Lead and Copper Rule Revisions Notification

This notice is to remind you that your water system is required to comply with the Lead and Copper Rule Revisions (LCRR). The LCRR applies to all community and non-transient non-community (NTNC) water systems, and its requirements will take effect on October 16, 2024. This notice outlines those requirements effective on October 16, 2024, and proposed requirements that may start in 2027.

The U.S. Environmental Protection Agency (U.S. EPA) established the Lead and Copper Rule (LCR) in 1991 to protect public health and reduce exposure to lead in drinking water. The LCR has since been revised to the LCRR, which was released on December 16, 2021.

The LCRR includes a few notable requirements, with the most pressing one being the completion of service line inventories. All community and NTNC water systems are required to create and maintain an inventory of all their service lines throughout their distribution systems.

Inventory Requirements:

- You must develop a service line inventory in accordance with the requirements listed in 40 CFR 141.84(a) and submit it by October 16, 2024. Service Line Inventory instructions and the required Ohio template can be found on Ohio EPA's website or linked at the end of this notice.
- If you identify service lines that are lead, galvanized requiring replacement, or lead status unknown, you must provide notifications to all people served by these lines. The initial notification must be sent by November 15, 2024. By January 1, 2025, you must submit an example of the service line inventory material notice(s) used and a verification form.
- Your service line inventory must be made publicly accessible by October 16, 2024. If you are a community system, you must provide instructions on where to view the inventory in your Consumer Confidence Report (CCR) annually starting in 2024. If you are a community water system with a population of 50,000 or more persons, you must also make your service line inventory publicly available online.

Lead Action Level Exceedance Public Notice:

- Starting October 16, 2024, Tier 1 Public Notice (PN) timeline adjustment for any lead action level exceedance (ALE).
- Within 24 hours of learning of the lead ALE the lead Public Notice (PN) must be send to all customers then Ohio EPA and U.S. EPA.
- Lead ALE PN templates and guidance will be provided if your system triggers a lead ALE.

You must continue monitoring for lead and copper as required in the rule and follow the existing requirements as stated in the 1991 LCR and the Ohio Administrative Code.

Proposed Lead and Copper Rule Improvements (LCRI)

In November 2023, U.S. EPA released the Lead and Copper Rule Improvements (LCRI) which, when finalized, will amend certain requirements of the LCRR. The inventory, service line notifications, and lead PN requirements listed above will not change. Ohio EPA will continue to provide information on requirements as they become available. LCRI finalization is expected to be completed by U.S. EPA before the end of October 2024, with compliance likely occurring by 2027. A summary of some requirements outlined in the LCRI are listed below; these are only **proposed** and could change before LCRI finalization.

Summary of **proposed** U.S. EPA requirements listed in LCRI:

- Achieving 100% lead pipe replacement within 10 years of the compliance date
- Baseline Service Line Inventory, annual updates
- Validation of certain non-lead service line materials
- Service Line Replacement Plan
- Lowering the lead action level from 15 µg/L to 10 µg/L
- Changes in lead and copper tap monitoring
- Strengthening protections to reduce exposure: conducting additional outreach and providing filters with multiple lead ALEs
- Small system flexibility
- Schools and child care facilities water testing

A fact sheet comparing the current LCR, LCRR, and proposed LCRI is attached below. In addition to this, please refer to additional guidance on Ohio EPA's Lead and Copper website.

Please contact DDAGWLeadCopper@epa.ohio.gov if you have any questions about this notice or how the LCRR may affect your water system. We appreciate your attention to this matter.

Attachments: U.S. EPA Comparison between LCR, LCRR, and LCRI, Instructions for Service Line Inventory Template, Service Line Inventory Template