforts in schools and child care facilities conducted under the LCRI
  - Builds on LCRI sections 141.90(i) and 141.92 of Title 40 of the Code of Federal Regulations (Sections 64761(i) & 64733 accordingly in the proposed Chapter 17.6 - Control of Lead and Copper)

# Connection to LCRI

- As discussed, the LCRI requires community water systems to offer **lead testing to certain schools and child care facilities**
  - LCRI does **NOT** require any of the lead testing information to be made publicly available
- AB 1096 builds on LCRI's protections and transparency
  - Ensures the information collected by community water systems is made **publicly available** on the State Water Board's website

# AB 1096 Policy Handbook

- **Purpose:** To provide a process to community water systems for implementing the requirements of AB 1096
  - Standardize process for submitting school and child care information related to outreach and sampling
  - Sampling waiver process
  - Adding additional reasons for declining lead testing
- Seeking early public input on these elements
- The Draft Policy Outline is provided on our website: [bit.ly/43mttdK](https://bit.ly/43mttdK)
- **Aligning with LCRI compliance date of November 1, 2027**

# History of Lead Sampling in CA Schools

- **Domestic Water Supply Permit Amendments (2017)**
  - Required community water systems to create a K-12 school inventory and conduct lead testing to all K-12 schools, upon request
- **Assembly Bill 746 (2017)**
  - Required community water systems to test lead levels in drinking water at all public K-12 schools constructed before January 1, 2010
  - **One-time testing mandate completed by July 1, 2019**

# History of Lead Sampling in CA Child Care Facilities

- **Assembly Bill 2370 (2018)**

- Requires licensed child day care centers\* located in a building that was constructed before January 1, 2010, to test drinking water for lead:
  - On or after January 1, 2020, but no later than January 1, 2023
  - Every five years after the date of the initial test
- Requires the State Water Board to make all test results available to the public via the State Water Board website
- Requires follow-up actions if a sample exceeds 5 parts per billion, equivalent to 0.005 mg/L

\*As defined in [HSC 1596.76](#) - “Day care center” means a child day care facility other than a family day care home, and includes infant centers, preschools, extended day care facilities, and school age child care centers, and includes child care centers licensed pursuant to Section 1596.951

# Child Care Facilities Excluded in AB 2370

- AB 2370 excluded “Family Day Care Homes” and some other types of facilities that care for children that may be applicable for the LCRI
- LCRI definition
  - **Child care facility** - A location that houses a provider of child care, day care, or early learning services to children, as licensed by the State, local, or Tribal licensing agency
- State Water Board is coordinating with U.S. EPA and CA Department of Social Services to understand which types of facilities are included in required LCRI sampling before completing the AB 1096 Handbook



# Privacy of Family Day Care Homes

As required under Health and Safety Code HSC Section 1596.819 (a):

- Child day care centers' names, statuses, and addresses are publicly available. These are sampled under AB 2370.
- Family day care homes' names and status are publicly available – but addresses are excluded for privacy purposes
- See Department of Social Services website: [bit.ly/3QevPIq](http://bit.ly/3QevPIq)
  - Choose “Download Data” tab

The State Water Board staff are working with the Department of Social Services to find a solution that meets both the confidentiality and public health mandates.

# Mapping Tool

The screenshot displays a mapping tool interface. On the left is a map of Sacramento, CA, with various colored markers. In the center is a data table for 'CITY OF SACRAMENTO MAIN'. On the right is a filter panel with two steps: 'Step 1: Choose your water system' and 'Step 2: Identify the facilities'. The filter panel shows a relationship of 'Intersect' and a message that there are 1 feature inside the data. The layers panel shows 'Child Care Center' with 247 features and 'K-12 School' with 129 features, both circled in red.

Boundary Type	Water Service Area
Verification Status	Verified
Verified By Name	J. Bird
Date Verified	6/11/2025, 12:00 AM
Water System Number	CA3410020
Water System Name	CITY OF SACRAMENTO MAIN
County	SACRAMENTO
Population	527979
Regulating Agency	DISTRICT 09 - SACRAMENTO
State Classification	COMMUNITY
Address Line 1	1395 35TH AVENUE
Address Line 2	
City	SACRAMENTO
State	CA
Zip Code	95822
Service Classification	14020

**Step 1: Choose your water system**

**Step 2: Identify the facilities**

Clear all

Select by data **Apply**

Relationship: Intersect

Selecting features: California Drinking Water Systeme...

There are 1 features inside this data.

**Layers**

- Child Care Center 247
- K-12 School 129

# AB 1096 Community Water System Requirements

- Compile and submit the information pertaining to outreach and sampling at schools and child care facilities, including the number and names of schools and child care facilities:
  - Served by the water system
  - Sampled in the previous year and their sampling results
  - Declined sampling and **reason for declining**
  - Did not respond to outreach attempts for sampling
- Systems must submit the previous year's outreach and lead testing information to the State Water Board by January 30 each year, as required by the LCRI

# AB 1096 Community Water System Requirements

- If lead sampling is declined
  - Provide the school or child care facility with the opportunity to select the reason for declining from a list of options
- Include the following in the annual Consumer Confidence Report by December 31, 2028:
  - A statement that information is available pertaining to lead testing in schools & child care facilities, including the names of those that received testing, and is on the State Board's (future) website
  - A direct link to the State Board's (future) website

# Reasons for Declining Lead Testing

## Drinking water and food preparation

- All outlets tested for lead within the last five years under an independent program
- All outlets installed after January 1, 2010 and connected to plumbing installed or replaced after January 1, 2010
- Uses bottled water, a certified point-of-use device, or both, for all drinking water and food preparation purposes

## Construction or modernization

- Constructed after January 1, 2010
- Modernized after January 1, 2010 and was fully replumbed
- Currently undergoing major modernization or construction

## Water quality testing

- Already maintains a routine water quality testing program
- Participating in another government-funded water quality program
- Opted to coordinate testing for lead in drinking water with a third-party vendor for operational reasons

## Logistical barriers

- Timing, access, or personal coordination prevent participation in offer to test

**The State Water Board may add additional reasons for declining lead testing to this list and is seeking input today!**

# AB 1096 State Water Board Requirements

- On or before June 30, 2028: make all of the information submitted by water systems publicly available on a website
  - Information must be searchable
  - Sample results above 5ppb (0.005mg/L) to be bold or highlighted
  - Samples above the lead action level must be indicated
- Website to provide information that explains the health impacts due to lead in drinking water
- Create a standardized process for the submittal of this information.

# Future Work

- Obtain clarity on definitions of child care centers included in the LCRI
- Address confidentiality of family child care homes
- Avoid burdensome or duplicative sampling or reporting by community water systems
- Ensure lead and copper tap sampling results for compliance (90<sup>th</sup> percentile calculation) remain **separate** from school and child care facility lead samples

# Contact Information & Resources

Division of Drinking Water (DDW) Lead and Copper Unit

- Email: [DDW-LCR@waterboards.ca.gov](mailto:DDW-LCR@waterboards.ca.gov)

Proposed California LCRI Regulation Text

- [bit.ly/4ve1nNA](http://bit.ly/4ve1nNA)

Assembly Bill 1096 Draft Policy Handbook Outline

- [bit.ly/4o82JXO](http://bit.ly/4o82JXO)

DDW's Lead and Copper Website

- [bit.ly/3S6YKie](http://bit.ly/3S6YKie)

U.S. EPA LCRI Supporting Materials

- [bit.ly/3Q7DNmF](http://bit.ly/3Q7DNmF)

# Thank you for your time!

Contact us at [DDW-LCR@waterboards.ca.gov](mailto:DDW-LCR@waterboards.ca.gov)

Today's presentation slides and recording will be available at:  
[bit.ly/426RCV2](http://bit.ly/426RCV2)

**We'll resume after a short break for the public comment session.**



# Public Comment Session



June 11, 2026

# Public Comments Guidelines



## Attendees with Pre-Submitted Questions

1. When you hear your name, please raise your hand.
2. Wait to be called on. Limit comments to 3 minutes
3. For technical or language assistance, email:  
[DDW-LCR@waterboards.ca.gov](mailto:DDW-LCR@waterboards.ca.gov)



## Via Zoom

1. Raise your hand
2. Wait to be called on
3. Speak slowly
4. Limit comments to 3 minutes

# Public Comments After the Presentation

- Questions/input on proposed California LCRI regulation text
- Questions/input on AB 1096 Policy Handbook Outline

Please email written comments in PDF format by **June 22, 2026**

- Send to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)
- Include "Control of Lead and Copper Regulation and AB 1096 Policy Handbook" in the subject line
- DDW will respond to all parties with a summary of the questions and answers

**Thank you!**