

Guidelines for Lead and Copper Rule Revisions (LCRR) Compliance Activities Due October 16, 2024 – Minimum Requirements

For Community Water Systems (CWS) and Non-Transient Non-Community Water Systems (NTNCWS)

INITIAL SERVICE LINE INVENTORY

Both CWS and NTNCWS in Maryland are required to:

1. Complete and Submit an Initial Service Line Inventory to the Maryland Department of the Environment (MDE) by October 16, 2024.

*NOTE: The initial inventory requires **ONLY A REVIEW OF RECORDS** as an investigation method to determine the material(s) of the service line. The required records include any previous materials evaluation (required for community water systems under [40 CFR 141.42\(d\)](#)), construction and plumbing codes/records, water system records, and distribution system/service area inspections and records. Although not required for the initial inventory, additional investigation methods may be used to determine material(s) of service lines.*

- a. Choose one of the two inventory reporting forms developed by MDE (available on [MDE's website](#)):
 - i. MDE LCRR Service Line Inventory Spreadsheet (any water system may use this form)
 - ii. MDE LCRR Service Line Inventory Certification Form for "New" Water Systems (only for water systems meeting [MDE's definition of a new water system](#) as it relates to the LCRR).
- b. Complete a review of [all required records](#) to identify service line materials and provide a description of the records on the Records Review table of the selected inventory reporting form, regardless of which of the two forms is used (i.e., page 1 of the spreadsheet or page 2 of the certification form must be completed). Detailed instructions on completing the Records Review table can be found [HERE](#).

NOTE: If the records description cell/field is left blank in any of the record types/categories on the Records Review table, the records review requirement of the LCRR will be considered incomplete, and the water system may receive a violation.

- c. Complete the minimum information on all pages of the selected reporting form, including:
 - i. General water system information.
 - ii. A description of all records reviewed (see item 1.b above).
 - iii. A list of all service lines connected to all buildings/homes in the service area (either from a water main to a building or from a well (post water treatment) to a building),
 - regardless of ownership, activity status, or actual or intended use
 - with a unique identification number assigned
 - iv. The material of the service line if known (if not known, simply select "Don't Know or Unknown" in the Inventory Spreadsheet).

IMPORTANT NOTES:

- If using the MDE LCRR Service Line Inventory Spreadsheet, the material classification for each service line will automatically be generated (assuming information is entered properly into the spreadsheet, including the basis of determination for the three service line characteristics of material, diameter and installation year. Water systems may simply select “Don’t Know or Unknown” in the Inventory Spreadsheet for any of the characteristics). The four EPA material classifications are: 1. Lead, 2. Galvanized Requiring Replacement (GRR), 3. Non-Lead, or 4. Lead Status Unknown.
- It is acceptable for water systems to have at least some (or all) service lines with “Lead Status Unknown” material classifications in their initial service line inventories. MDE anticipates this will be the case for many CWS, particularly those with older buildings, due to the lack of records for most customer-owned portions of service lines.
- Instructional videos on how to complete the MDE LCRR Service Line Inventory Spreadsheet are currently available on [MDE’s website](#) for Part 1; videos of Part 2 of the training will be forthcoming.
- Potential federal and State funding opportunities for service line inventories and lead service line replacement may be found on [MDE’s website](#).
- Additional resources to help water systems identify and replace lead service lines are available on EPA’s website (click [HERE](#))

d. Report the inventory electronically to MDE.

There are two ways a water system may submit their inventory to MDE:

- i. Using MDE’s submission form
- ii. As an Email Attachment or with Link(s) to Download

Please see [MDE’s website](#) for more information.

2. Make the Inventory Publicly Available by October 16, 2024

- a. Service lines classified as either Lead or Galvanized Requiring Replacement (GRR) must have a location identifier on the publicly accessible inventory (optional for Lead Status Unknown).
- b. Water systems serving fewer than 50,001 persons must make the service line inventory available to water customers upon request.
- c. Water systems serving greater than 50,000 persons must provide their inventory online and notify MDE when this step has been completed.
- d. Water systems with all service lines classified as Non-Lead (i.e., no Lead, GRR, or Lead Status Unknown service lines) may use a written statement in accordance with [40 CFR 141.84\(a\)\(9\)](#) (or MDE’s template – available [HERE](#)) for their publicly accessible inventory.

NOTE: CWS are also required to include instructions on how to access the service line inventory in their annual Consumer Confidence Report (CCR) starting July 1, 2027 (click [HERE](#) for more details).

3. Complete [Public Notifications of Service Line Materials](#)

- a. Notify water customers whose service line(s) are classified as either Lead, Galvanized Requiring Replacement (GRR), or Lead Status Unknown.
 - i. Initial notification to customers must be performed by **November 15, 2024**, or within 30 days of submission of the service line inventory to MDE if submitted after October 16, 2024 (however, late submissions of inventories are considered a violation under the LCRR).
 - ii. The notification must be provided to water customers via mail or by another method approved by MDE. NTNCWS may post the notification in a conspicuous place within each building to allow water customers to review the information.
 - iii. The notice must include:
 1. A statement that the water service line pipe connected to the building (e.g., residence, commercial building, etc.) is either Lead, Galvanized Requiring Replacement, or Lead Status Unknown.
 2. An explanation of the health effects of lead using EPA's mandatory language:

Health effects of lead. Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.
 3. Steps persons at the service connection can take to reduce exposure to lead in drinking water.
 4. For buildings served by:
 - A. Lead Service Lines:
 - i. A statement that the water system is required to replace its portion of a lead service line when the property owner notifies the water system that they (the property owner) is/are replacing their portion of the lead service line.
 - ii. Information about opportunities to replace lead service lines as well as programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line.
 - B. Galvanized Requiring Replacement:
 - i. Information about opportunities for replacement of the service line.
 - C. Lead Status Unknown:
 - i. Information about opportunities to verify the material of the service line.
 - iv. The EPA has developed templates for the notification of service line materials (see the Lead and Copper Rule Implementation Tools webpage on EPA's website under [Templates for the Notification of Known or Potential Service Lines Containing Lead](#)). Water systems may also use MDE's notification template (available on [MDE's website](#) or by clicking [HERE](#)).
- b. Certify to MDE, by July 1 annually (starting July 1, 2025), using MDE's certification form (available soon on [MDE's website](#)) that these service line notifications were delivered to water customers for the previous calendar year.

TIER 1 PUBLIC NOTICE FOR LEAD ACTION LEVEL EXCEEDANCES

Both CWS and NTNCWS in Maryland must:

1. Complete a Tier 1 Public Notice if the Lead Action Level is Exceeded (in Future Monitoring)

Starting October 16, 2024, water systems that have a Lead Action Level exceedance (i.e., Lead 90th percentile value is greater than 15 ppb – see 90th percentile calculation worksheet available soon on [MDE's website](#)) during a routine monitoring period (semi-annual, annual, triennial, etc.) will be required to:

- a. Within 24 hours after learning of the exceedance:
 - i. Provide public notification to persons served as soon as practical but no later than 24 hours after learning of the exceedance (i.e., Tier 1 Public Notice).
 - ii. Consult with MDE regarding the Action Level exceedance.
 - iii. Provide a copy of the notice to MDE and EPA.

NOTE: Instructions for notification, as well as notice templates, will be available soon on [MDE's website](#). In the interim, water systems may review the [instructions and notice templates available on EPA's website](#). Since EPA's notice templates are most suitable for community water systems, it is recommended that non-transient non-community water systems adjust the notice accordingly (mandatory language regarding the health effects of lead and the sharing of the notice should not be changed).

- b. Submit a certification form (available soon on [MDE's website](#)) to MDE within 10 days of completing the 24-hour Tier 1 Public Notice requirements.

NOTE: This Tier 1 Public Notice for a Lead Action Level Exceedance is in addition to:

- *The Lead Public Education Program that is required to be completed within 60 days after the end of the monitoring period if the Lead Action Level is exceeded, and*
- *The Lead Sample Customer Notices with individual Lead sample results that must be distributed/posted within 30 days of receipt of the laboratory reports regardless of the Lead sample results.*
 - *For community water systems, the notices must be delivered to each resident who had a lead sample collected at their home.*
 - *For non-transient non-community water systems, a notice with a summary of all lead sample results may be posted in a conspicuous place within each building.*

MDE will provide additional information on this new Tier 1 public notice requirement soon. Additionally, MDE will notify water systems when MDE's website has been updated with the new forms and templates.