

DNR Drinking Water and Groundwater Study Group

February 10, 2022

Revised Lead and Copper Rule Update

Ann Hirekatur- DNR

FEDERAL LEAD & COPPER RULE REVISIONS (LCRR)

- Went into effect on **December 21, 2021**.
- Compliance date is **October 16, 2024**.
- EPA intends to propose “Lead and Copper Rule Improvements” (LCRI) in 2023. In particular, they anticipate these “improvements” to include:
 - more stringent LSL removal requirements;
 - and
 - revisions to tap monitoring and action / trigger level requirements.
- EPA does not anticipate changes to the materials inventory requirements.
- All community water systems should begin working on their service line inventory now.

FEDERAL LEAD & COPPER RULE REVISIONS (LCRR)

- ✓ The Department is moving forward with developing tools for, and communicating with systems about, the LCRR materials inventory requirements.
- ✓ The Department is waiting for more information from EPA before we proceed implementing our internal plans for preparing to administer other sections of the LCRR.

LEAD & COPPER RULE REVISIONS (LCRR)
MATERIALS INVENTORY - WHAT IS REQUIRED?

- **§141.84(a)** *Lead service line inventory.* All water systems must develop an inventory to identify the materials of service lines connected to the public water distribution system.
- (2) The inventory must include all service lines connected to the public water distribution system regardless of ownership status.

LEAD & COPPER RULE REVISIONS (LCRR)
MATERIALS INVENTORY - WHAT SYSTEMS DOES THIS APPLY TO?

Wisconsin has > **11,000** Public Water Systems
regulated by the Safe Drinking Water Act

~**2,000** are regulated for Lead & Copper
and required to complete the inventory.

LEAD & COPPER RULE REVISIONS (LCRR)

WHAT HAVE WE DONE SO FAR?

MATERIALS INVENTORY SPREADSHEET TEMPLATE COLUMNS

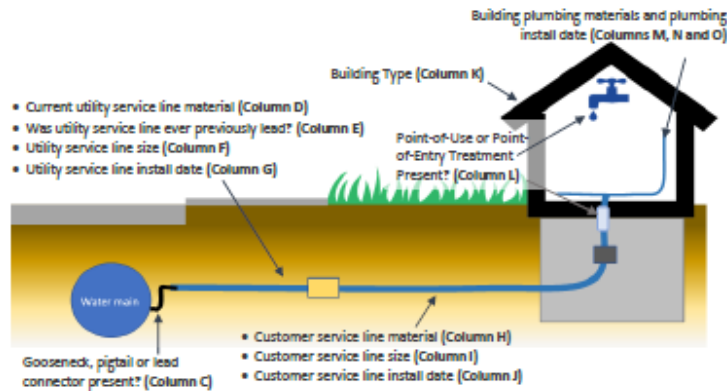
COLUMN	DESCRIPTION		
A	SITE ID This column is optional. PWSs that do not wish to report site addresses to the department in column B may want to use this column to "link" their materials inventory table to a separate service address table for their own use.		
B	LOCATION IDENTIFIER The location identifier can be the site address. If the PWS does not wish to report addresses to the department it can be a block, intersection or landmark. This column is required per sub-subparagraph §141.84 (a)(8)(i) of the LCRR which requires a that a location identifier be associated with each service line.		
COLUMN	DESCRIPTION	ANSWER OPTIONS	ANSWER OPTION DESCRIPTIONS
C	GOOSENECK CURRENTLY PRESENT? Is there a gooseneck, lead connector or pigtail present?	Y	YES - WITH CERTAINTY
		N	NO - WITH CERTAINTY
		UNK	NOT KNOWN WITH CERTAINTY
D	CURRENT UTILITY SERVICE LINE MATERIAL Service line pipe material, from the water main to curb stop.	L	CONFIRMED LEAD
		C	CONFIRMED COPPER
		G	CONFIRMED GALVANIZED
		P	CONFIRMED PLASTIC
		DI	CONFIRMED DUCTILE IRON
		CI-L	CONFIRMED LINED CAST IRON
		CI-U	CONFIRMED UNLINED CAST IRON
		UNK-LG	UNKNOWN - MAY CONTAIN LEAD OR GALVANIZED
		UNK-NOLG	UNKNOWN - DEFINITELY DOES NOT CONTAIN LEAD OR GALVANIZED
		E	WAS UTILITY SERVICE LINE MATERIAL EVER PREVIOUSLY LEAD? Was the service line ever previously lead?
N	NO - PWS KNOWS WITH CERTAINTY THAT SERVICE LINE MATERIAL WAS NEVER PREVIOUSLY LEAD		
UNK	NOT KNOWN WITH CERTAINTY IF MATERIAL WAS EVER PREVIOUSLY LEAD		
COLUMN	DESCRIPTION		
F	UTILITY SERVICE LINE SIZE Service line pipe diameter in inches, from the water main to curb stop. The DNR does <u>not</u> require this information, however, PWSs are required to report service line size to the PSC for their annual report. This column <u>may</u> be used by PWSs that wish to track information required by both agencies in a single document.		
G	UTILITY SERVICE LINE INSTALL DATE The four-digit year that the utility-side service was installed (i.e. 1974). If the exact year is not known, enter the decade (i.e. enter 1970 for some time in in the 1970s).		
H	CUSTOMER SERVICE LINE MATERIAL Service line pipe material, from the curb stop to water meter. See Row D answer options.		
I	CUSTOMER SERVICE LINE SIZE⁴ Service line pipe diameter, in inches, from the curb stop to water meter. As is the case with utility service line size, the DNR doesn't require this information, however, this column <u>may</u> be used by PWSs that wish to track information required by PSC and DNR in a single document.		
J	CUSTOMER SERVICE LINE INSTALL DATE The four-digit year that the customer side service line was installed (i.e. 1974). If the exact year is not known, enter the decade (i.e. enter 1970 for some time in in the 1970s).		

MATERIALS INVENTORY SPREADSHEET TEMPLATE COLUMNS

COLUMN	DESCRIPTION	ANSWER OPTIONS	ANSWER OPTION DESCRIPTIONS
K	BUILDING TYPE The type of structure that is served water by the service connection. At a minimum, the PWS must identify the connection either SF, MF or NONRES.	SF	SINGLE-FAMILY RESIDENTIAL
		MF	MULTI-FAMILY RESIDENTIAL
		SCH/CC	SCHOOL OR CHILD CARE <i>This category may be used by the PWSs to track locations that must to be monitored under §141.92.</i>
		RES/CC	RESIDENTIAL & IN-HOME CHILD CARE <i>This category may be used by the PWSs to track locations that must to be monitored under §141.92.</i>
		NONRES	NONRESIDENTIAL ONLY
		MIX	MIXED RESIDENTIAL & NONRESIDENTIAL
L	POINT-OF-ENTRY OR POINT-OF-USE TREATMENT PRESENT? Is the cold-water kitchen tap treated by point-of-entry or point-of-use softening, filter or other treatment?	Y	YES - THE SAMPLE TAP IS TREATED BY A POINT OF USE OR POINT OF ENTRY SOFTENER OR FILTER
		N	NO - THE SAMPLE TAP IS NOT TREATED BY A POINT OF USE OR POINT OF ENTRY SOFTENER OR FILTER
		UNK	PRESENCE OR ABSENCE OF POU AND POE IS UNKNOWN
M	BUILDING PLUMBING MATERIAL 1 The type of plumbing materials inside the structure served water. If there is more than one known plumbing material type, select the second material type in column N. Column N is not required.	CLS	COPPER WITH LEAD SOLDER
		C	COPPER, NO LEAD SOLDER
N	BUILDING PLUMBING MATERIAL 2	O	OTHER MATERIAL THAT IS <u>NOT</u> COPPER, OR COPPER WITH LEAD SOLDER
		UNK	UNKNOWN
COLUMN	DESCRIPTION		
O	BUILDING PLUMBING MATERIAL INSTALL DATE The four-digit year that the interior premise plumbing was installed. If the exact year is not known, you may enter the decade if the decade is not the 1980s. If the decade is the 1980s, you may enter one of the following: 1983-1984, <1983 or >1984.		
P	COMMENTS Use this column information to enter any other information that the PWS finds helpful to them or any information they wish to share with the department. This column is optional.		

LEAD & COPPER RULE REVISIONS (LCRR) MATERIALS INVENTORY - WHAT HAVE WE DONE SO FAR?

Materials Inventory Template For Drinking Water Systems Under The Lead And Copper Rule Revisions



1. Why do Public Water Systems (PWSs) need to provide this information?

Under Section §141.84 of the Lead and Copper Rule Revision (LCRR), all community Public Water Systems (PWS) "must develop an inventory to identify the materials of service lines connected to the public water distribution system. The inventory must include all service lines connected to the public water distribution system regardless of ownership status."

2. What specifically does the LCRR materials inventory require (columns D, E and F)?

Subparagraph §141.84 (a) (4) of the LCRR states that "each service line, or portion of the service line where ownership is split, must be categorized" as belonging to one of the following groups: lead; non-lead; lead status unknown; or galvanized requiring replacement. The information provided in columns D, E and F of the materials spreadsheet will enable the department to correctly assign every service line or portion thereof to one of these four categories.

3. What is the Site ID (column A)? Is this required?

The PWS can use this column to identify the site ID of lead and copper monitoring sites. For all other locations, the site ID is optional. PWSs that do not wish to report site addresses to the department in column B may want to use this column to "link" their materials inventory table to a separate service address table for their own use.

What is a locational identifier (column B)?

Sub-subparagraph §141.84 (a)(8)(i) of the LCRR requires a locational identifier associated with each service line. The locational identifier can be the site address, or it can be a block, intersection or landmark.

The LCRR defines some categories of materials, such as 'lead status' and 'galvanized downstream of lead' differently in different sections of the rule. Thus, the spreadsheet is intended to be a simple and easy way for municipal PWSs to collect and report the information required now and in the future. The DNR will use the materials inventory data collected by the water system to categorize each of their service connections appropriately under each section of the LCRR.

Materials Inventory Template For Drinking Water Systems Under The Lead And Copper Rule Revisions

5. Why do PWSs need to indicate whether a gooseneck is present (column C)?

Paragraph §141.86 (a) of the LCRR directs every public water system to "identify a pool of targeted sampling sites based on the service line inventory." However, the materials information needed to categorize service lines in accordance with §141.84 alone is insufficient to identify these targeted sampling sites. Specifically, as per LCRR sub-paragraph §141.86 (a) (5), Tier 3 sampling sites include both single-family structures served by galvanized lines located downstream of a lead service line (i.e. confirmed galvanized requiring replacement) or downstream of a lead gooseneck, pigtail or connector.

6. Why do PWSs need to indicate whether a service line that is not currently lead was ever previously lead (column E)?

The materials history of the upstream utility service line is needed to correctly categorize customer-side galvanized service lines as either non-lead or galvanized requiring replacement under the LCRR. Sub-subparagraph §141.84 (a)(4)(ii) of the LCRR requires that public water systems identify locations where a galvanized service line "is or was at any time downstream of a lead service line" or "lead status unknown" service line as "galvanized requiring replacement". If a water system knows with certainty that the utility side of a service line is not now, and never has previously been lead, then the downstream customer-side galvanized service line is identified as "non-lead". If a PWS does not know this with certainty, the material is categorized as "galvanized requiring replacement." However, as per paragraph §141.86 (a), galvanized service lines currently or formerly downstream of a lead gooseneck, pigtail, or connector are not identified as galvanized requiring replacement.

7. Are PWSs required to track the interior premise plumbing materials and install date at every service location in their system (columns M, N and O)?

This information is only required for service locations that are potential compliance sampling sites. If the PWS has at least as many Tier 1, Tier 2 and/or Tier 3 sampling sites as their required number of monitoring sites, then they are not required to track this information at this time. However, the PWS may be required to collect this information in the future, once all of their lead service lines and galvanized lines requiring replacement are removed.

8. Are PWSs required to track whether there is a point-of-entry (POE) or point-of-use (POU) treatment device at every service location (column L)?

This information is only required for service connections that are potential monitoring sites. Sub-paragraph §141.86 (1) of the LCRR states that "Sampling sites may not include sites with installed point-of-entry (POE) treatment devices and taps used at sampling sites may not have point-of-use (POU) devices designed to remove inorganic contaminants..." However, the department recommends that PWSs collect this information concurrently with premise plumbing materials at a given residence, so that PWSs don't need to revisit residences that become potential monitoring sites once their lead and galvanized lines are removed.

9. Are PWSs required to use the DNR template?

No, PWSs are not required to use the DNR template for their materials inventory. However, PWSs that track their drinking water distribution system materials using a different method should provide all of the information requested in the template.

10. Do Municipal PWSs have to report this information to the DNR and PSC both?

Due to differences in the frequency and timing of reporting and the type of information reported, municipal public water systems will continue to report service line information annually to the Public Service Commission (W-22 and W-29) for the foreseeable future. However, the DNR and PSC are in discussions about how they can collaborate to minimize the amount of similar reporting to multiple agencies after the LCRR compliance date.

lead & copper rule revisions (LCRR)

MATERIALS INVENTORY - WHAT HAVE WE DONE SO FAR?

Public Presentations

- AWWA Conference
- Multiple AWWA Webinars
- ASDWA LSLI Webinar
- Regional meetings

Communication with individual systems and consultants

- Sanitary survey reviews
- Corrosion control check-in meetings
- Individual skype or zoom meetings upon request



State Implementation Framework
for the Lead Service Line Inventory
Requirements under EPA's Lead
and Copper Rule Revisions (LCRR)



lead & copper rule revisions (LCRR)

***MATERIALS INVENTORY -
WHAT WE HAVE PLANNED?***

Communication with individual systems and consultants

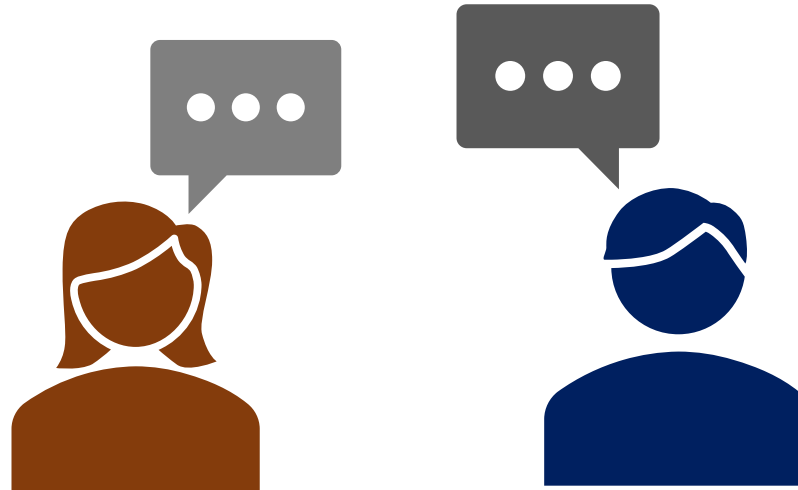
- Field Engineers emails and calls
- Sanitary survey reviews
- Corrosion control check-in meetings

Collaboration with Wisconsin Rural Water Association

- Circuit riders
- Small-system webinars

Ongoing

- GovDelivery announcements
- Lunchtime zoom updates
- DG Study Group updates



DNR Voluntary PFAS Sampling at Municipal Systems

Kyle Burton – DNR

What has Changed?

- Funding for PFAS sampling is now available to ALL municipal systems statewide
- Systems can ask questions and express interest in the project by emailing DNRDGPFASSAMPLING@Wisconsin.gov
- DNR will hold an informational virtual meeting for all interested systems

What has not Changed?

- Continue to partner with WI Department of Health Services (DHS) and WI State Lab of Hygiene (WSLH)
- Training and support for systems participating in the program
- DNR will work closely with impacted systems to leverage all resources available to protect health of customers and address impacts.

Why Sample Now?

- Funding Available as well as support from DNR, DHS, WSLH
- Proactively assess impacts and protect public health
- Infrastructure bill funding for addressing PFAS will be available
- UCMR5 and proposed DNR rules

Timeline?

- February 8, 2022 Governor Evers announces funding for voluntary sampling project
- February 2022 DNR will reach out directly to systems with more information
- March 2022 virtual informational meeting for all interested systems
- March/April 2022 sampling begins

Questions?



Member Roundtable

Scott Laeser, Clean Wisconsin

Chris Groh, Wisconsin Rural Water Association

Sean Scott, Wisconsin State Laboratory of Hygiene

Keith Donner for John Steinbrink, American Water Works Association (AWWA) -
Wisconsin Chapter

Lawrie Kobza, Municipal Environmental Group

Paul Junio, Northern Lake Service

Jeff Kramer, Wisconsin Water Well Association

Sarah Yang, Department of Health Services

Rick Wietersen, Wisconsin Association of Local Health Departments and Boards

Craig Summerfield, Wisconsin Manufacturers & Commerce

Updates to the Consumer Confidence Report process

Adam DeWeese – DNR

Secondary Drinking Water Standards and the CCR

The following paragraph and table of secondary drinking water standards (SMCL) are being added to the Consumer Confidence Report generator. The table should go below the list of regulated contaminants and before the Unregulated Contaminants Section. Information on secondary drinking water standards should be included if a system reports a detectable concentration for the SMCL.

Inclusion of the SMCL adheres to the following CCR guidance which is provided through the CCR generator.

- For any additional monitoring which indicates the presence of other contaminants in the finished water: the results and an explanation of the significance of the results noting the existence of a health advisory or a proposed regulation.

Contaminants with a Health Advisory Level or a Secondary Maximum Contaminant Level

The following table lists contaminants which were detected in your water and that have either a Health Advisory Level (HAL), or a Secondary Maximum Contaminant Level (SMCL), or both. There are no violations for detections of contaminants that exceed Health Advisory Levels, Groundwater Standards or Secondary Maximum Contaminant Levels. Secondary Maximum Contaminant Levels are levels that do not present health concerns but may pose aesthetic problems such as objectionable taste, odor, or color. Health Advisory Levels are levels at which concentrations of the contaminant present a health risk.

Contaminant (units)	Site	SMCL (ppm)	HAL (ppm)	Level Found	Range	Sample Date (if prior to 2020)	Typical Source of Contaminant
Aluminum		0.05 to 0.2	0.2				Runoff/leaching from natural deposits
Chloride		250					Runoff/leaching from natural deposits, road salt, water softeners
Iron		0.3					Runoff/leaching from natural deposits, industrial wastes
Manganese		0.05	0.3				Leaching from natural deposits
Silver		0.1	0.05				Runoff from industrial wastes

New Definitions

Definitions

Term	Definition
AL	Action Level: The concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.
HAL	Health Advisory Level: The concentration of a contaminant which, if exceeded, poses a health risk and may require a system to post a public notice. A Level 1 assessment is a study of the water system to identify potential
SMCL	Secondary drinking water standards or Secondary Maximum Contaminant Levels for contaminants that affect taste, odor, or appearance of the drinking water. The SMCLs do not represent health standards.
TCR	...

DNR Quarterly Nitrate Maximum Contaminant Levels (MCLs)

Adam DeWeese – DNR

- Public water systems with Nitrate violations are typically put on increased quarterly monitoring if they are not already
- Historically
 - No new violations after original (on-going)
 - No new public notice requirements
 - Unique to Nitrate
- Starting January 1, 2022
 - New quarterly violations when over the standard
 - New Public notice requirements

Internal Updates

Steve Elmore - DNR
Kyle Burton - DNR

New Public Water Engineering Section Chief

Theera Ratarasarn



Rule Updates

- NR 140 and NR 809 Cycle 10
 - Revisions to incorporate new standards including PFOA+PFOS
 - On February 23, the Natural Resources Board will consider these rules and their approval is the next step in advancing them to the legislature.
 - Interested individuals may register to speak or submit written comments to the Board by February 16, 2022.

Rule Updates

- NR 140 and NR 809 Cycle 11
 - Revisions including new standards for additional 16 PFAS compounds
 - Combined stakeholder meeting planned for spring 2022
- NR 811
 - Updates to water system and treatment design criteria
 - Stakeholder meeting to be held in April

Rule Updates

- NR 812
 - Proposes revisions concerning the use of PVC casing in bedrock formations
 - On February 23, the Natural Resources Board will consider these rules and their approval is the next step in advancing them to the legislature.
 - Interested individuals may register to speak or submit written comments to the Board by February 16, 2022.

Rule Updates

- Water Supply Service Area and Diversion Planning
 - Rule making will begin in accordance with recent bill signed by Governor Evers

Non-Community System Updates

- Electronic Monthly Operational Reporting (EMOR)
 - Now live for Non-Transient Non-Community (NN) systems
 - Schools and businesses regulated as public water systems can now report their operational treatment information online
- Online resources available soon for NN systems
 - Help preparing for sanitary surveys

Non-Community System Updates

- Determining Population at Daycares
 - Daycare facilities will count population as one child per day, regardless of time spent at the non-community
 - More protective than past practice outlined in 30 year old EPA guidance and consistent with other states.
 - Some systems may transition from Transient Non-Community (TN) to Non-transient Non-community (NN). DNR will work directly with those systems through the transition.

Community System Updates

- Deadline for municipal systems to submit Cross Connection Control Inspection Report
 - **MARCH 1, 2022**
- Operator Certification Exams now available online
 - Public Water System Operators and Well Driller / Pump Installer

<https://dnr.wisconsin.gov/topic/opcert/exams.html>

Community System Updates

- Lead Service Line Replacement Funding
 - Deadline for application has passed this year
 - Funding for removal of lead service lines through this program will be available again next year
- <https://dnr.wisconsin.gov/aid/documents/EIF/leadServiceLineFunding.html>
- Funding from the Bipartisan Infrastructure Law (BIL) will also be available in 2023



Bipartisan Infrastructure Law

===== PRESIDENT JOE BIDEN =====

**BUILDING A
BETTER AMERICA**

===== BUILD.GOV =====

**A GUIDEBOOK TO THE
BIPARTISAN INFRASTRUCTURE LAW
FOR STATE, LOCAL, TRIBAL, AND
TERRITORIAL GOVERNMENTS, AND
OTHER PARTNERS**

CONNECT WITH US

Next Meeting: April 14, 2022

The meeting recording will be posted on the
Drinking Water and Groundwater Study Group
website



/WIDNR



@WIDNR



@WI_DNR



/WIDNRTV



"WILD WISCONSIN:
OFF THE RECORD"