

Proposed Lead and Copper Rule Improvements (LCRI). Technical Fact Sheet: Deferred Deadlines for Service Line Replacement November 2023

This fact sheet contains information on the deferred deadlines for service line replacement under the proposed Lead and Copper Rule Improvements (LCRI). EPA is proposing for water systems to replace all lead and galvanized requiring replacement (GRR) service lines that are under the control of the water system in 10 years or less, with limited exceptions. EPA is proposing two eligibility criteria for systems that are not expected to be able to meet the 10-year deadline, as described below. A system needs to meet only one of the criteria to be eligible. EPA is also proposing for States to require systems to replace service lines by an earlier deadline if they determine that an earlier deadline is feasible, regardless of their eligibility for a deferred deadline.

Criterion 1: High proportion of lead and GRR service lines compared to households

EPA is proposing a threshold ratio of 0.039 annual replacements per household served (equivalent to 39 replacements per 1,000 households) (calculated as outlined below). If replacing all lead and GRR service lines in your system in 10 years would cause you to exceed this ratio, your system is eligible for a deferred deadline unless the State determines that an earlier deadline is feasible. Follow these steps to determine if your system is eligible and how to calculate your deferred deadline:

Step 1: Calculate the average annual number of replacements per year under a 10-year schedule. First, determine the total number of lead and GRR service lines in your baseline inventory. **Do not count the unknown service lines.** Next, divide the total number of lead and GRR service lines by 10. For example, if you have 6,000 lead and GRR service lines in your LCRI baseline inventory, your average annual replacements per year would be:

$$6,000 \text{ lead and GRR service lines} \div 10 \text{ years} = 600 \text{ replacements per year}$$

Step 2: Determine the ratio of annual service line replacements to households served. Do this by dividing the result in Step 1 (e.g., 600) by the number of households served by your water system. For example, if you serve 12,000 households, the proportion would be:

$$600 \text{ lead and GRR service line replacements per year} \div 12,000 \text{ households} = 0.05$$

Step 3: Compare the result from Step 2 to the threshold in the proposed LCRI of 0.039 annual replacements per household served. If your ratio is greater than 0.039, you are eligible for a deferred deadline. For example, based on the result from Step 2 of 0.05 replacements per household, this system would be eligible for a deferred deadline:

$$0.05 \text{ (from Step 2) is greater than } 0.039 \text{ (EPA's threshold ratio)}$$

Step 4: Calculate your deferred deadline, if applicable. Multiply EPA's threshold ratio, 0.039 by the number of households you serve (e.g., 12,000) and divide the total number of lead and GRR service lines in your baseline inventory by this number (e.g., 6,000). For the example above with 6,000 lead and GRR service lines and 12,000 households, the deferred deadline would be:

$$6,000 \text{ lead and GRR service lines} \div (0.039 \times 12,000 \text{ households}) = 12.8 \text{ years}$$

Criterion 2: More than 10,000 replacements per year

If your system has more than 100,000 lead and GRR service lines (not counting the unknown lines in the system's inventory), the system meets this criterion. These systems would be required to replace 10,000 lead and/or GRR service lines per year, taking more than 10 years to complete replacement, unless the State determines that an earlier deadline is feasible. For example, a system with 140,000 lead and GRR service lines would be required to replace 10,000 lines per year, resulting in the removal of all 140,000 lines in 14 years.

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