

Interruptions, Disturbances, and Construction

Requirements and Considerations for LCRR

Outline

- Interruption/Disturbance Protocol
- Filters and Public Education
- Replacement Notifications



Interruption/Disturbance Protocol

What to do if you have an interruption or disturbance



Physical Investigations

- Visual Inspection
- CCTV
- Excavation



REMEMBER: LCRR does not require physical investigations, just records review

Physical Investigations

- Consider whether your investigations are going to disrupt/disturb your service line
- If you do, you need to notify

Method	Disturbance Chance	Disruption Chance	Accuracy
Records Review	None	None	L to H
Visual Inspection	None	None	M to H
Internal CCTV	M to H	M to H	L to H
Excavation	Н	Н	M to H



Two Disturbance Situations

For lead/GRR/unknown service lines



Disturbances when water is shut off/bypassed (and you're not conducting a replacement)

What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
1. Info on the potential for elevated lead levels	Anyone at the service	Before the line is
2. Instructions on flushing to remove particulate lead	connection	returned to service



§141.85(f)(1)

Disturbances from replacing meters, meter setters, goosenecks, pigtails, or connectors

What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
 Info on the potential for elevated lead levels Public education materials A pitcher filter or point-of-use device with instructions for use and 6 months worth of replacement cartridges 	Anyone at the service connection	Before the line is returned to service



Filters and Public Education



Filters

Pitcher filters or point-of-use devices:

- Must be NSF/ANSI Standard 53 certified to remove lead
- Must include instructions for use
- Must include six months of replacement cartridges



Public Education Requirements

- 1. Notice of elevated lead levels
- Health effects of lead
- 3. Sources of lead
- 4. Steps your customers can take to reduce exposure to lead in drinking water
 - Run water to flush out lead
 - Use cold water for cooking and preparing baby formula
 - Do not boil water to remove lead
 - Look for alternative sources or treatment of water
 - Get your child's blood tested



§141.85(a)

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Public Education Requirements

- 5. Explain why there are elevated lead levels and what the water system is doing to reduce them
- Provide contact info
- 7. Discuss opportunities to replace LSLs and explain how the customer can access your inventory to determine if they have an LSL
- 8. Include info on financing programs that can assist your customers in replacing their portion of the LSL
- 9. Include a statement that the water system is required to replace their portion of an LSL if the customer replaces their portion



§141.85(a) 12

Public Education Requirements

- Requirements for Community systems:
 - Must tell customers how to get their water tested
 - Discuss lead in plumbing components
 - Discuss the difference between "low lead" and "lead-free"



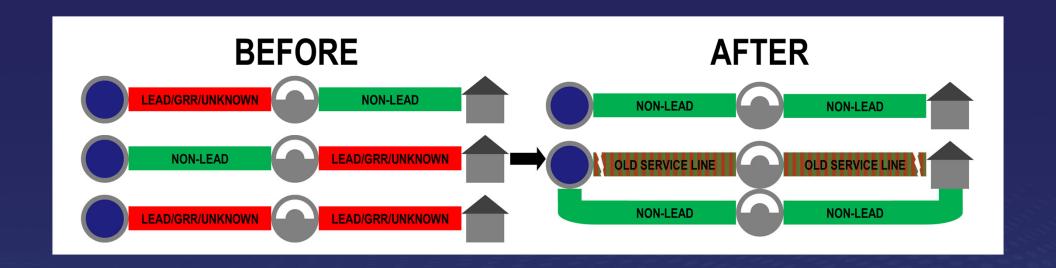
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Replacements

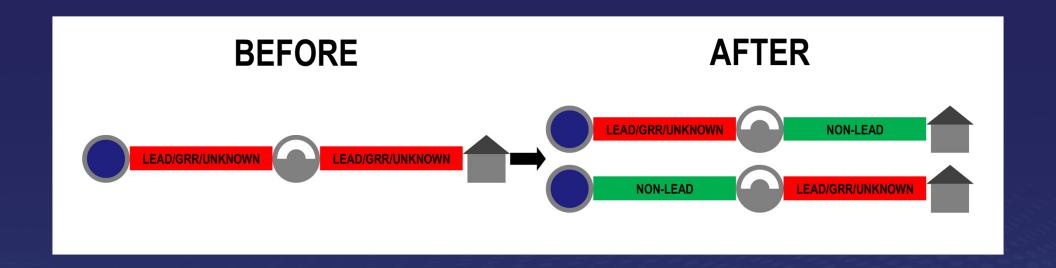


Full Replacements





Partial Replacements





Replacement Considerations

- Full replacements include replacing downstream galvanized
- While lead gooseneck, pigtails, and connectors don't count towards LSL classification, they do count toward the lead-free definition for full replacements, and are required to be replaced when encountered



Notification Requirements for Full Replacements

What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
1. Notice of replacement	The service line owner (or their agent) and any affected residents	Within 24 hours of completing the replacement
 Public education materials Information on flushing A pitcher filter or point-of-use device with instructions for use and 6 months worth of replacement cartridges Must offer to collect follow-up tap samples 3-6 months after completion 	Any affected residents	Before the line is returned to service



Notification Requirements for Partial Replacements

What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
 Notice of replacement Offer to replace the customer's portion 	The service line owner (or their agent) and any affected residents	At least 45 days prior to replacement
 Public education materials Information on flushing A pitcher filter or point-of-use device with instructions for use and 6 months worth of replacement cartridges Must offer to collect follow-up tap samples 3-6 months after 	Any affected residents	Before the line is returned to service
completion		



Notification Requirements for Multi-Family Dwellings

- Public education may be posted at a conspicuous location instead of being provided to all individual residents
- Filters, etc. need to be provided to every residence in the building





Partial Replacements From Emergency Repairs



What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
 Public education materials Information on flushing A pitcher filter or point-of-use device with instructions for use and 6 months worth of replacement cartridges 	Any affected residents	Before the line is returned to service



- If a system learns that a customer is going to replace their portion of the service line, they need to make a good faith effort to coordinate simultaneous replacement of its portion
- If they can't, the system has 45 days to replace their portion (from the date the customer completed their replacement)
- If the system fails to replace their portion within 45 days, they have 30 days to notify the State and request an extension
- They must complete their replacement within 180 days of learning of a customer replacement



§141.84(d)(3)

What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
 Public education materials Information on flushing A pitcher filter or point-of- use device with instructions for use and 6 months worth of replacement cartridges 	Any affected residents	Within 45 days of a customer completing their replacement



- If a system learns that a customer has replaced their portion of the service line in the last six months, the system has 45 days to replace their portion (from the date they became aware of the replacement)
- If the system fails to replace their portion within 45 days, they have 30 days to notify the State and request an extension
- They must complete their replacement within 180 days of learning of a customer replacement



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What do you need to provide?	Who do you need to provide it to?	When do you need to do this by?
 Public education materials Information on flushing A pitcher filter or point-of-use device with instructions for use and 6 months worth of replacement cartridges 	Any affected residents	Within 24 hours of becoming aware of a customer replacement



§141.84(d)(4)



Questions?

Contact the Lead and Copper Monitoring Team

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