## PROTECTING COMMUNITIES FROM LEAD EXPSOSURE IN DRINKING WATER

On December 16, 2021, the Environmental Protection Agency (EPA) announced developments to the existing Lead and Copper Rule (LCR). The EPA introduced the Lead and Copper Rule Improvements (LCRI) to protect communities from exposure to lead in drinking water. The LCRI intends to strengthen the original LCR, promulgated in 1991. EPA identified priority improvements for the LCRI:

1. Proactive and equitable lead service line replacement (LSLR)

2. Strengthening compliance tap sampling to better identify communities most at risk of lead in drinking water and to compel lead reduction actions

3. Reducing the complexity of the regulation through the improvement of the action and trigger level construct.

EPA intends to promulgate the LCRI before October 16, 2024. Public Water Systems (PWSs) like CCWSA must develop a Lead Service Line Inventory (SLI) by October 16, 2024. This is bullet point number 1. This inventory is required to be sent to each State's Primacy Agency. In Georgia, the primacy agency is Georgia Environmental Protection Division (GaEPD). Once submitted to GaEPD, the inventory must be posted publicly on the PWS's website. It must be searchable by the public, meaning clearly identifiable locations must be used so the public can see the results of their SLI entry.
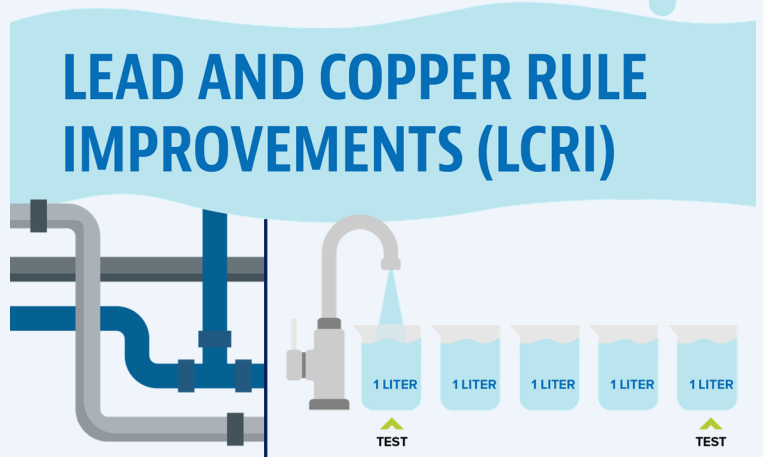
Some rules clearly define how service lines must be classified, but first, let's discuss how service lines are constructed. Each entry into the inventory is tied to one service address. This service address and the service line exist in two parts. The first part is from the water main to the meter. This is the portion of the service line that is owned by the utility. Once water passes through the meter, it enters the second portion of the service line, which is from the meter to the house or building. The second part of the service line belongs to the property owner. For each part of the service line, determinations for Lead, Non-Lead, or Galvanized Requiring Replacement (GRR) must be made. Lines can only be classified as lead if they are lead lines, they can only be classified as Non-Lead if they were never Lead, and they should be classified as GRR if the service line is galvanized that is/was ever downstream of a lead service line or lead unknown. When choosing which classification to use, you must be able to back up your choice with specific verifiable information. This information must come from reliable sources. For example, the Lead ban began in 1986 and was considered complete in 1988. This was when the Federal government removed the use of lead service lines and lead solder in drinking water systems. This is typically the breakpoint for delineating houses or buildings for a designation on Non-lead. However, you must use your jurisdiction building code updates as the defining date of designation. This means that for Cherokee County, the building code did not explicitly remove lead lines or lead solder until 1992. Even though a Federal ban existed and the likelihood of using lead lines or lead solder from 1988 to 1992 is slim, we are using 1992 as the Non-Lead cutoff. So, houses and buildings built after 1992 are classified as Non-Lead, while homes and buildings built before that date are subject to further scrutiny. For example, 2" or larger lines are classified as Non-Lead because lead lines were never made in those sizes. There are additional questions in the inventory, and they all must be backed up with verifiable resources or answered with "unknown." Inventory entries with "unknown" in the classification will be used to create a plan of action after October 2024 once LCRI rules are promulgated in their final form. CCWSA is working diligently to develop our inventory and make it publicly available. If you have any questions, please get in touch with Jennifer Arp at 770-479-1813 x 1101.

**Just as a reminder,
if you have a particular topic or question
you would like us to address,
please send it to ccwsaea@gmail.com.**