



Department of  
**Environment &  
Conservation**

# Lead and Copper Rule Changes

May 2024

# Topics for today

- Now  $\Rightarrow$  October 15
- October 16, 2024
- Forecast for 2025 - 2026
- 2027 & Beyond

# Effective October 16, 2024

- LSLI
- PLERN  
Potential Lead Exposure Risk Notice
- Tier 1 PN w ALEs

## **EPA to Issue Violations and Actions**

# New Documents Coming

- **PLERN** ⇒ available now!!
  - Variations for NTNC, UKM, LSL, GRR available
- **PLERN CD**
- **24Hr Public Notice**
  - Template
  - Certification of Distribution
  - Guidance
- **Consumer Notice of Results** Language/Template
  - After LCRI Publication

## MUST BE SUBMITTED BY OCTOBER 16, 2024

- EVERY CWS & NTNC
  - Even if everything is NonLead
- Most important to have ALL connections listed
  - UKMs are acceptable
  - Yes, include all fire lines, ag lines – EVERYTHING connected to the distribution system
- Do not inventory inside the school, only outside

Email LSLI Excel to: [Jennifer.Murray@tn.gov](mailto:Jennifer.Murray@tn.gov) or [DWRwater.compliance@tn.gov](mailto:DWRwater.compliance@tn.gov)

# PLERN

## Potential Lead Exposure Risk Notice

- Template available now!
  - Styling can be modified, Content cannot
- Give to all LSLs, GRRs, & UKMs
  - UKMs can be different than LSLs/GRRs.
- **Within 30 days** after October 16
  - **DUE BY NOVEMBER 15<sup>TH</sup>**
  - Lates will not be accepted
  - Send ONLY ONE copy of a sent PLERN along with the Certificate of Distribution
- Due **annually** by **July 15th**

# PLERN contents

- Information on requesting tap sample
  - WS does not need to pay for this
  - **DO NOT USE Method 200.8** or it can be counted into 90th
- Contains recommendation for using NSF filter
  - WS can **sell** filters, replacement cartridges, installation, delivery
    - Likely will be required to offer filters for LSLs/GRRs, especially during active replacements (must make free to low-income)

# Tier 1 PN w ALEs

ALEs of the 90<sup>th</sup> Percentile will require

## **Tier 1** Public Notice

- Within **24 hours**
- Template will be released later this summer
- 90<sup>th</sup> Percentile Remains at 15ppb





2025 - 2026

## Lead-Free Certification

### Definite Perks:

- ∅ PLERNS
- ∅ Publicly Published LSLI
- ∅ Mandatory % Replacements
- ✓ Sm WS 9Y Waiver
  - (w 90<sup>th</sup>% <PQL qualifier)
- ∅ LSLR Plan Requirement
- ∅ Updates to LSLI
  - unless Pb Identified
- ✓ Published on TDEC Drinking Water Public-facing Webpage

### *maybe:*

- ✓ Fewer WQPs
- ✓ 6M sampling less likely
- ✓ CCT Reassessment Requirements lowered
- ∅ POU device distribution

# 2025 – 2026

- Review of LSLI for Sample Sites
  - TDEC will review list of sites for MSSL Surveys
    - (Will likely change sampling locations)
- Updates to the LSLI
  - Due before each sampling event
    - (May change with LCRI, annual?)
- EPA will be issuing violations for Oct 16<sup>th</sup> changes:
  - LSLI Submission
    - Due Oct 16<sup>th</sup> & before each sampling event
  - PLERNS
    - Annual distribution
  - 24Hr ALE Public Notices
- **All other tap sampling protocols remain the same**

# 2025 - 2026 Guidance Docs & Trainings

- CCT
  - New Risk Assessment scoring for treatment changes
- Calculating the 90<sup>th</sup>
- WQP Sampling
- LSL Replacement Planning



Department of  
**Environment &  
Conservation**

## **2027 & Beyond**

- 90<sup>th</sup> to 10ppb
- Sampling Changes
- Schools & CCFs
- LSLR Plans



- Mandatory LSL Replacements

# 2027 & Beyond

- Most WS will return to 6-Month sampling
- 10 ppb 90<sup>th</sup> Percentile for Lead
- 1<sup>st</sup> & 5<sup>th</sup> Liter sampling?
- Increased Emphasis on WQPs
  - pH is no longer CCT qualifier, poly PO4 blends
  - >10K submit 6M WQP monitoring
  - WPS no longer required:
    - Calcium, Temp, Conductivity

# 2027 & Beyond

- LSLRs
  - 10% annual
  - Increased Public Interaction
- POU Devices
  - Not FREE for everyone, only to low-income customers
  - Can charge for filters, delivery, & installs
- Schools?
  - TDEC plans to file for a waiver