



VERMONT

DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
DRINKING WATER AND GROUNDWATER PROTECTION

GUIDANCE

## 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, galvanized requiring replacement, or unknown material service line, then the water system must notify affected customers by November 15, 2024 if the initial Service Line Inventory was submitted on October 16, 2024. For systems that submit the initial Service Line Inventory late, then the water system must notify affected customers no later than 30 days after the inventory's submission date.**

**Water systems should certify to the Vermont Department of Environmental Conservation (VT DEC) the notification is delivered no later than 10 days after delivery.** In accordance with the Lead and Copper Rule Revisions (LCRR), water systems must provide the certification to VT DEC by July 1, 2025.

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. Submit the Certification Form through ANR Online, mail, fax, or email, 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). On October 8, 2024, the EPA issued a pre-publication version of the LCRI. The EPA expects the LCRI to be enforceable before the end of the 2024 calendar year. The draft LCRI rule includes changes to service line inventory requirements and due dates. When the official LCRI is published in the Federal Register, 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.*