

SEFLUC – LEAD AND COPPER RULE WORKING GROUP

13 MONTHS

SEPTEMBER 14, 2026



Introductions



Lead and Copper Rules Background

Lead and Copper Rule Revisions (LCRR)

Rule Effective Date: December 16, 2021

Rule Compliance Date: October 16, 2024

Lead and Copper Rule Improvements (LCRI)

Proposed Rule released: November 30, 2023

LCRI Release Date: October 8, 2024, effective date December 30, 2024

LCRI Compliance Date: November 1, 2027 (except 4 items)

Pending Lawsuits related to private property replacements, 10 year replacement time and available funding (LCRR in effect, LCRI with portions eliminated, full LCRI)

Group Purpose – Marta Reczko

Share the most recent information

Share information resources

Share Strategies/Difficulties

We began in March 2022 made it
through October 2024!



Agenda



- 1 Hour sessions before every other SEFLUC meeting on one topic

Today...

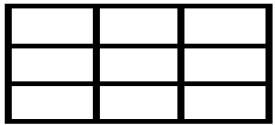
- What is due and when?
- Baseline Inventory
 - Supporting Activities
 - Templates and Supporting Materials

October 16, 2024 through Oct 31, 2027 Requirements

1. Lead and Copper Tap Sampling per LCR (old way) with results accessible within 60 days, and Large Systems must also have digital format
2. 24 hour notice to all customers if exceed the AL of 15 PPB for Lead
3. Service Line Inventory with tabs, submitted to FDEP or ACHD by 10/16/24
4. All Inventories Publicly available if > 50,000, and website if >100,000
5. Notification Letters to Customers within 30 days of submitting inventory (lead, GRR, unknown) (11/15/24) and Certification of Delivery to FDEP (7/1/25).
6. Notification to Customers annual (12/31/25 and 12/31/26) and Certification of Delivery (7/1/26 and 7/1/27)
7. Customer Service to provide line classification to new customers
8. Include how to access inventory in 2025 – 2027 CCRs, along with new lead language, range of results for lead and copper, and information on how to access results and rankings of the last tap sampling event.

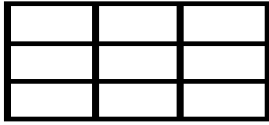
What is Due When per EPA?

**INITIAL
INVENTORY**



10/16/24

**BASELINE
INVENTORY**



11/1/27

SAMPLING



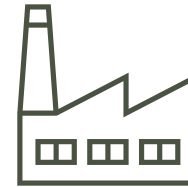
1/1/28

**SCHOOLS & DAY
CARES**



11/1/27

**WATER PLANT
CORROSION CONTROL**



2028?

**PITCHER
PLAN**

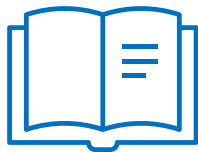


2028?

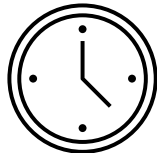
NOTIFICATIONS **SL REPLACEMENT PLAN** **24 HOUR NOTICE**



12/31/25(26)



11/1/27



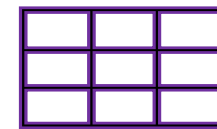
10/16/24?

PIPE REPLACEMENT



2027 - 2037

**INVENTORY
VERIFICATION**



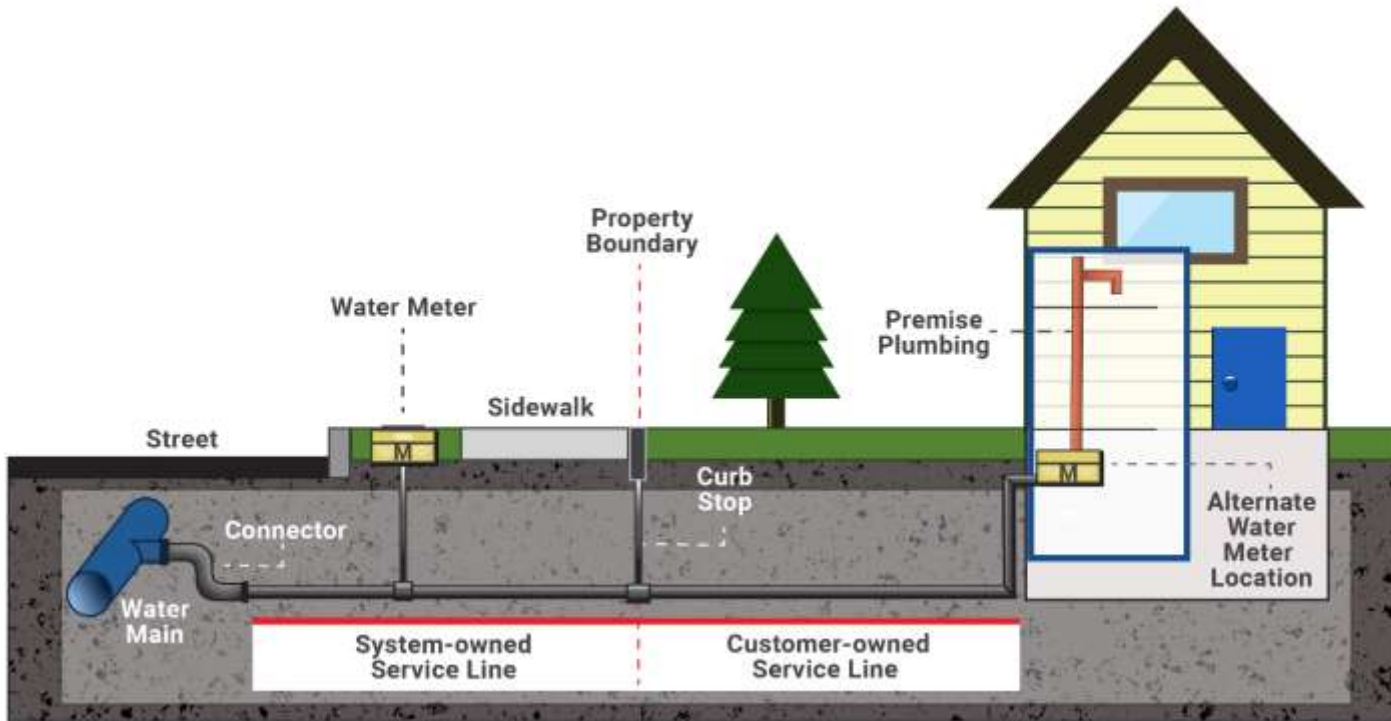
2034

MITIGATION



11/1/27

Baseline Inventory



- Service line composition (utility owned and customer owned) - Update
- Now includes address
- Connector information
- Due 11/1/2027 and annually starting (January 30, 2029)

Classification of Service Lines

LEAD

GRR*

NON-LEAD

UNKNOWN

* Galvanize Requiring Replacement (GRR) – where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a “Lead Status Unknown” service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.

Review LCRI Service Line Inventories – Tips August 2026



LCRI Service Line Inventories – Tips August 2026

Background

In 2024, water systems were required to complete an initial inventory to identify the material types of their service lines. Material types identified could include lead, non-lead, or galvanized requiring replacement (GRR). In the initial inventory, systems may have also identified a service line as “unknown” if they did not know the line material to be a lead, GRR, or a non-lead service line.

Building on the initial inventory, water systems must prepare and submit a Baseline Inventory by November 1, 2027 that updates the initial inventory.¹ Systems must then update their inventory annually.² Most water systems have up to ten years, until December 31, 2037, to identify all unknown service lines.³ Some water systems may qualify for a later deadline.⁴ Please see the appendix to this Tips document for strategies and case studies for identifying unknowns. Because service lines are connected to the water system’s distribution system, they are accessible at the juncture for investigation. Further, as described below and in the appendix to this tips document, there are methods to identify unknowns which do not rely on visual inspection of the pipe exterior. If physical access to private property is necessary to complete the inventory validation requirements and the water system is unable to gain access, water systems must randomly select another site for validation.

This document describes ways to determine service line material that can save inventory costs and reduce disruptions. The EPA recommends that water systems work with their primacy agency to identify and use effective, evidence-based inventory techniques. The EPA also recommends that water systems discuss with their primacy agency the validation steps they will need to take.

What’s an “unknown” line? A “lead status unknown service line” means a service line where the pipe material is not known to be a lead service line, galvanized requiring replacement service line, or a non-lead service line.⁵

Important Dates⁶

Initial Inventory:
October 16, 2024

Baseline Inventory:
November 1, 2027

Updated Inventory:
January 30, 2029
(annually)

Information Sources

To identify service line materials, water systems are required to use records including construction and plumbing codes, water system records, and distribution system inspection records. If approved by the primacy agency, water systems may use other evidence-based sources of information to determine that a service line is non-lead.⁷

Water System Personnel Experience: Water system personnel often have a deep knowledge of their distribution system, especially those with many years of experience. Water systems may use this knowledge as an

¹ 40 C.F.R. 141.84(a)(2)

² 40 C.F.R. 141.84(b)(1) and (3), and 40 C.F.R. 141.90(a)(4)(i)

³ 40 C.F.R. 141.84(b)(1)(i)

⁴ 40 C.F.R. 141.84(a)(5)(v)

⁵ 40 C.F.R. 141.84(b)(2) and 141.84(a)(3)(ii)

⁶ 40 C.F.R. 141.84(a)(3)(iv)

⁷ 40 C.F.R. 141.90(e)

https://www.epa.gov/system/files/documents/2026-08/508_0813inventorytips_clean.pdf

Add Connectors

Connector, also referred to as a gooseneck or pigtail, means a short segment of piping **not exceeding three feet** that can be bent and is used for connections between service piping, typically connecting the service line to the main. For purposes of subpart I of this part, lead connectors are not considered to be part of the service line.

Fittings are not considered connectors.

Connectors typically on utility side



Classification of Connectors per LCRI

Review information in:

- Plumbing codes
- Permits
- Records
- Other documentation that indicates material
- Other information approved by the state

All water system records on service lines and connectors:

- Distribution system maps and drawings
- Recent or historical records
- Meter installation records
- Historical capital improvement plans
- Standard Operating Procedures
- Distribution System Inspections
- Information on lead or galvanized steel identified

No need to inspect or dig

Connector Classification – enter in Inventory

LEAD – Connector is made of lead

NON-LEAD – Connector is determined through an evidence based record, method or technique

UNKNOWN – the **MATERIAL** of the connector is unknown

NO CONNECTOR PRESENT – no connector present and the service line directly connects a water main to the building inlet

**Does your central stores
have replacement
connectors?**



Use existing EPA Inventory Template?

Other Potential Sources of Lead		
Is there a Lead Connector?	Is there Lead Solder in the Service Line?	Describe Other Fittings and Equipment Connected to the Service Line that Contain Lead
<i>For example, lead gooseneck or pigtail where the water main is connected to the service line</i>	<i>Select Yes, No, or Don't Know</i>	<i>For example, backflow preventer or meter containing lead</i>
No	No	
No	No	
No	Don't Know	

(ii) Water systems must include each connector identified in paragraph (a)(2)(i) of this section in their baseline inventory. Connector materials must be categorized in the following manner:

(A) **“Lead”** where the connector is made of lead.

(B) **“Non-Lead”** where the connector is determined through an evidence-based record, method, or technique not to be made of lead. Water systems are not required to identify the specific material of a non-lead connector; however, they may use the material (e.g., copper or galvanized) as an alternative to categorizing it as “Non- Lead”.

(C) **“Unknown”** where the **material** of the connector is not known.

(D) **“No connector present”** where there is no connector at the location (e.g., where a service line directly connects a water main to a building inlet).

Submit Inventory to FDEP by Nov 1, 2027

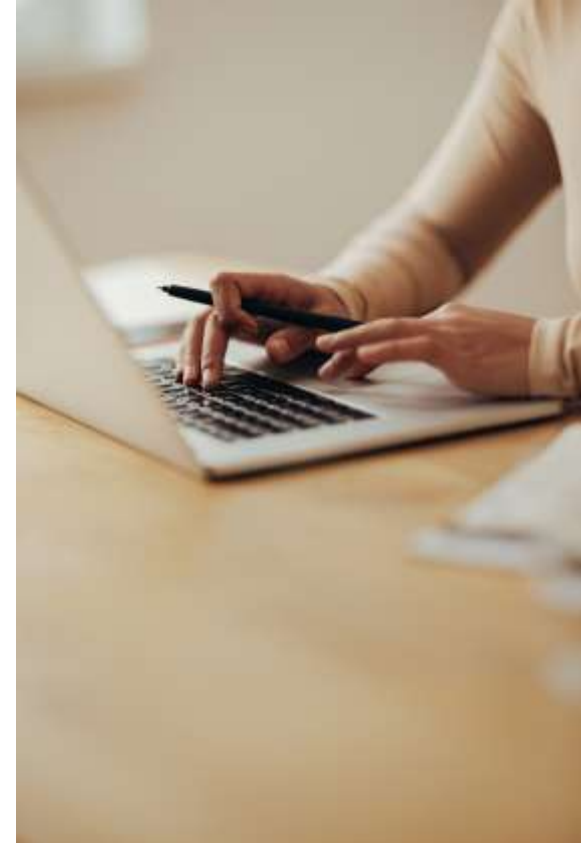
In addition to connector information:

Include addresses

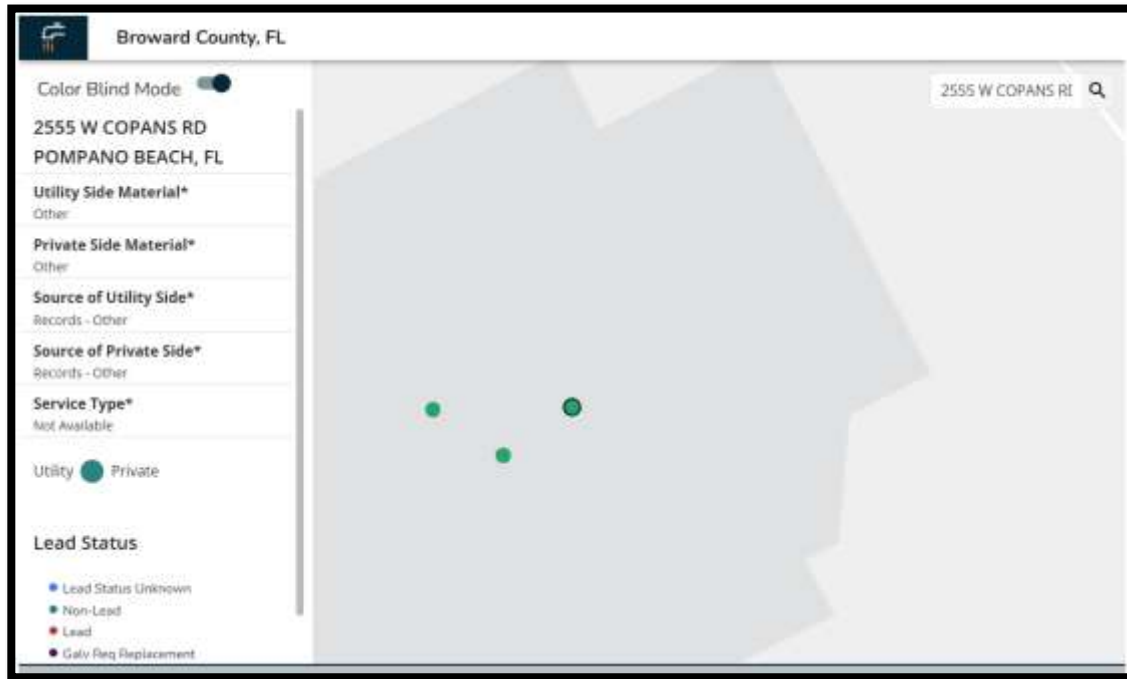
Update tabs in front pages of inventory

Update any service line information

Don't forget new tiers for tap sampling (AB
– AE columns in template)



Inventory Accessible to the Public



Inventory Publicly Accessible if >50,000 people

Include:

- Number of lead SLs
- Number of GRR SLs
- Number of Unknown SLs
- Number of Non-lead SLs
- Number of lead Connectors
- Number of Composition Unknown Connectors

By January 30, 2029

- Number of Full Lead Service Lines Replaced
- Number of Full GRR Replaced
- Number of Partial Lead Service Lines Replaced
- Number of Partial GRR Replaced

No Annual Inventory Submissions to FDEP

After the November 1, 2027 Submission if:

100% nonlead service lines, no lead connectors and no unknown connectors. (notify FDEP within 60 days if found)

May provide a written statement in lieu of the publicly accessible inventory, declaring that the distribution system has no lead, galvanized requiring replacement, or lead status unknown service lines, no known lead connectors, and no connectors of unknown material.

The statement must include a general description of all applicable sources used in the inventory.





30 Day Letters/Notices to Customers

Notify all customers with lead, GRR or unknown **Service line** by December 1, 2027 (30 days after submission of baseline inventory) and then annually by December 31

Certification of Delivery by (July 1, 2028)

No annual notification for lead connector (removed upon finding), and no notification for unknown connector compositions.

30 Day Letters Required Language –EPA Fact Sheet & Templates out

GRR Service Line

- Statement SL is Galvanized Requiring Replacement
- Health effects of lead (141.85(a)(1)(ii))
- Steps to reduce Lead Exposure
- SL replacement opportunity for customer

Lead Service Line

- Statement SL is made of Lead
- Health effects of lead (141.85(a)(1)(ii))
- Steps to reduce Lead Exposure
- SL replacement information (program/financing)
- **Statement Utility required to replace their portion of a lead line, if the customer replaces their portion**

30 Day Letters Required Language – EPA Fact Sheet & Templates out

Unknown Service Line

- Statement that SL is unknown, but may be lead
- Health effects of lead (141.85(a)(1)(ii))
- Steps to reduce exposure
- **Information about opportunities to verify the SL material**



Annual Report to FDEP



Beginning Nov 1, 2027, If a **consumer or customer** thinks the SL classification is in error, Utility must inspect the line within 30 days and document. Report to FDEP with inspections due Jan 30, 2029 and annually

1. Place contact on-line and train customer service and field to forward inquiry
2. Who will inspect the lines?
3. How will it be tracked?
4. Who will send the Report or Certification to FDEP?



Links

LCRI Rule (starts on page 86625) -

<https://www.federalregister.gov/documents/2024/10/30/2024-23549/national-primary-drinking-water-regulations-for-lead-and-copper-improvements-lcri>

Overall EPA LCRI -

https://www.epa.gov/system/files/documents/2024-10/final_lcri_fact-sheet_general_public.pdf

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

FDEP Due Dates - <https://floridadep.gov/water/source-drinking-water/content/lead-and-copper-rule-improvements>

Lead Goosenecks, pigtails and Connectors

Replace all found on utility side and provide information to inventory (comments?)

Offer to replace customer-owned if have access

If customer refuses, have them sign or document the verbal refusal

Replacement does not count as a LSL replacement

Mitigation required “upon replacement of any connector that is attached to a lead or GRR service line...”



City of Albany

Major Disturbance - Mitigation



No endorsement of brand –
certified by an American National
Standards Institute accredited
certifier to reduce lead

“If the disturbance of a lead, galvanized requiring replacement, or ...unknown service line results from the replacement of an inline water meter, water meter setter, or gooseneck, pigtail, or connection, the water system must provide the person served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance, public education materials..., a pitcher filter or point-of-use device ..., instructions to use the filter, and six months of filter replacement cartridges.”
The water system must comply... before the affected service line is returned to service.”

Lead Connectors

WHERE TO DOCUMENT?

[EPA SL Inventory](#)

GIS? Asset Management?

QUESTIONS RELATED TO CONNECTORS

Is an evidence-based approach to claim no connectors at site acceptable?

Can a predictive model or statistical approach be used?

Will new columns with dropdowns be provided or should we add these ourselves?

Should we add a column for removal date for connectors?

Consider...

Where will you track mitigation activity for connector replacement/removal?

Who will obtain the information from the field staff and place into the tracker?

Who will notify the laboratory about the testing 3 – 6 months after lead connector removal?

Where will the test results be tracked?

How will the test results be made available to FDEP or DOH?

Who will train field staff that finding a lead connector requires removal and possibly mitigation along with lab notification? And finding a non-lead connector requires tracking in inventory.

Who will train customer service customer on connection questions?



Next time: Schools/Day
Cares

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