



LEAD AND COPPER RULE IMPROVEMENTS (LCRI) REMINDERS

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Focus on Change| 2026



LEAD SERVICE LINE INVENTORY (LSLI)

UPCOMING DEADLINES

- The purpose of this presentation is to provide an overview of requirements and provide preliminary information and guidance before the U.S. Environmental Protection Agency (EPA) begins formal enforcement and implementation of the LCRI.
- The annual notification of known or potential lead service lines is due July 1, 2026.
- It is important to proactively establish future schedules to ensure compliance with the LCRI. For 2027, the big compliance items under the LCRI are the following.
 - Baseline inventories.
 - List of School and Childcare facilities serviced.
 - Annual Notifications for known or potential service lines containing lead.
- The Florida Department of Environmental Protection (DEP) will continue to coordinate with EPA over the next year to provide additional guidance and clarifications as the process continues.



BASELINE INVENTORY



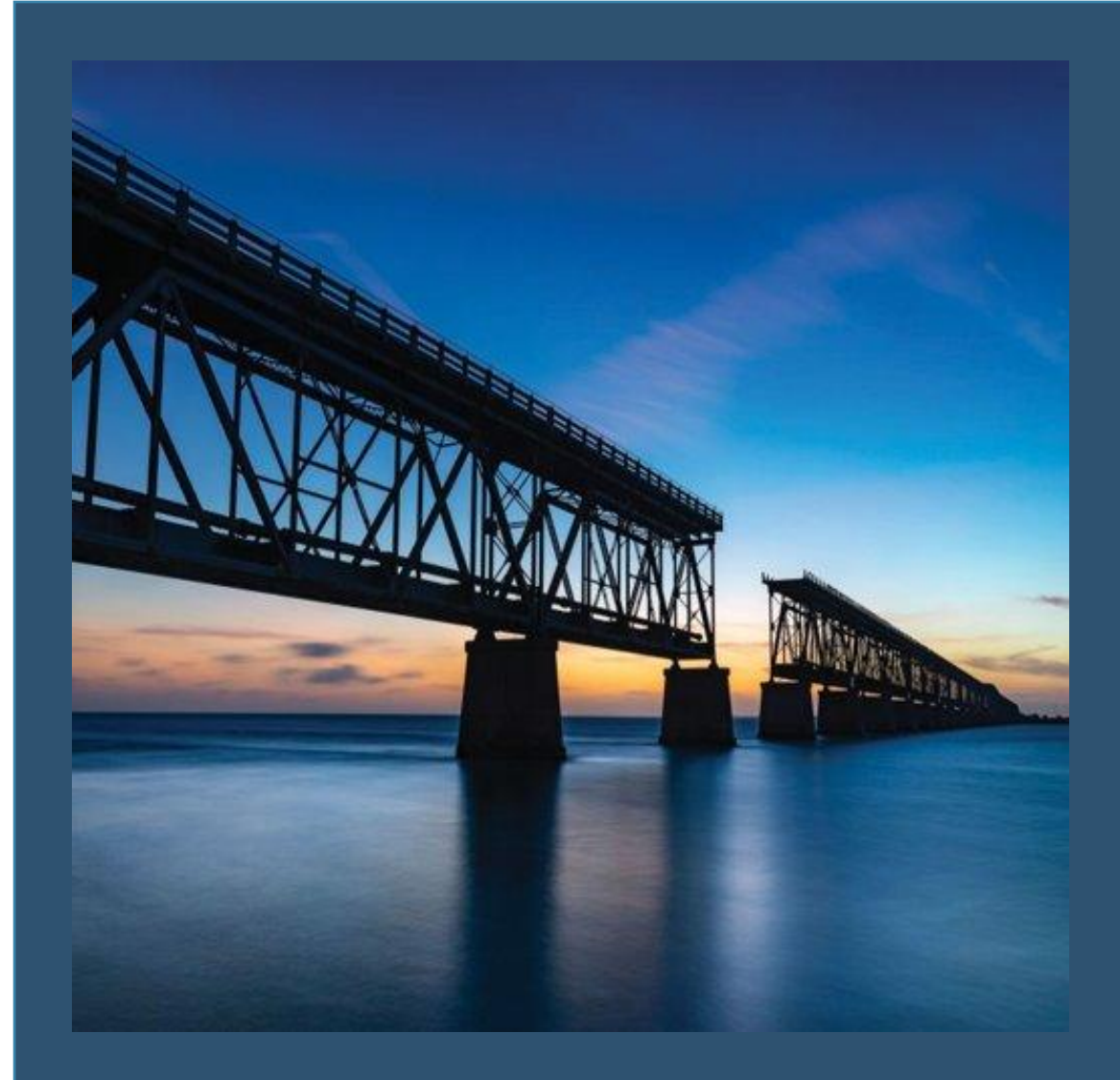
- When is it due?
 - Baseline inventories are due Nov. 1, 2027.
- How is this different from the initial LSLI?
 - The baseline inventory includes identification of service lines regardless of ownership status (both sides of the master meter).
 - This also includes identification and review of connector materials as well (pigtails, goosenecks, etc.).
 - Service lines that are connected to non-potable sources (emergency lines and fire suppression) and abandoned properties must also have their lines identified as well.
 - These inventories shall be updated on an annual basis as all lines are identified as non-lead, or when all identified lead lines are replaced.



SCHOOLS AND CHILDCARE FACILITIES

LIST SUBMITTALS

- For community water systems (CWS), along with the baseline inventory, they must submit a list of schools and childcare facilities that are being served by the system to DEP.
- This list is specifically focused on elementary/primary schools and childcare facilities.
 - High schools or middle schools would not be required to adhere to these requirements.
- Beginning Nov. 1, 2027, per the requirements of 40 CFR 141.90(D)(1), systems must sample 20% of schools and childcare facilities annually.





ANNUAL NOTIFICATIONS FOR KNOWN OR POTENTIAL LEAD SERVICE LINES

- What's the difference?
 - Although similar to annual notifications under the Lead and Copper Rule Revisions (LCRR), under the LCRI notices must be:
 - Updated to reflect the new baseline inventory and the new associated reporting requirements.
 - Sent with 30 days of the baseline submittal deadline and will be applicable each year thereafter, until all lead lines are replaced.
 - **Use required updated lead language, that provides more clarity to the health effects of lead exposure.**



LCRR VS LCRI

CONTENT FOR ANNUAL NOTIFICATIONS (40 CFR 141.85(E)(3))

(3) Content —

- (i) **Persons served by a confirmed lead service line.** The notice must include a statement that the person's service line is lead, an explanation of the health effects of lead that meets the requirements of [paragraph \(a\)\(1\)\(ii\)](#) of this section, steps persons at the service connection can take to reduce exposure to lead in drinking water, 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, and a statement that the water system is required to replace its portion of a lead service line when the property owner notifies them they are replacing their portion of the lead service line.
- (ii) **Persons served by a galvanized requiring replacement service line.** The notice must include a statement that the person's service line is galvanized requiring replacement, an explanation of the health effects of lead, steps [persons](#) at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities for replacement of the service line.
- (iii) **Persons served by a lead status unknown service line.** The notice must include a statement that the person's service line material is unknown but may be lead, an explanation of the health effects of lead that meets the requirements of [paragraph \(a\)\(1\)\(ii\)](#) of this section, steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities to verify the material of the service line.

LCRR effective date: March 2, 2022

(3) Content —

(i) **Persons served by a confirmed lead service line or galvanized requiring replacement service line.** The notice must include:

- (A) A statement that the person's service line is lead or galvanized requiring replacement as applicable.
- (B) An explanation of the health effects of lead that meets the requirements of [paragraph \(a\)\(1\)\(ii\)](#) of this section.
- (C) Steps persons at the service connection can take to reduce exposure to lead in drinking water that meet the requirements of [paragraph \(a\)\(1\)\(iv\)](#) of this section.
- (D) A statement that the consumer can request to have their tap water sampled in accordance with [paragraph \(c\)](#) of this section.
- (E) Include information on how to obtain a copy of the service line replacement plan or view the plan on the internet if the system is required to make the service line replacement plan available online.
- (F) Information about opportunities to replace lead and galvanized requiring replacement service lines. Where the water system intends for customer payment for a portion of the replacement where it is required or authorized by State or local law or a water tariff agreement, the notice must include information about programs that provide financing solutions to assist property owners with replacement of their portion of a lead or galvanized requiring replacement service line.
- (G) A statement that the water system is required to replace its portion of a lead or galvanized requiring replacement service line when the property owner notifies the water system that they are replacing their portion of the lead or galvanized requiring replacement service line.
- (H) A statement that provides instructions for the customer to notify the water system if they disagree with the service line material categorization in the inventory.

(ii) **Persons served by a lead status unknown service line.** The notice must include a statement that the person's service line material is unknown but may be lead, the information in [paragraphs \(e\)\(3\)\(i\)\(B\)](#) through [\(E\)](#) of this section, and information about opportunities to verify the material of the service line.

LCRI effective date: Dec. 30, 2024



LSLI STATISTICS

STATE STATISTICS

- ~80% of inventoried lines have been identified as non-lead; better than the national average of 73%.
- A substantial amount of service lines in Florida have been inventoried.
- 224 systems have not submitted LSLIs. This only accounts for 0.31% of the total service lines within Florida.

Breakdown of Categories			EPA National %	# Systems w/ Lead
Lead	5,207	0.07%	2.00%	54
Non-lead	5,911,933	79.74%	73.00%	% Systems w/ Lead
Galvanized Requiring Replacement (GRR)	34,494	0.47%	<1%	2.33%
Unknown	1,462,608	19.73%	24.00%	
Total number of service lines inventoried:	7,414,244	100.00%		
Unsubmitted inventories/service connections #	233,445	0.31%		
Total # of service lines:	7,437,587			



LSLI STATISTICS

UNSUBMITTED SYSTEM STATISTICS

- Many of the remaining systems that have yet to submit are on the smaller side (almost all have <1,000 service connections).
- ~77% of non-submittals are small CWS or Non-transient Non-community Systems (NTNC).

Breakdown of Unsubmitted Systems

More than 1,000 service connections	3	1.34%
Less than 1,000 service connections	221	98.66%
Less than 500 service connections	219	97.77%
Less than 100 service connections	172	76.79%



LSLI STATISTICS

REGULATORY OFFICES

- Following the Oct. 16, 2024, compliance date, DEP has worked to track vital statistics regarding LSLI submittals.
- Breakdown of submittals by each regulatory office.
- Overall compliance rate of 90.3%, which is slightly better than the national average.

Regulatory Offices	% Submitted	# PWSs Reporting Lead Service Lines	# Lead Lines by Regulatory Office
Northwest District	96.6%	1	81
Northeast District	89.6%	2	3
Central District	89.3%	20	133
Southwest District	87.1%	7	310
Hillsborough	99.7%	0	0
Polk	79.4%	10	4,419
Sarasota	100.0%	1	5
South District	91.7%	2	16
Southeast District	76.0%	5	135
Volusia	93.8%	0	0
Palm Beach	84.4%	7	1
Miami-Dade	100.0%	5	104
Totals		54	5,207
Compliance Rate = 90.3%			



ENFORCEMENT AND COMPLIANCE

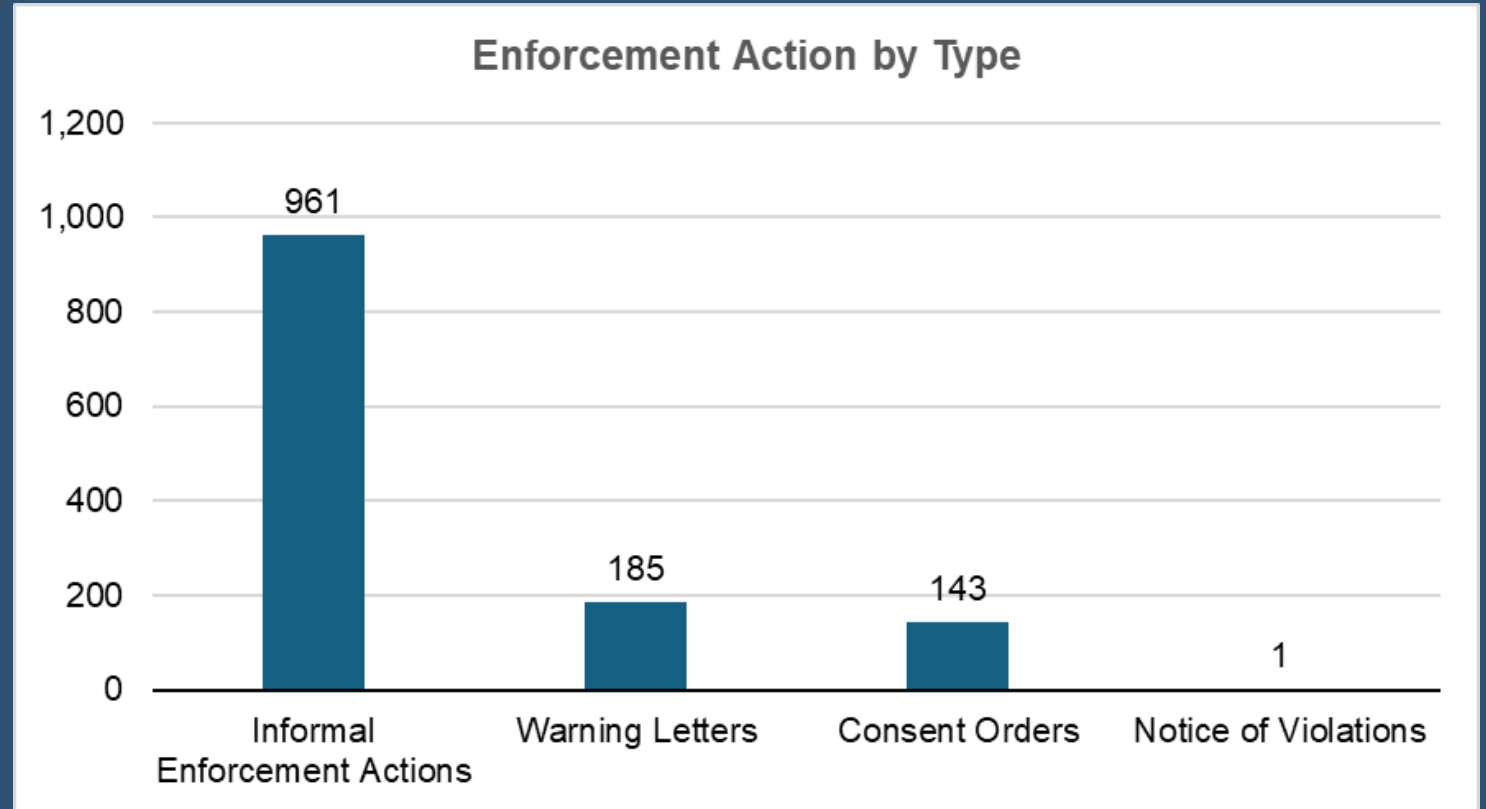
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ENFORCEMENT YEAR IN REVIEW

2025 ENFORCEMENT STATISTICS

- According to Florida's drinking water data, there were a total of 1,290 formal and informal enforcement actions issued in the state for 2025.
- Most actions were the lowest level, informal enforcement action (letters/contacts/meetings).
- There were still a large amount of formal enforcement actions issued as well (consent orders/notices of violations).





ENFORCEMENT PROCESS

ENFORCEMENT PENALTIES

E N V I R O N M E N T A L H A R M	EXTENT OF DEVIATION FROM REQUIREMENT			
		MAJOR	MODERATE	MINOR
	MAJOR	\$7,500 to \$6,200	\$5,999 to \$4,500	\$4,499 to \$3,450
	MODERATE	\$3,449 to \$2,400	\$2,399 to \$1,500	\$1,499 to \$900
	MINOR	\$899 to \$750	\$750*	\$750*

*Environmental Education may be an acceptable substitute.

DEP has defined timeframes and steps enforcement escalation. Enforcement penalties are determined on a case-by-case basis. This penalty matrix provides an idea of how penalties are determined. Penalties increase in relation to environmental harm/human health, as well as the extent of deviation from the requirement. Being proactive can help decrease potential penalties.



GUIDING PRINCIPLES

- Be proactive.
 - Many missed monitoring events tend to occur due to late submission of specific analytes (disinfection byproducts (DBPs), bacteriological). Planning your monthly and quarterly monitoring events in advance can mitigate the most on violations.
- Keep an open line of communication.
 - Many compliance assistance offers (CAO) can escalate to formal enforcement due to communication breakdowns; continued communication reduces escalation risks.
- Understand corrective action options.
 - Understanding the best solution for your system helps to resolve exceedance issues and associated penalties faster (corrosion control treatment options for Lead and Copper Rule, DBP reduction methods).



ENFORCEMENT SCENARIOS

WHAT WOULD YOU DO?

- Ryan's Revised Total Coliform Rule (RTCR) headaches: Ryan is the chief operator for a large CWS. However, he is not used to managing compliance schedules and sporadically misses distribution sampling events and submittals by a few days. After a few CAOs by phone, he is sent a warning letter (WL). What would you do?
- Jake's too busy to talk: Jake has taken on 30 smaller NTNCs. One of these is a mobile home park that has had repeating quarterly secondary iron maximum contaminant level (MCL) exceedance issues, but he is bogged down with his systems that he never gets a moment to speak with DEP, and it has now escalated to a WL and potential penalties. What would you do?
- Robert's corrective action frustrations: Robert has a small rural CWS that has had three quarterly MCL exceedances in a row, and he has tried to improve filtration, as other methods are too expensive. While it has helped, he still has high levels. What would you do?



ENFORCEMENT SCENARIOS

POTENTIAL SOLUTIONS

- Ryan's RTCR headaches: Since Ryan has a large system serving >5,000, he should be updating and maintaining his site sampling plans, so distribution point sampling is done at a reasonable place throughout the month. (Rule 62-550.518(4), Florida Administrative Code (F.A.C)). In addition, he should have public notice (PN) procedures ready, so if his sampling isn't finished during the compliance window, he will not get additional violations for failing to issue PNs within 48 hours.
- Jake's too busy to talk: Jake should initially reevaluate the number of systems he is managing. If the workload is impairing his ability to maintain compliance, then that is not ideal for public health, DEP regulations, business owners, or the operators. However, the best course of action is to contact DEP as soon as possible to determine the best method to reduce iron levels. This opens the dialogue to address the issue, as well as mitigate any addition violations and potential penalties.



ENFORCEMENT SCENARIOS

POTENTIAL SOLUTIONS (2)

- Robert's corrective action frustrations: Robert has maintained communication with DEP. They have discussed additional corrective actions such as granulated activated carbon filters or peroxide as a more effective method for reducing DBPs at his system. Additionally, he has been given information for potential funding opportunities through the State Revolving Fund and has been referred to the Florida Rural Water Association as they can provide additional assistance.



QUESTIONS?

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THANK YOU

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