Lead Service Line Replacement FAQs

What if my waterworks doesn't have any Lead Service Lines?

All water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must submit a Lead Service Line (LSL) Replacement Plan to the State by September 16, 2024. Waterworks that do not meet this criteria are not required to develop and submit a lead service line replacement plan. More detailed guidance on certification of no lead service lines will be provided at a later date.

Why/When is my waterworks required to do Lead Service Line Replacements?

Required lead service line replacements may be triggered by the following events:

- Waterworks that serve **greater than 10,000 persons** whose **90th percentile lead level is above the lead trigger level but at or below the action level** must conduct **goal-based** full lead service line replacements at a rate approved by the state.
- Waterworks serving **greater than 10,000 persons** whose **90th percentile exceeds the lead action level** must conduct **mandatory** full lead service line replacement at an average annual rate of at least three percent, calculated on a two-year rolling basis.
- Waterworks serving **10,000 or fewer persons** whose **90th percentile exceeds the lead action level and selects a full lead service line replacement program** must conduct replacements **on a schedule approved by the State**, not to exceed 15 years.
- When the **customer replaces their portion of a LSL** and notifies the waterworks in advance or notifies the waterworks of a replacement no more than 6 months in the past.

What other events could trigger a LSL replacement in accordance with the LSL Replacement Plan?

In addition to the required LSL replacements, a waterworks with LSLs must follow the LSL replacement requirements, detailed in the waterworks' LSL Replacement Plan, if a LSL replacement is triggered, such as by the following events:

- Waterworks replaces or rehabilitates a distribution main and replaces the existing LSLs.
- Waterworks repairs a waterline leak or break that triggers a LSL replacement.
- A leak or break in a LSL that triggers a LSL replacement.

What information should we provide to our customers when replacing LSLs?

A waterworks must notify customers at least 45 days in advance of a planned replacement that may result in a partial replacement. Before the affected service line is returned to service, the waterworks must provide notice that the customer may experience a temporary increase of lead levels in their drinking water due to the replacement, information about the health effects of lead, and actions consumers can take to minimize their exposure to lead in drinking water. The water system must also provide information about service line flushing before the affected service line is returned to service.

Do I need to provide notifications to customers with lead, galvanized requiring replacement, or lead status unknown?

Yes, a water system must notify all persons served by a lead, galvanized requiring replacement, or lead status unknown service lines. This notification is due within 30 days of completion of the lead service line inventory and annually until the connection is no longer a lead, galvanized requiring replacement, or lead status unknown service line.

Is there funding available for LSL replacements?

Yes, limited funding is available through the Financial and Construction Assistance Program's Lead Elimination Assistance Program (LEAP). Visit this website for more information: https://www.vdh.virginia.gov/drinking-water/fcap/leap/

What is a Lead Service Line (LSL) Replacement Plan?

In general, a LSL Replacement Plan is a document that describes how a water utility will complete replacements of lead service lines and/or galvanized requiring replacement service lines, protect the health of affected customers, and maintain compliance with certain requirements of the Lead and Copper Rule Revisions (LCRR).

When is a LSL Replacement Plan required?

All water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must submit a lead service line replacement plan to the State by September 16, 2024.

What is required in a LSL Replacement Plan?

The lead service line replacement plan must be sufficiently detailed to ensure a system is able to comply with the lead service line replacement requirements in the LCRR. The plan must include a description of the following elements:

(1) A strategy for determining the composition of lead status unknown service lines in its inventory;

(2) A procedure for conducting full lead service line replacement;

(3) A strategy for informing customers before a full or partial lead service line replacement;

(4) For systems that serve more than 10,000 persons, a lead service line replacement goal rate recommended by the system in the event of a lead trigger level exceedance;

(5) A procedure for customers to flush service lines and premise plumbing of particulate lead;

(6) A lead service line replacement prioritization strategy based on factors including but not limited to the targeting of known lead service lines and lead service line replacement for disadvantaged consumers and populations most sensitive to the effects of lead; and

(7) A funding strategy for conducting lead service line replacements, which considers ways to accommodate customers that are unable to pay to replace the portion they own.

What does LSL replacement goal rate mean?

Waterworks that serve more than 10,000 persons whose 90th percentile lead level is above the trigger level but at or below the action level must conduct full lead service line replacement at a rate approved by the state. This is the LSL "replacement goal" rate.

What is the mandatory replacement rate?

Waterworks whose 90th percentile lead level exceeds the action level, that are required to conduct LSL replacement, must achieve a mandatory replacement rate of 3% per year of lead service lines plus galvanized requiring replacement service lines plus unknown service lines. In certain cases, the State may establish an alternate replacement rate.

How does my waterworks determine the LSL replacement goal rate?

Waterworks must propose a LSL replacement goal rate to the state in the LSL Replacement Plan. The waterworks should use system-specific information as a basis for the goal rate. The waterworks should consider the number of LSLs and unknowns and the resulting required replacements.

What if my waterworks does not meet the LSL replacement goal rate identified in the Plan?

A waterworks that fails to meet the LSL replacement goal must:

- Conduct public outreach until either the waterworks meets the goal, or tap sampling shows the lead 90th percentiles is at or below the trigger level for two consecutive one-year monitoring periods.
- Recommence goal based lead service line replacement program if the lead 90th percentile level exceeds the trigger level but is at or below the action level.

How often do I have to update the LSL Replacement Plan?

The LCRR specifies that waterworks will submit the LSL Replacement Plan to the state by September 16, 2024. ODW expects waterworks will submit updates to the LSL Replacement Plan when substantial revisions are made to the plan. This would include changes or updates to required plan elements, such as the strategy for determining the composition of lead status unknown service lines, a LSL replacement goal rate, and the procedure for conducting full lead service line replacement. If a waterworks makes substantial revisions to the plan, the waterworks must submit it to ODW for review and approval.

Will partial LSL replacements count towards the replacement goal rate identified in the Plan?

No, partial replacements do not count toward meeting the replacement goal rate or mandatory replacement rate.

Do we need to put any information regarding the LSL Replacement Plan in the annual Consumer Confidence Report (CCR)?

There is no specific requirement regarding the LSL Replacement Plan in the CCR: however, waterworks must include instructions to access the service line inventory in each CCR.

How long does my waterworks need to keep a copy of the LSL Replacement Plan?

Waterworks are required to keep the LSL Replacement plan for no fewer than 12 years, and for as long as it is effective.

Must the waterworks replace a LSL on the customer side of the meter? Do replacements on the utility side count towards a mandatory replacement rate or goal replacement rate?

Waterworks must notify the owner of the lead service line at least 45 days in advance of the intent to replace the waterworks' portion of a lead service line. Waterworks are not required by the LCRR to replace service lines and/or lead goosenecks, pigtails, and connectors owned by customers, typically located on the customer side of the water meter. However, only full service line replacements count towards a waterworks' mandatory replacement rate or the goal replacement rate. Therefore, waterworks should have a strategy for conducting outreach to customers and a viable funding strategy to accommodate customers that are unable to pay to replace the portion they own.