

LCRR/LCRI: QUICK REFERENCE

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 due (LCRR). Systems must complete 24-hour Tier 1 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.

BASELINE INVENTORIES & VALIDATION

Baseline inventories are due **November 1, 2027**.

- Must include address or location identifiers for all service lines and known connectors.
- Systems must begin validation procedures to confirm the accuracy of their inventory.
- Systems with entirely non-lead inventories may submit a statement in lieu of the Baseline Inventory declaring their distribution as lead-free, GRR-free, and unknown-free 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 classified as **lead**, **GRR**, or **unknown** 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 the end of each year.

Annual Service Line Inventory Updates

Systems with LSLs, GRRs, or unknown service lines must submit annual updated inventories to the DWP.

- **November 1, 2027 (COMPLIANCE DATE):** Beginning of LCRI program year 1-Baseline Inventory due.
- **December 31, 2028:** End of LCRI program year 1.
- **January 30, 2029:** Annual inventory update due (and every January 30 thereafter).

LSL AND GRR SERVICE LINE REPLACEMENT PLAN (LSLRP)

Systems with lead, GRR, and unknown service lines:

- Must submit a **service line replacement plan** by **November 1, 2027**.
- LSLRPs must be publicly accessible and updated annually beginning **January 30, 2029**.
- Systems must begin conducting replacement programs by **November 1, 2027**-LSLs and GRRs under control of the water system must be replaced **within 10 years**.
- System must document a least 4 attempts/2 methods for LSL replacement-if consent not granted, the replacement is not required.

TAP SAMPLING

Key sampling changes from the final LCRI:

- First monitoring period with LCRI sampling requirements: **January 1 – June 30, 2028**.
- Submit a **sample site plan** with new site tiering by **July 1, 2027**.
- **Systems with LSLs** must use first-and-fifth-liter-paired sampling protocol for lead at LSL sample sites and use the higher of the two values to calculate the 90th percentile lead level.
- Water systems with lead and/or GRR service lines must conduct 6-month monitoring beginning **January 1, 2028**.
- Systems that meet defined criteria, such as the lower action level, can remain on their existing schedule.
- Systems without LSLs or GRRs will have their schedules re-evaluated based on historical results.

SUPPORTING MATERIALS

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

LCRR/LCRI: A Field Guide (MEDWP)

QUESTIONS? CONTACT US:

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