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Public Communication & Risk Management for Lead Service Lines

The U.S. Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) and Lead and Copper Rule Improvements (LCRI) contain extensive new requirements for public notice and outreach.

Local governments and community water systems must strike a careful balance of alerting residents about lead exposures without creating undue alarm or allowing misinformation to spread. Building public knowledge about the health risks of lead ingestion and the importance of participating in lead service line replacement programs through unified messaging is essential for successful lead service line replacement programs. This fact sheet covers requirements and best practices for communicating lead contamination risks and service line replacement progress with the public.

EPA's Health Effects Language for Lead in Drinking Water

What follows is EPA's Health Effects Language for Lead in Drinking Water for water systems to send customers:

"Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems."

Part 1 – Federal Requirements

Once the initial service line inventory was completed by October 2024:

- Community water systems were required to send notices of known and potential lead service lines to affected customers within 30 days. These notices had to include a statement acknowledging that the service line is either a known lead line, of unknown lead status or "galvanized requiring replacement" (GRR) - galvanized service lines that are or ever were downstream of lead service lines or service lines with unknown lead status. They also had to include specific health effects language from EPA, steps customers can take to reduce lead exposure, and lead service line replacement and financing opportunities available.
- Public notification must be repeated on an annual basis until the service line no longer contains lead.
- New customers must be notified of known and potential lead service lines when they initiate service.
- Each year by July 1, each community water system must send a report to the state with confirmation that it has given notice and informational materials to affected consumers during the previous calendar year.

In the case of a lead action level exceedance (currently 15 parts per billion):

- Within 24 hours, the water system must:
  - Issue public notice to customers
  - Notify the state and determine any additional requirements
  - Send a copy of the Tier 1 Public Notice to the state and EPA (LeadALE@epa.gov)
- Within 10 days of issuing a public notice, the water system must submit a certification to the state confirming that it has met all Tier 1 Public Notice requirements.
- For 60 days following the end of the monitoring period after an action level exceedance, the water system must provide public education material to affected residents.

Public Notification Rule: Tier Levels

A lead action level exceedance triggers public notification at the Tier 1 level in accordance with EPA's Public Notification Rule. The table below outlines what triggers each notification tier and what notification at each tier entails.

	TRIGGER	REQUIRED DISTRIBUTION TIME	NOTIFICATION DELIVERY METHOD
TIER 1	Water can potentially impact life immediately	24 hours	Media such as television, radio, newspapers; posted notices in public places; personally deliver a notice to customers
TIER 2	Water with contaminant levels that exceed EPA or state standards, but does not pose an immediate risk to human health	As soon as possible, but within 30 days of the violation	Media, posting, mail
TIER 3	Water systems violate a drinking water standard that does not have a direct impact on human health	Up to a year	Usually consolidated with Annual Water Quality Reports or Consumer Confidence Reports

Source: EPA Drinking Water Requirements for State and Public Water Systems, Public Notification Rule

If a substantial portion of customers served by the water system are non-English-speaking, the notice must either:

- Include wording in the appropriate language(s) highlighting the notice's importance, or
- Provide a phone number or address through which people may contact the water system and access a translated copy of the public notice or receive assistance in their appropriate language.

More information on language requirements may be available on a state-to-state basis.

EPA's Resources for Meeting Public Notice Requirements

See EPA's Fact Sheet for Notification of Known or Potential Service Line Containing Lead to understand requirements for notification after completing the initial inventory and annually thereafter.

See EPA's Fact Sheet on Requirements for Tier 1 Public Notice Following a Lead Action Level Exceedance for a checklist on what to—and what not to—include in a public notice.

Make sure to review EPA's required public education language for the Lead and Copper Rule.

More Resources to Inform Communication About Lead Service Lines

The American Water Works Association's Lead Communications Guide and Toolkit provides tips and best practices for water utilities to effectively communicate and build trust with the communities they serve.

The Lead Service Line Replacement Collaborative's webpage on Communicating about Lead Service Lines shares step-by-step guidance on messaging and outreach strategies.

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Part 2 - Building Public Trust and Managing Messaging

Local governments will need to meet these public notice requirements, educate residents about risks, minimize panic and dispel misinformation. To achieve these goals and build public trust, thoughtful communications strategies are paramount.

- Being transparent and setting realistic expectations is key. Communicating the risks of lead contamination and local progress towards replacement will help establish trust in the process. Communicate that, despite being a priority, it will take time to complete the full removal process as resources (financial and otherwise) are limited.
- Communicating about replacement plan sequencing is helpful. Clarifying who is at greatest risk of exposure and health effects and how replacements have been prioritized accordingly will aid transparency and demonstrate that health risks are being taken seriously.
- Clear, concise and consistent messaging will help minimize confusion and panic.
- Building on existing trust is also a winning strategy. Make sure to share information to and through trusted sources like community-based organizations, schools, daycare centers, libraries, healthcare facilities and faith-based organizations.
- Reaching disadvantaged communities—non-English speakers, undocumented residents and low-income renters—can be particularly challenging, but is imperative for making sure all residents are aware of risks and protocols. Creating materials in multiple languages and communicating through multiple trusted sources will help meet this need.
- Where lead service lines have been found, providing short term resources until replacement is possible will help show that the risk is being taken seriously. Testing kits and water filters can be effective short-term tools. It is also essential to maintain proper corrosion control treatments to limit lead contamination and to communicate the treatment and technologies strategies underway that help minimize risk.

Local governments or water systems can work across agency/jurisdictional boundaries to build public knowledge and efficiently implement replacement plans. Recommended strategies for effective communication and outreach include:

- Provide unified messaging about risks, timelines and priorities across entities like the water utility, public health departments, mayor or city manager's office, city council offices and other key messengers.
- Coordinate with the planning department, department of public works, contractors and utilities to apply Dig Once principles, reduce traffic, minimize noise disruptions and maximize efficiency of replacement projects.
- Partner with housing authorities to engage landlords and demonstrate the value of participating in replacement programs.

Leading On Lead Removal: Building Trust and Transparency in Lancaster, PA

The City of Lancaster, PA (population approximately 57,153) has created a webpage with comprehensive resources to promote transparency and build trust with residents as the city addresses lead service lines. The Lancaster webpage includes the following:

- A form to verify a property owner's service line material (listed in both English and Spanish)
- Frequently asked questions
- Health information
- Contact information
- A video explaining the lead service line inventory, what it is, how to check a line's material, and how to begin filling out the form
- A progress tracker
- Examples of water service line materials
- A water line inventory map showing the status (unknown, non-lead, and lead)
- A graphic showing where the utility side of a line ends and where the property owner's side begins.
- A "how to find your account number" section which is needed for the verification form
- An additional resources section

The city webpage helps residents receive correct information in a digestible way and encourages property owners to work with the city to replace lead service lines.

Leading On Lead Removal: Using Outreach to Share Risks and Opportunities in Chelsea, MA

The City of Chelsea, MA (population of approximately 38,319) has taken a holistic approach to serving their residents exposed to lead. The initiative is run through the Public Health Department with local healthcare providers and the city's Water & Sewer Division. Working with the Health Department and healthcare providers creates an extra touchpoint with residents who may be exposed to lead. This process is conducted through an annual lead poisoning screening in all children under the age of five. If children are behind in their screening, they are notified by the partnership. This extra touchpoint allows residents to then receive information about the lead service line inventory and replacement program, which the city offers at no cost to residents.

This is not the only avenue for residents to get information: they can also sign up for a free inspection that will verify the water service material entering the property. From there, residents can access the same free Lead Service Line Replacement Program. Lastly, to keep all this information transparent, Chelsea has a public-facing dashboard that shows the service line material (color coded for known lead, GRR, unknown material and non-lead) for both the public and private side of the water system's service lines.