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Notification and Reporting Requirements for Partial Lead Service Line Replacement under the Lead and Copper Rule

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TABLE OF CONTENTS

What is the Purpose of this Guidance Document? 1
How is this Document Organized? 1
What Special Terms Does A System or State Need to Know to Understand this Guidance? 2
How Have the Notification and Reporting Requirements Changed as a Result of the LCRMR? 3
Differences in Lead Service Line Replacement Requirements
Before and After the LCRMR 7
What Type of Information Must A System Report to the State? 9
What Key Points Should A System Remember? 10

APPENDIX A
Example Notification Language A-1
PWS Notification Requirements for Lead Service Line (LSL) Replacement A-2
Example Language for Line Replacement Offer to Private Line Owners A-3
Example Language for Notification of
Planned Partial Lead Service Line Replacement A-7
Example Language for Notification of Lead Service Line Sample Results A-9

APPENDIX B
Lead and Copper Rule Minor Revisions
that Relate to Partial Lead Service Line
Notification and Reporting Requirements B-1
Lead and Copper Rule Minor Revisions that Relate to Partial Lead Service Line Notification and Reporting Requirements B-2

Disclaimer

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How Have the Notification and Reporting Requirements Changed as a Result of the LCRMR?

The LCRMR strengthen and clarify the notification and reporting procedures that a system must follow after partial lead service line replacement. The LCRMR ***do not*** change the requirements regarding which systems must replace lead service lines. A system is still only required to begin replacing its lead service lines if it exceeds the lead action level after it has completed installing treatment that is designed to reduce lead levels [See §141.84(a)]. No matter what a system's size, it is subject to these requirements.

The LCRMR require a system to replace the portion of the line that it owns [See §141.84(d)]. This is consistent with the 1994 court ruling that revised the original requirements under the 1991 Rule. Under the 1991 Rule, systems were required to replace the entire line up to the building inlet, unless they could demonstrate to the satisfaction of the State that they controlled less than the entire service line.

The LCRMR also specifically require a system to maintain documentation in its files that identifies the portion(s) of the line that the system owns [See §141.84(b)]. In addition, the LCRMR also clarify that a system must ask owners or their authorized agents if they want their portion of the line replaced [See §141.84(d)].

As was true prior to the LCRMR, the owner of the service line is responsible for the cost of replacing his/her portion of the line. If local or State laws preclude a system from having to replace any lines that it does not own, then the system is not required to offer to replace the privately-owned portion of the line. In those instances, where such a restriction does not exist, a system should make this offer in writing and maintain records of any related correspondence. In addition, this correspondence should be completed well in advanced of any planned replacement. Otherwise, the system may not be aware of where it will be conducting partial replacement, and the system may be unable to meet the notification schedule described under the section entitled, "Partial Lead Service Line Replacement Notification Requirements".

Appendix A contains a "screening letter", to determine which line owners are interested in having their lines replaced. This document will allow a system to maintain records of the initial agreements that the system reaches with line owners or their agents. This letter is ***not*** intended to serve as a final contractual agreement for those who accept a system's replacement offer. Because formal contractual and financial agreements are highly situation-specific and are up to the parties involved, no sample language for these agreements is provided in this guidance document.

Partial Lead Service Line Replacement Notification Requirements

In those instances where the system does not replace the privately-owned portion of the line, because of legal restrictions or the owner decides not to pay for the replacement of the privately-owned portion, a system must fulfill the following notification and monitoring requirements. A system is not subject to these requirements whenever it replaces an ***entire*** lead service line [See §141.84(d). This would also be true in those instances where a system only replaces a gooseneck, pigtail, or other fittings and these are the only lead components in its service line.

1. A system must notify the residents of the building(s) for which it is replacing only part of the lead service line [See §141.84(d)].

   Under the LCRMR, a system's notification must:
   - be sent at least 45 days prior to the partial replacement; (some States allow less than 45 days notice in the case of

emergency repairs; in this instance, the system should notify customers as soon as possible; the system should check with the State to clarify the specific allowances that apply to the system);

- alert users that they might have a temporary increase of lead levels in their drinking water;
- provide users with guidance on how to minimize their exposure to lead; and
- inform users that the system will collect a sample for lead within 72 hours of completing the partial replacement, and that the system will notify them of the outcome within 3 business days of receiving the laboratory results [See §141.84(d)]

Notice to Water Users

Note: A system's notification to water users can be mailed, or delivered by other methods that are approved by the State. For multi-family dwellings, a system can post the information in a conspicuous common-use location.

Unlike public education, there is no mandatory language that a system must use to notify its affected users. The LCRMR only specify that the language contains the key elements listed above. If a system chooses, it can use the sample language provided in Appendix A.

2. A system must collect one representative water sample from each partially-replaced lead service line, and have it analyzed for lead [See §141.84(d)(1)].

   The sample must be:

   - collected within 72 hours of completing the partial lead service replacement; and
   - representative of the water in the service line, as described in the following section, "How to Collect a Representative Sample" [See §141.84(d)(1)].

3. A system must report the results of the analysis to the owner and the resident(s) served by the line within 3 business days of receiving the results [See §141.84(d)(1)]. If the notice is post-marked within 3 business days of receiving the results, it is considered to be "on time". A system can also distribute the sample results by posting in a conspicuous place (for multi-family dwellings), or by other State-approved methods.

A summary of the differences in requirements prior to LCRMR and under the LCRMR are provided in the table on the following page.

Remember: Whenever a system replaces an **ENTIRE** lead service line, the system is not subject to the partial lead service line notification and reporting requirements [See §141.84(d)].

How to Collect a Representative Sample

The procedure for collecting a representative sample following partial replacement is the same as if a system was testing a lead service line to see if it needed to be replaced. The procedure for collection is explained in §141.86(b)(3) of the federal regulations and is provided in Appendix B. EPA has provided further explanation below for convenience.

The service line sample must be 1 liter in volume and have stood in the line for at least six hours [See §141.86(b)(3)]. A system can collect the sample in one of the following ways:

1. **Sample from a kitchen or bathroom tap:** These samples should be taken after flushing the water volume between the tap and the line. A sample from a single-family home, should be collected after the water has run and there is a significant change in water temperature, which is indicative of water that has been standing in the line. The sample should be collected from the building tap which is closest to the portion of the lead service line that was not replaced (i.e., the first tap in the building, most likely a kitchen or bathroom tap on the first floor).

   If the sample is collected from a multi-family residence, then the volume of pipe between line replacement and the tap should be calculated. Use the "Pipe Volume" table on page 6 to estimate the volume. EPA recommends selecting the pipe diameter that is one size larger than the actual pipe size, since pipe material thickness can vary, affecting the interior diameter and the actual volume of water.

2. **Sample directly from a line tap:** When collecting samples in this fashion, a system should include the installation of the tap and collection of the sample into its lead service line replacement schedule.

> ☞ **Remember:** Lead service line samples should not be included in the 90th percentile calculations.

Pipe Volume Table (Volumes Listed in Liters)						
Pipe Length (Feet)	Pipe Diameter (Inches)					
	3/8	1/2	5/8	3/4	1	11/4
2	0.06	0.09	0.14	0.19	0.32	0.50
3	0.09	0.14	0.21	0.29	0.49	0.74
4	0.11	0.18	0.27	0.38	0.65	0.99
5	0.14	0.23	0.34	0.48	0.81	1.24
6	0.17	0.27	0.41	0.57	0.97	1.48
7	0.20	0.32	0.48	0.67	1.14	1.73
8	0.23	0.36	0.55	0.76	1.30	1.98
9	0.26	0.41	0.62	0.86	1.46	2.22
10	0.28	0.45	0.69	0.95	1.62	2.47
11	0.31	0.50	0.75	1.05	1.78	2.72
12	0.34	0.55	0.82	1.14	1.95	2.96
13	0.37	0.59	0.89	1.24	2.11	3.21
14	0.40	0.64	0.96	1.33	2.26	3.46
15	0.43	0.68	1.03	1.43	2.43	3.71
16	0.46	0.73	1.10	1.52	2.60	3.95
17	0.49	0.78	1.16	1.62	2.76	4.20
18	0.51	0.82	1.23	1.71	2.92	4.45
19	0.54	0.86	1.30	1.81	3.08	4.70
20	0.57	0.91	1.37	1.90	3.24	4.94
25	0.71	1.14	1.71	2.38	4.06	6.18
30	0.86	1.36	2.06	2.85	4.87	7.41
35	1.00	1.59	2.40	3.33	5.68	8.65
40	1.14	1.82	2.74	3.80	6.49	9.88
60	1.43	2.27	3.43	4.76	8.11	12.36

Notes:
1. Volumes can be added together for pipe lengths not listed.
2. Liters can be converted to gallons by dividing by 3.785.
3. EPA recommends selecting the pipe diameter that is one size larger than the actual pipe size, since pipe material thickness can vary, affecting the interior diameter and the actual volume of water.

Differences in Lead Service Line Replacement Requirements Before and After the LCRMR	
Requirements Under the 1991 LCR*	***Requirements Under the LCRMR***
What are a system's obligations regarding replacement of the privately-owned portion of the line?	
A system had to notify the user/building owner served by the line that it was replacing the portion of the line that it owns. A system had to offer to replace the privately-owned portion of the lead service line at the owner's expense. **Note:** Prior to the LCRMR, the rule was not clear whether the offer was to be made to the user or building owner.	A system must notify the owner of the line, or the owner's authorized agent, that the system is replacing the portion of the lead service line that it owns [See §141.84(d)]. A system must offer to replace the building owner's portion of the line at the owner's expense [See §141.84(d)]. If any local or State laws preclude such a requirement, a system is not required to either offer to replace, or to actually replace the line. A system is also not required to replace the privately-owned portion if the owner refuses to pay for this portion of the replacement.
What are a system's obligations to its customers if it does not replace the entire line?	
For each resident served by a partially-replaced line, a system had to offer to collect and analyze a *first-flush tap sample*, after the system had completed the partial replacement. This sample would have been collected at the tap of each resident that had accepted the system's sampling offer.	A system has to notify each resident that is served by a partially-replaced line that, after the system has completed the partial replacement, it will collect a sample *representative of the water in the service line* and have it analyzed for lead [See §141.84(d)(1)]. The system is not required to offer to collect samples for each affected resident. Rather, the system is just required to collect a representative service line sample [See §141.84(d)(1)]. Therefore, for a multi-family dwelling, only one representative sample must be collected, preferably at the first tap leading into the building [See §141.84(d)(1)]. A system also has to notify all residents served by the partially-replaced line that they may have a temporary increase of lead levels in their water [See §141.84(d)(1)]. With this, the system must provide guidance on measures consumers can take to minimize their exposure to lead [See §141.84(d)(1)]

Differences in Lead Service Line Replacement Requirements Before and After the LCRMR	
Requirements Under the 1991 LCR*	***Requirements Under the LCRMR***
When must a system provide notification of the planned partial lead service line replacement?	
Prior to the LCRMR, a notification schedule was not specified.	A system must provide notification at least 45 days before it begins the partial replacement [See §141.84(d)(1)]. However, if a system's line replacement is in conjunction with emergency repairs, the State may allow for a shorter timeframe.
When must a system collect the sample and provide the results?	
If resident(s) accepted the system's offer, the system had to collect the sample(s) and report results to the resident(s) within 14 days following the partial line replacement.	A system must collect the sample within 72 hours of completing the partial replacement and report the results within 3 business days of receiving the results [See §141.84(d)(1)].
Who pays for the analysis?	
The Rule did not specify.	The system.
Who must a system report the results to?	
A system had to report the results to residents.	In general, a system must report to both the building owner(s) and the resident(s) that are served by the partially-replaced line [See §141.84(d)(1)]. Note that both are notified because many multi-family dwellings are not owned by the occupants (e.g., apartment buildings). A system also must submit these monitoring results to the State within the first ten days of the month following that in which the system receives the results [See §141.90(e)(4)]. However, the LCRMR give States the option to modify a system's reporting requirements, so the system should check with the State to be sure of the specific requirements.
How should a system notify users that it is replacing a portion of the line and of the sample results?	
The Rule did not specify how to notify users.	A system must notify residents by mail [See §141.84(d)(2)]. However, for multi-family dwellings, a system can post the notification in a conspicuous common-use area of the building. Also, systems may be able to use other State-approved methods of notifying residents.

*Includes 1994 court ruling that revised the definition of control to include only those portions of the line that the system owned.

What Type of Information Must A System Report to the State?

The LCRMR require that a system report analytical results to the State for the samples that the system collected following partial lead service line replacement [See §141.90(e)(4)]. The system must submit these results to the State within the first ten days of the month following the month in which the system receives the results [See §141.90(e)(4)]. For example, if a system collected samples in September, and received the results during September, then it would be required to submit these to the State no later than October 10th.

A system can submit all of the partial lead service line monitoring results that it receives during any one month in a single report to the State. However, a system cannot save monitoring results from month to month and submit them collectively to the State in one report, without State approval. The LCRMR allow the State to eliminate or modify the reporting of post-partial replacement sample results. This also means that the State can require the system to report additional information. To be certain of its reporting requirements, a system should check with the State.

Remember: If a system does not exceed the lead action level in tap water monitoring for 2 consecutive monitoring periods, *and* the system has properly submitted the results to the State, ***the system can stop replacing its lead service lines.***

However, if at any time after this, the system *does* exceed the lead action level, it will have to resume the replacement process [See §141.84(f)].

What Key Points Should A System Remember?

- A system is not subject to the partial lead service line notification and reporting requirements whenever it replaces an **ENTIRE** lead service line [See §141.84(d)].
- If a system does not own the entire lead service line, the system must contact the owner(s) or their agents and offer to replace their portion of the lead service line [See §141.84(d)].
- The system does not have to pay for replacement of the privately-owned portion. It is the line owner's responsibility.
- A system is not required to replace the privately-owned portion of the line if the local or State regulations preclude the system from doing so, or if the owner decides not to pay for the replacement of the privately-owned portion.
- A system must provide notification to affected customers at least 45 days before beginning partial lead service line replacement, (although the system should check with the State to see if they allow exceptions in the case of emergency repairs) [See §141.84(d)(1)].
- A system must tell the residents of buildings with partial line replacement about the following:
    - that they may have a temporary increase in lead levels after the partial line replacement;
    - what they can do to minimize their exposure to lead; and
    - that the system will collect a sample after the replacement is done [See §141.84(d)(1)].
- A system must collect a sample that is representative of the water in the lead service line within 72 hours of completing the partial replacement and have it analyzed for lead [See §141.84(d)(1)].
- A system must report the results to the owners and residents served by the line within 3 business days of receiving the results [See §141.84(d)(1)].
- A system must also report these results to the State, unless the State specifies otherwise. The State may eliminate this reporting requirement or require the system to submit other information to demonstrate that the system has met its partial lead service line requirements [See §141.90(e)(4)].

APPENDIX A

Example Notification Language

PWS Notification Requirements for Lead Service Line (LSL) Replacement

EPA has included a combined flowchart and timeline to provide systems with a quick reference and overview of the various notification requirements related to lead service line replacement.

Suggested Language for Line Replacement Offer to Private Line Owners

This is an example of language that can be used to contact owners to determine if they want their portion of the lead service line replaced by the system during its planned line replacement. The response to this notice is not a binding contract, but an indication of which privately-owned portions of lead service lines may need to be replaced, and which customers will be affected by partial replacement.

Notification of Planned Partial Lead Service Line Replacement

This is example language for the notification which a system is required to send/post to customers at least 45 days prior to a partial line replacement. Customers that live in homes/buildings for which the service lines are being fully replaced will not need to be notified.

With this notification, a system is ***required*** to provide guidance on lead minimizing measures. EPA has provided systems with a list of lead minimizing techniques that systems can include in their packages or posting to these customers.

Notification of Lead Service Line Sample Results

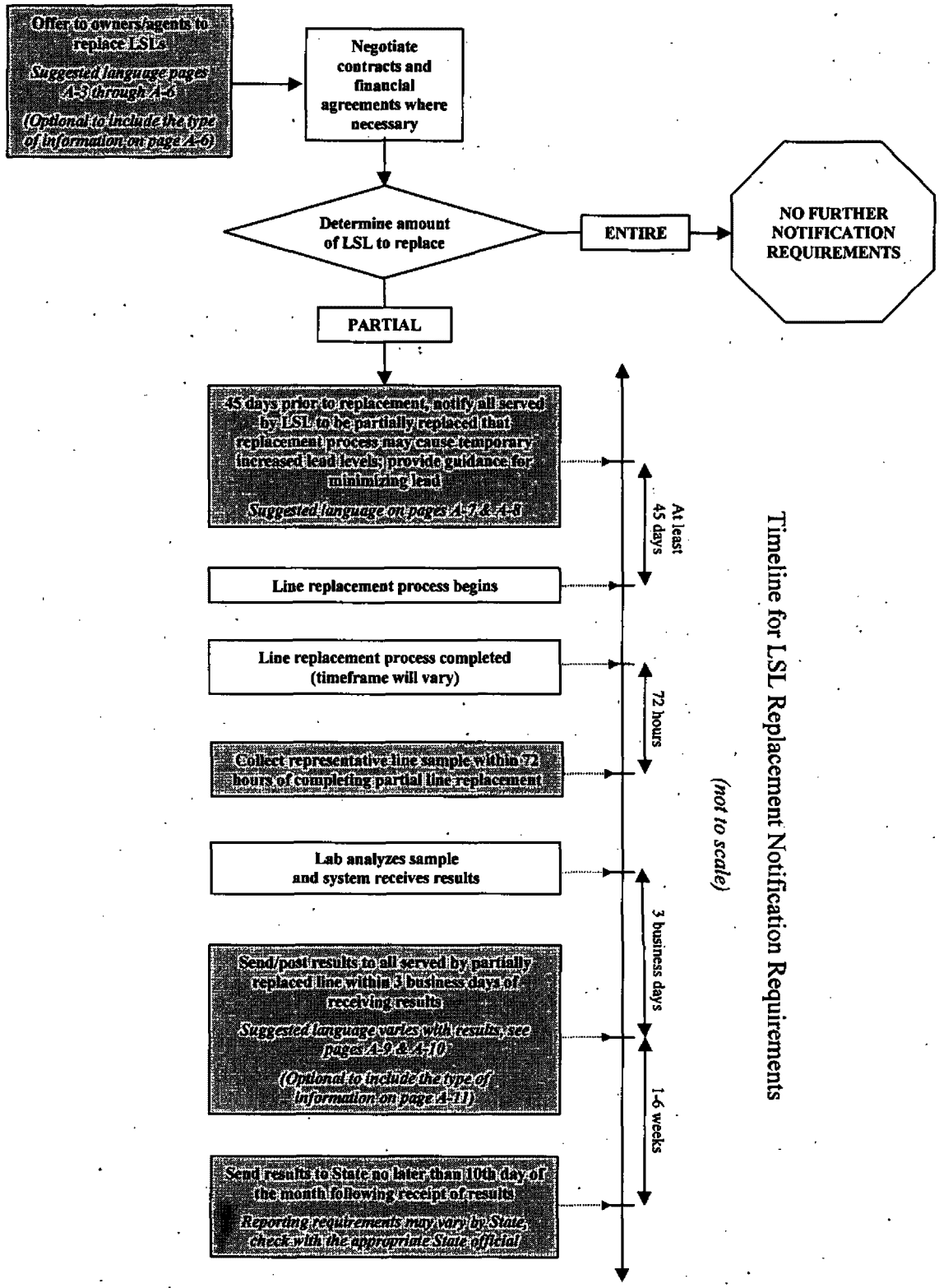
EPA has provided two sets of example language for notifying customers of the results of *post-replacement lead tests based on whether the lead level is less than or equal to* 0.015 mg/L or, is above this level.

Example 1: If Results are Less than or Equal to 0.015 mg/L

Example 2: If Results are Greater than 0.015 mg/L

EPA recommends that the consumer guidance for minimizing lead in drinking water accompany the notifications, in the case where lead levels exceed 0.015 mg/L.

PWS Notification Requirements for Lead Service Line (LSL) Replacement



Example Language for Line Replacement Offer to Private Line Owners

The notice below could be used as a "screening letter", to determine which line owners will be interested in having their lines replaced. The letter below is *not* intended to serve as a final contractual agreement for those who accept a system's replacement offer.

Specific dates and deadlines have been left blank. Individual judgement should be used in determining the necessary timelines for responses and contractual agreements. If a system's line replacement project is in conjunction with emergency repairs, note that the system should contact private line owners, as soon as possible during the course of the emergency repairs. In such a case, the language below can be used as a template, although some changes will need to be made.

<month, day, year> *Page 1 of 4*

NOTICE TO LEAD SERVICE LINE OWNERS REGARDING LINE REPLACEMENT

We will begin replacing a portion of lead service lines owned by *<insert water system name>* that carry water into your home/building on *<month, day, year>*. Our comprehensive treatment program did not bring lead levels in your community below 0.015 milligrams per liter (mg/L), thus, replacing lead service lines is now the best way to reduce lead in your drinking water. *<insert water system name>* is taking every possible step to minimize lead levels in your drinking water. We have determined, along with EPA and the State, that it is necessary to replace some of the lead service lines that distribute water in this community. These lines were installed before it was known that lead in drinking water poses a health hazard.

In fulfillment of both Federal and State regulations, we are offering to replace the portion of the lead service line that you own, while we are in the process of replacing the sections of the service line that we own. Any portion of your line that you choose to have us replace must be **paid for by you.**[1]

On the following page, entitled: "Deciding Whether to Replace Your Lead Service Line", we have outlined some important issues that you should consider in determining whether you will participate in our planned line replacement. Also attached is a confirmation form. If you indicate on this form that you would like us to replace your line, we will contact you by *<month, day, year (XX days prior to start date)>*. If we do not receive a response from you by ***<month, day, year>***, we will assume that you choose not to participate in this line replacement project.

If you have any further questions regarding this matter contact *<name>* at *<phone>*.

[1] According to Federal regulation §141.84(d): "A water system shall replace that portion of the lead service line that it owns. In cases where the system does not own the entire lead service line, the system shall notify the owner of the line, or the owner's authorized agent, that the system will replace the portion of the service line that it owns and shall offer to replace the owner's portion of the line. A system is not required to bear the cost of replacing the privately-owned portion of the line, nor is it required to replace the privately-owned portion where the owner chooses not to pay the cost of replacing the privately-owned portion of the line, or where replacing the privately-owned portion would be precluded by State, local or common law. ..."

DECIDING WHETHER TO REPLACE YOUR SERVICE LINE:

- As noted above, our comprehensive treatment program did not bring the lead levels in your community below 0.015 mg/L. Replacing lead service lines is now the best alternative to minimize lead in your drinking water. This process should bring the lead levels to below 0.015 mg/L, as long as your building does not contain high-risk plumbing materials such as, lead pipes, lead-based solder used to join copper pipe, or brass and chrome-plated brass faucets.

- If the drinking water in your home/building was not specifically tested for lead, we recommend that you have your water tested. The cost of the lead test is about $___. The following is a list of some State-approved laboratories in your area that you can call to have your water tested for lead.

<Insert names and phone numbers of at least two laboratories>

If your lead levels are above 0.015 mg/L, you should consider having your lines replaced during our planned replacement project.

If you do have your lead service line replaced:

- Depending on the length of your portion of the service line, your expenses could range from $_____ to $_____.

- Please be aware that there may be some inconvenience during the replacement process. It will be necessary for the land above the line to be excavated during the replacement. To the extent possible, this land will be returned to its original state upon completion of the replacement.

- As noted above, there is no guarantee that lead levels will be reduced after replacement, particularly if your plumbing contains high-risk materials. We recommend that you have your water tested for lead after replacement is completed. If the levels of lead in your water remain above 0.015 mg/L after the line replacement, we urge you to take every step possible to ensure that your drinking water is safe. A list of lead-minimizing techniques, entitled, "How to Reduce Lead in Drinking Water", is included as the last page of this notice.

If you do <u>not</u> have your lead service line replaced:

- If you choose not to have your lines replaced, you and others who drink the water in your home/building may be exposed to higher levels of lead in your drinking water. The greatest risk is to young children (especially under age 6) and pregnant women. Amounts of lead that won't hurt adults can slow down normal mental and physical development in the growing bodies of children.

- We urge you to take every step possible to ensure that your drinking water is safe. If you choose not to have your lines replaced, please refer to the list of lead-minimizing techniques that we have enclosed, entitled, "How to Reduce Lead in Your Drinking Water".

YES, I WANT TO HAVE MY LEAD SERVICE LINES REPLACED

I, the undersigned, request that the <*insert water system name*> water system replace the portion of lead service line which I own. I understand that during the replacement process, the land above this line will be excavated, and that there may be some temporary increases in lead in the drinking water related to this replacement process. I understand that, although it is most likely that my lead levels will be decreased to below 0.015 mg/L as a result of this line replacement, there is no guarantee that levels will decrease after the replacement is complete. I understand that this document is not a binding contract for the line replacement, and I will make myself available for communications and signing of a contractual agreement with <*insert water system name*> by no later than <*day, month, year*>.

I understand that I am responsible for the costs of replacing the portion of the line that I own.

_____
Printed Name

_____ _____
Signature Date

NO, I DO NOT WISH TO HAVE MY LEAD SERVICE LINES REPLACED

I, the undersigned, choose *not* to have the <*system name*> water system replace the portion of lead service line which I own.

_____
Printed Name

_____ _____
Signature Date

HOW TO REDUCE LEAD IN YOUR DRINKING WATER

1. Flush Your Taps.

For most of you, flushing tap water is a simple and inexpensive way you can help protect your family's health. Flushing usually uses less than one or two gallons of water and costs only a few cents per month. To flush, let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in your plumbing, the more lead it may contain. Since your building most likely has a lead service line to the water main, you should run the cold water faucet until the water has significant temperature change, and then approximately for an additional minute, before drinking. To conserve water, fill a couple of bottles with water after flushing the tap, and when possible use the first flush water to wash dishes or water plants.

2. Use only cold water for cooking and drinking.

Try not to cook with, or drink water from the hot water tap. Hot water can dissolve lead more quickly than cold water. If you need hot water for consumption, heat water from the cold tap on the stove.

3. Remove debris from faucet strainers regularly.

Remove loose lead solder and debris that may accumulate in your faucet strainers due to the recent lead service line replacement. You can do this by removing the faucet strainers from all taps and running the water from 3 to 5 minutes. Thereafter, periodically remove the strainers and flush out any debris that has accumulated over time.

4. Install a Point of Use / home treatment device.

Tap filter These home treatment devices are limited in that each unit treats only the water that flows from the faucet to which it is connected, and all of them require periodic regular maintenance and replacement. Devices such as reverse osmosis systems or distillers can effectively remove lead from your drinking water. Some activated carbon filters *may* reduce lead levels at the tap, however, all lead reduction claims should be investigated. One way to do this is to look for the National Sanitation Foundation (NSF) mark.

NSF tests and verifies products, such as drinking water treatment units, to determine whether they comply with specific standards, including the claims made by the manufacturer. Those products that pass the NSF's standards can bear the NSF mark. If you want more information about drinking water treatment devices, you can contact NSF at (800-NSF-8010) or visit their web site at www.nsf.com.

Countertop filter Filtering systems are now widely available at most home-goods or department stores. Again, filters that pass NSF's testing criteria will carry the NSF mark. It is important to follow the product usage and filter replacement instructions. Leaving a filter in for longer than its recommended life can actually cause levels of lead or other contaminants to increase, because of accumulation in the filter. In addition, there is potential for accumulation of bacterial contamination.

5. Purchase bottled water for drinking and cooking.

6. Replace internal plumbing such as faucets.

Example Language for Notification of Planned Partial Lead Service Line Replacement

A system must notify the residents of the building(s) for which the system is replacing only a portion of the lead service line (i.e., for those buildings which the owner/agents of the connecting lead service lines declined to have their portion of the line replaced) [See §141.84(d)(1)]. The system's notification must be sent at least 45 days prior to the partial replacement [See §141.84(d)(1)]. However, some States allow less than a 45-day notice in the case of emergency repairs. In this instance, the system should notify customers as soon as possible. The system should check with the State to clarify the specific allowances that apply to the system. EPA has provided systems with recommended language for this notification below. Along with this notification, systems are **required to provide guidance** to consumers on how to minimize lead in their drinking water [See §141.84(d)(1)]. Recommended language for this consumer guidance is also provided below.

<month, day, year> *Page 1 of 2*

NOTICE TO WATER USERS

To bring you the safest drinking water possible, we will begin replacing service lines that carry water into your building on *<month, day, year>*.

<insert water system name> is taking every possible step to minimize lead levels in your drinking water. We have determined, along with EPA and the State, that it is necessary to replace some of the lead service lines that distribute water in this community. These lines were installed before it was known that lead in drinking water poses a health hazard.

Because ownership of the line that services your building is shared jointly between *<insert water system name>* and the owner of the building, only the portion of the line owned by *<insert water system name>* will be replaced. In some instances, this ***may cause a temporary increase in the levels of lead in your drinking water***. As you may know, lead can pose a significant risk to your health if too much of it enters your body. Lead builds up in the body over many years and can cause damage to the brain, red blood cells and kidneys. The greatest risk is to young children and pregnant women. Even small amounts of lead can slow down normal mental and physical development of growing bodies. Until the lead levels stabilize, we recommend that you take the precautionary measures, such as those discussed on the next page, entitled, "How to Reduce Lead in Your Drinking Water".

In addition, we will collect a sample that is representative of the lead levels in the newly replaced service line. We will collect this sample within 72 hours of completing our line replacement and have it analyzed for lead. We may contact you to ask you if a sample can be collected at one of your faucets. Regardless of where we collect the sample, we will be notifying you of the results within three business days of when we receive the results.

If you have any questions regarding this matter contact _____ at _____.

Please look for our notice with the results of the lead analysis soon after the lead service line replacement is completed.

HOW TO REDUCE LEAD IN YOUR DRINKING WATER

1. Flush Your Taps.

For most of you, flushing tap water is a simple and inexpensive way you can help protect your family's health. Flushing usually uses less than one or two gallons of water and costs only a few cents per month. To flush, let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in your plumbing, the more lead it may contain. Since your building most likely has a lead service line to the water main, you should run the cold water faucet until the water has significant temperature change, and then approximately for an additional minute, before drinking. To conserve water, fill a couple of bottles with water after flushing the tap, and when possible use the first flush water to wash dishes or water plants.

2. Use only cold water for cooking and drinking.

Try not to cook with, or drink water from the hot water tap. Hot water can dissolve lead more quickly than cold water. If you need hot water for consumption, heat water from the cold tap on the stove.

3. Remove debris from faucet strainers regularly.

Remove loose lead solder and debris that may accumulate in your faucet strainers due to the recent lead service line replacement. You can do this by removing the faucet strainers from all taps and running the water from 3 to 5 minutes. Thereafter, periodically remove the strainers and flush out any debris that has accumulated over time.

4. Install a Point of Use / home treatment device.

Tap filter These home treatment devices are limited in that each unit treats only the water that flows from the faucet to which it is connected, and all of them require periodic regular maintenance and replacement. Devices such as reverse osmosis systems or distillers can effectively remove lead from your drinking water. Some activated carbon filters *may* reduce lead levels at the tap, however, all lead reduction claims should be investigated. One way to do this is to look for the National Sanitation Foundation (NSF) mark.

NSF tests and verifies products, such as drinking water treatment units, to determine whether they comply with specific standards, including the claims made by the manufacturer. Those products that pass the NSF's standards can bear the NSF mark. If you want more information about drinking water treatment devices, you can contact NSF at (800-NSF-8010) or visit their web site at www.nsf.com.

Countertop filter Filtering systems are now widely available at most home-goods or department stores. Again, filters that pass NSF's testing criteria will carry the NSF mark. It is important to follow the product usage and filter replacement instructions. Leaving a filter in for longer than its recommended life can actually cause levels of lead or other contaminants to increase, because of accumulation in the filter. In addition, there is potential for accumulation of bacterial contamination.

5. Purchase bottled water for drinking and cooking.

6. Replace internal plumbing such as faucets.

Example Language for Notification of Lead Service Line Sample Results

Within 72 hours of completing its line replacement project, a system is required to collect a representative service line sample and have it tested for lead [See §141.84(d)(1)]. A system is required to send the results of these tests to those served by the partially-replaced line within three business days of receiving the results [See §141.84(d)(1)]. Depending on the results, EPA recommends slightly different language for this customer notification. Recommended language is provided below for the two possible scenarios: if results are less than or equal to 0.015 mg/L (example 1), and if results are greater than 0.015 mg/L (example 2). In the latter case (example 2), **EPA recommends that systems provide guidance** to consumers on how to minimize lead in their drinking water.

Example 1: If Results are Less than or Equal to 0.015 mg/L

<month, day, year> *Page 1 of 1*

NOTICE TO WATER USERS

On *<day, month, year>* we completed replacing the portion of the lead service lines owned by *<insert water system name>*, which carry water into your building. We collected a representative service line sample for lead after completing our line replacement. This sample was collected from *<kitchen tap/bathroom tap/direct line tap>* on *<day, month, year>*. The laboratory analysis yielded the following results:

Lead: xxx mg/L

This is below 0.015 mg/L. This precautionary test shows that our line replacement efforts are working to reduce the levels of lead in your drinking water.

However, because there are other factors that could contribute to high lead levels in your drinking water, **we urge you to find out whether you need to take further action by having the drinking water in your home tested.** Contributing factors can include materials within your home plumbing system, such as lead pipes, lead-based solder used to join copper pipe, or brass and chrome-plated brass faucets. The cost of a lead test is about $___.

The following is a list of some State-approved laboratories in your area that you can call to have your water tested for lead.

<Insert names and phone numbers of at least two laboratories>

If you have already had the drinking water in your home tested, with results showing low levels of lead, no further testing is likely to be necessary.

We will continue to monitor for lead levels in the drinking water delivered to our customers as required by Federal and State law. We will notify you through our lead public education efforts if lead levels above 0.015 mg/L persist in more than 10 percent of these samples. *The safety of your drinking water is our first priority.*

Example Language for Notification of Lead Service Line Sample Results, continued

Note again that within 72 hours of completing its line replacement project, a system is required to collect a representative service line sample and have it tested for lead [See §141.84(d)(1)]. The system is required to send the results of these tests to those served by the partially-replaced line within three business days of receiving the results [See §141.84(d)(1)]. **If results are greater than 0.015 mg/L, EPA recommends that systems provide guidance** to consumers on how to minimize lead in their drinking water. Recommended language for this consumer guidance is provided below.

Example 2: If Results are Greater than 0.015 mg/L

<month, day, year> *Page 1 of 2*

NOTICE TO WATER USERS

On *<month, day, year>* we completed replacing the lead service lines owned by *<insert water system name>*, which carry water into your building. We collected a representative service line sample for lead after completing our line replacement. This sample was collected from *<kitchen tap/bathroom tap/direct line tap>* on *<month, day, year>*. The laboratory analysis yielded the following results:

Lead: xxx mg/L

This amount of lead is above 0.015 mg/L. These results may indicate, that despite our best efforts to remove lead from the water supply, lead levels in some homes or buildings may still be high.

Although this elevated level of lead is most likely to be temporary, **we urge you to find out whether you need to take action in your own home by having your drinking water tested.** Testing the water is essential because you cannot see, taste, or smell lead in drinking water, and because there are a variety of factors that can contribute to high levels of lead in your drinking water. Contributing factors can include materials within your home plumbing system, such as lead pipes, lead-based solder used to join copper pipe, or brass and chrome-plated brass faucets. The cost of a lead test is about $___.

The following is a list of some State-approved laboratories in your area that you can call to have your water tested for lead.

<Insert names and phone numbers of at least two laboratories>

Note that if you have already had the drinking water in your home tested, with results showing low levels of lead, no further testing is likely to be necessary.

The safety of your drinking water is our first priority. We will continue to monitor for lead levels in the drinking water delivered to our customers as required by Federal and State law. We will notify you through our lead public education efforts if lead levels above 0.015 mg/L persist in more than 10 percent of these samples.

Remember that lead can pose a significant risk to your health if too much of it enters your body. Lead builds up in the body over many years and can cause damage to the brain, red blood cells and kidneys. If you choose not to have your lines replaced, you and others who drink the water in your home/building may be exposed to higher levels of lead in your drinking water. The greatest risk is to young children (especially under age 6) and pregnant women. Amounts of lead that won't hurt adults can slow down normal mental and physical development in the growing bodies of children. We have summarized several steps that you can take to help ensure that the water that you consume is safe. Please refer to the next page entitled, "How to Reduce Lead in Your Drinking Water".

HOW TO REDUCE LEAD IN YOUR DRINKING WATER

1. Flush Your Taps.

For most of you, flushing tap water is a simple and inexpensive way you can help protect your family's health. Flushing usually uses less than one or two gallons of water and costs only a few cents per month. To flush, let the water run from the tap before using it for drinking or cooking any time the water in a faucet has gone unused for more than six hours. The longer water resides in your plumbing, the more lead it may contain. Since your building most likely has a lead service line to the water main, you should run the cold water faucet until the water has significant temperature change, and then approximately for an additional minute, before drinking. To conserve water, fill a couple of bottles with water after flushing the tap, and when possible use the first flush water to wash dishes or water plants.

2. Use only cold water for cooking and drinking.

Try not to cook with, or drink water from the hot water tap. Hot water can dissolve lead more quickly than cold water. If you need hot water for consumption, heat water from the cold tap on the stove.

3. Remove debris from faucet strainers regularly.

Remove loose lead solder and debris that may accumulate in your faucet strainers due to the recent lead service line replacement. You can do this by removing the faucet strainers from all taps and running the water from 3 to 5 minutes. Thereafter, periodically remove the strainers and flush out any debris that has accumulated over time.

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Tap filter These home treatment devices are limited in that each unit treats only the water that flows from the faucet to which it is connected, and all of them require periodic regular maintenance and replacement. Devices such as reverse osmosis systems or distillers can effectively remove lead from your drinking water. Some activated carbon filters *may* reduce lead levels at the tap, however, all lead reduction claims should be investigated. One way to do this is to look for the National Sanitation Foundation (NSF) mark.

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Countertop filter Filtering systems are now widely available at most home-goods or department stores. Again, filters that pass NSF's testing criteria will carry the NSF mark. It is important to follow the product usage and filter replacement instructions. Leaving a filter in for longer than its recommended life can actually cause levels of lead or other contaminants to increase, because of accumulation in the filter. In addition, there is potential for accumulation of bacterial contamination.

5. Purchase bottled water for drinking and cooking.

6. Replace internal plumbing such as faucets.

APPENDIX B

Lead and Copper Rule Minor Revisions that Relate to Partial Lead Service Line Notification and Reporting Requirements

§141.84(b)

§141.84(d)

§141.86(b)(3)

§141.90(e)(4)

Appendix B

Lead and Copper Rule Minor Revisions that Relate to Partial Lead Service Line Notification and Reporting Requirements

***§141.84(b):** The following section requires a system to replace the portion of the lead service line that it owns.*

A water system shall replace annually at least 7 percent of the initial number of lead service lines in its distribution system. The initial number of lead service lines is the number of lead lines in place at the time the replacement program begins. The system shall identify the initial number of lead service lines in its distribution system, including an identification of the portion(s) owned by the system, based on a materials evaluation, including the evaluation required under §141.86(a) and relevant legal authorities (e.g., contracts, local ordinances) regarding the portion owned by the system. The first year of lead service line replacement shall begin on the date the action level was exceeded in tap sampling referenced in paragraph (a) of this section.

***§141.84(d):** The following section contains language that explains: to whom a system must make the offer to replace the privately-owned portion of the line; what information must be included in the system's notification; and how the system must provide this notification.*

A water system shall replace that portion of the lead service line that it owns. In cases where the system does not own the entire lead service line, the system shall notify the owner of the line, or the owner's authorized agent, that the system will replace the portion of the service line that it owns and shall offer to replace the owner's portion of the line. A system is not required to bear the cost of replacing the privately-owned portion of the line, nor is it required to replace the privately-owned portion where the owner chooses not to pay the cost of replacing the privately-owned portion of the line, or where replacing the privately-owned portion would be precluded by State, local or common law. A water system that does not replace the entire length of the service line also shall complete the following tasks.

(1) At least 45 days prior to commencing with the partial replacement of a lead service line, the water system shall provide notice to the resident(s) of all buildings served by the line explaining that they may experience a temporary increase of lead levels in their drinking water, along with guidance on measures consumers can take to minimize their exposure to lead. The State may allow the water system to provide notice under the previous sentence less than 45 days prior to commencing partial lead service line replacement where such replacement is in conjunction with emergency repairs. In addition, the water system shall inform the resident(s) served by the line that the system will, at the system's expense, collect a sample from each partially-replaced lead service line that is representative of the water in the service line for analysis of lead content, as prescribed under §141.86(b)(3), within 72 hours after the completion of the partial replacement of the service line. The system shall collect the sample and report the results of the analysis to the owner and the resident(s) served by the line within three business days of receiving the results. Mailed notices post-marked within three business days of receiving the results shall be considered "on time".

(2) The water system shall provide the information required by paragraph (d)(1) of this section to the residents of individual dwellings by mail or by other methods approved by the State. In instances where multi-family dwellings are served by the line, the water system shall have the option to post the information at a conspicuous location.

Lead and Copper Rule Minor Revisions that Relate to Partial Lead Service Line Notification and Reporting Requirements

***§141.86(b)(3):** The following section was NOT amended by the LCRMR. It is included here for the convenience of the reader, as the sampling procedure described here is referenced above in §141.84(d).*

(3) Each service line sample shall be one liter in volume and have stood motionless in the lead service line for at least six hours. Lead service line samples shall be collected in one of the following three ways:

(i) At the tap after flushing the volume of water between the tap and the lead service line. The volume of water shall be calculated based on the interior diameter and length of the pipe between the tap and the lead service line;

(ii) Tapping directly into the lead service line; or

(iii) If the sampling site is a building constructed as a single-family residence, allowing the water to run until there is a significant change in temperature which would be indicative of water that has been standing in the lead service line.

***§141.90(e)(4):** The following section adds a requirement for systems to report information to the State that demonstrates compliance with partial lead service line replacement requirements.*

Any system which collects lead service line samples following partial lead service line replacement required by §141.84 shall report the results to the State within the first ten days of the month following the month in which the system receives the laboratory results, or as specified by the State. States, at their discretion may eliminate this requirement to report these monitoring results. Systems shall also report any additional information as specified by the State, and in a time and manner prescribed by the State, to verify that all partial lead service line replacement activities have taken place.

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