

LCRR/LCRI: A FIELD GUIDE

LCRI: Lead and Copper Rule Improvements

Applicability: Community Water Systems (CWSs) and Non-Transient, Non-Community Water Systems (NTNCs)

At-A-Glance Timeline:

- **October 16, 2024:** Initial Lead Service Line Inventory (LSLI) due under the Lead/Copper Rule Revisions (LCRR). Systems must complete 24-hour Tier 1 Public Notice (PN) for lead ALEs at 15ppb.
- **July 1, 2025:** Annual customer service line notifications must be certified/submitted to the DWP.
- **December 31, 2025:** Annual customer service line notifications must be distributed unless all service lines non-lead.
- **July 1, 2026:** Annual customer service line notifications must be certified/submitted to the DWP.
- **December 31, 2026:** Annual customer service line notifications must be distributed unless all service lines non-lead.
- **July 1, 2027:**
 - Annual customer service line notifications must be certified/submitted to the DWP.
 - Sample Site Plan due.
- **November 1, 2027 (COMPLIANCE DATE):**
 - Beginning of LCRI program year 1.
 - Baseline Inventory – all CWS and NTNC systems.
 - Service Line Replacement Plan – CWS and NTNC systems with lead, GRR, or unknown service lines.
 - List of schools and licensed childcare facilities served or certification that the system does not serve any – CWS only.
 - Systems must complete 24-hour Tier 1 PN for Lead ALEs at 10ppb.
- **December 1, 2027:** Annual customer service line notifications must be distributed unless all service lines non-lead.
- **January 1, 2028:**
 - Copy of tap sample protocol provided to samplers due.
 - PWSs with Lead or GRR service lines must begin first of 2 consecutive six-month (6M) monitoring periods of routine tap monitoring (January 1 – June 30, 2028).
 - Other systems may remain on reduced monitoring if they meet all criteria.
 - PWSs with Tier 1 and Tier 2 sample sites (sites served by lead service lines) must begin following the 1st and 5th liter sample collection protocol at these sample sites.
- **December 31, 2028:** End of LCRI program year 1.
- **January 30, 2029:** Annual inventory update is due. Certification of annual customer service line notifications for the previous calendar year is due to be submitted to the DWP.
- **March 1, 2029:** Annual customer service line notifications must be distributed unless all service lines non-lead.
- **December 31, 2034:** Service Line Inventory validations must be complete.
- **January 30, 2035:** Service Line Inventory validation results must be submitted to DWP.

Current Action Levels:

Lead: 0.015 mg/L

Copper: 1.3 mg/L

LCRI Action Levels:

Lead: 0.010 mg/L

Copper: 1.3 mg/L

The new lead action level is not enforceable until November 1, 2027.



LSL AND GRR REPLACEMENT

EPA is requiring full replacement of all lead service lines (LSLs) and galvanized requiring replacement (GRRs) lines under control of the water system within 10 years or less. Systems are required to replace a certain percentage of lines each year. Limited exceptions include:

- Providing deferred deadlines for water systems with a high proportion of known lead and GRR service lines in their system unless the State determines that the 10-year deadline or a shorter one is feasible.

LCRI prohibits partial LSL or GRR replacement unless it is part of an emergency repair or in coordination with planned work impacting service lines. Following a full or partial replacement and additional types of disturbances to lead, GRR, and unknown service lines, water systems are required to provide pitcher filters or point-of-use (POU) devices certified to reduce lead, six months' worth of replacement cartridges, and instructions for use.

Service Line Replacement Customer Refusals

If a system does not have legal and physical access to replace a service line, 4 attempts using at least 2 different contact methods must be made to get consent for the replacement. The PWS must document the attempts and try again if ownership changes. If consent is not granted, the replacement is not required.

BASELINE INVENTORIES & VALIDATION

Baseline inventories must include updated service line information and the address or location identifiers for all service lines and known connectors. To confirm that inventories are accurate, systems must validate (visually inspect) a subset of non-lead lines. This validation subset is a small percentage of randomly selected service lines from the inventory. The system-side and customer-side must both be visually inspected at 2 points of inspection for each service line. Service lines that do not have split ownership also need 2 points of inspection to complete the validation requirement.

If physical access to private property is necessary to complete the validation and the water system is unable to gain access, the system is not required to conduct a validation at that site. The system must replace the site by randomly selecting a new service line. All unknown lines must be identified by the replacement deadline.

Water systems with entirely non-lead inventories may submit a statement in lieu of the Baseline Inventory declaring their distribution system is lead, GRR, and unknown free by November 1, 2027, as long as their initial inventory submitted in 2024 contained all the information required in the Baseline Inventory.

Consumer Notification

All persons served by a service line that is known to or may potentially contain lead (lead, GRR, or lead status unknown service lines) must be notified of their service line material annually until the service line is reclassified as non-lead.

Systems will need to distribute these notices by 12/31/2026 and will need to certify by July 1, 2027, that the 2026 annual notices were distributed.

Systems need to include a representative copy of the notice being distributed upon submission. If a system elects to customize their public notice, they should submit a copy of that version and attach the Maine DWP template version with the public notice certification section filled out at the bottom of the form. This template is available on the [Maine DWP LCRR / Inventory](#) webpage and is titled "Direct Notice to Customer Served".

Annual Service Line Inventory Updates

Following the Baseline Inventory due date, water systems containing LSLs, GRRs, or unknown service lines must submit annual updated inventories to the DWP including the following:

- ✓ The total number of lead, GRR, non-lead, and unknown service lines.
- ✓ The total number of lead connectors and connectors of unknown material.
- ✓ The total number of lead and GRR service lines fully and partially replaced in each preceding year.

Inventories must be updated annually beginning November 1, 2027, and must include total numbers of LSLs and GRRs replaced in each preceding year.

Inventories must be made publicly accessible and include a street address associated with each service line and connector or a unique locational identifier (e.g., block, GPS coordinates, intersection, or landmark) if a street address is not available. Water systems serving over 50,000 persons must make their inventory accessible online.

All unknown service lines must be identified by the service line replacement deadline.

LSL and GRR Service Line Replacement Plans (LSLRP)

Systems must include the following elements in the service line replacement plan and update it periodically with new information:

1. Strategy for identifying unknown service lines.
2. Standard operating procedure for full service line replacement.
3. Communication strategy to inform consumers and customers before full or partial replacement.
4. Procedure for consumers and customers to flush service lines and premise plumbing.
5. Strategy to prioritize replacements based on (but not limited to) known lead and GRR service lines and community-specific factors such as disproportionately impacted and/or sensitive populations
6. Funding strategy.
7. Communication strategy to inform residential and non-residential consumers and customers about the replacement plan and program.
8. Identification of any State and local laws and water tariff agreements that affect the water system's ability to gain access to conduct full service line replacement.



Replacement plans must be made publicly accessible and posted online for water systems serving more than 50,000 persons. For systems that identify any lead-lined galvanized service lines in the inventory, the plan must include a strategy to determine the extent of the use of these lines in the distribution system and categorize them accordingly. For systems that are eligible for and plan to use a deferred deadline, the plan must include documentation that the systems meet the eligibility criterion and that the deferred deadline and associated replacement rate are the fastest feasible.

TAP SAMPLING

Key sampling changes from the final LCRI:

- Prioritizes collecting samples from sites served by LSLs. All samples must be collected from sites served by LSLs and/or premise plumbing made of lead, if the system has any.
- Modifies the tiering criteria that indicates where tap samples must be collected to include LSLs and premise plumbing made of lead (where known) as the highest priority Tier 1 and Tier 2 sites. Also,

revises the Tier 3 criteria to include sites served by a lead connector and sites served by a galvanized service line or containing galvanized premise plumbing identified as ever having been downstream of an LSL.

- Requires water systems with LSLs to collect an additional fifth-liter sample at the same time as the first-liter sample (i.e., first-and-fifth-liter-paired sample) for lead at LSL sites and use the higher of the two values to calculate the 90th percentile lead level.
- Specifies when samples must be included in the 90th percentile calculation when they are not part of the initial compliance sampling pool.
- Systems cannot provide sampling instructions that include aerator cleaning/removal or pre-stagnation flushing prior to sample collection.

Table 1: Updated Tiering criteria under LCRI

Tier	Description
Tier 1	HIGHEST PRIORITY Single-family structures (SFS) with premise plumbing made of lead and/or served by a lead service line (LSL).
Tier 2	Buildings, including multiple-family residences, with premise plumbing made of lead and/or served by an LSL.
Tier 3	SFS served by a lead connector or SFS served by a galvanized service line or containing galvanized premise plumbing identified as ever having been downstream of an LSL.
Tier 4	SFS that contain copper premise plumbing with lead solder installed before the effective date of the State’s applicable lead ban (Jan 1, 1989, in Maine).
Tier 5	LOWEST PRIORITY SFS or a building in which the plumbing materials used at that site would be commonly found at other sites served by the PWS (i.e., representative of sites throughout the distribution system).

Ongoing Sampling

Ongoing monitoring under LCRI begins
January 1, 2028.

By July 1, 2027 (prior to the first lead/copper monitoring period beginning January 1, 2028), all water systems must submit a site sample plan to the Drinking Water Program (DWP) for review. The plan must include:

- ✓ A pool of tap sampling sites from the highest tier(s) based on the information gathered by the system as part of their lead service line inventory on the materials of service lines and connectors in their system.
- ✓ A list of water quality parameter entry point and distribution sampling locations.

6M Monitoring Criteria: Water systems with lead and/or GRR service lines must conduct standard six-month monitoring for 2 consecutive monitoring periods. Water systems that meet defined criteria under the LCRI tap sampling protocols such as the lower action level, prior to November 1, 2027, can remain on their existing sampling schedule.

Annual Monitoring Criteria: Water systems can qualify for annual monitoring if they do not exceed the lead action level of 0.010 mg/L or copper action level of 1.3 mg/L for two consecutive six-month tap monitoring periods after November 1, 2027 and meet their optimal water quality parameters (OWQPs) if applicable. When conducting annual monitoring, systems must sample for lead at the standard number of sites and for copper at the reduced number of sites.

Triennial Monitoring Criteria: Water systems can qualify for triennial monitoring at the reduced number of sites for both lead and copper if they meet their OWQPs (if applicable) and if they:

- Serve 50,000 or fewer people and their 90th percentile levels do not exceed the lead action level of 0.010 mg/L or copper action level of 1.3 mg/L for three consecutive years of sampling.

Customer Refusals

Water systems do not need to sample from a site in the sample plan after a customer refusal or two outreach attempts with no response from the customer. The number of refusals and non-responses from customers must be documented and reported to the State.

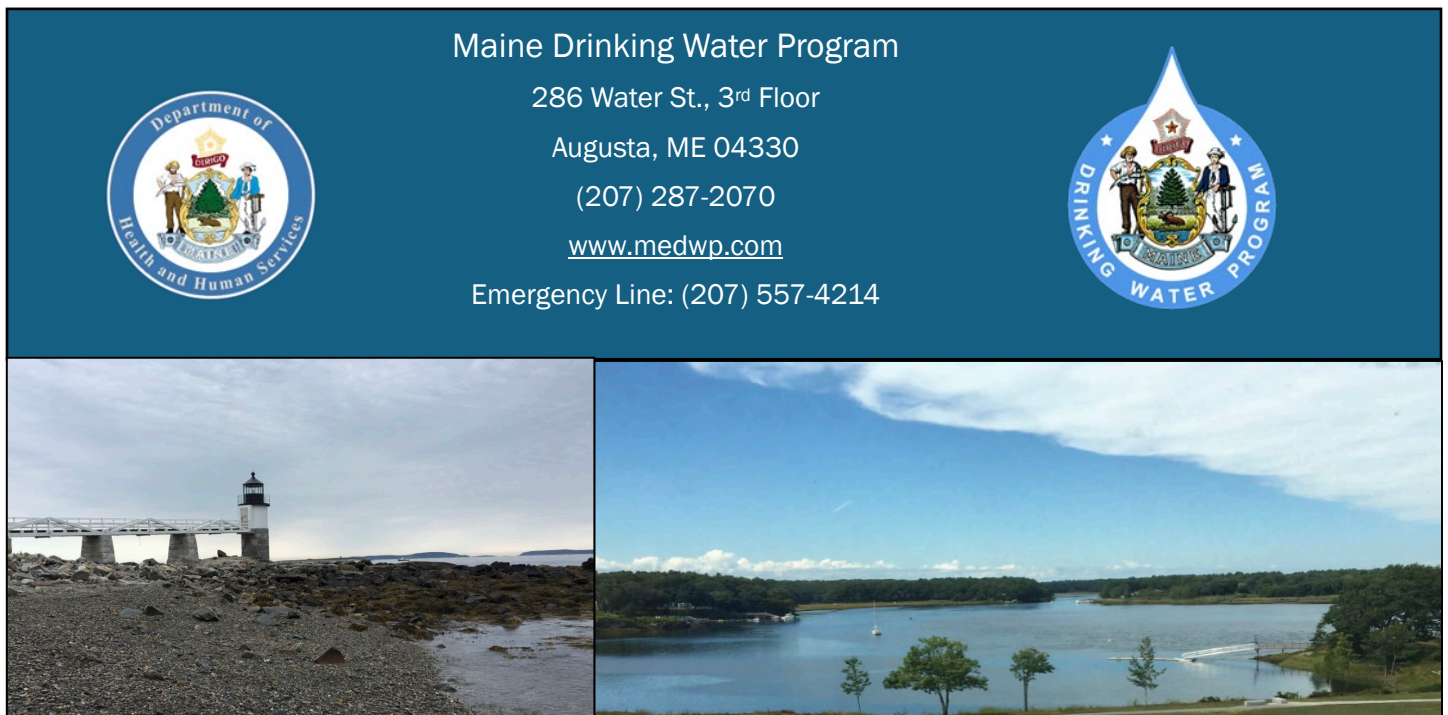
LCRI TECHNICAL FACT SHEETS

EPA has published technical factsheets for major components of the LCRI online. They can be found here:

<https://www.epa.gov/dwreginfo/lead-and-copper-rule-improvements-supporting-materials>

QUESTIONS? CONTACT US:

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The banner features a dark blue background with white text and two circular logos. On the left is the Department of Health and Human Services logo, which includes the state seal of Maine. On the right is the Maine Drinking Water Program logo, which is a water drop shape containing the state seal and the words 'DRINKING WATER PROGRAM'. The text in the center provides contact information for the program.

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