

Clean Water Council

LCR Overview

All public community and non-transient non-community water systems are required to comply with the Federal LCR

- Public water systems sample every 6-months, annual, or triennial
- Required to sample from high risk sites (lead service lines, lead solder after 1982)
 - o Community water systems are required to target single family residences first, and also multi-family dwellings first if at least 20% of the structures served by the water system are multi-family residences.

Community Water Systems	
Tier 1	Single-Family Structures: <ul style="list-style-type: none"> • Served by a lead service line; and/or • Contain copper pipes with lead solder installed after 1982 or contain lead pipes. *When multiple-family residences comprise at least 20% of the structures served by a water system, the system may include Tier 2 sampling sites in its Tier 1 sampling pool.
Tier 2	Buildings, including multiple-family residents: <ul style="list-style-type: none"> • Are served by a lead service line: and/or • Contain copper pipes with lead solder installed after 1982 or contain lead pipes.
Tier 3	Single family structures that contain copper pipes with lead solder installed before 1983
Other	Structures with other plumbing materials

Non-Transient Non-Community	
Tier 1	Buildings: <ul style="list-style-type: none"> • Served by a lead service line; and/or • Contain copper pipes with lead solder installed after 1982 or contain lead pipes.
Tier 2	Buildings that contain copper pipes with lead solder installed before 1983
Other	Structures with other plumbing materials

- If a system exceeds the lead or copper action level (15ppb and 1300ppb) required to take Corrosion Control Steps. If the system already has CCT installed and they have lead service lines, the system is also required to initiate a lead service line replacement program to replace 7% of the lead service lines annually.
 - o Public Education is also required if the lead action level is exceeded.
- Water Quality Parameter monitoring also required (pH, alkalinity, inhibitor residuals, etc.). State to set minimum optimal values following installation of CCT.
 - o Large systems (>50,000) required to monitor every compliance period
 - o Small & Medium systems required to monitor only when exceed action level
 - NJ will be requiring all small and medium systems to continuously monitor after installation of CCT

What NJ is Doing

- Established a dedicated Lead Team within the Division to review sampling plans, develop technical resources and guidance, respond to inquiries, and provide training.
- Developed a website specifically for lead which contains information for consumers, public water systems, and schools/childcare facilities.
- Review of Sampling Plans
 - o Large Systems (about 25) serve > 50,000 persons
 - Reviewed and approved WQP sampling plans and they have been placed on follow-up or optimal WQP monitoring beginning July 1, 2016.
 - Currently reviewing their PbCu Sampling plans
 - Required to certify site materials (i.e. tier) of sites previously sampled.
 - Required to provide information on lead service line inventory within their distribution system
 - Required to submit a sampling pool of sites to use for future sampling events
 - Notified that they are to return to standard PbCu sampling beginning January 1, 2017.
 - o Small & Medium Systems
 - Developed a prioritization scheme to call in PbCu and WQP sampling plans
 - Considered systems that:
 - o serve municipalities with children with high blood levels
 - o Serve sensitive populations (i.e. schools)
 - o Previous action level exceedances
 - o CCT installed and no ALE
 - o CCT installed and/or had a recent ALE
 - o System classification (community vs. non-community)
 - Small and medium systems that have CCT installed and have had a past action level exceedance are required to submit their sampling plans by January 4, 2017 (about 200 systems)
 - o Other instances where plans are called in
 - Systems that apply to the department for a construction permit may also be required to submit sampling plans and/or conduct additional non-compliance monitoring (typically for WQPs)
 - Systems that are exceed the action level are being required to submit PbCu sampling plans
- Corrosion Control Treatment
 - o November 2015, EPA issued a Memorandum titled *Lead and Copper Rule Requirements for Optimal Corrosion Control Treatment for Large Drinking Water Systems*, which stated, that “due to the unique characteristics of each PWS it is critical that public water systems, in conjunction with their primacy agencies and, if necessary, outside technical consultants, evaluate and address potential impacts resulting from treatment and/or source water changes.”
 - The Division is now considering impacts on CCT for all water systems submitting applications for temporary or permanent treatment and source water modifications.
 - Application forms have been updated and new ones created
- Implementation of LCR
 - o Letter was issued to all CWS and NTNC water systems on August 19, 2016 advising them of the Division’s progress with its self-evaluation of the LCR and what the outcomes and expectations are.
 - o To begin running compliance on ALL components of the rule consistently
 - Conduct PbCu monitoring

- Action Level Exceedance (90th percentile value)
 - Submit a Corrosion Control Treatment Recommendation
 - Submit a Source Water Treatment Recommendation
 - Install Corrosion Control or Source Water Treatment
 - Conduct WQP Monitoring
 - Level Compliance with Optimal WQP values
 - Conduct Source Water Monitoring
 - Lead Public Education
 - Lead Consumer Notice
 - Lead Service Line Replacement
 - Some of these are already set up and running; however, some are still being worked on
 - Includes determining how to track, setting up databases, developing letter templates and SOPs, etc.
- Developing Guidance for systems
 - PbCu sampling plan guidance and template now available
 - WQP sampling plan guidance is available and a template is coming soon.
 - Developing Fact sheets for various parts of the LCR (i.e. materials evaluation, PE, LSLR), templates for reaching out to customers for participation, etc.

Schools

- State Board of Education's regulation went into effect July 13, 2016 that requires schools to test for lead within their facilities within 1 year from of the effective date of the rule.
 - Only requires public schools, charter schools, renaissance schools, jointure commissions, educational service commissions, approved private schools for students with disabilities acting under contract on behalf of NJ public school districts, State funded early childcare centers
 - Private schools and daycares are not required to comply
- Developed technical guidance and resources to assist schools with complying with this regulation
 - Includes toolkit and templates for sampling plan, QAPP, letters to school community, etc.

Training

- Public Water Systems
 - Spring 2016 held training sessions for water systems and labs regarding the LCR
 - 2 training sessions were held in November for water systems, specifically focusing on content and development of sampling plans
 - Considering turning this training into a webinar
- Schools
 - DOE and DEP held regional training sessions for school districts in September
 - Video recorded one of these sessions with the intention to place on our website
 - Developing vignettes to place on our website