

Lead and Copper Rules

Division of Water- Drinking Water Branch
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LCRR (so far)

HOW DID KENTUCKY DO?

EPA Region 4 LCRR Compliance

Region 4 Compliance % Rates as of Oct 17, 2024



Region 4 Current Compliance % Rates (March 2025)



Kentucky Compliance with Initial Service Line Inventory (ISLI)

15 Tier 3 violations: submitting ISLI after the October 16, 2024 deadline

10 Tier 2 violations: submitting an incomplete / insufficient ISLI

Communications (letters sent to customers with lead, galvanized requiring replacement (GRR), or unknown SLs):

- For most, letters were due to customers by November 16, 2024
- Certification is due to DOW July 1, so no violations would be submitted until after that time

LCRR and LCRI Comparison

Requirement	LCRR	LCRI
Annual Inventory Requirement	X	X
First- and Fifth-Liter Sampling / 5 Tier Sampling / New Sampling Plan	X	X
School and Childcares Sampling (20% per year)	X	X
LSL / GRR Replacement Requirements	Based on Triggers	10% per year
Increased Public Education / Customer Communication	X	X

*Requirements are not exactly the same between LCRR and LCRI, but the main requirements still exist under both rule revisions.

WHAT ARE THE UPCOMING DEADLINES?

Annually between now and 2028*

- Customer notifications
- New language in the CCR
 - New info about health effects of lead
 - Mention the SL Inventory and where to find it
- 24-hr Public Notice (PN) for action level exceedances in 2025 and beyond

*Continued requirements after 2028, with changes to reporting deadlines

WHAT ARE THE UPCOMING DEADLINES?

November 1st 2027

- Baseline Service Line Inventory
- Replacement Plan (for systems with Lead, GRR, Unknown service lines on baseline inventory)
- School and Childcare Sample Packet
- Report Corrosion Control Treatment info to state*

January 1st 2028

- New Lead and Copper Site Sample Plan
 - Include water quality sample sites

WHAT CAN WE DO NOW TO PREPARE?

IDENTIFY UNKNOWNNS

- Having a complete inventory in 2027 will help clarify which requirements pertain to your system

Continue to update SLI

- As connections are added or removed, update them in the inventory

LCR sampling – identify sampling points for LCRI

Identify schools and daycares in service area

- Sample now or tell schools about KY DOWs sampling program
- Resources for identifying schools/childcares available at:
www.tinyurl.com/drinkingwatercompliance

WHAT **RESOURCES ARE AVAILABLE TO ASSIST?**

KY DOW MOA with KRWA and GLCAP

- Assist with SLI inventory, communications, LCRR/LCRI compliance questions

KY DOW Technical Assistance CCT program

- DOW TA team is reaching out and working directly with PWS

KY DOW Voluntary School and Childcare Lead Reduction Program

- Sampling counts towards first 5-year school/childcare sampling requirements
bit.ly/VoluntaryLeadTestingInSchools

WHAT RESOURCES ARE AVAILABLE TO ASSIST?

KY DOW pre-reviews of required customer notification communications

- Email to Eileen.miller@ky.gov

Check Your Pipes KY Initiative

- Communication resources for PWS and other stakeholders:
<https://eec.ky.gov/Environmental-Protection/Water/Drinking/Pages/CheckYourPipesKY.aspx>

Templates for required compliance documents

- Customer notifications, CCRs, and other guidance documents: www.tinyurl.com/drinkingwatercompliance

Lead in Drinking Water Workgroup

Workgroup comprised of DOW staff, PWS staff, contractors, KRWA/GLCAP, DPH, Universities, and more!

Meetings are hybrid (virtual and in person option)

Next meeting is July 9th at 10:00 EST

Subgroups:

- Service line inventories
Cortni Edwards– cortni.edwards@ky.gov
- Service line replacements and funding
JD Sloan– jsloan@louisvillewater.com
- Communications and outreach
Eileen Miller – eileen.miller@ky.gov
- Corrosion control treatment
Brad Montgomery– brad.montgomery@stvinc.com
- Sampling – tap, schools, childcare centers
Emily Fritz– efritz@louisvillewater.com

Questions?

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