



LCR Revision: Will Your Utility Be Ready



What the timeline for compliance?



Dec. 16, 2021

Effective Date

EPA develops LCRI
(draft in 2024)



Oct. 16, 2024

Compliance Date

- Develop list of schools & licensed childcare facilities for sampling
- Submit to the State:
 - Service Line Inventory
 - LSL Replacement Plan



2025

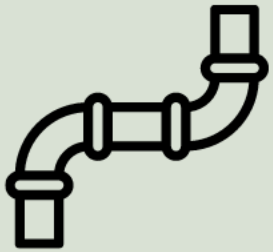
- Start of 1st tap sample monitoring period.

Submit to the State:

- Tap sample sites
- WQP sites (if required)
- Tap sampling protocol (providing to individuals who are sampling)

Focus Areas

Lead & Copper Rule Revisions



—
**Service Line
Inventory**



—
**Water
Quality**



—
Collaboration



—
Budgeting



—
Communication

Inventory



Deadline: Oct 16, 2024; annual updates



Records review required



Field inspections allowed



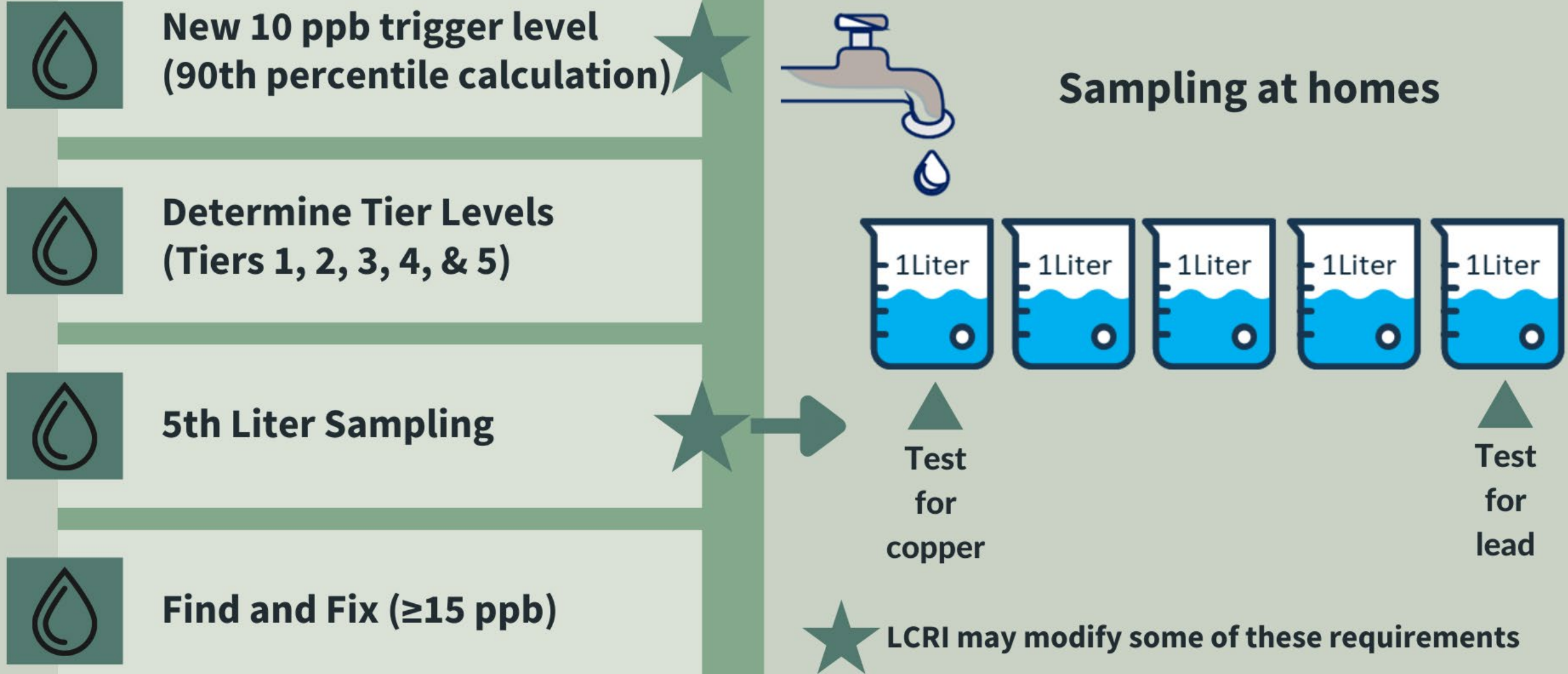
Unknowns = Lead



Galvanized pipe on customer side = Lead



New compliance sampling protocol



Corrosion Control Treatment & Water Quality Parameters



P90: >10 & ≤ 15
Conduct CCT study,
if TCEQ requires



P90: > 15
Complete CCT
installation



P90: >10 & ≤ 15
Follow steps in rule
for re-optimizing



P90: > 15
Re-optimize

***Small systems flexibility**

Collaborate

Within Utility

Meter Services

Field Operations

Customer
Service

Public
Engagement

Capital Delivery

Water IT

Laboratory

Other City Departments

Code
Compliance
Consumer
Health

Neighborhood
Services

Development

State Agencies

TCEQ

TEA

TDSHS

Local

County Health
Departments

Schools
(ISDs, parochial,
private, charter)

Licensed child
care

Other

Plumbers

Realtors

Social Service
Organizations

Builders and
Developers

Equity Issues



Adequate staffing?



Hire consultants/contractors?



Operational Costs

- Bottles (2 sizes)
- Pitcher/Filters
- Printing, mailing for public outreach
- Gift cards for compliance monitoring participants
- Staff resources for program compliance

Cost impacts

Public Outreach



- Inventory
- **Compliance Sampling**
- **Public Notification**
- School & Daycare Sampling
- **Corrosion Control**
- **LSL Replacements**
- **Disturbances**
- Health Departments
- Annual Water Quality Report (CCR)



Individual Test Results

- 30 days if <15 mg/L
- 3 days if ≥ 15 mg/L
- Must make results public



Overall results

- Annual outreach to state and local health departments
- Publicly available within 60 days



Exceedances require outreach

- $>$ trigger level
- $>$ action level
- **AL exceedance = public notification (24 hours)**



Compliance Sampling

Trigger Level Exceedance (>10,000 served) Goal-based LSR replacements

**Failure to meet
replacement goal in
1st year**

```
graph LR; A[Failure to meet replacement goal in 1st year] --> B[Must do one outreach activity (5 options)]; B --> C[More outreach required each successive year fail to meet goal (1 of 5 plus 2 of 4)];
```

**Must do one
outreach activity
(5 options)**

**More outreach
required each
successive year fail to
meet goal
(1 of 5 plus 2 of 4)**



Planned water line replacements



Unplanned water line repairs



Disturbances



Customer initiated replacements

Outreach: LSL Replacements

To do list (by Oct. 16, 2024)

- ✓ **Develop a SL inventory**
- ✓ **Eliminate “unknown” SL**
- ✓ **Prepare website for displaying**
- ✓ **Develop a LSL Replacement Plan (including Find & Fix protocols)**
- ✓ **Develop an SOP for disturbances of lead, unknown and galvanized downstream of lead**

- ✓ **Prepare sampling plan for schools and registered daycares**
- ✓ **Update sampling pool in accordance with new tiers**
- ✓ **Revise sampling protocols to meet new requirements**
- ✓ **Contract with a lab, if no in-house capability**
- ✓ **Develop public education materials /notifications**

Takeaways



This rule is complex.



This rule is expensive.



If you have not started, you are already behind.



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Thank You



Additional Information



System size matters little



Corrosion Control Treatment



Water Quality Parameter Monitoring



Post inventory to website



Resources: Rule



Lead and Copper Rule Revisions

www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule



Lead and Copper Rule

www.epa.gov/dwreginfo/lead-and-copper-rule



TCEQ Lead & Copper Rule Revisions

www.tceq.texas.gov/drinkingwater/chemicals/lcrr



TCEQ Drinking Water Advisory Work Group

www.tceq.texas.gov/drinkingwater/dwawg



Resources: Financing



Drinking Water State Revolving Loan Fund:

www.epa.gov/dwsrf



EPA Bipartisan Infrastructure Law (aka Infrastructure Investment & Jobs Act):

www.epa.gov/infrastructure



DWSRF specific BIL site:

www.epa.gov/dwsrf/bipartisan-infrastructure-law-srf-memorandum



Texas Water Development Board:

www.twdb.texas.gov/financial/programs/DWSRF/index.asp

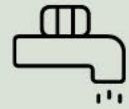
Inventory

Data Availability

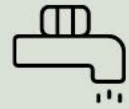
- Must include location identifier
- Info in CCR on how to access
- Large systems (>50,000 served) must post on website

Notify

- Customers with LSL, galvanized requiring replacement or unknown
 - Within 30 days of completing inventory
 - Annually until no longer in any of these categories
 - New customers at time service initiated
 - Notification language varies



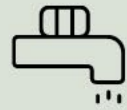
Notification to property owners and people at location at least 45 days before planned work will result in LSL replacement;



Must offer to replace private portion, but not required to pay for it

Planned

LSL Replacements - Partial



Notification to customers **before** SL placed back in service:



May experience a temporary increase of lead levels in their drinking water due to the replacement



Required language on health effects of lead



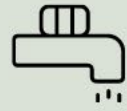
Actions to minimize exposure to lead in drinking water



Procedure for flushing



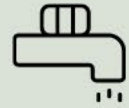
Pitcher filter or POU device with six months of filters



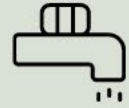
Offer of follow-up tap sample 3 to 6 months after SL replacement

Planned &
Unplanned

LSL Replacements
Partial or Full



When notified customer portion is being replaced and simultaneous replacement cannot be conducted or when find out it was replaced within previous six months:



Notification to customers **before** SL placed back in service:



May experience a temporary increase of lead levels in their drinking water due to the replacement



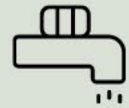
Required language on health effects of lead



Actions to minimize exposure to lead in drinking water



Procedure for flushing



Pitcher filter or POU device with six months of filters

Customer
Initiated

LSL Replacements

Disturbances

Shut off or bypass
(operating a valve on a service line or meter setter, and without conducting a partial or full lead service line replacement)



Replacing an inline water meter, a water meter setter, or gooseneck, pigtail, or connector

Corrosion Control



**America's Water
Infrastructure
Act of 2018**

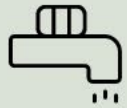


Annual
Water Quality
Report



Information on
corrosion control efforts

Schools and daycares



Elementary Schools and daycares



Health risks



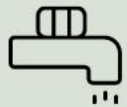
Requirement to sample; proposed schedule



Instructions and 3Ts document



Results and remediation options



Secondary Schools



Health risks



info on how to request sampling



Results and remediation options





State & Local Health Departments



Find & Fix

- Location of sites exceeding action level
- Result of initial tap sample
- Result of follow-up tap sample
- Result of water quality parameter monitoring
- Distribution system management actions
- Corrosion control treatment adjustments made



Schools and Daycare Results



Timing and Delivery

- Annually by July 1 of following year
- By mail or other state approved delivery method

Annual Water Quality Reports (CCR)



Table

- 90th percentile value
- # of sites exceeding action level
- Range of tap sample results



Statements

- Inventory prepared & how to access
- Complete sampling data are available & how to access