

# NEW COLLABORATIVE RESOURCE: LEVERAGING THE LCR TO ACCELERATE LSL REPLACEMENT



The Lead Service Line Replacement Collaborative



**LEAD SERVICE LINE REPLACEMENT COLLABORATIVE**

[WWW.LSLR-COLLABORATIVE.ORG](http://WWW.LSLR-COLLABORATIVE.ORG)

# CURRENT MEMBERS

\* Steering Committee Members

- American Public Health Association
- American Water Works Association\*
- Association of Metropolitan Water Agencies\*
- Association of State Drinking Water Administrators
- Blue Green Alliance
- Children's Environmental Health Network\*
- Clean Water Action\*
- Environmental Defense Fund\*
- Environmental Policy Innovation Center
- Green and Healthy Homes Initiative
- Justice and Sustainability Associates
- Learning Disabilities Association of America
- National Center for Health Housing
- National Association of County and City Health Officials
- National Association of State Utility Consumer Advocates
- National Association of Water Companies
- National Conference of State Legislatures
- National Environmental Health Association
- National League of Cities
- National Rural Water Association
- Natural Resources Defense Council
- North East Midwest Institute
- RESOLVE\*
- River Network
- Rural Community Assistance Partnership
- Trust for America's Health
- United Parents Against Lead
- Water Research Foundation

# FUNDING SOURCES



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*The Collaborative also thanks its previous funders the W.K. Kellogg Foundation and the Pisces Foundation.*

# NEW RESOURCES

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KEY TERMS

KEY REQUIREMENTS AND OPPORTUNITIES

## LEAD SERVICE LINE REPLACEMENT COLLABORATIVE

Our goal is to accelerate voluntary LSL replacement in communities across the United States.

### What can I find on this site?

This site provides information to help communities facilitate full lead service line replacement.

# LCR: KEY REQUIREMENTS & OPPORTUNITIES

## EPA'S REVISED LEAD AND COPPER RULE: KEY REQUIREMENTS & OPPORTUNITIES

The screenshot shows a webpage with a navigation menu on the left and main content on the right. The navigation menu includes: Home, Roadmap, Replacement Practices, Policies, EPA's Lead and Copper Rule (expanded to show sub-items: Key Terms, Key Requirements and Opportunities, Outreach, Inventory, Replacement, Notification). The main content area contains two paragraphs of text.

On January 15, 2021, the Environmental Protection Agency (EPA) published revisions to the Lead and Copper Rule (LCR) – the federal regulation designed to control lead and copper in drinking water. The agency proposed revisions a year earlier. The LCR requirements, originally established in 1991, apply to community water systems (public water systems that supply water to the same community year-round); non-transient, non-community water systems and state and tribal agencies responsible for drinking water regulatory development and enforcement.

The rule sets compliance deadlines beginning in 2024. While individual states may incorporate additional requirements that impact implementation, they cannot make the LCR less stringent than the final rule. The LCR revisions were finalized in the closing days of the last presidential administration. The rule has been contested in court (petitions for review have been filed) and the current administration took action on March 10, 2021 to extend the effective date of the revised LCR at least until June 17, 2021 to undertake a review of the rule. EPA also announced that it proposes to extend to effective date of the LCR until December 16, 2021 with a corresponding extension of the revised LCR's compliance deadline to September 16, 2024.

Eighteen of the Collaborative's 27 members submitted comments on the proposed rule requesting a wide array of major and minor changes to the proposal. Illustrating how this rulemaking is perceived as an opportunity to advance lead service line (LSL) replacement. The Collaborative does not advocate or take a position on the LCR. Rather it is focused on helping its members and their constituents leverage the changes in the LCR revisions to further that shared goal. Therefore, it is important to understand the new LCR requirements related to LSLs and the opportunities they present.

1. Outreach to Public Health Agencies
2. Lead Service Line Inventory
3. Lead Service Line Replacement Plan
4. Proactive Notification About Lead Service Lines
5. Special Notices when Disturbing Lead Service Lines, Galvanized Requiring Replacement or Unknowns
6. Customer-Initiated Lead Service Line Replacement
7. Lead Service Line Replacement as Small System Compliance Option
8. Schools and Child Care Facilities

# SPEAKER INTRODUCTIONS

- **Carol Walczyk**, Vice President, Water Quality & Compliance, Suez
  - ▣ Lead Service Line Inventory
  - ▣ Lead Service Line Replacement Plan
  
- **Lindsay McCormick**, Program Manager, Chemicals and Health, Environmental Defense Fund
  - ▣ Proactive Notification About Water Service Lines
  - ▣ Special Notices when Disturbing Lead Service Lines, Galvanized Requiring Replacement or Unknowns
  
- **Kristie Trousdale**, Deputy Director, Children's Environmental Health Network
  - ▣ Outreach to Public Health Agencies

# LEAD SERVICE LINE INVENTORY

- By January 2024, water systems must develop an inventory identifying whether each service line on public and private property falls into the following categories:
  - Lead
  - Galvanized requiring replacement
  - Lead status unknown
  - Non-lead
- All water systems must make the inventory publicly accessible and systems serving more than 50,000 people must make the inventory available online.
- Inventory must be updated over time and the state informed of progress to improve accuracy and to track LSL replacements.

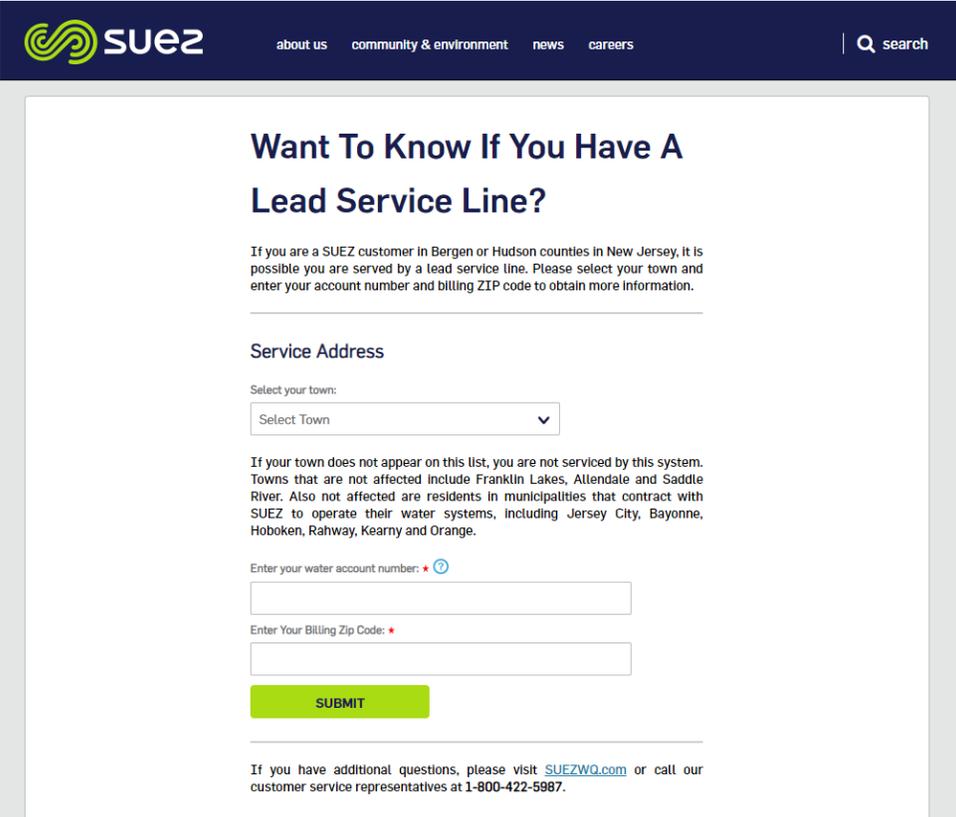
# QUESTIONS TO ASK TO ACCELERATE REPLACEMENT

- Are the local commissioner of revenue, building inspection, and planning offices prepared to support inventory development?
- Are community residents aware of how to identify LSLs and communicate that information to the water system?
- Have local leaders established policies that facilitate LSL identification (e.g., notification at time of property sale or rental)?
- How does this inventory connect with similar inventories of homes with lead-based paint and other information about lead gathered by health departments, schools, and other organizations?
- In developing an inventory, has the community considered multiple types of ownership situations?

# EXAMPLE: SERVICE LINE INVENTORIES

- On-site investigations prioritized by predicted lead density, road programs and predictive analytics
- Website with lead FAQs, customer lookup function, customer self-identification survey and service line identification instructional video
- Open houses with service line material examples and computers for lookups
- Service line material records updated during routine repairs, construction, maintenance and meter replacement activities
- Challenges: incomplete/inaccurate records, customer-side access

# EXAMPLES: CUSTOMER LOOKUP TOOL



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## Want To Know If You Have A Lead Service Line?

If you are a SUEZ customer in Bergen or Hudson counties in New Jersey, it is possible you are served by a lead service line. Please select your town and enter your account number and billing ZIP code to obtain more information.

**Service Address**

Select your town:

Select Town

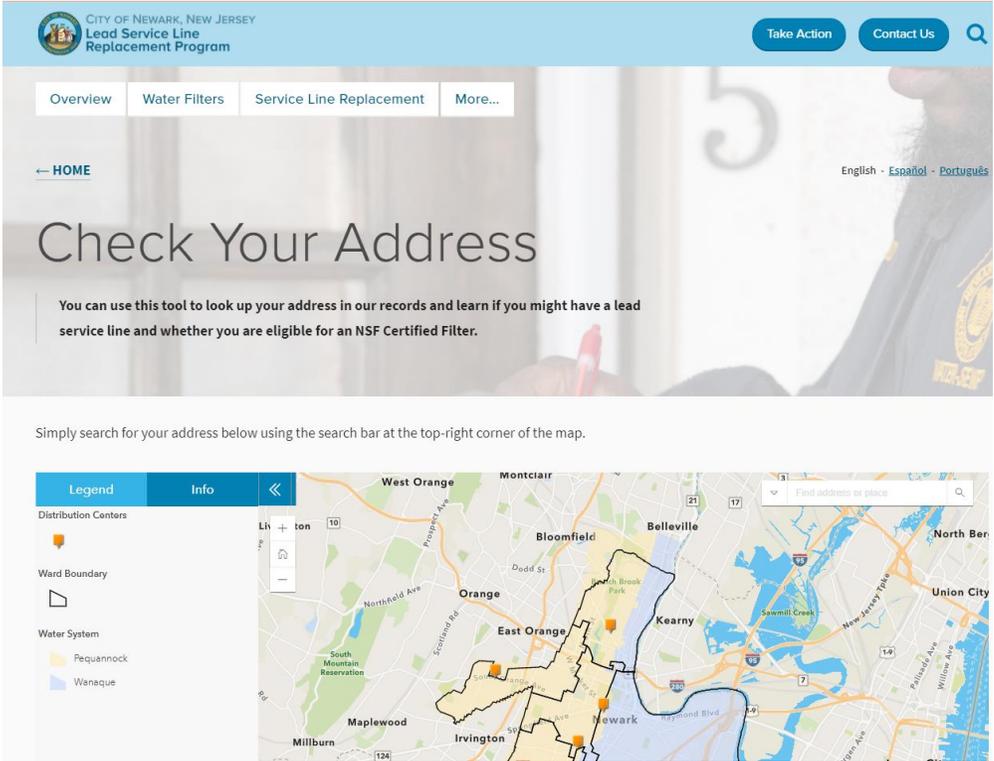
If your town does not appear on this list, you are not serviced by this system. Towns that are not affected include Franklin Lakes, Allendale and Saddle River. Also not affected are residents in municipalities that contract with SUEZ to operate their water systems, including Jersey City, Bayonne, Hoboken, Rahway, Kearny and Orange.

Enter your water account number:

Enter Your Billing Zip Code:

**SUBMIT**

If you have additional questions, please visit [SUEZWQ.com](http://SUEZWQ.com) or call our customer service representatives at 1-800-422-5987.



CITY OF NEWARK, NEW JERSEY  
Lead Service Line Replacement Program

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## Check Your Address

You can use this tool to look up your address in our records and learn if you might have a lead service line and whether you are eligible for an NSF Certified Filter.

Simply search for your address below using the search bar at the top-right corner of the map.



Legend | Info

- Distribution Centers
- Ward Boundary
- Water System
  - Pequannock
  - Wanaque

Map showing Newark, NJ area with various streets and landmarks. Search bar: Find address or place

# INVENTORY PROGRESS

- In 2 years (Hackensack system):
  - ▣ SUEZ-owned known lead service lines and suspected lead goosenecks reduced by nearly half
  - ▣ 60% reduction in customer-owned unknowns and 79% reduction in SUEZ-owned unknowns
- In 1 year (Lambertville system)
  - ▣ Inventory 100% complete with no unknowns on SUEZ or customer side

# COMMUNITY EXAMPLE: NEWARK

## Water Sampling:

No water sampling results found.

## Program Status:

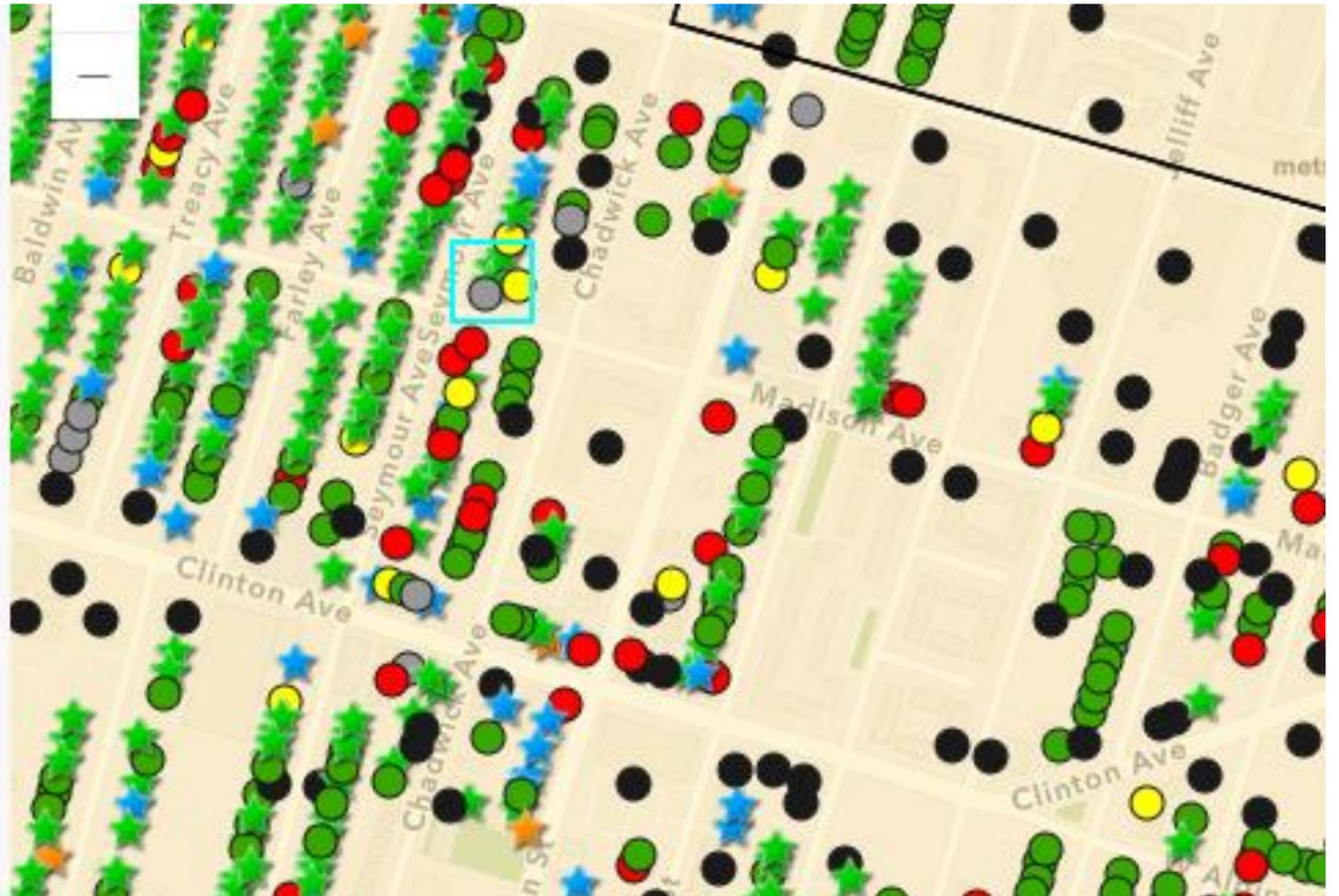
Lead service line replacement was completed for this residence on June 23, 2020 under Contract 29 by Roman E&G.

## Water Filters:

The city recommends that you continue to use a filter because you may have lead plumbing elements inside your home. Contact the Water & Sewer Department at 973-733-6303 or 973-733-6370 or [waterandsewer@ci.newark.nj.us](mailto:waterandsewer@ci.newark.nj.us) for more information.

## Filter and Cartridge History:

Floor 3: Filter distributed on 2/5/2019 date.  
Cartridge distributed on 2/5/2019 date.



View Newark's Map here: <https://www.newarkleadserviceline.com/check-your-address>

# LEAD SERVICE LINE REPLACEMENT PLAN

- By January 2024 water systems will submit LSL replacement plans to their state primacy agencies. These plans must include the following details:
  - Strategy for determining the composition of unknowns in its inventory;
  - Procedure for conducting full LSL replacement;
  - Strategy for informing customers before a full or partial LSL replacement;
  - For systems with more than 10,000 persons, an LSL replacement goal rate recommended by the system in the event of a lead trigger level exceedance;
  - Procedure for customers to flush service lines and premise plumbing of particulate lead;
  - Replacement prioritization strategy based on factors including but not limited to the targeting of known LSLs, LSL replacement for disadvantaged consumers and populations most sensitive to the effects of lead; and
  - Funding strategy for conducting LSL replacements, which considers ways to accommodate customers that are unable to pay to replace the portion they own.

# EXAMPLES: FULL LSL REPLACEMENT PROCEDURE

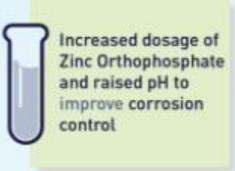
- Known/suspected LSLs identified and prioritized for replacement
- 45-day opt-in/opt-out provided to customer
- Filter pitchers and flushing instructions provided
- Prompt updates of inventory and revision of sampling/profile plans
- Exceeded triggered target replacement rate
- Challenges: COVID-19, customer side access, funding
- Customer-side identification and replacement ordinances

# EXAMPLE: SUEZ-NJ LSL REPLACEMENT PROGRAM



## COMMUNITY LEAD RESPONSE

### BY THE NUMBERS



# QUESTIONS TO ASK TO ACCELERATE REPLACEMENT

- Are local elected and appointed officials aware of and supportive of LSL replacement and funding efforts?
- Are local public health offices prepared to support communication with the public about lead risk? And help with coordinating lead risk reduction from other sources with the LSL replacement plan?
- How can community groups support plan development?
- How could community dialogue minimize the number of partial replacements that leave a segment of a LSL on a customer's property?
- How might the community secure funding to reduce the cost burden on customers and avoid disparities in participation?
- How can principles of health equity and environmental justice inform how replacements are prioritized in the community?

# PROACTIVE NOTIFICATION ABOUT WATER SERVICE LINES

- Who:
  - ▣ To “persons served by water” from lines that are “lead, “galvanized requiring replacement” or “lead status unknown”
- When:
  - ▣ Annually to all persons served based on inventory
  - ▣ To new customers – usually those buying an existing home – when the water service is initiated
- What:
  - ▣ Notice includes status of line, a mandatory statement on health effects, steps to reduce lead

# OPPORTUNITIES TO ACCELERATE REPLACEMENT

- Begin notification now to ensure a smooth and effective system by January 2024
- Make special efforts to notify child care facilities and schools
- Engage realtors, home inspectors, and plumbers to help reach and engage property owners with LSLs
- Employ strategies to reach non-English speaking neighborhoods, including working through community organizations

# RESEARCH ON LSL DISCLOSURE

- Behavioral study: impact of disclosure of LSLs during homebuying & renting

	Insist owner to confirm LSL-status	Insist owner replace LSL as condition of purchase or rental	Look for another home	Move in & pay for LSL replacement	Move in & leave LSL alone
Lead is present in either side of service line	--	85-91%	81-88%	33%	4-6%
Lead status is unknown	88-90%	--	55-65%	--	--

## Notes:

- Only one in four of potential renters indicated they would be likely to install a filter and replace it monthly at a loss of about \$150 a year.
- Ranges are derived from various conditions. See the full article for more precise results: <https://www.mdpi.com/1660-4601/16/6/963>.

# COMMUNITY EXAMPLE: NEWARK

- Nearly completed its LSL Replacement program at no cost to resident
- Onsite notification to residents during physical inspections (historical records & inspection result)



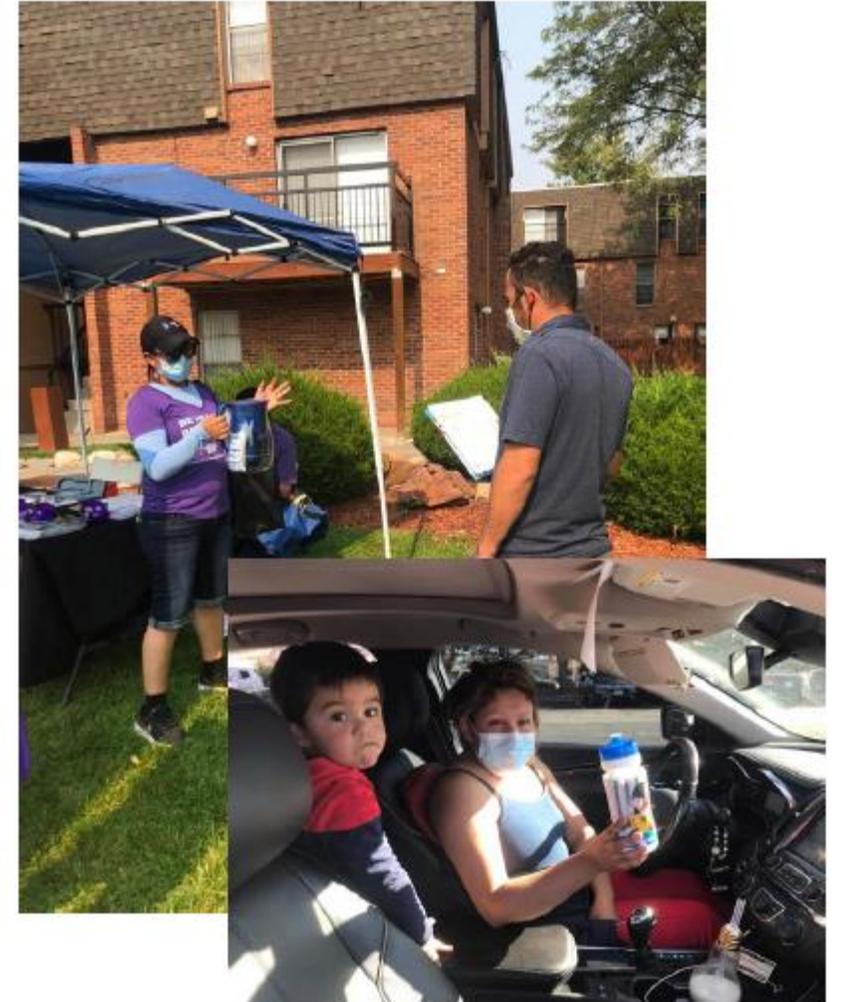
(Photo: Newark Lead Service Line PSA)



(Photo: City of Newark)

# COMMUNITY EXAMPLE: DENVER

- ❑ Committed to replacing all LSLs in 15 years at Denver Water's expense
- ❑ Notification
  - ❑ Spring 2020, all customers who may have an LSL received a notification letter; followed by filter
  - ❑ Interactive map
- ❑ Community outreach & education
  - ❑ Traditional communications (e.g., social media, advertising, community meetings)
  - ❑ Ambassador program
  - ❑ Multilingual communications, reaching immigrant and refugee families
  - ❑ Community engagement with various audiences and scales



# SPECIAL NOTICES WHEN DISTURBING LINES

- Who:
  - ▣ To “persons served by water” from lines that are “lead, “galvanized requiring replacement” or “lead status unknown”
  
- When:
  - ▣ Before a disturbance (i.e., any activity that results in the water to an individual service line being shut-off or bypassed)
  
- What:
  - ▣ Risk information, flushing procedures, and opportunities to replace lead
  - ▣ Varies by level of disturbance

# OPPORTUNITIES TO ACCELERATE REPLACEMENT

- Create a process for residents receiving notices to reach out to health department staff or their primary care provider for additional information
- Secure funding to reduce the burden on customers with limited access to resources needed to pay for full replacement
- Leverage multiple communication vehicles (e.g. mailers, email, robocalls, community listservs, neighborhood association meetings)

# COMMUNITY EXAMPLE: CINCINNATI



A Service of The City of Cincinnati

**G R E A T E R C I N C I N N A T I**  
**W A T E R W O R K S**

**G R E A T E R C I N C I N N A T I**  
**W A T E R W O R K S I S C O M I N G**  
**T O Y O U R A R E A . . .**

**...and here's what you need to know!**

---

GCWW is replacing the water main in your neighborhood soon. Although we try to avoid disruptions to water service, some temporary shutoffs may occur. GCWW will notify you of any disruption as far in advance as possible.

The water main replacement is taking place in an area that may have lead service lines. Lead is toxic and can cause health problems in children and adults. There is no safe level of lead.

Construction may cause changes in water quality, including a temporary increase in lead levels. As a precaution, GCWW is offering **free water filters** which are certified to remove lead.

Disturbances to a lead water service line, such as a water main replacement or a leak, may cause changes in water quality, including the possibility of a temporary increase in lead levels. The U.S. Environmental Protection Agency recommends the following actions to reduce possible lead exposure in drinking water:

- If water has not been used for several hours, run the tap until there is a noticeable temperature drop. Then, run water for 30 seconds to 3 minutes before using it for drinking and cooking. This helps flush any lead in the water that may have been leached from plumbing.
- Use cold water for cooking, drinking, and preparing baby formula. Boiling the water will not reduce lead.
- Clean your faucet aerator regularly. Small particles of solder and other material can accumulate in faucet aerators and release lead into the water. Cleaning the accumulated particles will help eliminate this potential source.
- Identify if your plumbing fixtures contain lead and consider replacing them, when appropriate.

# OUTREACH TO PUBLIC HEALTH AGENCIES

Outreach to public health agencies has always been an element of public education required by the LCR following an exceedance. The current LCR revisions take this coordination several steps further:

- Whenever a compliance monitoring sample is greater than 15 micrograms per liter (15 ppb) the water system must provide the relevant health department with an annual report that includes information from its required analysis of the elevated values along with other risk communication materials supplied under the rule.
- The water system must provide the relevant health department with the results of lead in school and childcare monitoring conducted under the rule.

The rule frames this required communication as an opportunity for water systems to collaborate with state and local health agencies.

# TO ACCELERATE REPLACEMENT COMMUNITIES MAY CONSIDER

- Involving local public health agency experts in briefings to community leaders and the public.
- Renewing dialogue with public health agencies as key contact in reaching pediatricians, OB-GYN, and other specialties serving young children and mothers.
- Reviewing communication materials with public health experts prior to using them in practice.
- Coordinating communications among water systems, public health agencies, and community organizations, including on notices and online inventories, in advance of the deadline.
- Identify ongoing lead prevention outreach and education efforts to understand how those efforts could be leveraged to benefit the LSL replacement program.
- Determining if local public health lead programs have any insights into lead occurrence that could inform prioritization efforts in lead service line replacement.
- Proactively sharing the location of tap water sampling results with public health agencies before the information is sent to consumers so that the agencies can be prepared for questions.

# EXAMPLE: NEWARK, NJ

- Nearly completed removal of all LSLs in a little over 2 years at no cost to consumers
- All-in approach from government agencies
- Water and Sewer Department worked with the city, county, and state health departments to:
  - ▣ Reach child care providers for testing and LSL replacement
  - ▣ Distribute free water filters, educate consumers about the need for filters in homes with LSLs
  - ▣ Coordinate messages to consumers about free water testing, LSLR program, and children's BLL testing
  - ▣ Provide free BLL testing (for 18 and under) at the city health department
- Water and Sewer Department shared the location of tap water sampling results with health agencies at the same time it was sent to consumers

# EXAMPLE: SUEZ WATER, NJ

- Lead Open Houses
  - ▣ Central locations - community colleges
  - ▣ Tabling with handouts, refreshments
    - Water quality experts
    - Samples of different service line materials
    - Computer station for service line material look-up
    - LSL replacement schedules
    - County health department representatives



