

Monitoring Schedules

Many water systems may need to restart six-month monitoring based on inventory, sampling plans, and infrastructure components. Based on information currently available from EPA, the sampling will continue under original LCR procedures until three years after the implementation of LCRI.

New sampling tiers will be implemented based on material composition of premise plumbing and service lines.

New sampling plans will be required for all community and non-transient non-community (NTNC) water systems subject to the LCRI.

All small systems with corrosion control that exceed the action level as well as all medium and large systems with corrosion control must monitor the distribution system for water quality parameters.

Public Notices, Education, and Temporary Point-of-Use Treatment

The LCRI changes the existing requirements for notifying users of a lead action level exceedance. Public notice and public education will be required within 24 hours of an action level exceedance for lead.

Systems with multiple exceedances (three instances within five years) will be required to increase the frequency of distributing education to users, expand upon rule-related notifications, and provide pitchers and filter cartridges to all users.

Sampling

At lead service lines, samples will be collected for the first and fifth liter. The higher concentration sample is used for comparison with the 90th percentile.

Nationally, school sampling is a major requirement of LCRI. However, the expectation is that Vermont will achieve a statewide waiver because of the work already completed through state regulations.

Small System Flexibility

Systems with less than a 3,300-person population may elect to remove all lead infrastructure, replace all LSLs quickly, and/or install point-of-use treatment instead of installing centralized corrosion control treatment. However, due to the requirements and expectations established in the LCRI, Vermont only intends to approve Small System Flexibility for NTNC and very small community water systems on a case-by-case basis. Details and eligibility for small system flexibility are subject to change based on the final LCRI once it is published.

ASSISTANCE AVAILABLE TO WATER SYSTEMS

Service Line Inventories

The LCRR requires all community and NTNC water systems to develop an initial service line inventory (SLI) by October 16, 2024. The need to maintain an inventory will not change once the LCRI is implemented, but there likely will be some minor adjustments to the content of the inventories. To assist water systems with the development of their SLIs, three funding and assistance opportunities are available.

- Water systems with 10 or fewer buildings. DWGPD staff will visually inspect service lines, conduct a records review, and develop the inventory for the water system's approval. E-mail ANR.SLI@Vermont.gov for more information.
- Water systems serving 1,000 or fewer customers and with less than 250 connections. DWGPD has hired four contractors to develop SLIs. The contractor works with the water system to review records, visually inspect customers' service lines, and draft the inventory for the water system's approval. The contractor is paid by the State; the water system is not billed for this assistance. Access the [Frequently Asked Questions \(PDF\)](#) to find out more or e-mail ANR.SLI@Vermont.gov for an assistance application.
- Community water systems serving more than 1,000 customers or 250 service connections. For larger systems in Vermont, zero-interest loans are available to pay for water system staff or consultant services to develop the SLI. For many systems, a portion of the loan is reimbursed after the completion of the project. The reimbursement portion varies by system and may be up to 100%. Visit the [Water Investment Division's Applications and Forms page for SLI loan application forms, templates, and policies.](#)

Identifying Unknown Material Service Lines

DWGPD is developing technical assistance for water systems with unknown material service lines. After completing visual inspections and records reviews during the initial SLI development, water quality sampling may be used to identify potential LSLs.

DWGPD intends to prioritize water systems without corrosion control treatment, which may have an elevated public health risk. When details are finalized, DWGPD will contact eligible systems about this assistance.

Replacing Lead Service Lines

Water systems with LSLs, galvanized requiring replacement service lines, unknown material service lines, or lead connectors may apply for [low-interest, potentially reimbursable Drinking Water State Revolving Fund financing](#). Funds may be used for planning, design, and construction activities. Additional funding from the Bipartisan Infrastructure Law is specifically allocated to these lead service line projects.

Lead Service Line Loans

Information provided by the Drinking Water and Groundwater Protection Division of the Vermont Department of Environmental Conservation (DEC)



Water systems in Vermont are eligible for Drinking Water State Revolving Fund (DWSRF) loans to help pay for completing Service Line Inventories (SLI), Lead Service Line Replacement (LSLR) plans, and LSLR projects. Many systems are eligible for loan forgiveness, delayed repayment, and zero-percent interest. Loan funds may be applied toward any of the three project steps.

- [Step I Loan: Planning & Preliminary Engineering](#) for planning, feasibility, and preliminary engineering reports.
- [Step II Loan: Final Design](#) for final design, detailed plans and specifications. A prior Step I loan is not required.
- [Step III Loan: Construction](#) for bid phase, construction phase, and warranty phase.

Lead Service Line loan funds may be used for the following:

- Development and updating of service line inventories.
 - Locating & mapping service lines.
 - Visual observation.
 - Water quality sampling (non-compliance).
 - Mechanical, vacuum, or hydro-excavation.
 - Statistical analysis.
- Lead Service Line Replacement Plans.
- Complete removal and replacement of lead service lines (public and privately owned portion) or galvanized requiring replacement service lines.
- Removal and replacement of lead or galvanized goosenecks, pigtails, and connectors.
- Replacement of curb stops, curb stop boxes, and other appurtenances that are removed as part of full LSLR.
- Site restoration, including landscaping, sidewalks, driveways, etc. if the removal was necessary to replace the lead service line.
- Permit fees if the fees are normal, required, and specific to the LSLR.
- Temporary pitcher filters to reduce lead during or for a short period after LSLR projects.
- Planning and design for infrastructure projects listed above.
- Non-routine lead sampling (if not for compliance purposes) as part of a LSLR project.

For more information about loans visit the [Water Investment Division's Applications & Forms | DEC \(Vermont.gov\)](#) webpage for applications, templates, and policies.

For more information about service line inventories and replacement plans, please visit the [Lead & Copper Rule Revisions | DEC \(Vermont.gov\)](#) webpage or email ANR.SLI@vermont.gov.