

Lead and Copper Rule Revisions

September 23, 2024



TOWN OF HILLSBOROUGH

1

Lead and Copper Rule

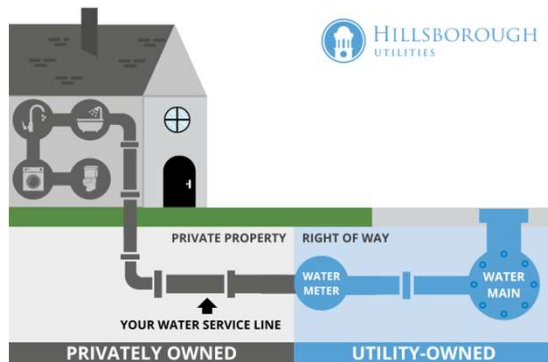


- Environmental Protection Agency adopted new, more stringent requirements in 2021
- New rule requires community water systems to inventory their water services and report any lead pipe
- Inventory must be provided to the state by Oct. 16, 2024.



2

Inventory Requirements

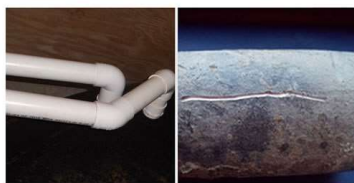


- System- and customer-owned service lines must be inventoried and classified
- Classifications are lead, galvanized requiring replacement, non-lead, or unknown
- Inventory must be publicly accessible
- Premise plumbing (in house) does not have to be inventoried



3

Inventory – Unknown



Plastic

Scratched Lead



Copper

Galvanized Steel and Valve

- Service lines must be classified using “evidence-based records, methods, or techniques”
- Record drawings, building permit applications, the state’s ban of lead in 1987 can be used
- “Unknown” is used where records are incomplete.
- State requires documentation of field verification before making assumptions on material



4

Lead “Goosenecks”



- Lead connectors, or “goosenecks,” were frequently used to connect galvanized services to cast iron mains
- Goosenecks are not considered a lead service line by the EPA, but the agency requires they be replaced when found
- Customers with a lead gooseneck do not have to receive a lead notification letter.

Inventory Submittal

Inventory Submittal											
Asset ID	Asset Name	Asset Type	Asset Class	Asset Material	Asset Diameter	Asset Length	Asset Status	Asset Location	Asset Date	Asset Notes	Asset Actions
1	123456789	Water Main	Cast Iron	12 inch	100 feet	Active	123456789	12/15/2023	123456789		
2	987654321	Water Main	Cast Iron	12 inch	100 feet	Active	987654321	12/15/2023	987654321		

- Inventory must be submitted on or before Oct. 16, 2024
- Failure to submit by the deadline requires a Tier 3 notification (notice to customers as part of annual reports)
- Inventory must be submitted in state’s approved format

Public Notification

- Community water systems must notify customers with lead, galvanized required replacement, or unknown service lines within 30 days of submitting inventory
- Notification must include specific health effects language
- To add context, town will provide information with the required language.
- Notice must include information about how to verify the service line material and steps resident can take to reduce lead exposure

Lead	GRR	Lead Status Unknown
✓ A statement that the service line is lead.	✓ A statement that the service line is GRR.	✓ A statement that the service line material is unknown but may be lead.
✓ An explanation of the health effects of lead as specified in the rule and below.	✓ An explanation of the health effects of lead as specified in the rule and below.	✓ An explanation of the health effects of lead as specified in the rule and below.
✓ Steps persons at the service connection can take to reduce exposure to lead in drinking water.	✓ Steps persons at the service connection can take to reduce exposure to lead in drinking water.	✓ Steps persons at the service connection can take to reduce exposure to lead in drinking water.
✓ Information about opportunities to replace LSLs as well as programs that provide financing solutions to replace the LSL.*	✓ Information about opportunities for replacement of the service line.	✓ Information about opportunities to verify the material of the service line.

*EPA recommends that water systems ask the owner of the service connection to contact the water system prior to making any arrangements to have the service line replaced.

Health Effects Language: 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.



Notification – Hillsborough

- Hillsborough has no documented history of lead service lines, has found goosenecks still in service
- Currently, the town’s database has about 900 unknown services on the town side, about 3,000 unknowns on the customer side
- Virtually all the notifications to go to customers are due to unknown services, not due to known lead



Month X, 2024

Dear Hillsborough Water Customer:

The Town of Hillsborough is working to identify the materials for all service lines connected to the town's water system. The Environmental Protection Agency is requiring that water service providers complete the inventory due to changes to the federal lead and copper rule.

Town records show the material of the private pipe that connects your home to the town's water main is unknown. Determining the material is important so you can plan for replacement if some or all of the line is lead or galvanized pipe previously connected to lead. Homes built before 1987 may have lead service lines.

Determine Your Service Line Material

Please help identify and correct the information on your service line material. For guidance on how to test the material of the pipe that enters your home, visit the town's Lead and Drinking Water webpage. Then complete the water service line materials form also on the page: hillsboroughnc.gov/lead-and-drinking-water.

Health Effects of Lead

Living in a home with a lead or galvanized pipe previously connected to a lead service line increases the risk of lead exposure from drinking water. 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 worsen existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these negative health effects. Adults can have increased risks of heart disease, high blood pressure, and kidney or nervous system problems.



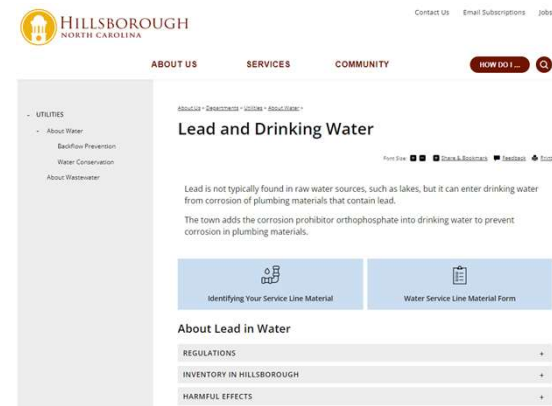
Inventory Map

- Town will post the inventory map on the website for public viewing
- Map will be posted with a form to contact town staff with additional information or clarifications on material



Notification – Customer Follow-up

- A form for self-verification of service lines will be provided in the notice.
- Customers will be asked to provide documentation of service material if the service is easily accessible
- Town must provide repeat notifications on an annual basis until all the unknowns are verified



Compliance – Future Steps

- Lead sampling of daycares, childcare centers, known lead services (if any found) will begin in January 2025
- A contract for additional field verification of services is recommended to reduce the number of notifications in 2025
- N.C. Department of Environmental Quality allows statistical methods and predictive modeling using field verifications to reduce unknowns

Appendix A: Minimum Number of Unknown Service Lines Requiring Physical Verification³

Number of Unknown Service Lines Remaining	Number of Service Lines Requiring Physical Verification
Fewer than 1,500	20% of Unknown Service lines
1,500	306
1,600	310
1,700	314
1,800	317
1,900	320
2,000	322
2,200	327
2,400	331
2,600	335
2,800	338
3,000	341

Questions?