

Lead and Copper Rule: Public Education & Other Public Information Requirements for Community Water Systems

Public Education Requirements

Utilities must ensure that water from the customer's tap does not exceed the action level for lead in drinking water (15 ppb) in at least 90 percent of the homes sampled. If you have a **lead action level exceedance** you must complete the following steps to comply with the Lead and Copper Rule (LCR) public education (PE) requirements.

Section 141.85 of the LCR regulations contains specific requirements regarding the content and delivery of your public education program. To learn more about the revisions to the public education requirements, refer to *Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems*, Section 1, page 5.

Step 1: Develop the content of your written public education materials.

The following information must be included in your PE materials. The text in *italics* is mandatory and must be included as written. Headings in **bold** must be addressed, but can be customized. Fill-in-the-blank templates (in English and Spanish) are available at: www.epa.gov/safewater/lcrrm/compliancehelp.html. More information can be found in *Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems*; Section 1, page 8: Required Content of Public Education Materials and Appendix B: Public Education templates.



Table 1. Required Content and Language for Public Education Materials

Section	Language
Informational Statement * Mandatory language	<i>Important Information about Lead in Your Drinking Water</i> <i>[Insert name of water system] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.</i>
Health Effects of Lead * Mandatory language	<i>Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys, and can interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.</i>
Sources of Lead * Can be customized; Example language	Lead is a common metal found in the environment. The main sources of lead exposure are lead-based paint and lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the work place and exposure from certain hobbies (lead can be carried on clothing or shoes). Brass faucets, fittings, and valves, including those advertised as "lead-free," may contribute lead to drinking water. EPA estimates that 10 to 20 percent of a person's potential exposure to lead may come from drinking water. Infants who consume mostly formula mixed with lead-containing water can receive 40 to 60 percent of their exposure to lead from drinking water.

Table 1. Required Content and Language for Public Education Materials (continued)

Section	Language
<p>Steps you can take to reduce your exposure to lead in your water * Can be customized; Example language</p>	<p>1. Run your water to flush out lead. Run water for 15 - 30 seconds to flush lead from interior plumbing [or insert a different flushing time if your system has representative data indicating a different flushing time would better reduce lead exposure in your community and if the Primacy Agency approves the wording] or until it becomes cold or reaches a steady temperature before using it for drinking or cooking, if it hasn't been used for several hours. [It is likely that systems with lead service lines will need to collect data to determine the appropriate flushing time for lead service lines.]¹</p> <p>2. Use cold water for cooking and preparing baby formula. Lead dissolves more easily into hot water.</p> <p>3. Do not boil water to remove lead. Boiling water will not reduce lead.</p> <p>4. Look for alternative sources or treatment of water. You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International at 800-NSF-8010 or www.nsf.org for information on performance standards for water filters.</p> <p>5. Test your water for lead. Call us at [insert phone number for your water system] to find out how to get your water tested for lead. [Include information on your water system's testing program. For example, do you provide free testing? Are there labs in your area that are certified to do lead in water testing?]</p> <p>6. Get your child's blood tested. Contact your local health department or healthcare provider to find out how you can get your child tested for lead, if you are concerned about exposure.</p> <p>7. Identify and replace plumbing fixtures containing lead. Brass faucets, fittings, and valves, including those advertised as "lead-free," may contribute lead to drinking water. The law currently allows end-use brass fixtures, such as faucets, with up to 8% lead to be labeled as "lead free." Visit the NSF Web site at www.nsf.org to learn more about lead-containing plumbing fixtures.</p>
<p>What happened? What is being done? * Can be customized; Example language</p>	<p>[Insert information about how and when the exceedance was discovered in your community and provide information on the source(s) of lead in the drinking water, if known.]</p> <p>[Insert information about what your system is doing to reduce lead levels in homes in your community.]</p>
<p>For More Information * Mandatory language</p>	<p><i>Call us at [Insert Number] or (if applicable) visit our Web site at [insert Web site Here]. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's Web site at www.epa.gov/lead, or contact your health care provider.</i></p> <p>[We recommend you include the name of your system and the date that the information is being distributed, along with the state water system ID, somewhere on the notice.]</p>

¹The bracketed language does not need to be included, as worded, in your materials. It is designed to alert systems that, where applicable, lead service lines might affect the flushing time.



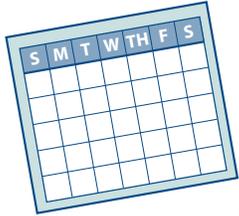
Different Language Communities. If significant proportions of the population in your community speak languages other than English, the PE materials must contain information in the appropriate language(s) regarding the importance of the notice or a contact where persons can obtain a translation or assistance.



Step 2: Get State approval.

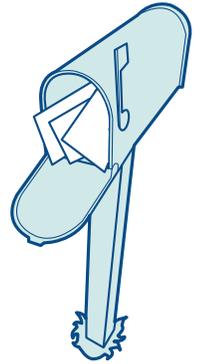
You must submit all written PE materials to the Primacy Agency prior to delivery. The Primacy Agency may require you to obtain approval of PE materials prior to delivery.

Step 3: Deliver your public education materials.



Timing: All public education materials must be delivered within 60 days after the end of the monitoring period in which the exceedance occurred and repeated once every 12 months, EXCEPT providing information on or in each water bill, which must be included in each billing cycle (no less than quarterly or the Primacy Agency can approve a separate mailing) and two press releases per 12 month period for as long as you exceed the lead action level. Also, the Primacy Agency

can allow activities to extend beyond the 60-day requirement if needed for implementation purposes; however, this extension must be approved in writing in advance of the 60-day deadline. Note: This extension is only appropriate if the system has initiated public education activities prior to the end of the 60-day deadline.



For more information go to *Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems*; Section 1, page 9: Required Methods of Delivery for Community Water Systems.

Table 2. Required Methods of Delivery for Small and Large Community Water Systems

Small (<3,300 customers)	Large (>3,300 customers)
Deliver printed materials (pamphlets, brochures, posters) to all bill paying customers	Deliver printed materials (pamphlets, brochures, posters) to all bill paying customers
Deliver public education materials to the following facilities and organizations that are served by the system that are most likely to be visited regularly by pregnant women and children: <ol style="list-style-type: none"> 1. Local public health agencies¹ 2. Public and private schools or school boards 3. Women Infants and Children (WIC) and Head Start programs 4. Public and private hospitals and medical clinics 5. Pediatricians 6. Family planning clinics 7. Local welfare agencies 	Deliver public education materials to the following organizations that are located within your service area, along with a cover letter encouraging distribution to all potentially affected customers or users: <ol style="list-style-type: none"> 1. Local public health agencies 2. Public and private schools or school boards 3. Women Infants and Children (WIC) and Head Start programs 4. Public and private hospitals and medical clinics 5. Pediatricians 6. Family planning clinics 7. Local welfare agencies

¹If you do not have a local public health agency, you should contact your State Health Department.

Tip: To obtain a list of organizations in your area, contact your local Public Health Agency. Additional informational resources of associations and licensing agencies of these organizations may be found in *Implementing the Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems*; Appendix C.



Systems are required to contact their local Public Health Agencies directly (either in person or by phone).

Table 2. Required Methods of Delivery for Small and Large Community Water Systems (continued)

Small (<3,300 customers)	Large (>3,300 customers)
<p>Make a good faith effort to locate the following organizations within the service area and deliver materials that meet the content requirements, along with an informational notice that encourages distribution to all potentially affected customers or users. The good faith effort to contact at-risk customers may include requesting a specific contact list of the organizations from the local Public Health Agencies, even if the agencies are not located within the water system service area:²</p> <ol style="list-style-type: none"> 1. Licensed childcare centers 2. Public and private preschools 3. Obstetricians-Gynecologists and Midwives 	<p>Make a good faith effort to locate the following organizations within the service area and deliver materials that meet the content requirements, along with an informational notice that encourages distribution to all potentially affected customers or users. The good faith effort to contact at-risk customers may include requesting a specific contact list of the organizations from the local Public Health Agencies, even if the agencies are not located within the water system service area:²</p> <ol style="list-style-type: none"> 1. Licensed childcare centers 2. Public and private pre-schools 3. Obstetricians-Gynecologists and Midwives
<p>Provide information on or in each water bill (no less than quarterly or Primacy Agency can approve a separate mailing)^{3,4}</p>	<p>Provide information on or in each water bill (no less than quarterly or Primacy Agency can approve a separate mailing)^{3,4}</p>
<p>Submit press release to newspaper, television, and radio stations⁵</p>	<p>Submit press release to newspaper, television, and radio stations</p>
<p>Conduct one (1) activity from one of the following general categories:^{6,7}</p> <ul style="list-style-type: none"> • Public Service Announcements • Paid Advertisements • Display Information in Public Areas • Email to Customers • Public Meetings • Delivery to Every Household • Provide Materials Directly to Multi-family Homes • Other Methods Approved by the Primacy Agency 	<p>Conduct three (3) activities from one, two, or three of the following general categories:^{6,7,8}</p> <ul style="list-style-type: none"> • Public Service Announcements • Paid Advertisements • Display Information in Public Areas • Email to Customers • Public Meetings • Delivery to Every Household • Provide Materials Directly to Multi-family Homes • Other Methods Approved by the Primacy Agency
	<p>Post material on a publicly accessible Web site (for systems serving > 100,000 individuals)</p>

²For further clarification of a good faith effort, you should consult with your Primacy Agency.

³Primacy Agency may allow a separate mailing if you cannot place information on the water bill.

⁴You may add additional pages (e.g., public education brochure) to the Consumer Confidence Report if timing is appropriate. However, it may be rare that timing will coincide, given that the CCR must contain compliance data collected in the previous calendar year and the report must be provided to consumers no later than July 1 (i.e., the report issued by July 1, 2007 contains compliance data collected in calendar year 2006).

⁵Primacy Agency may waive this requirement as long as you distribute notices to every household served by your system.

⁶You should discuss/verify with your Primacy Agency to ensure fulfillment of all requirements.

⁷Appendix B of *Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems* contains customizable templates for PE materials that may be used to meet these requirements.

⁸For example, you may do 3 PSAs or 3 public meetings if the Primacy Agency allows.

Table 3. Other Public Information Requirements – Regardless of An Action Level Exceedance

Consumer Confidence Report (CCR) Requirements¹

Every report must include the following lead-specific information: *If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. [NAME OF UTILITY] is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.*

A system may write its own statement in consultation with the Primacy Agency.

Notification of Results – Reporting Requirements²

Must provide a consumer notice of lead tap water monitoring results to all persons served at the tap from which the sample was taken.

Must provide consumer notice as soon as practical, but no later than 30 days after system learns of tap monitoring results.

Must include the following information: results of lead tap water monitoring, an explanation of the health effects of lead (you may use the health effects language found in Table 1), list steps consumers can take to reduce exposure to lead in drinking water, and utility contact information. This notice must also include the maximum contaminant level goal (MCLG) for lead and the action level (AL) for lead and the following definitions for these two terms:

The MCLG for lead is zero and the action level is 15ppb. The MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety. The action level is the concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Must be provided to all persons served at the site by mail or other methods (subject to approval by the Primacy Agency). This includes those who do not receive a water bill.

¹CWSs in States where EPA is the Primacy Agency or have adopted the Revisions by December 2008 must begin including the lead informational statement in CCRs that are due to consumers by July 1, 2009 (i.e. the 2008 CCR). Otherwise, CWSs must begin to include this information in the 2009 CCR.

²Consumer Notification of Results templates are available in *Appendix B of Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems*.

For Additional Information:

- ▶ *Implementing the Lead Public Education Provision of the Lead and Copper Rule: A Guide for Community Water Systems (EPA 816-R-08-007, June 2008).*
- ▶ EPA’s Website on Lead in Drinking Water – Lead and Copper Rule: www.epa.gov/safewater/lcrmr
- ▶ EPA’s Safe Drinking Water Hotline: (800) 426-4791
- ▶ Your Primacy Agency

Disclaimer: This document is designed for Community Water Systems; the guidance contained in this document does not substitute for provisions or regulations, nor is it a regulation itself. Thus, it does not impose legally-binding requirements on EPA, States, or the regulated community, and may not apply to a particular situation based upon the circumstances.