

INSTRUCTIONS AND GUIDANCE FOR NOTIFICATION OF KNOWN OR POTENTIAL SERVICE LINE CONTAINING LEAD

The federal Lead and Copper Rule (Revisions) (40 CFR 141, Subpart I) requires all water systems with lead, galvanized requiring replacement, or lead status unknown service lines in their inventory to inform all persons served by the water system at the service connection with a lead, galvanized requiring replacement, or lead status unknown service line.

If a water system's initial service line inventory includes a lead, GRR, or unknown material service line, then the water system must notify affected customers by November 15, 2024. Water systems must certify to VT DEC no later than July 1, 2025 that they have delivered the initial notification and educational materials to affected customers. As new customers connect or start service with the water system, water systems must also provide notice at time-of-service initiation.

The notice must include a statement describing the service line's material composition, an explanation of the health effects of lead, steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities for service line replacement or service line material verification.

The Template for Affected User Notification includes public health language and definitions. On the template, the water system must fill in: water system name, water system phone number, website, water system identification number (WSID), number of service line addresses notified, delivery methods, and dates. When applicable, additional information may be provided in the space at the bottom of the notification's first page. For example, a direct phone number to schedule an inventory inspection.

Community water systems must provide education to users by direct delivery, which includes mailing letters, hand-delivering notices, or leaving notices in living units. Where there are multiple owners or rental tenants, the water system must make every attempt to provide education to them in addition to the primary owner.

Non-Transient Non-Community (NTNC) water systems must reach all users via posting near taps (where practical), handouts in employee mailboxes, posting on bulletin boards in hallways and breakrooms, or similar means. NTNC schools **must** provide information to staff, students, and parents/guardians.

The **Certification Form** follows the templates, documenting who distributed the education, when, and how. Mail, fax, or email the Certification Form, with a copy of the education, to the Drinking Water and Groundwater Protection Division. Initial certification is due by July 1, 2025.

Email may be used as a notification method **only** if the water system has current email addresses that are routinely used for communication. Emails must be sent with a clear subject line about lead in drinking water, and with a return receipt setting if possible. Users without email addresses or whose email addresses generate errors must be contacted by the water system by other means, such as a letter. The notice information must be included as text in the email. An attachment or web link may be provided but must not take the place of text within the email body. A copy of the email notice must be submitted to the Division along with the Certification Form, similar to the process for paper letters.

On November 30, 2023, the U.S. Environmental Protection Agency (EPA) published a draft rule entitled the Lead & Copper Rule Improvements (LCRI). The EPA expects the LCRI to be finalized and enforceable before October 16, 2024. The draft LCRI rule includes changes to service line inventory requirements and due dates. If and when the EPA officially finalizes the LCRI, VT DEC will revise this form as necessary to comply with federal regulations.

To preserve, enhance, restore, and conserve Vermont's natural resources, and protect human health, for the benefit of this and future generations.