



## OFFICE OF GROUND WATER AND DRINKING WATER

WASHINGTON, D.C. 20460

August 27, 2025

### **MEMORANDUM**

**SUBJECT:** Primacy for the 2024 Lead and Copper Rule

**FROM:** Marietta Echeverria, Division Director  
Drinking Water Capacity and Compliance Assistance Division  
Office of Ground Water and Drinking Water

**TO:** Water Division Directors  
Regions I – X  
Association of State Drinking Water Administrators

On October 30, 2024, EPA published the Final Lead and Copper Rule Improvements (LCRI) to Subpart I of Title 40, Subchapter D, Part 141 of the Code of Federal Regulations (CFR). The new requirements pertain to most drinking water systems across the country and require these water systems to identify and replace lead pipes. The LCRI also includes more testing of drinking water and a lower threshold requiring communities to take actions to protect people from lead exposure in water. In addition, the final rule improves communication within communities so that families are better informed about the risk of lead in drinking water, the location of lead pipes, and the plans for replacing them.

Under 40 CFR 142.12(b), complete and final requests for approval of primacy program revisions to adopt new or revised EPA regulations must be submitted to the Administrator not later than two years after promulgation of the new or revised EPA regulations. Therefore, primacy agencies (i.e., states, Tribes, and territories) must submit a final primacy revision application for the LCRI requirements no later than October 30, 2026. If the primacy agency cannot meet this deadline, the primacy agency may apply for an extension for up to two additional years. The extension request must be submitted to the EPA region before October 30, 2026.

The attachment to this memorandum includes a primacy crosswalk that combines all the requirements of the 1991 LCR, the 2000 LCR Minor Revisions (LCRMR), the 2007 LCR Short-Term Revisions (LCRSTR), and the retained 2021 LCR Revisions (LCRR) with the requirements promulgated in the 2024 LCRI. In addition, the documents listed below are intended to support states in developing their primacy program revisions incorporating these new requirements.

- Primacy Revision Timetables
- Primacy Revision and Extension Request Checklists
- Example Extension Agreement Letter

- Example Attorney General’s Statement
- Recommended Workload Activities

EPA plans to provide a National Primary Drinking Water Regulations – Lead and Copper Rule Implementation Guidance that describes these requirements in more detail.

EPA recognizes that primacy agencies will be working toward program revisions and implementation for three drinking water regulations in the next few years: 1) Per- and Poly-fluoroalkyl Substances (PFAS) National Primary Drinking Water Rule (NPDWR); 2) Consumer Confidence Report (CCR) Rule Revisions; and 3) Lead and Copper Rule Improvements (LCRI) NPDWR. We look forward to working with you and our co-regulators to find ways to reduce burden and streamline implementation, while providing safe drinking water throughout the country.

Please distribute these materials to your primacy agencies.

Thank you for your continued commitment to the public health protection objectives of the SDWA. If you have questions, *please contact Treda Grayson at [grayson.treda@epa.gov](mailto:grayson.treda@epa.gov).*