

Tap Sample Site Plan Changes Required by the 2021 Lead and Copper Rule Revisions (LCRR)*

40 CFR 141.86

The LCRR requires changes to tap sampling for water systems. There are new requirements for the locations where lead and copper samples should be collected.

This guidance provides instruction on lead and copper sampling *locations* and *schedules*; sampling *procedures* will be addressed in another guidance document.

New Tiers – Collect Samples from Highest Tier Possible

There is a new tier prioritization system under the LCRR. Lead and copper tap sampling points must *all* be collected from the highest tier possible. For example, if a water system has identified sufficient single-family residences served by lead service lines (Tier 1 locations under the LCRR), all required lead samples must be collected from these locations. Water systems may not collect samples from service lines where the lead status is unknown (40 CFR 141.86(a)).

- **Tier 1:** single family structures serviced by a known lead service line, OR multiple-family residences *only if* they comprise at least 20% of the structures served by the water system *and* have a LSL
- **Tier 2:** non-residential buildings and multifamily residences served by known LSLs
- **Tier 3:** single-family structures with galvanized service lines downstream from LSLs currently or in the past, or downstream of lead goosenecks, pigtails, or connectors
- **Tier 4:** single-family structures with copper pipes with lead solder
- **Tier 5:** everything else, including non-residential buildings and multifamily residences. Must prioritize 1) single-family structures, then 2) multifamily structures.

Standard Monitoring – Collect More Samples in 2025

Starting in 2025, all community and non-transient non-community water systems must start Standard Monitoring, even if they are currently approved for Reduced Monitoring (e.g., 3-year monitoring schedule).¹ This means that these systems will be collecting lead and copper samples in the first six months AND the second six months of 2025. The number of sampling locations will also increase during these monitoring periods. See the table below to determine how many samples to collect:

Number of sampling points required by the Lead and Copper Rule Revisions.

| System size (number of people served) | Number of sites (Standard Monitoring - 2025) | Number of sites (Reduced Monitoring) |
|--|--|---|
| >100,000 | 100 | 50 |
| 10,001 to 100,000 | 60 | 30 |
| 3,301 to 10,000 | 40 | 20 |
| 501 to 3,300 | 20 | 10 |
| 101 to 500 | 10 | 5 |
| ≤100 | 5 | 5 |

¹Water systems that have conducted lead and copper sampling in accordance with all the LCRR tap sampling methods between January 15, 2021 and October 16, 2024 should work with the regional Technical Assistant to determine whether they may qualify for reduced monitoring by 2025.

*Additional tap sampling requirements apply. By October, 2024, the EPA will be making further revisions to the LCRR in a new regulation – the Lead and Copper Rule Improvements – which may delineate further changes to tap sampling requirements.