ARKANSAS DEPARTMENT OF HEALTH

LEAD AND COPPER RULE

In 1991, EPA published the Lead and Copper Rule to minimize lead and copper in drinking water. Minor revisions were made in 2000, 2004, and 2007. The rule established a maximum contaminant goal of zero for lead in drinking water and an Action Level (AL) of 15 parts per billion for lead and 1300 parts per billion for copper based on the 90th percentile level of tap water samples. An AL exceedance is not a violation but can trigger other requirements, such as increased monitoring, installation of corrosion control treatment, public education, and lead service line replacement. The fact sheet for the LCR can be found on EPA's website.

EPA revised the Lead and Copper Rule in 2021. This rule is known as the Lead and Copper Rule Revisions (LCRR). It improves the protection of children and communities from lead exposure by sampling schools and daycare facilities, removing lead service lines, and empowering communities through public education. The LCRR can be found at this link. The LCRR establishes a compliance deadline of October 16, 2024, for water systems to complete their initial service line inventories. EPA announced on December 16, 2021, that they will begin developing a new regulation, the Lead and Copper Rule Improvements (LCRI), to strengthen key elements of the LCRR. EPA plans to finalize the rule in the summer of 2024, and the estimated compliance deadline for the LCRI is the summer or fall of 2027, three years after the effective date of the rule. More information on the LCRI can be found here.

LEAD SERVICE LINE INVENTORIES

The LCRR requires all community water systems and all non-transient, non-community water systems to complete an *initial* lead service line inventory (LSLI) by **October 16, 2024**. The inventory must include all service line connections, regardless of ownership, and be submitted using this <u>template</u>. The template must be submitted to the Arkansas Department of Health, Engineering Section through the <u>Engineering's File Transfer Portal</u>.

LEAD SERVICE LINE INVENTORY REQUIREMENTS

- The LSLI must include every service line in the system.
- Each service line must include an address or other location identifier, such as a meter number or GPS coordinates.
- The water system-owned portion and the customer-owned portion must be classified as one of the following:
 - o Lead
 - o Galvanized downstream of a lead line (GRR, or galvanized requiring replacement)
 - o Non-lead, where there is documentation to support this determination, and
 - Unknown
- Typical documentation to determine non-lead status would include:
 - o Historical records review
 - o Identifying service line material during normal operations
 - Service line investigations
 - Date of installation Arkansas implemented the lead ban on June 1, 1988, and signed by then Governor Bill Clinton on June 16, 1988 (Arkansas State Plumbing Code 10.1.6 and 10.1.7 banning lead pipe, lead solder, and flux). Service lines installed after June 1988 are considered non-lead unless a water system has documentation to show otherwise.
 - o Size of line Service lines greater than 2" are considered non-lead.