

Preparing for New Lead and Copper Rule Requirements for Drinking Water Systems

In 1991, the United States Environmental Protection Agency (EPA) published a regulation to control lead and copper in drinking water. This regulation is known as the Lead and Copper Rule (also referred to as the LCR). Since 1991, the LCR has undergone various revisions in 1998, 2000, 2004, 2007 and 2020. A [quick reference guide and summary of the current rule](#) can be found on EPA's website or by contacting your State Health Department.

Although these rules were implemented over 30 years ago, our country still struggles with lead exposure in legacy water systems with antiquated infrastructure. A National Resources Defense Council analysis of 2018-2020 nationwide water system reporting data concluded that millions of people within our country consume water with lead level which exceed standards established by the American Academy of Pediatrics, FDA, and EPA. A significant source of lead in drinking water is aged infrastructure including service lines, the critical conduit between the water distribution system and individual homes, businesses, and institutional buildings. Disadvantaged communities could be particularly vulnerable due to a lack of historic infrastructure investment.

On August 4, 2022, EPA released Guidance for Developing and Maintaining a Service Line Inventory to support water systems with their efforts to develop inventories and to provide states with needed information for oversight and reporting to EPA. The guidance provides essential information to help water systems comply with Lead and Copper Rule's new requirements to prepare and maintain a Lead Service Line Inventory by 2024. These inventories are an essential first step to implementation of service line replacement programs. Key requirements of a Lead Service Line Inventory include:

- The inventory must include all service lines connected to the public water distribution system regardless of intended use.



New EPA provides essential information to help water systems comply with Lead and Copper Rule's new requirements to prepare and maintain a Lead Service Line Inventory by 2024.

- The inventory must include information on both the system- and customer-owned portions where ownership is split.
- Service lines must be classified as lead, galvanized, non-lead (or the actual material), or lead status unknown service lines (or unknown)
- A classification of non-lead must be supported by evidence-based records, methods, or techniques to prove it is not lead or galvanized
- The water system must create and maintain an inventory that includes the exact address associated with each service line connected to the public water system
- An inventory of service lines must be made publicly available, but the LCRR does not require the publicly available inventory to include the specific address of each lead and galvanized service line.

Other recommendations include the following:

- EPA encourages water systems to consider including street addresses, when available, as their location identifier for all service lines in its public-facing inventory. Identifiers should be significantly detailed to allow the identification of a specific service line
- EPA encourages water systems to expand their inventories to include service line subclassifications, other plumbing components such as lead connectors, and other details such as source of information, pipe diameter, and installation date

To support these efforts Congress is making billions of dollars available through State Drinking Water State Revolving Fund Programs through 2025. Verdantas' staff have decades of experience in helping Clients access funding, analyze existing water system conditions, develop capital improvement plans, and design and construct water system upgrades.

[Contact us](#) to learn more.