

## 2021 LCRR Requirements that Are Retained in the Final Lead and Copper Rule Improvements and Compliance Dates

October 2024

This fact sheet describes the requirements of the 2021 Lead and Copper Rule Revisions (LCRR) that EPA did not change in the final Lead and Copper Rule Improvements (LCRI) that systems must comply with starting October 16, 2024<sup>1</sup>, clarify what requirements water systems must follow between October 16, 2024 and the LCRI compliance date, and describe the final LCRI compliance date requirements.

### When must water systems comply with the LCRI?

Water systems must comply with the requirements of the LCRI three years after the date the final rule is published.

### What requirements must water systems comply with between October 16, 2024, and the LCRI compliance date?

The Lead and Copper Rule (LCR) is the National Primary Drinking Water Regulation first promulgated in 1991 that requires actions by public water systems to reduce levels of lead and copper in drinking water. On January 15, 2021, EPA promulgated the LCRR. In October 2024, EPA published the final LCRI to significantly reduce exposure to lead through drinking water. The final LCRI builds on the 2021 LCRR and the original LCR and supersedes the 2021 LCRR.

The LCRI requirements replace most of the 2021 LCRR requirements and requires water systems to continue to comply with the LCR with the exception of certain 2021 LCRR requirements between the 2021 LCRR's October 16, 2024 compliance date and the LCRI compliance date. Specifically, in the LCRI, EPA retains the October 16, 2024 compliance date for the initial service line inventory, notification of service line material, Tier 1 public notification of a lead action level exceedance, and associated reporting requirements as listed in Tables 1 and 2 (water system requirements and State requirements that apply as a condition of primacy, respectively) below for water systems and States<sup>2</sup>, respectively. Table 1 also clarifies the lead health effects language that must be used between October 16, 2024 and the LCRI compliance date. With these limited exceptions, water systems will comply with the LCR (as codified in the July 2020 Code of Federal Regulations) for all other rule provisions and transition directly to the LCRI at the LCRI compliance date.

---

<sup>1</sup> The 2021 LCRR requirements described are the same as those described in EPA's April 2024 [LCRR Implementation Fact Sheet](#).

<sup>2</sup> As part of this fact sheet, "State" refers to the agency of the state, Tribal, or territorial government that has jurisdiction over public water systems consistent with the definition of "State" in 40 CFR 141.2. During any period when a state or Tribal government does not have primary enforcement responsibility pursuant to section 1413 of SDWA, the term "State" means the relevant Regional Administrator of EPA.

**Table 1: 2021 LCRR Water Systems Requirements Systems Must Comply with October 16, 2024 through the LCRI Compliance Date**

System Requirements	Compliance Date	Code of Federal Regulations (CFR) Section
<b>Initial Inventory and Associated Reporting</b>		
Initial inventory development (includes making inventory publicly accessible).	October 16, 2024	40 CFR 141.84(a)(1) through 141.84(a)(10) (excluding 141.84(a)(6) and (a)(7))
Submission of initial inventory to the State	October 16, 2024	40 CFR 141.90(e)(1)
Failure to submit initial inventory to the State by October 16, 2024, requires Tier 3 Public Notification (PN).	Starting October 16, 2024	40 CFR Appendix A to Subpart Q of Part 141 I.C.1 (excludes Tier 3 notification for 141.90 except 141.90(e)(1), (e)(13), and (f)(4))
<b>Notification of Service Line Material and Associated Reporting</b>		
Notification of known or potential service lines containing lead within 30 days of completion of the inventory (initial) and repeat notification on an annual basis until the entire service connection is no longer lead, galvanized requiring replacement, or unknown. For new customers, water systems must also provide the notice at the time of service initiation.	Within 30 days of completion of the inventory and then annually	40 CFR 141.85(e)
Provide revised lead health effects language in public education materials to ensure consistent notification messaging with PN requirements (as referenced in 40 CFR 141.85(e)).	Starting October 16, 2024	40 CFR 141.85(e)(3) requires health information meeting the requirements of 40 CFR 141.85(a)(1)(ii)
Annual reporting to the State by July 1 that the system provided notification and delivered lead service line information materials to affected consumers with lead, galvanized requiring replacement, or unknown service lines for the previous calendar year. Water systems must provide a copy of the notification and information materials to the State.	July 1, 2025, and then annually	40 CFR 141.90(e)(13), 40 CFR 141.90(f)(4)
Failure to certify to the State that the system notified persons served at service connections of a known or potential service line containing lead requires Tier 3 PN.	Starting October 16, 2024	40 CFR Appendix A to Subpart Q of Part 141 I.C.1 (excludes Tier 3 for 141.90 except 141.90(e)(1), (e)(13), and (f)(4))
<b>Other Public Education Materials<sup>1</sup></b>		
Provide 2021 LCRR revised lead health effects language in public education materials (including public education after a lead action level exceedance) to ensure consistent messaging with	Starting October 16, 2024	40 CFR 141.85(a)(1)(ii)

System Requirements	Compliance Date	Code of Federal Regulations (CFR) Section
notification of service line material and PN requirements.		
<b>Public Notification<sup>2</sup> and Associated Reporting</b>		
Exceedance of the lead action level as specified in § 141.80(c) requires Tier 1 PN provided to persons served by the water system no later than 24 hours after the system learns of the exceedance.	Starting October 16, 2024	40 CFR 141.201(a)(3)(vi) (In Table 1 to § 141.201), 40 CFR 141.202(a)(10) (In Table 1 to § 141.202), 40 CFR Appendix A to Subpart Q of Part 141 C.2
A copy of the Tier 1 PN for lead action level exceedance must be sent to the head of the primacy agency and EPA Administrator no later than 24 hours after the system learns of the exceedance.	Starting October 16, 2024	40 CFR 141.201(c)(3), 40 CFR 141.31(d)(2)
Provide revised lead health effects language as required in Tier 1 PN for lead action level exceedance and Tier 2 and 3 PN for violations.	Starting October 16, 2024	40 CFR Appendix B (D.23) to Subpart Q of Part 141

<sup>1</sup> While discussed in the April 2024 LCRR Implementation Fact Sheet, a row was added to the table to ensure systems know the LCRR health effects language is required starting October 16, 2024 through the LCRI compliance date, upon which the LCRI health effects language is required.

<sup>2</sup> From October 16, 2024 through the LCRI compliance date, Tier 1 PN is triggered by a lead action level exceedance of 0.015 mg/L. Starting on the LCRI compliance date, Tier 1 PN is required if a system exceeds the new lead action level of 0.010 mg/L.

**Table 2: 2021 LCRR State Requirements States Must Comply with October 16, 2024 through the LCRI Compliance Date**

State Requirements	Compliance Date	Code of Federal Regulations (CFR) Sections
<b>Initial Inventory and Associated Reporting</b>		
States reporting to EPA: For each public water system, the number of lead, galvanized requiring replacement, and lead status unknown service lines in its distribution system, reported separately.	States receive information in Q4 2024 and report this information by the end of Q1 2025 (3/31/25) for the initial inventory.	40 CFR 142.15(c)(4)(iii)(D)
Quarterly reports to the Administrator include any system violations for failure to submit initial inventory to the State.	States receive information in Q4 2024 and report this information by the end of Q1 2025 (3/31/25) for the initial inventory.	40 CFR 142.15(a)(1)
<b>Notification of Service Line Material and Associated Reporting</b>		
Quarterly reports to the Administrator include any system violations for failure to certify notifications.	States receive information in Q4 2024 report this information	40 CFR 142.15(a)(1)

	by the end of Q1 2025 (3/31/25).	
<b>Public Notification and Associated Reporting</b>		
Quarterly reports to the Administrator include any system violations for failure to conduct Tier 1 PN.	States receive information in Q4 2024 report this information by the end of Q1 2025 (3/31/25).	40 CFR 142.15(a)(1)
Reporting of 90 <sup>th</sup> percentile lead concentrations where the State calculates a water system's 90 <sup>th</sup> percentile concentrations: The State provides the results of the 90 <sup>th</sup> percentile lead calculations, in writing, to the water system within 15 days of the end of the tap sampling period.	Within 15 days of the end of tap sampling periods.	40 CFR 141.90(h)(3)

### What are water systems required to submit by the LCRI compliance date?

In addition to preparing to comply with all the LCRI requirements, water systems must submit the following to the State by the LCRI compliance date:

- All water systems must submit a baseline inventory or statement that they have no lead, galvanized requiring replacement or unknown service lines.
- All water systems with at least one lead, galvanized requiring replacement, or unknown service line must submit a service line replacement plan.
- All community water systems must submit a list of the schools and licensed child care facilities they serve or provide certification that they do not serve any.
- If a water system wishes to obtain a waiver from the inventory validation requirements, they must also submit a written request to the State demonstrating that they have conducted an inventory validation that is at least as stringent as the LCRI inventory validation requirements by the LCRI compliance date.

Please see the Service Line Replacement and the Lead in Schools and Child Care Facilities fact sheets for more information about these requirements.

**Disclaimer:** This document is being provided for informational purposes only to assist members of the public, States, Tribes, and/or public water systems in understanding the Lead and Copper Rule Improvements (LCRI). It includes descriptions of regulatory requirements. In the event that there are any differences, conflicts, or errors between this document and the LCRI, States, Tribes, and/or public water systems should refer to the LCRI. This document does not impose any legally binding requirements on the EPA, States, Tribes, or the regulated community. Further, this document does not confer legal rights or impose legal obligations on any member of the public. In the event of a conflict between the discussion in this fact sheet and any statute or promulgated regulation, the statute and any promulgated regulations are controlling.