

**NEW JERSEY  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION**

Lead and Copper  
Rule Revision  
Update:  
Stakeholder  
Meeting

April 2021  
Division of Water Supply & Geoscience

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## Ground Rules

- Begin and end on time
- Please mute yourself... \*6
- \*6 also unmutes you
- Adhere to the agenda
- Be respectful and listen

- Etiquette for Questions
  - Use the chat bar – include slide #
  - You will be called upon to speak
  - One minute total speaking time

Your attendance and feedback is valuable!

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## Agenda

### Division Presentation & Discussion on Current Direction

10:00 AM – 12:00 PM

- Introduction
- Status of EPA's Lead and Copper Rule
- Corrosion Control and Source Water Treatment
- Water Quality Parameters
- Materials Evaluation, Lead Service Line Inventory and Replacement
- Tap Monitoring and Public Education
- Questions and Next Steps

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## Priorities

- Reduce and respond to climate change
- Protect New Jersey's water
- Revitalize our communities and protect public health
- Manage and promote thriving and natural and historic resources
- Strengthen the DEP

## Principles

- Follow the law
- Use the best available science
- Listen to all sides
- Find the best balance
- Be transparent and honest with the public



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The Division of Water Supply & Geoscience (DWSG) works to ensure New Jersey's water supply is **adequate, reliable, safe, and available for the future**, based on sound science.




## Mission Statement




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DIVISION OF WATER SUPPLY AND GEOSCIENCE



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- Water Supply Home
- Drinking Water Customers ▶
- Drinking Water Systems ▶
- Wells ▶
- NJ Geological and Water Survey
- Water Allocation ▶
- General Information ▶
- Contact Us
- Open Public Records Act (OPRA)

### Lead in Drinking Water

Lead is not normally found in drinking water at the source. Typically, lead gets into your drinking water from the service lines, plumbing and fixtures that contain lead. As a result of corrosion, lead and other metals from the pipes slowly dissolve into the water. Many factors affect the amount of lead that leaches into the water, including lead content of pipes, fixtures, and solder, along with water temperature, pH and hardness. Lead is associated with adverse health impacts even at low levels, particularly in infants and children.


Additional information is available at the following links:

[CONSUMER](#)  
(You are served by a community water system/are on "city water")

[SCHOOLS](#)

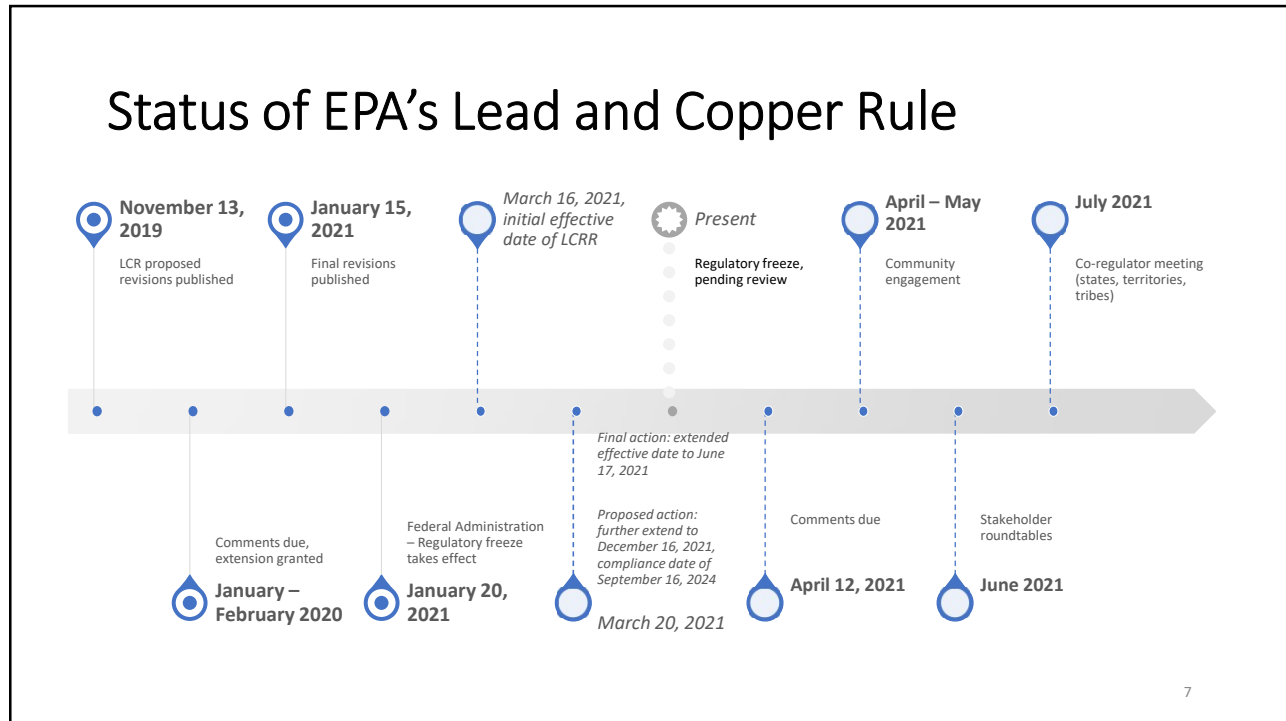
[PUBLIC WATER SYSTEM](#)  
(Community or Non-transient non-community)

[EPA Lead and Copper Rule Implementation Info](#)



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## New Jersey Lead and Copper Rule Overview


**Main Topic Areas:**

1. Corrosion Control and Source Water Treatment
2. Water Quality Parameters
3. Materials Evaluation, Lead Service Line Inventory and Replacement
4. Tap Monitoring and Public Education/Notification



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## Corrosion Control Treatment (CCT)

### Stakeholder Session Discussions:

Study Timeframes

Technical Content of CCT Study

- Sequential Sampling
- Pipe Scale Analysis

Small System Flexibility

Consecutive System Considerations



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## Corrosion Control Treatment (CCT) *Current NJ Rule Direction*

- All Water Systems will demonstrate CCT is optimized or conduct a study
- Study Timeframes
  - Demonstration Study- 30 months- CWS >3,000, CWS <3,300 w/ LSLs, NTNC as required by the Department
  - Desktop Study – 18 months-(CWS <3,300 w/no LSLs, NTNC)
  - Extension allowed



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## Corrosion Control Treatment (CCT) *Current NJ Rule Direction*

### Technical Content of CCT Study

- Aligning with EPA CCT Guidance
- Sequential Sampling
  - Required as a component of demonstration study
  - First, Service Line Sample, and Flushed include additional parameters
- Pipe Scale Analysis
  - Required as a component of demonstration study for subset of systems
  - Minimum of 2 sites



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## Corrosion Control Treatment (CCT) *Current NJ Rule Direction*

### Small System Flexibility

- Consideration given to NTNC and small CWS replace plumbing in entirety

### Consecutive System Considerations

- Require to coordinate with each other during various evaluation stages of the optimization process and continue to coordinate after optimization is achieved



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## Source Water (SoW) Requirements

### Stakeholder Session Discussions:

SoW sampling frequency

SoWT Process and Timeframes

Change in Source/Treatment Requirements

### Current NJ Rule Direction:

- POE to the distribution system, including interconnections
- Monitoring to begin the month after the sampling period that exceeded
- Initial, follow-up, and optimal monitoring schedules
- Long-term/permanent changes in source or treatment (longer than 30 days)
- Mandatory monitoring at a minimum of two, six-month monitoring periods

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# Questions?



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## Water Quality Parameters

### Stakeholder Session Discussions:

WQP Sampling Sites, Parameters, and Frequency

WQP Process

Follow Up WQP Timeframe

Optimal WQP

- Additional parameters for a complete evaluation of CCT
- Action after a single excursion
- State designations – minimum, ranges, or both

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## Water Quality Parameters *Current NJ Rule Direction*

- Increased the number of sites and frequency
- Every water systems will be required to monitor for WQPs
- Additional parameters included
- WQP sampling plan completed and updated
- Optimal WQP Designations - Minimums and ranges



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## Consecutive Systems

### Stakeholder Session Discussions:

Sampling requirements - Location, timing

### Current NJ Rule Direction:

- Coordination required with each other during various evaluation stages of the optimization process and continue to coordinate after optimization is achieved
- Sample at permanent, active interconnections
- Sample for WQP upon notification of OWQP violation
- Notification for significant change in treatment or source

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# Questions?



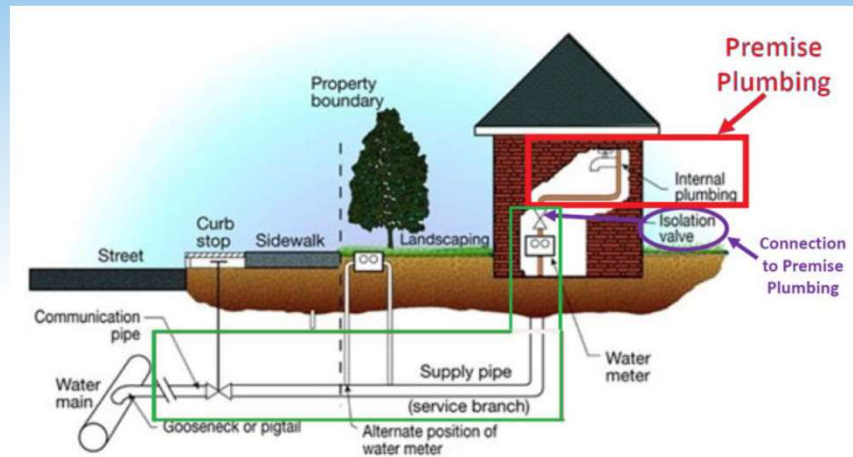
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## Lead Service Line (LSL) Definition

- What constitutes a LSL?



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## Materials Evaluation and LSL Inventory

### Stakeholder Session Discussions:

How to develop - Documents, materials, steps

Notifications - partial replacement by property owner

### Current NJ Rule Direction:

- Materials Evaluation must include a service line inventory and must have strategy to confirm unknown materials
- Complete within 60 days from effective date of rule; update on a continuous basis and submit changes to sampling pool to the DEP
- Service line inventory: inventory to include all materials, submit within 90 days; provide annual updates, publicly accessible
- Four categories\*: lead, non-lead, lead status unknown, galvanized requiring replacement
- Include requirements for newly discovered LSLs

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## LSL Replacement

### Stakeholder Session Discussions:

Lead Service Line Replacement (LSLR) calculations  
Criteria, Timing, Number per year

### Current NJ Rule Direction:

- Requiring all systems with known or unknown LSLs to develop a LSLR plan
- Mandatory LSLR at 3% per year on average for that incur a 90<sup>th</sup> percentile of 10 ppb
- LSLR rate of 7% per year on average after a lead ALE (15 ppb)
- Requiring LSLR to occur upon encountering an LSL during normal operations and becoming notified by a customer replacing their portion of the LSL
- Calculating LSLR compliance on a two-year rolling average
- Cannot stop once started; Must replace until 0 LSLs and 0 unknowns
- Only full LSL replacements counting towards the required replacement rate
- The number of service lines to replace each year is to be updated annually

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## Filter Distribution & Sampling

### Stakeholder Session Discussions

Distribution conditions/criteria

Requirements for a program

Sampling after Lead Service Line Replacement

### Current NJ Rule Direction:

- Notification before, during and after LSLR
- Mandatory filter distribution program for LSLR and disturbances of a LSL during meter replacements, 6-month supply of cartridges
- Respond to customer requests for assistance, provide instructions on operation and maintenance
- Sample once at 6 months after any/all LSLR and investigation/corrective actions for results above the lead AL

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# Questions?



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## Tap Monitoring

### **Stakeholder Session Discussions:**

Criteria for pool size  
Proactive investigative actions  
Monitoring schedules

### **Current NJ Rule Direction:**

- Modifying the required number of samples
- Incorporating Federal Find and Fix remedial action approach (greater than 15 ppb for lead) with the inclusion of elevated copper results
- Potential narrow scope for triennial monitoring

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## Tap Monitoring

### Stakeholder Session Discussions:

Service line sampling  
Copper requirements  
Additional samples

### Current NJ Rule Direction

- First draw and 5th liter service line samples for water systems at sites with LSLs
- No change to copper, except for tiers
- Copper collected in first draw sample
- 5 Tier classifications, more detailed sampling plan
- Customer requested samples - offer to collect and analyze during ALE

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## Tap Monitoring in Schools and Child Care Facilities

### Stakeholder Session Discussions:

Requirements for water systems  
NJ requirements – DOE, DCF coordination

### Current NJ Rule Direction:

- Require water systems to sample at these facilities every 3 years, for those facilities not covered under DOE or DCF regulations
- Separate sampling procedures for schools and child cares
  - 250 mL sample size
  - 5 sites in schools
  - 2 sites in childcares
  - Maximum stagnation time

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## Public Education and Notification

### Stakeholder Session Discussions:

Public Education: Type, Frequency and Content

Public Notification: Timing of Notification - ALE and Individual results

### Current NJ Rule Direction:

- Adding additional options for lead PE, adding more content for LSLs
- Continue every 6 months as long as exceeding
- Tier 1 public notice requirement (24 hours) for systemwide lead ALE
- Three-day notification requirement for individual sites exceeding lead AL
- Notification requirements to all consumers for lead and copper ever year
- Everyone gets annual statement and a notice if served by LSL/unknown
- Copper: streamlined/paired down PE; consumer notice 30 days or include w/lead notice)

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# Questions?



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## NJLCR Timeline And Next Steps

- Focus group sessions (4): October 2019 – December 2019
- Surveys: Sent to water systems after each session
- Virtual Stakeholder Meetings (3): June 2020
- Second Round of Virtual Stakeholder Meetings (2): April 2021
- Rule Proposal
- Public Hearing: 60-day comment period
- Adoption



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