

THE LEAD AND COPPER RULE REVISION 12/2023

The Lead and Copper Rule Revision (LCRR), handed down from EPA to DOH, went into effect, December 2023. One of the first tasks water systems are faced with is the Lead Service Line Inventory (LSLI) that is part of the new regulatory requirements. This involves water systems compiling an inventory of the material used from the water main line connection to the meter (or property corner for those systems that are not metered individually yet), then after the meter to the home, which is considered private or homeowner property, to the house. The primary objective is to ensure there are no lead service line components, by definition. In general, water systems are responsible for the maintenance and repair of all water system components up to the meter, or property corner. They do not have jurisdiction on private property (unless in a utility easement) so up to the entrance into private property, or post water meter, is considered the homeowners responsibility. Lead service lines were primarily installed in the late 1800's through the 1940's. It would be very unlikely to find lead components (such as a gooseneck or pigtail, which is simply a raised horseshoe or slack in the lead service line, so if when excavated, had a portion of slack line to pull on without breaking the line - hopefully) installed after the 1940's.

Lead pipes visually are identified by being a dull greyish color, that when scraped with a sharp edged tool such as a knife, they will appear silver and shiny. Lead is not magnetic, so another way to verify would be if a magnet will adhere to it. If a magnet does, then it's likely galvanized steel. The exterior of a galvanized pipe may appear corroded, with large rust spots or "growths" on the exterior portion, which is primarily rust and zinc corrosion (galvanic corrosion). Depending on the age and chemistry of your pipe and water supply, the interior may look nearly new, or it may also have corrosion present, which if on the interior, may eventually restrict water flow as the corrosion increases. Other types of common water service lines could be PVC (Poly Vinyl Chloride) pipe. There are two different types of PVC pipe used for service lines. White colored pipe is schedule 40, the lighter weight of the two, and darker grey PVC is schedule 80, the heavier duty of the two. The other common type is Polyethylene, commonly referred to as "poly" pipe. It is most commonly a black pipe, though some manufacturers produce this in a blue color pipe. PEX is a newer plastic pipe though not very often is this type of pipe buried. It is much more commonly used on the interior of a home. PEX may be blue (cold water), red (rated for hot water) or an opaque white type of pipe. Service lines are most commonly some combination of those types of pipe especially for systems built after the 40's. In 1986, the first lead reduction rule was adopted into the Safe Drinking Water Act (first introduced in 1974, amended in 86' and again in 96'). It's possible, though fairly rare for copper pipe to be used in service lines, primarily due to cost, as copper is much more expensive versus PVC and Poly pipe. Fittings used anywhere in the service lines for a pipe transition, or to accommodate bends needed to go up/down or around, may be a variety of different types of material, though are small enough they aren't considered a significant contributor to lead, should they have lead in them at all. These may include brass, differing PVC or nylon plastic fittings. These fittings do not need to be identified in the LSLI data. It is considered safe to assume, any components installed post 1986, as a non-lead service line. This fact may save you, your neighbors, and the water system the headache of the potential need to excavate any portion of a service line if the system as a whole was built post 1986.

Water purveyors, those responsible for the source water supply, such as a well or spring, and pump houses with tanks and plumbing, as well as a reservoir and pressure pumps as applicable, are responsible to identify plumbing material in service lines up to the meter or private property corners. Lines after the meter or inside the private property line boundary are the homeowner or business owner's responsibility to identify the type of material. Again, the goal is to ensure there are no lead lines installed.