

SUMMARY OF EXISTING AND PROPOSED LEAD AND COPPER RULE REQUIREMENTS

The following proposals are *DRAFT* and subject to change as a result of public comment.

Current Lead & Copper Rule Requirements	<i>DRAFT</i> Changes to Lead & Copper Rule Requirements
Supplies not required to remove lead service lines unless Lead Action Level is exceeded after corrosion control treatment is installed.	<ul style="list-style-type: none"> Supplies with lead 90th percentile greater than 5 ppb required to remove lead service lines (LSLs) at a rate of 5% per year. All other supplies required to incorporate LSL replacement into asset management planning and replace over time. LSL replacement includes lines with only lead “goosenecks” and galvanized lines that are or were connected to LSLs.
Partial lead service line replacements are allowed, leaving customer-side lead lines in place unless customer agrees to pay for their portion.	<ul style="list-style-type: none"> Supplies must offer to replace private portion of lead service line at supply expense. If owner declines offer, owner/occupant must be notified prior to partial LSL replacement, provided educational materials, and offered follow-up sampling.
Lead Action Level is 15 parts per billion (ppb)	Lower Lead Action Level to 10 ppb
No follow-up required for high lead levels at individual homes, except for consumer notification.	Create a Household Advisory Level of 40 ppb to trigger faster notice to residents, including information about obtaining blood testing and a household plumbing assessment.
Supplies can reduce lead and copper rule sampling to every three years.	Supplies with corrosion control treatment and all large supplies (more than 50,000 people) can sample every three years only if annual monitoring 90 th percentiles are at or below 5 ppb for lead and 650 ppb for copper.
Supplies are responsible for communicating with customers about drinking water issues.	<ul style="list-style-type: none"> Create Statewide Advisory Council to generate lead public awareness campaign materials. Create Local Advisory Councils in larger cities to advise on distribution of educational materials in their community.
Many supplies still using their original distribution system materials evaluation. Original evaluations not required to be submitted to the state.	<ul style="list-style-type: none"> Require updated distribution system materials inventories: preliminary inventory due 1/1/2020, verified inventory due 1/1/2024. Require inventory be submitted to the state. Require annual update to state on status of LSL replacement. Require customers be notified if served by a LSL. Make service line summary information available.
Original sampling pools were designated in 1990s and not required to be submitted to the state.	<ul style="list-style-type: none"> Sampling pools must be reviewed and/or updated based on current materials inventory, and submitted to the state by 1/1/2020. Emphasize sampling at sites with lead service lines, if present.
All valid compliance samples used to calculate lead and copper 90 th percentile values.	Only use highest result of valid compliance samples taken at a site to calculate lead and copper 90 th percentile values.
Only first-draw samples after at least 6 hours stagnation are used for compliance, potentially representing only water in the fixture and indoor plumbing.	Require second sample at sites served by a lead service line. Second sample taken after 6 liters of water has been drawn, to more closely represent water in the service line.
Recent guidance provided on maintaining corrosion control treatment when changing sources or treatment.	Clarify requirements for source water or treatment changes to ensure ongoing maintenance of optimal corrosion control treatment.

Draft proposals as of January 29, 2018.

