



# Lead and Copper Rule Revisions:

# **Communication**

## **A TCEQ Perspective**

# Lead and Copper Rule Revisions (LCRR)



October 16, 2024



New Lead Service Line (LSL) Inventory Notice Requirements



New LSL Disturbance Notice Requirements



New LSL Replacement Notice Requirements



New Trigger Level Exceedance (TLE) Notice Requirements



Revised Action Level Exceedance (ALE) Notice Requirements

# LSL Inventory

**All Water Systems** must submit the initial inventory per the LCRR compliance date of October 16th 2024.

Failure to submit an inventory will result in treatment technique violations per LCRR.

# What additional customer communication is required for LSL Inventory?

You must make the initial inventory publicly accessible such as on the system's website, by mail, or in-person at your water system's office

Systems serving a population of 50,000 or more are required to make their LSL Inventory available online.

All Community systems are required to disclose a LSL Inventory materials statement on their CCRs – even if you have no Lead Service Lines in your inventory.

# No LEAD Service Lines (LSL) in Your inventory?



## Great!

After inventory is complete, either make the initial inventory publicly available (online)  
**OR**  
Provide a written statement that your system has no LSLs, GRRs, or lead status unknown service lines along with a statement describing the steps used to make the determination.

- However, you still must disclose there are no LSLs in the following ways:
- Even if a CWS does not have LSL in their inventory, the CCR still needs to include a statement indicating they have no LSLs in the CCR each year.
- EPA recommends to document the evidence-based records, methods, and techniques that you used to determine that all service lines are non-lead to help with customer communications, transparency, and State review.

# LSL Inventory Public Notice



Public Notification of inventory needs to be issued to customers by November 15th, 2024 to remain compliant.



Repeat the notification annually until the entire service connection is no longer a lead, galvanized requiring replacement, or lead status unknown service line.



For new customers, water systems shall provide the notice at the time-of-service initiation (for instance, new customer moves into the home).



# LSL Public Notice must include:



MATERIAL OF  
SERVICE LINE  
IF KNOWN



HEALTH  
EFFECTS OF  
LEAD.



STEPS  
CONSUMERS  
CAN TAKE TO  
REDUCE  
EXPOSURE  
TO LEAD IN  
DRINKING  
WATER.



CONTACT  
INFORMATION  
FOR THE  
SYSTEM



LSL  
REPLACEMENT  
AND FINANCING  
OPPORTUNITIES



SYSTEM  
REQUIREMENT TO  
REPLACE THE  
SYSTEM'S PORTION  
WHEN A CUSTOMER  
REPLACES THEIR  
PORTION

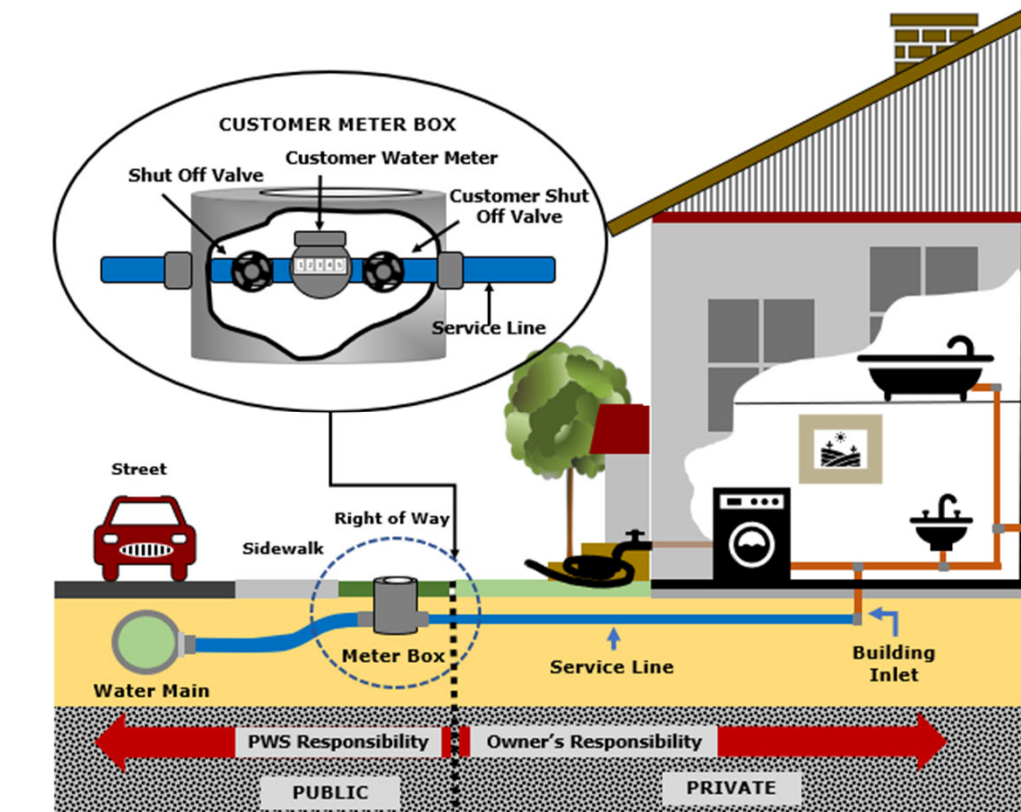
# New Disturbance and Replacement Public Notice Requirements are Coming



TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

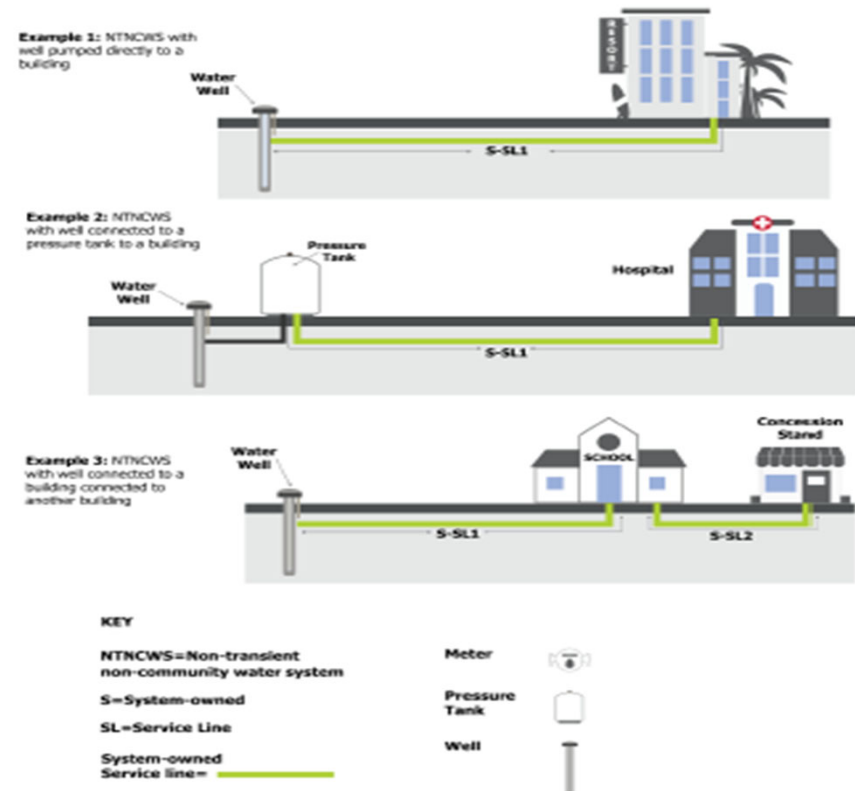


Example of Community PWS  
Owned portion of service line vs.  
customer-owned portion of service  
line



Example of NTNC PWS owned portion of service line vs. customer-owned portion of service line

Exhibit 4: Examples of a Non-transient Non-community Water System (NTNCWS) Service Configurations (Profile View)



# Upcoming Notice Requirements LSL Disturbance

## Before Service Line Returns to Service

- Flushing Education
- Pitcher Filter or POU (only certain LSL disturbances)
- Lead Public Education

**Texas Commission on Environmental Quality  
Form 20681a  
Lead Exceedance Public Education Requirement  
FOR COMMUNITIES**

**IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER:**

[public water system (PWS) name] found elevated levels of lead in drinking water in the building(s) or residences during [sample date of Lead and Copper sampling]. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

This notice is being sent to you by [PWS name] Texas State Water System ID # [PWS ID] on [date of notice].

This notice is to inform you that some lead and copper tap samples showed high lead levels above the Environmental Protection Agency (EPA) action level of 15 parts per billion (ppb), or 0.015 milligrams of lead per liter of water (mg/L).

Please note, this is not a violation under federal or state drinking water regulation, but does require [PWS name] to post Lead Public Education and conduct subsequent sampling. If high lead levels continue to be found, a program must be implemented to minimize lead in your drinking water. This program may include adding corrosion control treatment, source water treatment, or replacing lead service lines. For more information, call us at [PWS phone number] or visit our website at [PWS website]. For more information on reducing lead exposure around your home or building and the health effects of lead, visit EPA's website at [www.epa.gov/lead](http://www.epa.gov/lead), or contact your health care provider. This document explains the simple steps you can take to protect you and your family by reducing your exposure to lead in drinking water while in the [PWS name] homes(s).

**Health Effects of Lead**

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys, and can interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.

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# Upcoming Notice Requirements LSL Full or Partial Replacement

Before service line is returned to service:

- Flushing Education
- Pitcher Filter or POU
- Lead Public Education

No Later than 6 Months after replacement:

- Offer Tap Sampling

45 days prior:  
*(Only for partial LSL replacement)*

- Provide to notice to customer
- Must explain that the system will replace the portion of the line it owns and offer to replace the portion of the service line not owned by the water system

# Upcoming Notice Requirements for TLE

## LSL Replacement Plan Notice

- Provide notice within 30 days (Tier 2) of the end of the tap sampling period where exceedance occurred.
- Provide information on system's LSL replacement program and opportunities for replacement.

## Outreach for failure to meet LSL replacement Goal

- Systems with 90<sup>th</sup> percentile TLE are required to conduct goal-based LSL replacement at a rate approved by TCEQ.
- Systems that fail to meet the replacement goal must conduct one outreach activity as defined in rule. – look at rule
- Subsequent goal failure will result in additional outreach activities up to 3 per year.

# Upcoming Revised Notice Requirements for ALE



## Lead Consumer Notice

- For individual tap samples/customers
- NEW! Distribution required 3 days (from System's receipt of lab results) for samples exceeding 15 µg/L.

## PN required for 90th percentile ALE

- NEW! Provide PN within 24 hours (upgraded to Tier 1 Public Notice)

# NOTICE REQUIREMENTS FOR ALE

## Requirements with No Change under LCRR regarding ALE:

- Provide Lead Public Education within 60 days after the monitoring period in which the ALE occurred (same).
- Offer additional tap sampling (same)



# GENERAL PUBLIC NOTICE REQUIREMENTS

## Under LCRR:

- **Monitoring/Reporting (M/R) Violations are Tier 3 PNs**
- **Treatment Technique (TT) Violations are Tier 2 PNs**
  - **Any violation of 40 CFR 141.84 (Lead service line replacement requirements) is a TT violation.**
- **Standard health effect language for Lead was revised.**



# Is Your Public Water System Ready for the LEAD AND COPPER RULE REVISIONS (LCRR)?

By **OCTOBER 16, 2024**, you must:






1



Begin complying with these revised rules.

Visit [www.tceq.texas.gov/goto/lcrr](http://www.tceq.texas.gov/goto/lcrr) to find

-  the Service Line Inventory form,
-  LCRR compliance resources, and
-  a link to EPA's LCRR regulatory guidance.





2



Submit your initial Service Line Inventory form (TCEQ-20943).

Visit our Financial, Managerial, and Technical Assistance Program webpage at [www.tceq.texas.gov/goto/fmt](http://www.tceq.texas.gov/goto/fmt) or email [FMT@tceq.texas.gov](mailto:FMT@tceq.texas.gov) for

-  information or help preparing or submitting your Service Line Inventory form and
-  training on LCRR requirements.

For more help or questions on these requirements, contact the Lead and Copper Monitoring team at [LCRR@tceq.texas.gov](mailto:LCRR@tceq.texas.gov) or call 512-239-4691 and ask for the Lead and Copper Program.



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