

Proposed LCRI Highlights

Jeff Swertfeger
Superintendent

Water Quality and Treatment Division
Greater Cincinnati Water Works

Disclaimer

This is just proposed. Final rule will probably look similar but some items may be different depending on comment

Timeline



Significant Requirements

- Most LCRR requirements delayed 3 years with LCRI
 - Service line inventory, notifications, and Tier 1 notice with Action Level exceedance still starts October 2024
- Must remove all lead lines* within 10 years (by 2037)
- Lower Action Level (from 15 to 10 ppb) with tougher sampling requirements
- Significant Actions if exceed new Action Level

*Lead = lead on either side and galvanized requiring replacement (GRR)

Delayed LCRR Requirements

- School sampling
- New compliance sampling
- Lower action level (until 2027 action level stays at 15 with old sampling sites)
- Removal plans
- Giving filter when changing meters, disturbing lead lines

Inventory

- Service Line Inventory (both sides) Due October 16!!!
- Must use OEPA template to submit
- OEPA expects justification
- Send out letters to LSL, GRR, Unknown line owners by Nov 15.
- Put online

Notice Letter Template

[INSERT CONSUMER NAME AND ADDRESS]

Re: Notification of Lead Service Line

Dear Consumer:

[INSERT NAME OF PUBLIC WORKS SERVICE] to this location. You are required to replace the lead service line. A service line is the pipe that carries water from the main to your home or building.

We think you have a lead line

What Does This Mean?

Under the authority of the Safe Drinking Water Act, the US Environmental Protection Agency (EPA) requires us to replace the lead service line. A lead service line means that a portion of the pipe that carries water from the main to your home or building contains lead.

What a lead line is

What are the Health Effects of Lead?

There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreased cognitive function and behavioral problems. Exposure to lead in drinking water may also cause kidney or nervous system problems. Adults have increased risks of heart disease, high blood pressure, and kidney or nervous system problems. Contact your health care provider for more information on your risks.

New Health Effect Language

What Can I Do to Reduce Exposure to Lead if Found in My Drinking Water?

- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Flush your tap if it has been unused for 6 or more hours.** Lead levels increase over time as water sits in lead-containing plumbing materials. Regular water usage in your home or building can reduce lead levels in drinking water. When water has not been used for 6 hours or more, flush the tap for 30 seconds before drinking. This is especially important for lead service lines.
- **Use bottled water.** Use bottled water for drinking and cooking. Always check the label to make sure the water is certified to the ANSI/NSF 53 standard for lead removal.
- **Use an ANSI certified lead filter.** Filters certified to the ANSI/NSF 53 standard for lead removal can be effective at reducing lead levels in water. [IF PWS IS MAKING FILTERS AVAILABLE, INCLUDE INFORMATION ON HOW THE CONSUMER CAN OBTAIN A FILTER]
- **Regularly clean your faucet aerators.** Over time, particles containing lead can build up on the inside of aerator screens. Cleaning aerators regularly will help eliminate this source of lead.
- **For pregnant persons, infants, and young children.** Some populations such as pregnant persons, infants, and young children may be more at risk from the harmful effects of lead.

How to reduce lead exposure (includes filters and bottled water)

their drinking water analyzed for lead, using an alternative source of water, such as bottled water, or utilizing a filter certified to ANSI/NSF 53 standard for lead removal. [PWS CAN ADD OTHER OPTIONS CONSUMER CAN TAKE TO REDUCE EXPOSURE]

Check for lead-containing plumbing fixtures. Many old faucets, valves and other plumbing fixtures may contain lead. Identify if your buildings plumbing fixtures contain lead and replace them when appropriate.

Have your child's blood tested for lead. Your local health department can be contacted at [INSERT LOCAL HEALTH DEPARTMENT CONTACT INFO].

Test your water for lead in your home or building to request this, contact [INSERT PWS CONTACT INFO].

[OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027]: To obtain a copy of the service line replacement plan [OR VIEW THE PLAN ONLINE], please visit [INSERT WEBSITE ADDRESS OR PHYSICAL ADDRESS / LOCATION THAT THE SERVICE LINE REPLACEMENT PLAN CAN BE FOUND].

(OPTIONAL SECTION) What is [INSERT NAME OF PWS] Doing?

[PWS can describe the actions it is taking to reduce lead exposure, such as corrosion control treatment, flushing, or other measures. [OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027]: You may wish to test your water for lead in place.]

What is system doing

What Can You do About Your Lead Service Line?

[REQUIRED: Insert information on opportunities to replace their lead service lines as well as programs that provide financial solutions to assist property owners with replacement of their portion of a lead service line]. As your PWS, we are required to replace our owned portion of the lead service line,

if/when we are notified. [OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027]: If you are notified by a lead service line, please notify [INSERT PWS CONTACT INFO] and follow instructions for CUSTOMER TO NOTIFY].

What you can do about your lead line

For More Information, Please Contact: [INSERT CONTACT INFORMATION FOR YOUR PWS]; visit US EPA's website at www.epa.gov/lead; or visit Ohio EPA's [Learn About Lead | Ohio Environmental Protection Agency](#) website. For information about other lead exposure, please visit the Ohio Department of Health's [Childhood Lead Poisoning](#) website. [PWS CAN INSERT OTHER RELEVANT LINKS]

Please share this information with all the other people in this home or building, especially those who may not be notified, such as family members, friends, neighbors, schools, and businesses.

Share with others in your building

New LCRI Requirements (Starting Oct 2027)

Additional Inventory Requirements

- LCRR Initial service line inventory is due Oct 2024
- !!!Some interpretations of a service line includes mobile home parks, campuses, apartment complexes etc. !!!
- A new LCRI Baseline Inventory due October 2027
 - Includes lead connectors/goosenecks
 - Notify all LSL, GRR, unknown lines annually
 - Respond within 60 days when customer says their material is different

Inventory (cont)

- Must validate a percentage of non-lead sites unless used records or visual inspection to identify.
- Two point visual validations
- Validation due October 2034
- Annual updates and annual mailings
- Offer lead sampling to anyone with LSL, GRR, unknown lines

| Size of Pool | No. of Validations |
|---------------|--------------------|
| <1,500 | 20% |
| 1,500-2,000 | 322 |
| 2,001-3,000 | 341 |
| 3,001-4,000 | 351 |
| 4,001-6,000 | 361 |
| 6,001-10,000 | 371 |
| 10,000-50,000 | 381 |
| >50,000 | 384 |

Replacement Plan

- Due October 2027
- Includes how to
 - ID unknown lines, procedures for replacement, communications, flushing, prioritization, paying for it
 - Outreach strategies and strategies to reach landlords and renters
 - Inform customers about plan, put plan online
 - Plan needs to consider low income and disadvantaged consumers
 - Identify any legal barriers that impact utility's ability to access and replace line

Replacement

- Replace all LSL, GRR, in 10 years (2027-2037)
- If customer refuses after 4 contact attempts with 2 methods then skip
 - Have to contact customer every year with replacement offer
 - Have to educate/offer replacement on property transfer
- Partial replacements not allowed unless emergency or part of main replacement program.

Replacements (cont)

- Only full LSLR count as replaced
- Offer to replace customers part within 45 days if doing a partial
- Do not have to pay for customer side (but equity considerations?)
- Replace your part when customer replaces theirs
- Provide filters, education materials for full or partial replacements
- Sample 3-6 months post replacement

Disturbances

- Give educational materials upon turning curb stop off for any reason, potholing or digging on a line
- Provide filters if disturbing lead line, GRR, Unknown:
 - Full or partial replacement
 - Replacing meters or meter settings
- Provide filters to every “unit” so 4 to a 4 family building etc.

Compliance Monitoring

- Worst case monitoring so higher 90th percentiles
 - New sample sites - only LSL sites
 - Sample 1st and 5th liter, use higher of the two for 90th %tile
- Lower Action Level – 10 ppb instead of 15 ppb
- If exceed Action Level –
 - Give 24 hour notice to all customers about exceedance via press releases etc.
 - Begin treatment studies
- If exceed Action Level in 3 out of 5 six- month compliance period – Offer filters to everyone (not just LSL people)

Distribution System and Site Assessment

- Must somehow investigate all high lead values – why was lead high?
- Starts 2028 probably
- Report to state reason why high value found

Schools and Childcares

- Starts 2027 (but can get a head start now)
- Only sample if building built before 2014
- Sample 20 percent per year
 - 5 samples per school
 - 2 samples per child care
- Waiver for buildings sampled since Jan 1, 2021
- Annual outreach to schools
- Every 5 years redo list and sample new schools/child cares

Other

- Updated health effect language
- Non-English translation requirements
- A lot of detailed public education requirements
- More specific public education if $>AL$
- Notices about how public can to access plan, inventory, other info

For More Info

- Google “Ohio EPA lead rule”
 - General info
 - Fact sheets
 - Inventory template (Due October 16)
 - Coming soon – Notification letter template

