

Hazen



Public Works Commission

Lead and Copper Rule Revisions (LCRR)

City of Beverly Hills

September 14, 2023

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Background on Lead and Copper Rule

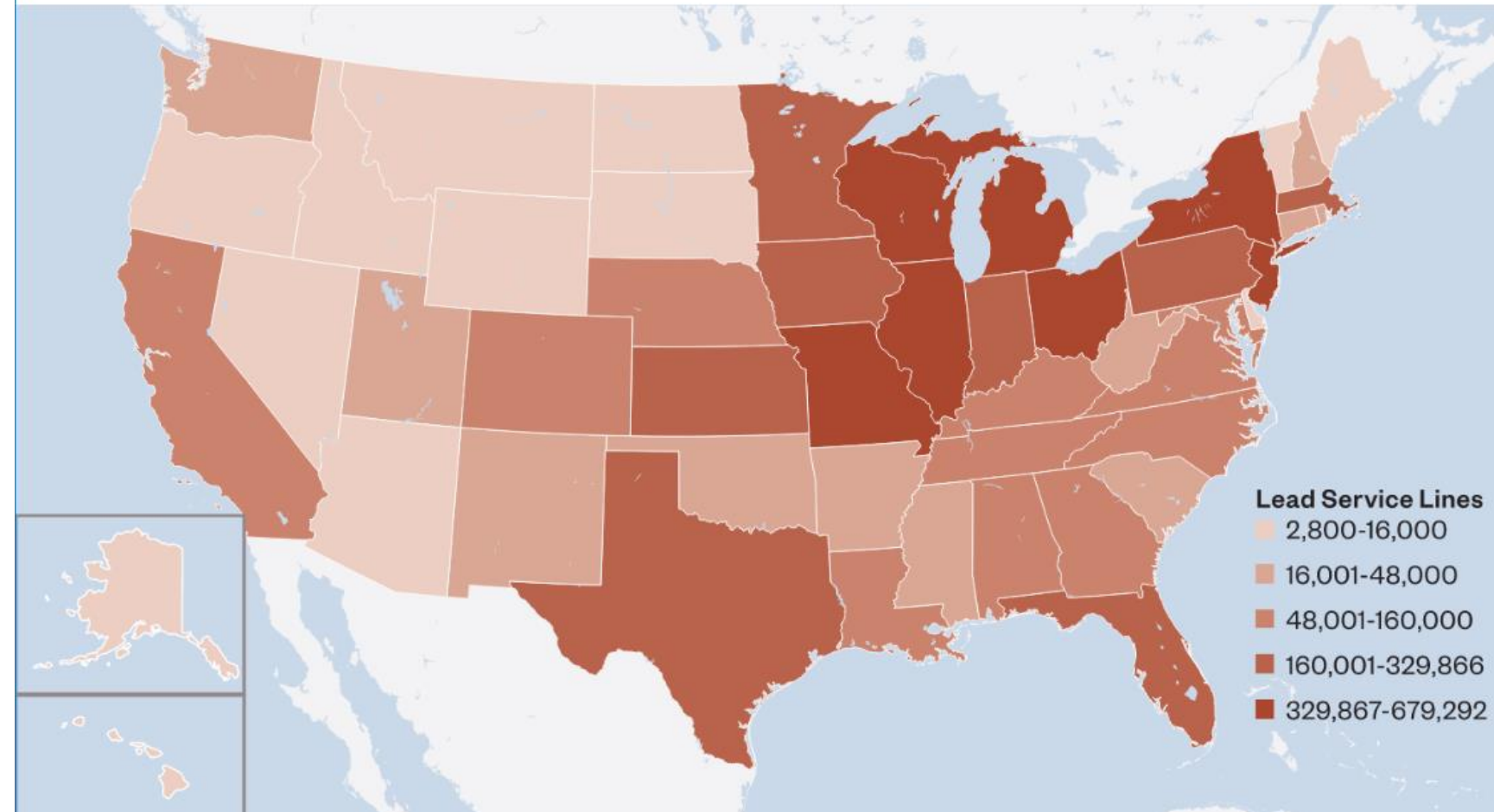
- The original Lead and Copper Rule (LCR) was published by the United States Environmental Protection Agency (USEPA) in 1991 to control lead and copper in drinking water supplies.
- The City's water system is regulated by California State Division of Drinking Water (DDW) and USEPA.
- Currently, the City complies with DDW and USEPA regulations by sampling at 120 customer tap locations for lead and copper, and 52 regulatory designated distribution stations.
- Lead and Copper Rule Revisions (LCRR) is an updated set of regulations for lead and copper that focuses on customer service lines.
- All public water systems are required to comply with the LCRR starting October 16, 2024.



History of Lead Service Lines in the United States

- Nationally, Lead Service Line (LSL) installation most common from **1900 – 1930**
- LSLs banned nationally in **1986**

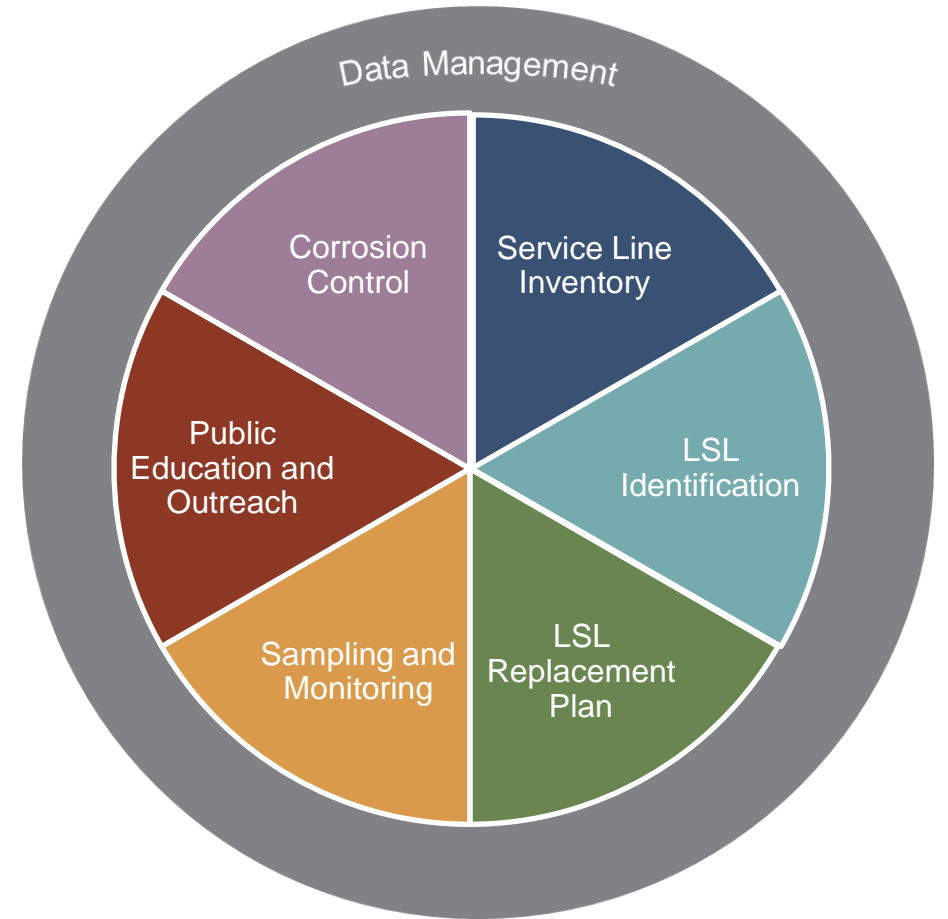
Lead Service Lines Per State



[Lead Pipes Are Widespread and Used in Every State | NRDC](#)

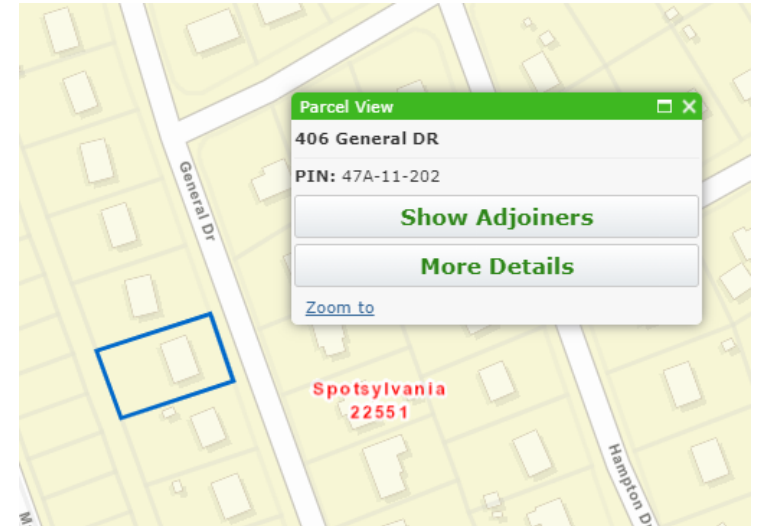
LCRR Compliance – Program and Inventory Development

- Service Line Inventory
- LSL Identification Plan
- Public Education and Outreach
- School Sampling Plan



LSL Identification Action Plan

- Identify data sources for customer account records
- Characterize service lines based on building type and construction date
- Establish potential date ranges for LSLs or lead cutoff date
- Preliminary estimate of “**lead status unknown**” service lines
- Propose methods to verify service line materials



Land Development

Zoning: RU
AgForestal District: N
Airport Protection Overlay District: N
Historic Overlay District: N

Information found here is provided for general reference purposes and does not const

Assessment (2021)

Building Assessment: \$173,700
Land Assessment: \$85,000
Year Built: 1993
Sq Footage: 1269

Public Education and Outreach

- LCRR requires provisions to inform the public about their drinking water system and the occurrence of LSLs, for example:
 - City website
 - Water bill inserts
 - Townhall meetings
 - Email distribution

LSL Inventory Framework

- Identify data sources that should be collated into the inventory
- Identify areas with high likelihood to contain lead



Elementary School and Childcare Sampling Plan

- Develop complete list of elementary schools and childcare facilities (prior to October 2024)
- Develop a sampling and implementation plan to meet LCRR requirements



LCRR – Still More to Come...

- **Lead and Copper Rule Improvements (LCRI)**
 - *To be finalized prior to the October 2024 LCRR deadline*
 - *Impacts to Service Lines*
 - *Compliance Tap Sampling*
 - *Trigger and Action Level*



December 2021

including best practices, case studies, and templates. EPA is also updating the Safe Drinking Water Information System to support state and Tribal data management needs for inventories.

New Rulemaking Action: Lead and Copper Rule Improvements

EPA intends to immediately begin to develop a proposed National Primary Drinking Water Regulation: Lead and Copper Rule Improvements to address key issues and opportunities identified in our review. EPA intends to promulgate the LCRI prior to October 16, 2024.

Focus Areas for the Proposed Rulemaking

- **Replacing all Lead Service Lines.** Replacing all lead service lines is an important public health goal. EPA intends to propose requirements that, along with other actions, would replace all lead service lines as quickly as feasible. EPA's proposal will fully consider the agency's statutory authority and required analyses, including an economic analysis.
- **Compliance Tap Sampling.** EPA intends to assess data to consider opportunities to strengthen compliance tap sampling requirements. Robust tap sampling methods are essential to identifying locations with elevated lead, whether the source of the lead is a lead service line or leaded plumbing materials within a residence.
- **Action and Trigger Levels.** For the proposed rule, the agency plans to explore options to reduce the complexity and confusion associated with these levels with a focus on reducing health risks in more communities. The agency will also evaluate whether the trigger level requirements of the LCRR are still necessary with a proactive lead service line replacement and more protective action level.
- **Prioritizing Historically Underserved Communities.** EPA intends to explore how to replace lead service lines in a manner that prioritizes underserved communities. EPA will evaluate options to prioritize the removal of lead service lines in communities disproportionately impacted by lead in drinking water. The goal of these potential lead service line replacement regulatory improvements—coupled with non-regulatory actions—is to more equitably protect public health.

Questions?