



Accelerating the Removal of America's Lead Pipes

EPA's Proposed Updates to the Lead and Copper Rule

Summary: On October 10, 2019, the Environmental Protection Agency (EPA) took historic action by proposing significant improvements to the Lead and Copper Rule (LCR) that would reduce lead in the nation's drinking water. One of the most significant improvements to the current rule addresses the requirements for lead service line replacement. The existing rule's 7% replacement rate is rarely occurring due to weaknesses in the current rule.

The improvements outlined below would result in a 3-to 30-fold increase in lead service line replacement investments by closing these loopholes, propelling early action, and strengthening replacement requirements. Through the proposal's set of interrelated actions that work together combined with its transparency and outreach requirements, it will increase the current rate of lead service line replacements and better protect America's families and children.

EPA's LCR proposal will result in more lead service lines replacements through the following improvements to the current rule:

For Large Community Water Systems (serving <10,000 customers)

1. Lead Service Line (LSL) removal begins sooner.

- Systems start removing LSL at 10 part per billions (ppb) versus 15 ppb.
- Systems will begin replacements based on a goal set with their state at >10 ppb and < 15 ppb.

2. More stringent sampling will identify more LSLs sooner.

- Systems with levels above 10 ppb will monitor more frequently, at more targeted sampling sites, and using improved sampling procedures that will better find the high lead levels that compel replacement.
- At >10 ppb systems will monitor annually or semi-annually at the standard number of sites (no reduced monitoring at >10 ppb).
- All samples must be taken at homes with LSL, likely to have higher levels of lead.
- Common sampling procedures used to lower the lead in samples will be prohibited. For example, cleaning faucet aerators of lead particles prior to sampling.

3. Systems must replace the entire lead service line.

- Partial lead service line replacements will not meet the proposal requirements.
- Water systems must replace the water system-owned portion of an LSL when a customer chooses to replace their customer-owned portion of the line.

4. Systems will no longer be able to "test out" lines.

- The current rule allows system to count the line as replaced towards their 7% removal if a sample taken from an individual line is below 15 ppb — even when no replacement construction has occurred.
- The proposed rule removes this provision.

5. Systems will no longer be able to avoid or quickly stop removal.

- Currently, water systems can stop the 7% removal of lead service lines if after one year or less once they are below the action level.
- The proposed rule requires water systems that fall under the rule's mandatory 3% replacement program to have lead levels less than the 15ppb action level for two years prior to ending its replacement program.

6. Neighborhoods will know where their LSLs are located.

- Water systems must make their LSL inventory publicly available, so people know about the LSLs in their neighborhood which could compel local action.

7. Customers with an LSL will know they have an LSL.

- Systems must notify occupants of homes with LSL every year about the presence of their LSL.
- Systems will also be required to provide information about options for mitigating risk, including removing the LSL.

For Small Community Water Systems (serving <10,000 customers)

8. Smaller systems that remove LSL will have a specific timeframe for removal.

- Small water systems that select LSL replacement as their compliance option would have to replace LSLs on a schedule not to exceed 15 years if they exceed the action level.
- The current rule does not provide a specific timeframe.