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Water Supply Operations

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Guidelines for Public Notice to Customers with Unknown, Lead, or Galvanized Requiring Replacement Service Line Materials.

Background

EPA's Lead and Copper Rule Revisions (LCRR) and Improvements (LCRI) require community and non-transient, non-community water systems to distribute notifications to water system customers with service lines identified as lead, galvanized requiring replacement (GRR), or unknown (but could be lead) in their service line inventory. The notifications must be mailed to customers with certain required language within 30 days after October 16, 2024, and annually thereafter until all service lines have been classified and replaced, if needed. No notification is required if the entire service line is non-lead (e.g., copper or plastic).

Who Must Be Notified?

Water systems must provide notification to all consumers supplied by a service line classified as the following (see column R of the Iowa DNR Lead Service Line Inventory spreadsheet template):

- Any portion of the service line is known to be **lead** (excluding lead goosenecks or pigtails)
- The service line is known to be galvanized and is or was at any time downstream of a lead service line or "lead status unknown" service line (**GRR**)
- Any portion of the service line material is **lead status unknown**

Notification Templates

Service line material notification templates are available on the Department's [lead service line inventories website](#) (the full URL is listed below in the Resources section). Systems must fill in the required information highlighted in blue on the draft templates before sending to consumers.

What Must Be Included in The Notification?

Water systems are encouraged to use the Department-generated service line material notification templates to ensure the notification has all the required information. Systems can then customize the notification as needed. Water systems should communicate accurately and openly about system-specific conditions to better represent their efforts related to the service line inventory and replacement.

The material notifications **must contain all of the following information:**

- A statement indicating the material type(s) of each service line
- The "Health effects of lead" paragraph included in the template
- A list of steps consumers can take to reduce exposure to lead in drinking water
- For consumers with unknown service lines, information about opportunities to verify the material of the service line
- For consumers with lead and/or GRR service lines:
 - Information about opportunities for replacement of the service line, if applicable
 - Information on financing solutions to assist the property owner with replacement of their portion of lead or GRR service line, if applicable
- For consumers with lead service lines where service line ownership is shared with the water system, a statement that the water system is required to replace their portion of the lead service line when the property owner notifies them that they are replacing their portion
- Contact information for the water system

What Are the Distribution Requirements?

Initial Notification - The water system must provide an initial notice to consumers with a lead, GRR, or lead status unknown service line within 30 days after October 16, 2024. The Department will issue formal letters to affected systems that meet the public notice requirements. The letters will include a template and a delivery certification form.

Annual Notification - The water system must repeat notification annually until the entire service line is no longer lead, GRR, or lead status unknown. For new customers, the water system must also distribute the notification at the time of service initiation if the service line is lead, GRR, or unknown.

Delivery Method - Community water systems must distribute the notice to consumers by mail, hand delivery or another Department-approved method. Non-transient, non-community systems must provide the notice by mail, hand delivery, or by posting in conspicuous locations.

Steps After Distribution

For the initial material notification, the water system must submit one example copy of each type of notice distributed (lead, GRR, or unknown) **and** a certificate of delivery form to the Department by **July 1, 2025**.

Water systems conducting ongoing annual notifications of service line material must submit representative copies of the notifications and a certificate of delivery form no later than **July 1** of each year for notices distributed during the previous calendar year.

Frequently Asked Questions (FAQs)

1. **Do consumers with confirmed non-lead service lines need to be notified?** No, consumers with service lines determined to be all non-lead do not need to be notified of their service line material.
2. **If ownership is split, do we have to notify consumers of the system-owned and customer-owned material?** Yes, the consumer must be notified if any portion of the service line is lead, GRR, or lead status unknown, regardless of ownership.
3. **Will the Department contact a system that is required to issue this public notification?** Yes, after the service line inventory submission date of October 16, 2024, the Department will issue a formal letter to affected systems required to issue service line material public notifications. The letter will include public notice templates and a delivery certification form.
4. **Can the material notification be emailed?** If a water system has electronic billing, reliable contact emails, and uses email as their main method for contacting a customer, the Department will accept email distribution. Systems who use email to distribute the notice and get a bounceback will have to find another method to reach the consumer. If a system wishes to use an alternative method such as email, they need to contact the Department for approval. Generally, email is considered a supplemental public notification method.
5. **Do the property owner and occupants need to be notified, if different?** The water system must distribute the notification to consumers supplied at the service connection with a lead, GRR, or unknown service line. The water system must make an attempt to provide the notification to the property owner as well, if the property owner and occupant are different.
6. **Can we use our own service line material notification form?** Yes, water systems may use their own service line material notification, as long as it contains all of the applicable required information as specified in the "What must be included in the notification?" section above.
7. **Does the template need to include information about a lead service line replacement program?** If this is not applicable to a water system, this information can be eliminated. If a water system has a lead service line replacement plan, it should be included.
8. **Are systems required to collect lead samples for customers when requested?** No, systems are not required to offer lead testing when requested by the customer. If your system does not offer lead testing, you can remove that section from the public notice.
9. **Do non-transient, non-community (NTNC) systems need to notify consumers of service line material?** Yes, NTNC systems must notify consumers of the service line material if the service line is determined to be lead,

GRR, or lead status unknown. NTNC systems may post the notification in a conspicuous location(s) for consumers to view.

10. **What if an unknown service line is confirmed to be lead after providing the material notification? Is the lead service line material notification required? When?** If an unknown service line is later determined to be lead or GRR, the consumer must be provided with an updated service line material notification. The consumer should be notified as soon as possible upon discovery of the material, but no later than the date by which the next annual notification is due. The system should also update their service line inventory.
11. **When must ongoing annual material notifications be distributed to consumers?** The annual notifications must be redistributed every year by July 1. Representative copies of the notifications and a certificate of delivery form must be submitted to the Department no later than July 1 of each year for service line notifications delivered the previous calendar year.
12. **Do we need to notify customers with a lead pigtail or gooseneck?** No, at this time systems are not required to notify consumers of a lead pigtail or gooseneck.
13. **Are we required to notify consumers of their service line material annually if they have declined replacement of their portion of the service line?** Yes, the water system must continue to notify consumers annually of their service line material until the entire service line is non-lead. This includes consumers who already declined to have their portion of lead or GRR service line replaced. While ongoing notice may be viewed as a potential annoyance by some consumers, it reinforces the importance of reducing lead exposure from drinking water.

Further Recommendations

1. Update your website to reference the new LCRR/I requirements and steps you are taking to reduce lead in drinking water and post on your website if you have one.
2. Identify a point of contact to answer emails, phone calls, and talk to customers.

Resources

- <https://www.iowadnr.gov/Environmental-Protection/Water-Quality/Drinking-Water-Compliance/Lead-Service-Line-Inventories>
- <https://www.EPA.gov/dwreginfo/lead-and-copper-rule>
- <https://www.epa.gov/dwreginfo/lead-and-copper-rule-implementation-tools>
- LCRR@dnr.iowa.gov