Lead Communications Guide and Toolkit

AN OPPORTUNITY TO STRENGTHEN TRUST IN YOUR COMMUNITY

American Water Works Association

Dedicated to the World's Most Vital Resource®

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Dedicated to the world's most important resource, AWWA sets the standard for water knowledge, management and informed public policy. AWWA members provide solutions to improve public health, protect the environment, strengthen the economy, and enhance our quality of life.

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Helpful Terms & Acronyms

American Water Works Association (AWWA)

The largest nonprofit, scientific and educational association dedicated to managing and treating water, the world's most important resource. With approximately 50,000 members, AWWA provides solutions to improve public health, protect the environment, strengthen the economy, and enhance our quality of life.

Consumer Confidence Report (CCR)

Water quality report required for all community water suppliers to summarize important information about their water.

Environmental Protection Agency (EPA)

The independent executive agency of the United States federal government tasked with environmental protection matters, including drinking water quality.

Galvanized Requiring Replacement (GRR)

The LCRR considers a galvanized service line as a lead service line if it ever was or is currently downstream of any lead service line, lead connector, or service line of unknown material.

Goosenecks

Goosenecks, otherwise known as connectors and pigtails, are shorter pipes that connect the lead service line to the main.

Lead and Copper Rule (LCR)

EPA first established the Lead and Copper Rule in 1991 to reduce exposure to lead and copper in water. These contaminants primarily enter drinking water through corrosion of service lines, fixtures, or plumbing. EPA has revised this rule multiple times since 1991 and published Lead and Copper Rule Revisions (LCRR) on January 15, 2021. The LCRR became effective on December 16, 2021.

Lead and Copper Rule Revisions (LCRR)

Revisions to the Lead and Copper Rule, effective December 16, 2021, designed to better protect children and communities from the risks of lead exposure.

Lead Service Line (LSL)

A portion of pipe that is made of lead, which conveys water from the water main to the building inlet. A lead service line may be owned by the water system, owned by the property owner, or both.

Lead Service Line Replacement (LSLR)

The act of replacing a lead service line with a new service line of different material.

Public Notification (PN)

Notifications required to be delivered to customers using specific methods and under specific schedules identified by regulation.

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

This is a federal assistance program of the Food and Nutrition Service of the United States Department of Agriculture for healthcare and nutrition of low-income pregnant women, breastfeeding women, and children under the age of five.

Training, Testing, Taking Action (3Ts)

3Ts for Reducing Lead in Drinking Water (Training, Testing, and Taking Action) —A guide produced by EPA to prepare schools, child care facilities, and states to build a voluntary implementation program to reduce lead.

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INTRODUCTION

American Water Works Association

Our Moment to Communicate and Build Better Relationships With Our Community

Dear Water Utility Colleagues:

As drinking water providers, we are anchors in our community. Our product makes it possible for each of us to take care of the essentials in our home. Water makes it possible for schools, hospitals and industries to thrive. Our water is quality of life, and it's forever linked to public health.

Consumers depend on us to produce and deliver drinking water that meets regulations. To earn the trust of our communities, we must be visible beyond the tap. Those who recall receiving information from their utility other than a bill are more likely to consider their water safe and their water quality as excellent or good.[1] Consumers need to hear from us and know the story of what we do every day.

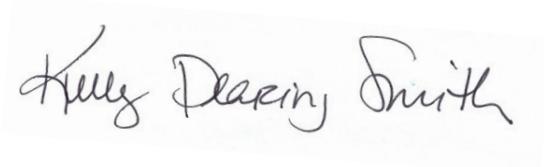
It's time for bold and effective communication. The U.S. EPA's revised Lead and Copper Rule follows water crisis situations that captured national headlines and eroded public confidence in drinking water. The rule presents utilities with new challenges, but fundamentally, the rule is an opportunity to strengthen public trust. Regardless of whether you have a dedicated communications department, we all have the responsibility to engage with our communities and tell the story of drinking water and what we do to minimize the risk of lead getting into the drinking water.

AWWA's Lead Communications Guide and Toolkit draws insights and examples from utilities throughout the United States and Canada that are at the forefront of communicating about water quality and lead. This document includes the following:

- Communication best practices, examples, and guidance.
- Tips on communicating about water quality with your community.
- A summary of the LCRR requirements and what they mean for your utility's communication and outreach efforts.
- Checklists for meeting key LCRR communication and outreach requirements and assessing your readiness for implementation.

Every new challenge is an opportunity. As drinking water providers, this is our moment to build better relationships with our communities and communicate information with full transparency, care, and empathy.

Sincerely,



Kelley Dearing Smith

AWWA Public Affairs Council Chair
Vice President, Communications & Marketing, Louisville Water Company

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1: American Water Works Association, 2021

If Anything, Do This

This guide includes detailed information on communicating about lead, including best practices, examples, lessons learned, and requirements, but it all boils down to these simple steps:

STEP 1

Understand Your Needs

+ Who are your customers? How do they communicate? What are their priorities?
+ Do you have lead service lines or other sources of lead in contact with your water?
+ What are your lead sampling results?

STEP 2

Tell Your Story

+ Deliver messages that are educational and positive — before it's required.
+ Keep messages simple and use visuals.
+ Deliver the message where the consumer can receive it.
+ Partner with community leaders, local organizations and health departments, and others for greater impact.

STEP 3

Understand the Requirements

+ Understand how LCRR communication requirements impact your system.
+ Prepare for and begin communicating ahead of compliance deadlines.
+ Maintain transparency throughout your program to strengthen trust.

STEP 4

Implement and Adapt

+ Share accurate messages early to make your utility a credible source.
+ Maintain regular communication.
+ Assess the effectiveness of your communications and adapt accordingly.

The Business Case for Public Communication

When it comes to communicating about lead, water systems no longer have a choice to remain silent. It's required. Too much is at stake for your utility and your customers. Public water systems cannot afford to sit on the sidelines. Communicating effectively with customers and community partners helps your utility avoid undesired outcomes, such as:

- Significant public health impacts to your community.
- Difficult-to-combat misinformation about drinking water quality.
- News stories that don't fairly represent your side of the story.
- Negative brand reputation that hurts staff morale and recruitment.
- Public opposition or apathy toward future capital improvements and funding needs.

2021 Public Perceptions of Tap Water Survey

↖ **CLICK TO LEARN MORE:** AWWA's recent consumer survey found a positive relationship between utility communications and consumer confidence.

PERCEPTION WITHOUT ADDITIONAL COMMUNICATIONS

Americans are confident in their tap water, yet water utilities have an opportunity to improve communication to strengthen public trust.

77% consider the quality of their tap water excellent or good

80% report their water is safe to drink

78% are satisfied with the water they receive at their faucet

PERCEPTION WITH ADDITIONAL COMMUNICATIONS

People who recall having received communication from their water utility in the last year report higher satisfaction with their water than those who do not recall any communication.

85% consider the quality of their tap water excellent or good

86% report their water is safe to drink

84% are satisfied with the water they receive at their faucet

No lead service lines?

Even water systems that can demonstrate they do not have lead service lines are required to communicate under the LCRR. They must:

- Produce annual Consumer Confidence Reports that include new health effects language.
- Provide important stakeholders, like public health providers, with ongoing education. See more information here.
- Work with schools and facilities within the service area for lead sampling and education opportunities.
- Publish a statement of no lead service lines, including an explanation of how that was determined.

Public communication about lead is now required, along with a compliance timeline. Going beyond the bare minimum will earn you goodwill, respect, and public confidence. Ongoing, transparent communication is simply good for business. There are many benefits to communicating proactively about water quality and any potential exposure risk from lead in drinking water:

Positive partnerships with schools, daycares, and healthcare agencies that reinforce your messages.

Property owners are more willing to work with your utility and act on their side of the water service line.

Customers, stakeholders, and the media are more likely to take time to listen and understand the issue.

Board members, elected officials, and voters are more likely to support your utility and financing.

↖ CLICK TO LEARN MORE: **AWWA's Communications & Outreach resource page**

Resource Spotlight: Trending in an Instant

What can your utility gain from communications, especially when it comes to proactively delivering the message? AWWA's "Trending in an Instant: A Risk Communications Guide for Water Utilities" provides helpful context about communicating to consumers in an era of distrust:

"Consumers are paying attention and increasingly seeking out information about the safety and quality of their water. Ideally, they receive information from you, and you are their trusted source for water information. However, if you are not communicating, they may turn to Google for information, or a Facebook friend may provide a link to a company promoting a product. If this happens, these sources can become your customers' trusted source for water information. Social media sources may provide information that is incorrect, incomplete or without context. Investing in communication programs designed to build trust with consumers is an excellent way to insert yourself into a landscape crowded with self-proclaimed experts."

In addition to guidance on proactive communications, this document provides best practices on responding during a crisis. This is important to review for water systems that may expect a Lead Action Level Exceedance.

↖ CLICK TO LEARN MORE: **Trending in an Instant Executive Summary**

BEST PRACTICES: HOW TO START COMMUNICATING WITH YOUR COMMUNITY

American Water Works Association

Water utilities have resources available to help develop a communications plan. This section includes best practices and guidance from existing materials from AWWA, EPA, and other organizations. There are also utility examples and interviews with three water systems.

Communicate Internally First

Lead is complicated and technical. Water quality, operations, and communication staff need to work collaboratively from the beginning to develop accurate but simple messages that your community will understand. This collaboration must continue through the life of your program to adapt communication materials along the way.

Be Proactive

Water systems should communicate with their customers beyond their water bills and water quality report or consumer confidence report. Documents posted on your website may be helpful for a technical audience, but the average customer isn't likely to find or read them. Find ways to share information in simple terms, use visuals, and deliver it to your customers through multiple channels.

Communicating proactively will establish your utility as the trusted source for information about lead. It is easier to talk with your community about a difficult subject if you are the first one to do it. It is much more difficult to react to stories about your water and your utility's response, and initial inaccuracies can compound if you are not part of the conversation from the beginning.

Being proactive also means communicating with your community about what you do before a public concern arises. LCRR's compliance date is now Oct. 16, 2024. Customers will be more understanding if they hear from you in channels other than your bill, especially if you engage them in positive ways, such as at fairs and festivals. After you develop materials, communicate with your employees first. A good plan starts on the inside.

Partner with Others

Reaching out to schools and health agencies about lead is now required. Take advantage of this requirement and develop partnerships with these organizations as well as grassroots and community organizations, condo boards and homeowner associations. Partnerships will help you improve your messaging, reach new audiences, and provide support and advocacy for your work.

Tell Your Story

If you don't tell your story, someone else will. Dedicate time and staff resources to communicating with community leaders, the media, and customers about where your water comes from, how your system operates, and efforts your utility is making to ensure safe, reliable, and affordable service. This communication needs to be a core part of your lead strategy and will make other aspects of your work easier.

Strengthening Public Trust

If customers only hear from you when there is a problem or when you send a bill, they have little basis to trust what you say about their drinking water.

The traditional utility mindset of being "out of sight, out of mind" is no match for today's challenges of aging infrastructure, increasing regulations, misinformation, and affordability concerns.

To strengthen public trust, your utility's communication must start before problems surface and should occur on a consistent basis. Proactively tell stories about how you treat and deliver drinking water. A thoughtful, strategic public education program not only helps your community understand how your water system works; it also provides your customers with a positive frame of reference when difficult issues, like lead, arise.

Key Actions

Building public trust can include many tactics across the utility. Giving public tours at your water treatment plant, presenting to local community organizations, letting local news outlets know about new construction projects, and including educational messages on bills can help build public trust without straining your limited resources. Plus, always serve your product, tap water, at meetings and events.

TIPS TO GET STARTED:

- Identify someone in your organization with strong people skills and successful communication experience interacting with customers to lead your public communications. This person could be your Executive Director, a customer service representative, administrative support staff, or a field worker. Make sure that person is able to take on this additional work.
- Coordinate public communications with internal staff. Make sure that your water quality and technical staff review communication documents for accuracy and that strategies are aligned with regulations.
- A good communications plan starts on the inside. Your employees can be your best ambassadors.
- Identify key stakeholders who need to be informed and can help communicate. Elected officials should receive regular communication from your leadership. Identify neighborhood organizations or established civic groups who can be good partners.
- Use your billing system to identify schools and child care providers. Partner with the local health department for communication.
- Get started with developing three key messages and a specific activity. Focus on developing a single flyer to include with your bill or a single facility tour event so you don't get overwhelmed. After you complete the activity, review with your team how it went and begin planning your next activity!

LEADING EXAMPLE

Philadelphia Water Department

After survey results showed that 40% of Philadelphia residents preferred bottled water over tap water, the Philadelphia Water Department hit the streets to strengthen public trust. A fictional spokesperson, "Water Woman," attended tap water bar events throughout the city to give out free water and dispel myths about tap water. These efforts were featured in positive news stories and in videos that aired on social media to reach a broad audience. The Department also trained volunteers called Philly Tap Ambassadors to engage neighborhoods where many don't drink tap water.

↖ CLICK TO LEARN MORE

LEADING EXAMPLE

Stoughton Utilities

Stoughton Utilities is a water system in Wisconsin with less than 5,000 connections that partnered with the Wisconsin Department of Natural Resources in 2021 to celebrate Imagine a Day Without Water. This initiative shows that partnering with other organizations and utilizing resources from nationwide initiatives can help elevate a water system's message. This is especially valuable for utilities with limited staff resources.

↖ CLICK TO LEARN MORE

Spotlight: Halifax Water

Canadian utilities must consult with their provincial health authorities for specific local requirements. See the **National Health Canada Guidelines.** Halifax Water, based in Nova Scotia, Canada, is proactively replacing an estimated 3,500 lead service lines ahead of any regulatory requirement to do so. In addition to protecting public health, Halifax Water's approach has generated goodwill with customers and allowed for customized programs within the community.

Since 2007, Atlantic Canada's largest integrated water utility has been conducting its own research in partnership with Dalhousie University. Based on this research it determined that corrosion control was not a final solution to lead. The utility initially began replacing lead service lines in the 1970s, but its research determined that Halifax Water's partial lead service line replacements could make the situation worse. Partial lead service line replacements result in only the utility's side of the service line being replaced, with the section of the lead service line owned by the customer remaining in place.

Since then, Halifax Water has focused on full service line replacements, coordinating those replacements with other capital improvement projects where possible and providing financial assistance to residents to help with the cost of replacing their side of the service line. Changes to the program in 2020 mean that Halifax Water now pays for full lead service line replacement from the main to the meter.

↖ **CLICK TO LEARN MORE**: **Get the Lead Out project website**

KEY COMMUNICATION INSIGHTS FROM HALIFAX WATER:

+ Hiring a communication consultant prior to launching the new program helped Halifax Water develop simple and effective messages from the start.
+ Water quality and communication staff work closely to develop, monitor, and adapt communication materials as they implement their program.
+ A website provides a hub of information for the general public and customers with lead service lines.
+ Utilities should expect that most customers will not take action on their lead service line after the first notification. Multiple notifications are needed. Resources and technical assistance from staff will help expedite the process.
+ Designating a staff point of contact for customers having their service lines replaced made service line replacements more efficient.
+ Targeted communications to customers who are scheduled to have a lead service line replaced helps set the right expectations.

Halifax Water is replacing over 150 public- and 200 customer-owned lead service lines every year and is on track to remove all lead service lines by 2038.

↖ **CLICK TO LEARN MORE**: **Lead regulations in Canada**

Communicating About the Risk of Lead

For many years, the risk of lead from paint, gasoline, jewelry, soil and toys dominated the conversation. In recent years, and particularly following coverage of the lead incident in Flint, Mich., the public is more aware of the possibility of lead in drinking water. For these reasons, utilities must explain how lead can get into drinking water, and that means translating the technical language into easy-to-understand words and visuals.

It also means focusing your message on the "source" of lead and not the water itself. Once customers have a basic understanding of how lead gets into drinking water, the system of pipes below ground, and the work you do, they'll be more likely to collaborate with the utility to reduce exposure.

Key Actions

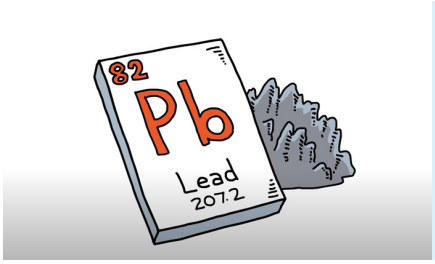
- Explain how lead can enter drinking water.
- Clarify that lead is not in drinking water when it leaves the water treatment plant.
- Define and illustrate system components like service lines, goosenecks, meters, fixtures, and solder.
- Explain which parts of the system are the customer's responsibility versus the utility's.
- Collaborate with experts to explain the public health impacts of lead. Use the mandatory health effects language from EPA and refer to other expert sources.
- Help customers take action by providing information about how to identify lead service lines and ways to reduce their exposure to lead in drinking water.
- Provide information about other sources of lead, such as paint chips or dust, and direct customers to resources on those potential exposures.
- Work with your local health department to accurately communicate the number of cases of elevated blood lead levels in your community.

Implementation Action Plan

- Audit existing outreach materials. ***See Tips to Getting Started on page 6.***
- Identify key messages for your utility on water treatment, service line material, testing, and risk.
- Create a cross-functional working group with water quality, operations, administrative, and communication staff to develop and review materials.
- Ask for feedback from community organizations in your area that serve underserved or hard-to-reach populations. Feedback could come in the form of a volunteer advisory committee comprised of community members who review outreach materials and guide outreach strategies. These community members can also become utility advocates.

Small Water System Adaptation

- Reuse text from examples shared in this document and from your primary regulator.
- Review and adapt guidance and materials from EPA and your state.
- Create simple diagrams showing where service lines begin and how lead can enter drinking water. Hiring a local freelance graphic designer to make diagrams or illustrations may be cheaper than you think. Consider students from a local college or university.

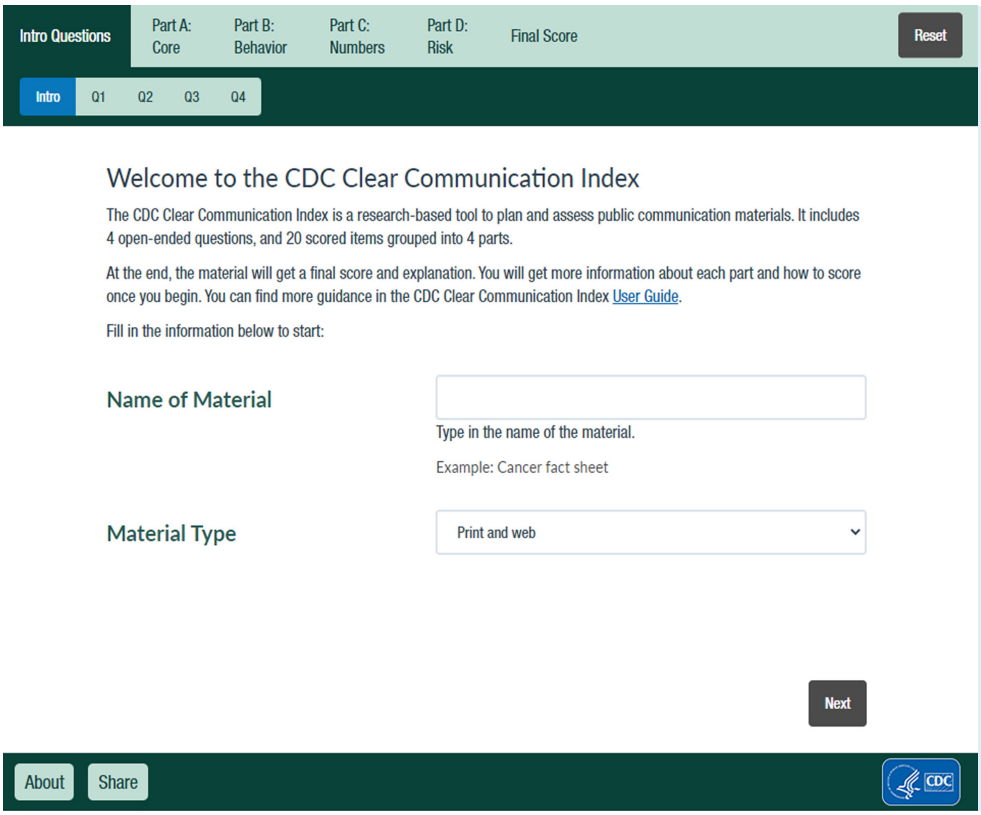


HELPFUL RESOURCE

AWWA: Educational Video

AWWA's "Together, Let's Get the Lead Out" video provides a general description and overview of how lead enters drinking water and ways to reduce risk.

↖ CLICK TO LEARN MORE

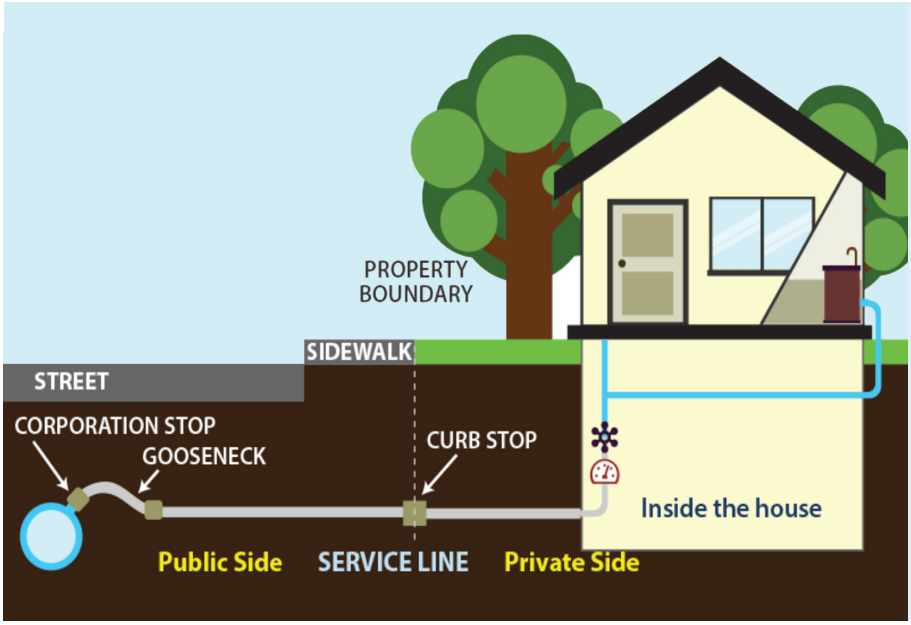


HELPFUL RESOURCE

CDC: Clear Communication Index

The Center for Disease Control's Clear Communication Index Widget (Index) is a research-based tool to help you develop and assess public communication materials and simplify complex language that can be a barrier to comprehension. The Index has four introductory questions and 20 scored items drawn from scientific literature in communication and related disciplines. The items represent the most important characteristics that enhance and aid people's understanding of information.

↖ CLICK TO LEARN MORE



LEADING EXAMPLE

Ann Arbor: Lead Goosenecks and Connectors

Ann Arbor, like many communities, previously used a small piece of lead pipe to connect galvanized water service lines to the water mains. This small piece of lead pipe, known as a "gooseneck," was used on some service lines installed in the 1920s and between 1942 and 1945. Using a visual like this to accompany information about service lines and goosenecks is important to effectively communicate about the source of lead with customers.

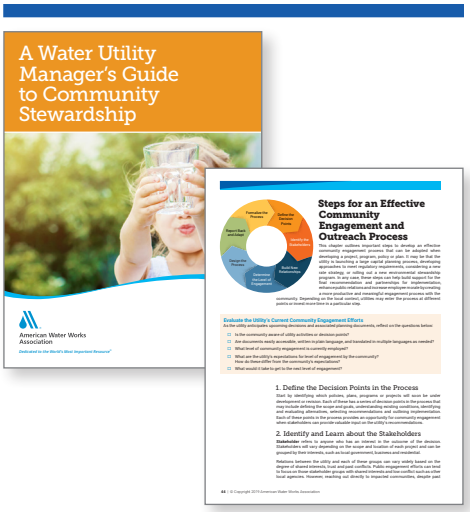
Communicating with Disadvantaged, Underserved, and English-as-a-Second-Language Populations

Disadvantaged communities may include those with specific socioeconomic, demographic, financial, public health, and environmental justice indicators or affordability challenges. Water utilities need to make extra efforts to overcome these barriers when communicating.

Traditionally underserved populations or neighborhoods are communities that have inadequate infrastructure or lack of services that exist in the rest of the community, such as utilities, sidewalks, lighting, waste collection, schools, libraries, and grocery stores.

Many times, these communities are where most lead service lines and plumbing are found. Utilities should take additional time to understand the unique challenges of these communities and make sure their lead reduction programs and communications effectively serve them.

Water systems should identify populations that speak primary languages other than English. This information can be found by reviewing census data, but also by meeting with organizations that serve your community. Communication materials should be translated to reach these communities, and community engagement activities should be pursued in partnership with organizations that provide translation services, if available.



HELPFUL RESOURCE

AWWA: A Water Utility Manager's Guide to Community Stewardship

This document provides guidance in providing equitable services, particularly for traditionally underserved neighborhoods.

CLICK TO LEARN MORE

Sharing Lead Service Line Inventory Data

Based on a 2016 Cornwell et. al. study of U.S. community water systems, recent estimates indicate there are between **six and 10 million lead service lines** in the United States. Now that community public water systems are required to identify lead service lines and share the inventory with the public, consider how your utility will investigate, validate, and communicate replacement opportunities.

Key Actions

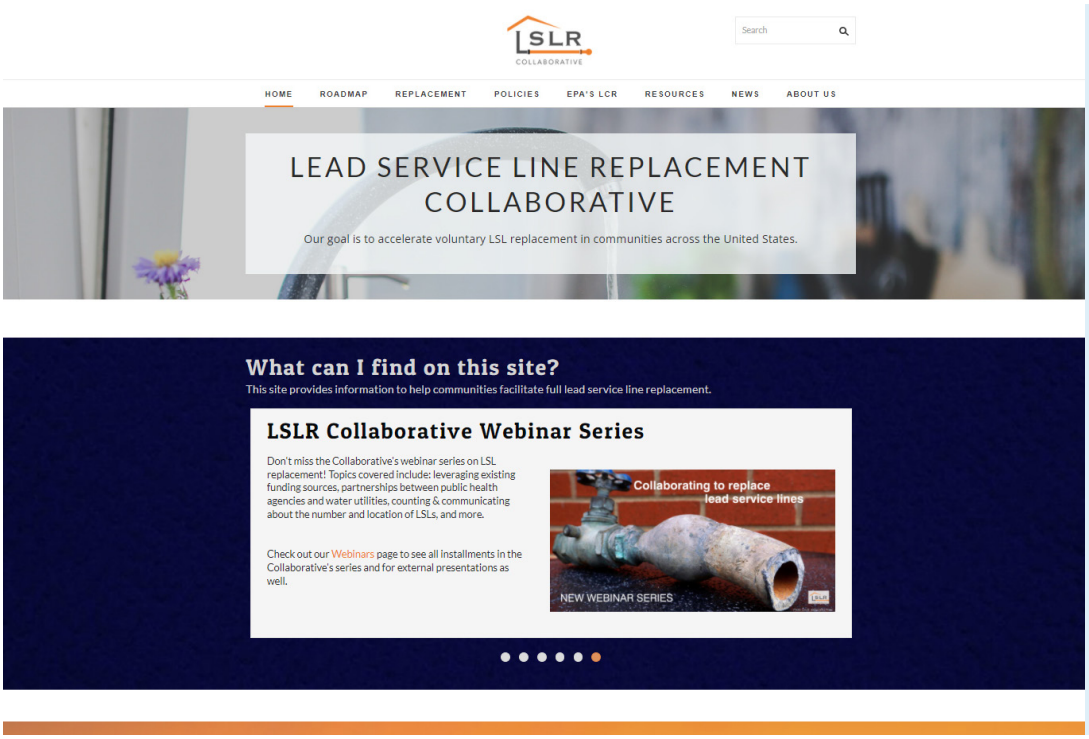
- Make sure your lead service line inventory data is accessible, transparent, and easy for customers to understand.
- If possible, publish your inventory online as an interactive map. Maps that show areas which are likely or unlikely to have lead service lines are helpful complements to databases.
- Be upfront about how the lead service line inventory data was created, what information is not included, and how the information will be maintained. Include information on public and customer sides of service lines.
- Be upfront with what you know and don't know. Explain how you'll correct information that will change along the way.
- Identify database or mapping systems that integrate timely updates.
- If publishing your data inventory online, consider the various devices and browsers the public will use.

Implementation Action Plan

- Where possible, communication and technical staff should collaborate on the development of the inventory. Spokespersons should understand how the inventory was developed and have educational materials explaining the process.
- Consider the information needs of your community. If your community has a lot of renters, share information about how renters can encourage action to remove lead pipes as part of the inventory.
- If an inventory map is created, develop and implement a communication plan to announce it and explain to customers how to use it.
- Consider partnering with other municipal agencies and local media to promote the availability of the inventory.
- Ask customers to send pictures, invoices from past plumbing work, and past permits to you to help identify their service line material. Have a process in place to verify pictures and information provided by customers.

Small Water System Adaptation

- Water systems serving less than 50,000 customers do not need to publish online a lead service line inventory, but systems serving more than 50,000 customers must make the inventory available online.
- However, consider making the inventory publicly accessible, even if it's PDFs of your records posted on your website.
- If your system does not have legacy data on service lines, focus your message on how you will collect more information moving forward.

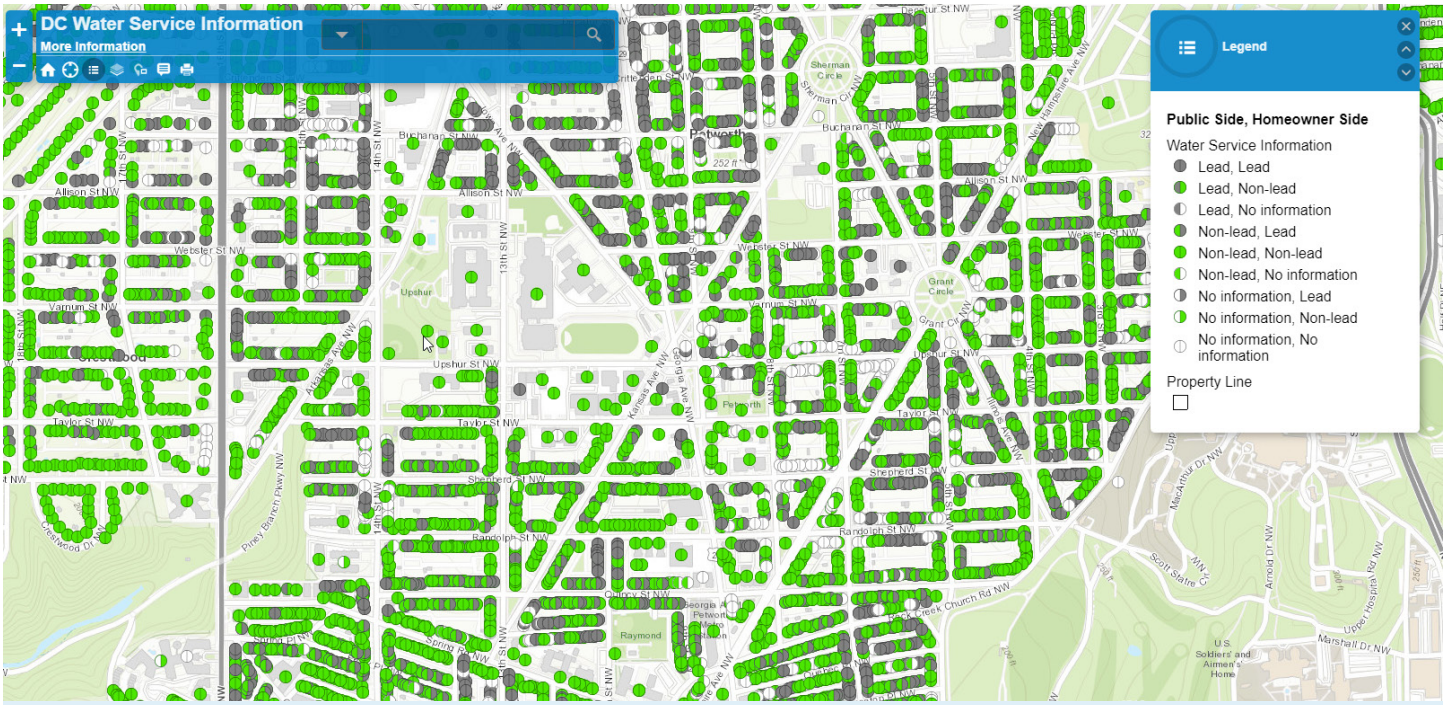


HELPFUL RESOURCE

Lead Service Line Replacement Collaborative

This coalition of environmental, water, and public health organizations maintains a website with resources to help utilities identify and remove lead service lines, including tips for sharing lead service line inventory maps.

↖ CLICK TO LEARN MORE



LEADING EXAMPLE

DC Water: Lead Service Line Online Map

DC Water shares its records on the type of pipe material for every public and customer service line. A 2020 study completed by the Environmental Defense Fund found that more customers initiated lead service line removals after this map was published.

↖ CLICK TO LEARN MORE: **Online map**
↖ CLICK TO LEARN MORE: **Environmental Defense Fund Report**

Lead Service Line Removal and Replacement Programs

Full replacement of lead service lines, both of the utility and the customer lines, greatly reduces the risk of lead entering the drinking water. The LCRR encourages full replacement. Although partial lead service line replacements are still allowed in some cases, they are expected to be prohibited in future regulations. While the LCRR does not ban partial replacement, only full replacements count in a system's LSLR program following exceedance of the lead trigger or action levels. Water systems must also replace their portion of the line when the customer initiates replacement of their portion of the line to prevent a partial replacement. In cases where partial replacements are conducted, water systems are required to communicate directly with each customer who has a lead service line and find ways to encourage replacement of the customer-owned lead service line.

Key Actions

- Use postcards, letters, phone calls, text messages, and door hangers to disseminate materials to consumers, and be prepared to conduct follow-up in-person conversations.
- Prioritize direct communication to customers with lead service lines or service lines of unknown material.
- Use a diagram to explain ownership of the utility's side of the lead service line and the customer's side.
- Be prepared to send multiple reminders to customers if you are seeking some type of action from them.
- Explain the funding opportunities available for homeowners.
- Keep the community and media apprised of your progress in removing lead service lines.

Implementation Action Plan

- Decide how your utility will gain consent from customers to enter their homes to complete full lead service line replacements.
- Educate residents on how your utility will coordinate lead service replacements.
- Identify resources to track down property owners.

Small Water System Adaptation

- Communicate on a regular basis with local leaders on your progress to remove lead service lines. This can be an email or face-to-face.
- Train a single field operations staff person to manage customer notifications for lead service line replacements.
- Include an annual summary of your lead removal efforts in your Consumer Confidence Report. Consider sharing this summary with your local media outlets. Most media outlets have a contact form or contact email address listed on their website.

Spotlight: City of Newark

Following a Lead Action Level Exceedance in 2017, the City of Newark jumped into action to protect the health of its community. Within just a few days, over 30,000 filters were distributed throughout the community, followed by bottled water distribution.

City leaders were also determined to remove every lead service line in the city. While the city was working hard to distribute filters and bottled water and remove lead service lines, local media reports were critical of their response and communication with the community.

The City of Newark implemented a comprehensive outreach program. The strategy included community meetings, direct mail, billboard advertisements, automated phone calls, media outreach, and coordination with community partners that became ambassadors for the program.

Early buy-in from city leaders and communicating this unified support were key to the City of Newark's Lead Service Line Replacement program's success.

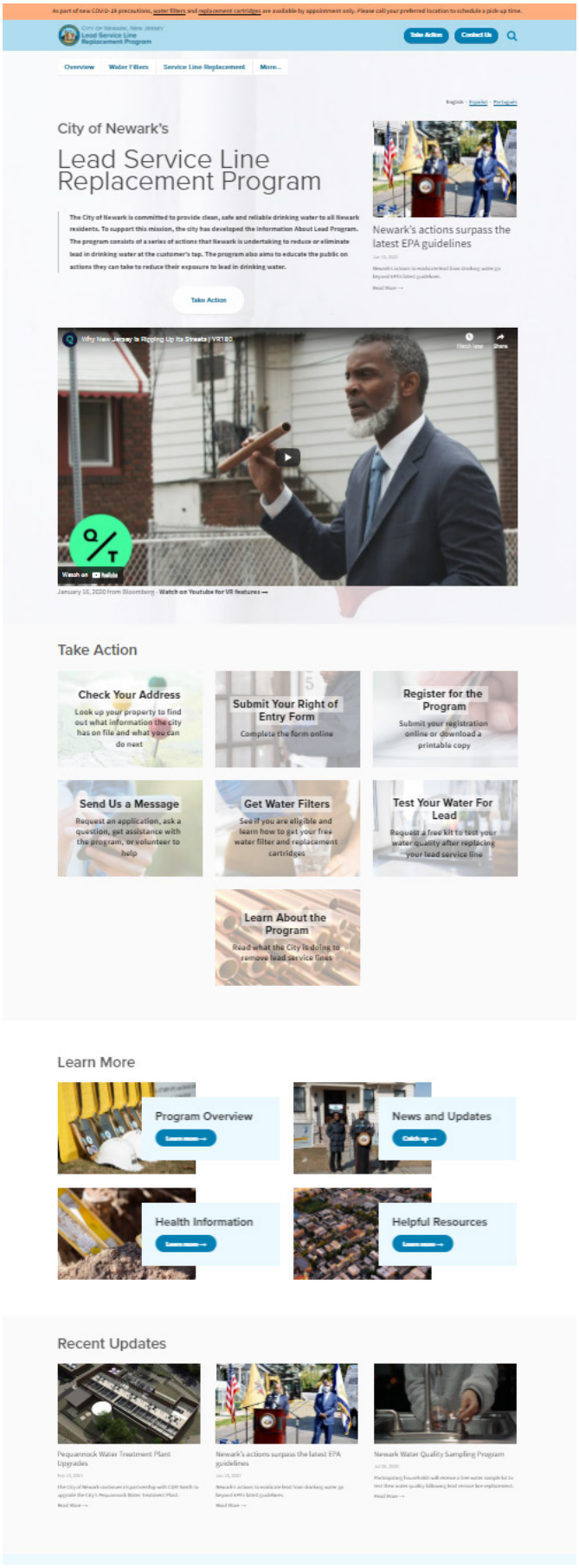
KEY COMMUNICATION INSIGHTS FROM THE CITY OF NEWARK:

- Bring the media in, give them access to staff, and show them your work. If you don't talk with the media, someone else will, and your story may not be shared accurately. It is much more difficult to change a media narrative once it is in place.
- Partner with community organizations. Local community organizations have existing relationships with neighborhoods and residents. They can help you reach residents, host events, and advocate for your work.
- Getting right of access and making lead service line replacements free were critical to removing lead service lines quickly. Very few residents were willing to replace their lead service line if there was a fee associated with it.
- Hire an experienced, multi-faceted top-notch firm to build an interactive and informational website. The City of Newark worked with CDM Smith to develop a website that provided one-stop shopping for residents and the media. This website shows where lead service lines were located, where filters were distributed, where service lines were replaced, and more. This transparency built trust with community members and the media.

The map tool allows residents to look up their addresses in the city's records to learn if they might have lead service lines and whether they are eligible for a National Sanitation Foundation (NSF) Certified Filter. As of February 2022, Newark had replaced every lead service line in its service area, totaling more than 20,000.

↖ CLICK TO LEARN MORE:
City of Newark's Lead Service Line Replacement Program

↖ CLICK TO LEARN MORE:
City of Newark's Check Your Address Map Tool



Contextualizing Water Treatment

Minimizing the risk of lead entering drinking water starts with the source and water treatment. Often, corrosion control is a critical part of a utility's lead strategy. It's important to describe the corrosion control program in an easy-to-understand way.

Key Actions

- Work with water quality and operations staff to describe your corrosion control process in the simplest terms.
- Clarify that corrosion control does not remove lead pipes, but reduces the risk of lead breaking off or dissolving into drinking water.
- Highlight how the chemicals used for corrosion control are food grade and safe for drinking water.
- Use graphics to show how corrosion control works in the pipe.

Here's an example of how you might describe corrosion control as a layer of protection:

Drinking water can travel through miles of pipe before it reaches the faucet. Since utilities need to consider different types of plumbing, corrosion control helps protect the water from picking up particles of lead that could be present in a lead pipe.

Implementation Action Plan

- Take time to understand your corrosion control process. Meet with water quality staff on site at the treatment facility.
- Review materials that currently describe your corrosion control process, such as your Consumer Confidence Report.
- Explain corrosion control and your utility's process in the lead or water quality section of your website.

Small Water System Adaptation

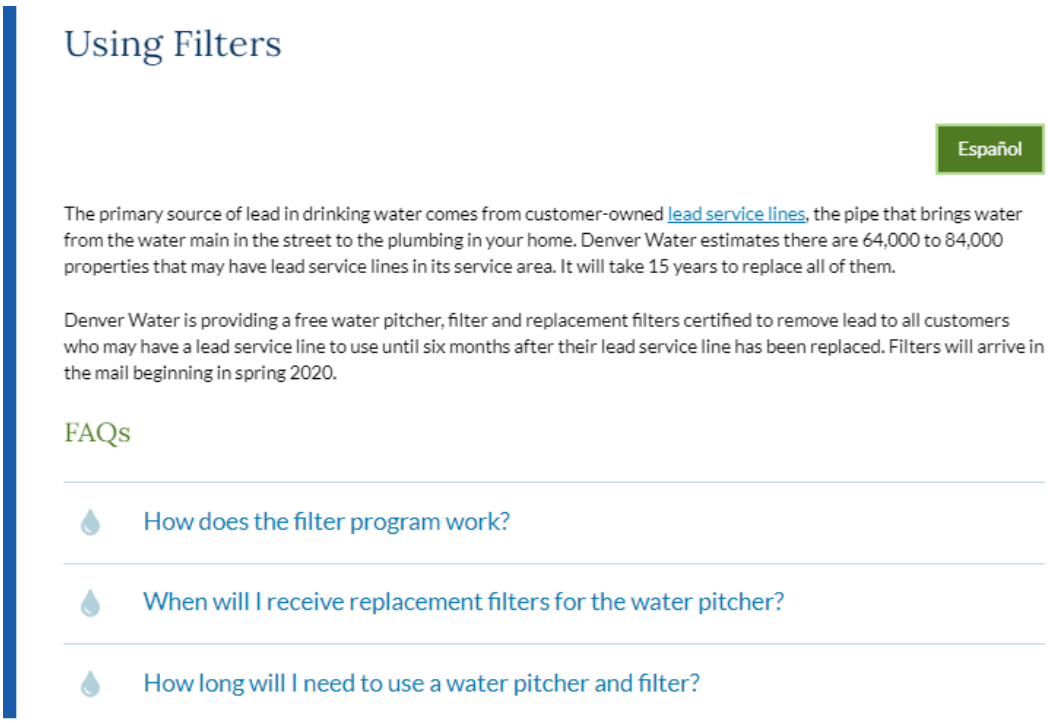
- Reach out to nearby water systems or your state regulatory agency for existing resources that you can repurpose.
- Include a simple description of corrosion control in your Consumer Confidence Report and reuse that for other educational materials, such as a letter to customers.
- Invite local elected officials and other community organization leaders to tour your water treatment plant.

Filters and Point of Use Devices

The LCRR requires water systems to distribute filters in certain circumstances to reduce the risk of lead. ***Read more on Page 30 about Lead Service Line Replacement Plan.***

Key Actions

- Provide information on the potential sources of lead with all filter-related communications.
- Provide guidance on what the filter should be used for (i.e. drinking water, ice, cooking, and preparing infant formula) and what it may not need to be used for (i.e. watering plants). This is information customers will ask for if you don't proactively provide it.
- Highlight the filter's certification by an accredited American National Standards Institute certifier to remove lead, and recommend only using filters with this certification for water the customer consumes. Provide information on properly maintaining the filter.
- Consider providing a webpage describing filter use and maintenance with "Frequently Asked Questions" and a video to assist customers and reduce calls.
- Small systems should work with their local regulators on using pre-developed templates on how to manage and communicate the use and maintenance of water filters.



LEADING EXAMPLE

Denver Water: Using Filter Resources

Denver Water is providing pitcher filters and replacement filters to all customers with a known lead service line and those who may have a lead service line, until six months after their lead service line is replaced. The utility has a website dedicated to answering questions about using filters and a video on how to use the filter provided.

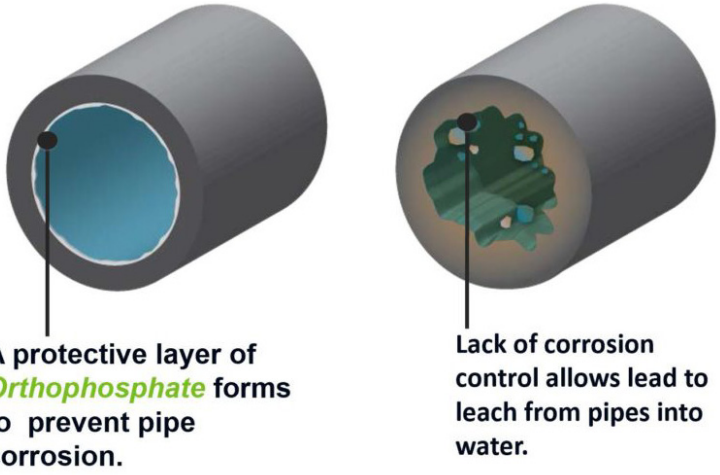
↖ CLICK TO LEARN MORE

LEADING EXAMPLE

Virginia American Water: What to Know About Your Water Quality Report Video

Annual Consumer Confidence Reports are a great opportunity to educate your customers about water quality and water treatment. Many customers aren't interested in reading the full report, so consider alternative ways to deliver this information. Virginia American Water produced a video promoting their water quality reports.

↖ CLICK TO LEARN MORE



LEADING EXAMPLE

Pittsburgh Water and Sewer Authority: Corrosion Control

Below is an example of how Pittsburgh Water and Sewer Authority describes corrosion control with a visual and text. It's helpful to both describe and show how corrosion control works, use terms like "food-grade," and identify pipes as the source of lead.

> "Orthophosphate is a food-grade additive that we will begin adding at our treatment plants to help reduce lead levels in water. When water with orthophosphate runs through the system, it will create a coating on the inside of lead service lines, creating a barrier between the lead pipes and the water. This is called 'corrosion control.'

↖ CLICK TO LEARN MORE

Sampling and Monitoring Requirements

Customers play a critical role in LCRR sampling because the customer frequently collects the water sample. In fact, this is the only water quality regulation where utilities must depend on the customer's cooperation.

Use LCRR sampling to strengthen public trust. The science of lead testing not only has to be explained but presents one of the most challenging aspects of community transparency for utilities.

Overwhelming the public with too much information could cause misinformation as sampling results are misinterpreted. At the same time, even the mere appearance of not giving enough information will not hold up to public scrutiny.

Key Actions

- Work with operations and quality staff to audit existing materials for sampling and develop new messaging.
- Provide illustrations of plumbing that demonstrate where samples are collected and why.
- Create updated instructions on sampling to comply with the LCRR requirements. Provide communication staff an opportunity to review who will be notified
- Develop "Frequently Asked Questions" and provide a point of contact to make it easy for customers to ask follow-up questions.
- Make the distribution of sampling kits for homeowners easy and convenient for your community. Identify a staff person responsible for coordinating delivery of sampling kits, ideally when the customer is home.
- Be prepared to provide testing results in a timely manner. Often, a phone call is required. A sample > 15 ppb must be notified within 24 hours and individuals with samples ≤ 15 ppb must be notified within 30 days.
- Provide materials on the source and risks of lead in service lines and plumbing to help customers take action after receiving their test results.

Implementation Action Plan

- Develop a working group consisting of water quality customer service and communication staff to create communication materials.
- Let someone outside this group review the materials. Getting a fresh perspective, especially from staff who live in the community, will help evaluate and refine messages.
- Develop follow-up materials in advance, such as "Frequently Asked Questions" and talking points.
- Establish a process to adapt materials based on customer feedback.
- Prepare to address individual sample results above the Action Level.
- Consider working with customer service and/or customer advisory committees to vet and improve exceedance notification templates appropriate for your community ahead of needing them.

LEADING EXAMPLE

Louisville Water: How to Collect Water Samples

Lead sampling can be difficult for customers to understand. Louisville Water created step-by-step instructions for customers in a May 2022 video and diagram.

↖ CLICK TO LEARN MORE:
Watch video
↖ CLICK TO LEARN MORE:
Download diagram

School and Child Care Facilities

LCRR requirements for water systems to sample at schools and child care facilities present an opportunity to partner with education and child care professionals. A proactive communication program to keep schools, child care facilities, parents, and families informed about potential sources of lead in drinking water will prevent misunderstanding and address concerns before they arise.

Effectively communicating throughout the sampling and result publication process and taking a partnership approach with these organizations is essential to strengthen and maintain trust.

Key Actions

- Work with agencies that license and permit child care facilities in your community to identify and create a contact list. Consider other child care environments, such as day nurseries, drop-in care centers, indoor recreational facilities, teenage parenting programs, school-age centers housed in faith-based facilities, non-public kindergarten programs, Head Start programs, shelters, and juvenile detention facilities.
- Work with school districts and private schools in your service area to identify all school facilities that you serve.
- Work with school and child care facility staff to understand parent/family needs, expectations, opinions, attitudes, and knowledge levels about lead risks.
- Establish relationships and working groups with public and private schools, child care facilities, PTAs/PTOs, and after-school programs.
- Work with school officials and child care professionals in your community to deliver multiple, varied, and targeted communication while respecting specific cultural requirements and priorities.
- Create information centers to share outreach materials, resources, and announcements from credible sources.
- Commit to transparency. Be prepared to share results in coordination with the school but through your own channels if the school is not responsive. Water systems will be required to share these results with local health departments, and these results could be the target of an open records request.
- Integrate and align lead communication into existing information tactics, events, and communication tools deployed by school officials and child care professionals.
- Create practice scenarios for school and child care professionals that simulate the discovery of lead and align with utility crisis plans.
- Identify child care licensure and occupancy permitting partners and resources in your community in which to embed information on LCRR requirements.
- Establish partnerships at the municipal and state levels to develop compliance and accountability resources for child care facility owners.
- For areas most impacted by lead service line replacement, create enhanced outreach and information-sharing campaigns to enhance school and childcare outreach, such as with flyers in these specific, impacted areas.
- Establish partnerships with local government and nonprofit agencies, such as social justice and advocacy organizations or agencies that administer assistance programs for low-income households, to create information-sharing campaigns.
- Partner with English language learner (ELL) advocates, interpreters, translators, and community agencies that serve immigrant families to review communication materials and ensure cultural responsiveness.
- Create feedback loops with local school boards, school officials, child care facility owners, and child care professionals to regularly evaluate and improve LCRR communication materials.
- Collaborate with school systems to design a testing regimen that is appropriate to the school sizes and needs.

Implementation Action Plan

- Audit existing utility and public health education programs to identify opportunities to integrate and align LCRR communication and revise to include required language.
- Establish and strengthen relationships with local public and private education providers in your community.
- Consider creating a communication working group of school communications professionals for insights and recommendations on appropriate strategies.
- Systems should consider working with partners to identify potential funding for mitigation activities in schools and childcare facilities, such as replacing lead plumbing and fixtures.

Small Water System Adaptation

- Systems with limited staff will be challenged to develop partnerships with school and child care staff, who also have limited resources. Consider having the initial outreach from your water utility come from your local leadership in the form of a letter to school/childcare leadership. This outreach may be more efficient than having your staff try to identify the right staff at schools in your service area. Even if you don't have resources to develop deep partnerships with schools, you can set the right expectations and the right tone with a thoughtful and proactive letter.
- Work with the state for resources, such as technical assistance providers (like the school board association or nonprofit cooperatives) to help develop communication materials and outreach to the community, as well as school and childcare providers.

HELPFUL RESOURCE

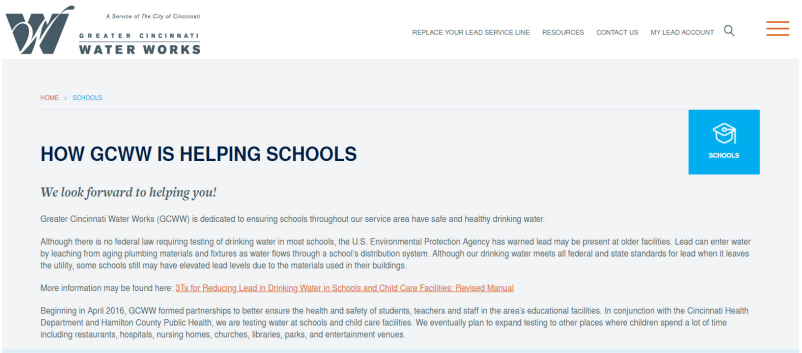
EPA: 3 T's (Training, Testing, and Taking Action) for Reducing Lead in Drinking Water in Schools and Child Care Facilities

Published by the Environmental Protection Agency in 2006 and revised in 2018, this document is a helpful resource for schools and child care facilities. The LCRR includes a requirement to provide a copy of this guidance to schools and child care facilities as part of the sampling process.

This guidance is designed to help facilities implement a volunteer program for reducing lead in drinking water by training (staff), testing (water), and taking action (remediation). Topics include how-to guidance on the following:

- Developing and implementing a communication plan.
- Partnering with water systems, local officials, and health departments.
- Training staff.
- Conducting water sampling.
- Remediating elevated lead levels.
- Documenting efforts.

↖ CLICK TO LEARN MORE



LEADING EXAMPLE

Greater Cincinnati Water Works: School Partnerships

Beginning in April 2016, GCWW formed partnerships to better ensure the health and safety of students, teachers, and staff in the area's educational facilities. In conjunction with the Cincinnati Health Department and Hamilton County Public Health, GCWW is testing water at schools and child care facilities.

GCWW WORKS WITH THE SCHOOL TO:

- Verify the material of service lines providing water to the schools.
- Share copies of EPA's list of best practices for reducing lead in drinking water.
- Provide water testing kits to the schools, free of charge.
- Analyze the samples, free of charge.
- Collect additional samples, if needed.
- Assist with a remediation plan, if needed.
- Help address media questions regarding testing and results.

↖ CLICK TO LEARN MORE

Spotlight: Green Bay Water

Green Bay Water (GBW) treats and pumps up to 42 million gallons from Lake Michigan to the City of Green Bay (population 107,000) and surrounding area municipalities. As the state's oldest city, many of the city's pipes date back to the 1800s, and until 1984, lead was present throughout the growing metropolitan region.

1,782 of GBW's 36,000 service lines (from the main to the cutoff valve) contained lead and 247 private services (from the curb to the basement meter) did also. Green Bay worked with state and municipal authorities to change a law that barred Wisconsin utilities from assisting in funding privately-owned service replacements, allowing both sides to be replaced at once. Green Bay hired additional distribution crews to work on replacing lead service lines every day. The crews replaced 300-400 lead service lines each year and removed all lead service lines by October 2020.

KEY COMMUNICATION INSIGHTS FROM GREEN BAY WATER:

- GBW started with no communications staff, and hired a boutique firm to get to the bottom of the foundational questions: Who are you trying to reach? What are you trying to say? How should you adapt messages for different audiences? The expense soon warranted hiring a full-time position.
- Metering staff developed relationships with school maintenance staff, regularly testing and flushing school plumbing and explaining the importance of plumbing and fixtures when addressing water quality.
- GBW started by educating water utility staff, wholesale customers, stakeholders, elected officials and neighborhood groups. GBW attended meetings specific to cultural groups to tell their "water story."
- Letters and pamphlets about ways to reduce lead impacts were mailed to all customers with known lead service lines. The letter included a few sentences in other languages and provided links to the pamphlet online in those respective languages.
- GBW joined with the County Health Department to create a Lead Coalition, which includes local pediatricians and public health professionals and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) representatives. More awareness was gained through co-creation of pamphlets that talked about where lead can be found in a home.
- City and County Staff, City Council Members, Water Commissioners and neighborhood associations were provided monthly updates with lead data (how many replaced/new lead discovered/short paragraph about public awareness campaigns).
- GBW attempted a campaign in which residents used postcards and a YouTube video to try to identify their own services. The findings were mostly erroneous, with a greater proportion of the population believing their service lines contained lead than really did.
- Even after offering free lead service line replacements, customers remained unresponsive. GBW created urgency by telling the public that if they did not act, financing would run out and they would be responsible for the replacement (estimated $5k).
- GBW found the best approach to outreach and communication was to diversify it by using all channels available: community partners, meetings, press releases, social media posts, take-home info (magnets/pamphlets), website, etc.

↖ **CLICK TO LEARN MORE: Green Bay Water website**

MESSAGING WATER QUALITY: HOW TO TALK ABOUT LEAD

American Water Works Association

Water utilities earn the public's trust when they communicate frequently and authentically — over time — about drinking water quality. Utilities that have established this foundational relationship with customers will be better positioned to talk about the risk of lead in service lines and plumbing.

No Communications Department?

Just like engineers design a plan to install a new water main, communications professionals design plans to talk about rates, infrastructure, water quality, and service. While not all utilities have a dedicated communications staff, it's still necessary to talk with customers.

- Build a network of partners by collaborating with state agencies, community organizations, and adjacent cities and counties.
- Incorporate communication planning into regular activities, such as hydrant flushing and updating emergency response plans.
- Identify a communications professional to help develop your initial messages and materials. Possibilities include a communications professional from your city government, contacts with peer associations, or a contract with a consultant.
- Meet with partners and staff who live in your community to identify the best communication channels to use for delivering your messages.
- Develop brief talking points for staff and board members to share with the community.
- Review how messages are received by your community and adjust accordingly.

Improving Risk Communication

Under the LCRR, water systems will need to prepare public communication materials and strategies in advance to deploy with little notice.

This means taking a fresh look at your existing communication program and identifying effective public education strategies that consider customer equity, at-risk populations, and environmental justice implications.

24-HOUR NOTIFICATION REQUIREMENT

The new LCRR requires public notification of a Lead Action Level Exceedance within 24 hours. New sampling requirements are likely to lead to more Action Level Exceedances. These notices must be distributed to the entire system, not just to people with lead service lines. Utilities should talk about these changes with key stakeholders and local media long before the rule compliance date of October 16, 2024 as the LCRR is currently effective.

↖ CLICK TO LEARN MORE: **Review the content and delivery requirements for these notifications**

Key Actions

- Start talking about how you produce and deliver drinking water. Utilities need to talk about what they do — not just about lead.
- Communicate proactively about lead risks through your website and other means, explaining what your utility does to minimize lead exposure and steps consumers can take to protect their households.
- Collaborate with medical and public health experts in explaining health risks associated with lead. Who else can share your story and endorse what you are doing to protect public health? Refer to messaging developed by EPA, your state, and local public health agencies.
- Be transparent about what you do know and do not know. This is important for maintaining your credibility in the long term.
- Establish partnerships with local government and nonprofit agencies, such as social justice and advocacy organizations or agencies that administer assistance programs for low-income households, to create information-sharing campaigns.
- Identify and partner with English language learner (ELL) advocates, interpreters, translators, and community agencies that serve immigrant families to review communication materials and ensure cultural responsiveness.
- Develop or update a risk/crisis communication plan for your water system, identifying roles and responsibilities for when a crisis event occurs, like an Action Level Exceedance.
- Schedule periodic reviews, walk-throughs, and updates of your risk/crisis communication plan to keep contact information and messaging up-to-date. Always keep your risk/crisis communication plan printed out and easily accessible.

Implementation Action Plan

- Conduct an audit and gap analysis to review existing communication plans, tools, and community partnerships.
- Create simple communication/monitoring protocols and plans for frontline employees.
- Consider existing staff capacity, training needs, and funding to sustain risk communication efforts over time.
- Schedule regular reviews of talking points and outreach materials with department leaders and frontline employees.
- Seek input from local and state agencies for joint review and development of outreach materials.
- Conduct formal reviews and debriefs after crisis situations to assess how to improve risk communication efforts in the future.

Communicating with Empathy

Talking about the risk or the presence of lead in drinking water requires authentic and strategic communications. To make it easier for you to respond to specific situations, the Covello Center for Risk Communication created a series of risk communication templates with easy-to-remember acronyms. The Caring, Action, and Perspective (CAP) template is for responding to a high-concern question or statement, while the Acknowledge, Action, and Follow-up (AFF) template is useful to build, maintain, or restore trust, such as when you need to respond to a criticism or challenging situation.

CAP Template Example

Use when responding to a high-concern question or statement.

CARING MESSAGE

Lead can be a serious public health concern, and it's especially important to protect children from exposure. One of the reasons I work at _____ utility is because I care deeply about public health.

ACTION MESSAGE

Our utility is developing a lead service line inventory to make sure everyone understands if their home is at risk. We have also posted a set of materials to help you protect your household as we remove lead service lines.

PERSPECTIVE MESSAGE

I am proud of our utility's record of meeting or exceeding all public health standards. We're committed to strong protections today while we work for a future where lead service lines are gone from our community.

AFF Template Example

Use when the immediate goal is to build, maintain or restore trust.

ACKNOWLEDGE UNCERTAINTY MESSAGE

We're partnering with our schools to better understand the presence of lead in the school's plumbing systems. Our water system doesn't contain lead, but it can be present in plumbing within some older schools. We do not have good information on which schools contain lead.

ACTION MESSAGE

Last week, we partnered with _____ School to sample drinking water in fountains, kitchen sinks, and classroom fixtures. We notify parents if the sample determines a location containing lead exceedance and encourage schools to reduce their lead levels to the lowest possible concentrations.

FOLLOW-UP MESSAGE

We will continue to work with the school to monitor and assure that the risk has been removed. If you have additional questions about our monitoring and the results, you can reach us at _____.

↖ CLICK TO LEARN MORE: **Trending in an Instant Additional Risk Communication Templates**

Communicating with Transparency

It's important the community recognizes the water utility as the trusted source for information about the drinking water. Communicating with transparency on issues like lead can strengthen public trust.

Transparency is defined as "making available all legally releasable information, whether positive or negative, in a manner that is accurate, timely, and balanced for the purpose of enhancing the reasoning ability of publics and holding organizations accountable for their actions, policies and practices." – Public Relations Journal[2]

Social Media

Social media provides many opportunities for engaged water utilities, but it can also be a source of quickly spreading misinformation. Communicating with timeliness and consistency prevents suspicion and distrust. Utilities should have protocols in place to quickly address false information and validate and amplify the facts. Monitor conversations online to be aware of concerns and trending conversations.

Tips for managing social media conversations with transparency include:

- If needed, you can offer an expert for commentary.
- Pre-empt or warn about potential disinformation before it occurs.
- Correct disinformation.
- Take public responses offline when possible. Do not engage in arguments.

Public Meetings

Community listening forums and public meetings involving local elected officials are two opportunities to notify, interact with, and receive feedback from the public. When hosting public meetings, it's important to listen to and acknowledge the concerns of attendees and not be defensive or dismissive.

Communications should be rooted in facts and supported by credible sources of information. Track how you resolve public concerns and complaints to assure follow-through from these meetings.

Partnering with News Media

Since much of the general public still gets its day-to-day information from local news organizations, media are important partners. Use the Single Overriding Communication Objective (SOCO) formula[3] below to have clear, consistent communication messages when talking to news media:

KEY POINT
One brief message or action

KEY FACTS
Three most important facts

TARGET AUDIENCE
Who you are trying to reach

CONTACT POINT
Where the public should go for more information

2: Rawlins, B. L. (2008). Measuring the relationship between organizational transparency and employee trust. Public Relations Journal, 2(2), 1–21.
3: CDC Drinking Water Advisory Communication Toolbox: https://www.cdc.gov/healthywater/emergency/dwa-comm-toolbox/index.html

Explaining 90th Percentile Results

Lead sampling results are evaluated against an Action Level of 15 parts per billion for the 90th percentile of sample results. Water systems are required to share these 90th percentile results, but the LCRR requires water systems to share the 90th percentile, the range of samples, and they must make the individual sample results available, which can be a challenging concept to convey to customers.

A 90th percentile result, as reported by a water system, is the value found in one, single address. It is not an average of lead found in homes in that system, or even in homes with lead service lines.

The 90th percentile does not mean that a non-detectible result at that 11th home can be extrapolated to mean that other, untested homes with lead service lines or galvanized requiring replacement are also at nondetectable levels.

The 90th percentile is essentially the top 10% of results. A water system exceeds the Action Level for lead if 10% of sampling results are above the Lead Action Level of 15 parts per billion. Conversely, if 90% of lead sample results are below 15 parts per billion, the water system does not exceed the Lead Action Level. Another way to state the 90th percentile is 9 out of 10 results, so 9 out of 10 lead sampling results must be below 15 parts per billion to be below the Lead Action Level.

Additional Tips for Communicating 90th Percentile Results:

- It's important to remember that even in a community that does not exceed the Lead Action Level, certain homes could have elevated lead levels. With that in mind, avoid blanket statements like "we don't have lead concerns because we are below the federal regulatory limits."
- If your utility is below the Action Level, explain that your sampling indicates your corrosion control is effective, and that customers with lead in their pipes and plumbing can take additional steps to protect their households. Link to further information or AWWA's whiteboard explainer.
- Use a bar graph showing your 90th percentile results and the Lead Action Level to visually show where your water system stands relative to the Lead Action Level.
- Share a table of all lead sampling results in ascending order and highlight which result is the 90th percentile.
- If the customer with a previously untested address has a lead line or GRR, it's best to test that specific location, so the best information can be gathered and discussed with the customer.

LCRR COMMUNICATION REQUIREMENTS

American Water Works Association

EPA first established the Lead and Copper Rule in 1991 to reduce exposure to lead and copper in water. These contaminants primarily enter drinking water through corrosion of service lines, fixtures, or plumbing. EPA has revised this rule multiple times since 1991 and published Lead and Copper Rule Revisions (LCRR) on January 15, 2021. The LCRR became effective on December 16, 2021.

EPA states that the LCRR was published to "provide greater and more effective protection of public health by reducing exposure to lead and copper in drinking water. The rule will better identify high levels of lead, improve the reliability of lead tap sampling results, strengthen corrosion control treatment requirements, expand consumer awareness and improve risk communication." [4]

This section summarizes new communication and outreach requirements under the LCRR, including:

- Lead Service Line Inventories
- Annual Lead Service Line Notification Requirement
- Lead Service Line Replacement Plan
- Trigger Levels, Sampling, Action Level Exceedances, Water Disturbances
- Public Health Effects Language
- Outreach to State and Local Health Agencies
- Updated Information in Consumer Confidence Reports
- Testing at Schools and Child Care Facilities

Communicating about lead and drinking water is really a story about treating and delivering drinking water. Think of it as a three-part story:

1. It starts at the water treatment plant where the water utility adjusts water chemistry to make it less corrosive.
2. It continues with removing lead from our water pipes and plumbing.
3. And finally, there is ongoing education: talking about sources of lead, who is at risk, what the utility is doing, what the consumer can do, etc.

What's the Story of Your Drinking Water?

Before you start communicating about lead, know your utility's story and share it. When did your utility start its operations? How do you describe the source of your water and your water quality testing? How has research and developing science changed our approach to delivering safe and reliable water?

Changes Expected

EPA recently announced that it intends to further revise its regulation on lead in water.

The Lead and Copper Rule Improvements (LCRI) are expected before October 2024. Utilities should not wait for these new changes to begin communicating about lead.

The LCRI may change the action and Trigger Levels, tap sampling procedures, and lead service line replacement requirements. It may also place greater emphasis on prioritizing historically disadvantaged communities. EPA says these changes will be no less strict than the current LCRR.

4: www.federalregister.gov/documents/2021/01/15/2020-28691/national-primary-drinking-water-regulations-lead-and-copper-rule-revisions?msclkid=3238db15a67911ecb22723bfe63c483c

What to Communicate Now: Top Priorities for Meeting LCRR Communication Requirements

The compliance deadline for most LCRR communication requirements is October 16, 2024, but work will need to begin sooner to stay on track. Here is a guide on the communication requirements to begin working on now. More detail on these and other requirements are included in the pages that follow.

Lead Service Line Inventory

- Begin working with customers now to collect information on service line material where gaps exist in your database. You may need to ask customers to provide pictures of where their service line enters their home or coordinate employee access to confirm material. **View the EPA's Protect Your Tap Tool.**
- You may need to hire a consultant to publish a lead service line inventory map on your website. Account for time to bring a consultant on board and to develop the map. Although online inventory maps are a best practice, water systems serving less than 50,000 people are not required to make their inventory available online.
- Remember that water systems will be required to notify customers every year for three reasons: 1) if they don't have their service line material confirmed, 2) if they have a lead service line, and 3) if they have a galvanized line requiring replacement, so it is best to collect this data upfront to avoid confusion and frustration.
- Beginning after October 16, 2024, community water systems will be required to sample for lead at schools and licensed childcare facilities, and to reach out to public health agencies every year. It's important to connect with these organizations early to build strong relationships and to be considerate of other priorities and resource constraints these organizations may have.
- Consider initial outreach to these organizations before the compliance deadline to introduce your water system, let them know about the new requirements, and to open a line of communication. This early outreach is intended to establish points of contact and build a relationship, by introducing your water system, your LCRR program and their role in a partnership.

Lead Service Line Replacement Plan

- EPA does not expect to propose changes to the requirements for information to be submitted in the initial LSL inventory or the associated October 16, 2024 compliance date.

Sampling Protocols and Materials

- New sampling requirements in the LCRR will likely lead to new sampling locations that require additional outreach. Also, new sampling protocols will require the development of new instructions for customers to follow.

Lead Service Line Inventories

The LCRR requires that all water systems, regardless of size, create a publicly available inventory of service lines. If a system only has non-LSLs, it must still create the initial inventory, but it will not need to provide updates.

Timing

Each water system must develop an LSL inventory by **October 16, 2024**.

- Water systems must update their LSL inventory in accordance with their tap sampling monitoring period schedule, but no more frequent than annually.
- Systems with annual or more frequent monitoring periods must update the service line inventory annually. Systems on triennial monitoring would be required to update their inventories every three years.

What to Show

The inventory should identify LSLs, galvanized service lines that are or could have been downstream of an LSL, "lead status unknown" service lines, and non-lead service lines. While the system must track internally the address of each of the four service line material classifications, it is only required to include LSLs and galvanized requiring replacement in its publicly available inventory and may choose to publish a non-address "location identifier," such as a street, block, or other geographic marker.

- Situations where galvanized service lines that are or could have been downstream of an LSL must be labeled "galvanized requiring replacement." In cases where the system is unable to demonstrate that the galvanized line is not or never was downstream of an LSL, it must presume it was.
- The inventory must cover both water system-owned and customer-owned segments of the service line. EPA recommends but does not require lead connectors to be inventoried.

Communication Requirements

All water systems are required to make their LSL inventory publicly available.

- All water systems are required to include information on how to access the LSL inventory in their Consumer Confidence Report (CCR).
- Water systems serving greater than 50,000 people are required to make their inventory available online.
- Water systems with only non-LSLs can meet this requirement with a publicly accessible statement that there are no LSLs, along with a general description of the methods used to make that determination.

Source: § 141.84 Lead service line replacement requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.84

Annual Lead Service Line Notification Requirements

All water systems must notify and provide education materials annually to households with lead, galvanized service lines requiring replacement, or "lead status unknown" service lines.

Communication Requirements

This annual notice must include a statement on the classification of the property's service line, information on the health effects of lead, and actions that can be taken to reduce exposure to lead.

- For persons served by an LSL or a "galvanized requiring replacement" service line, the notice must also provide information about opportunities for LSLR, including the water system's requirement to replace its portion of an LSL when notified by property owners that they intend to replace their own portions of the LSL. A description of financing solutions for property owners seeking to replace their portions of an LSL is also required, if available.
- For "lead status unknown" service lines, this notice must include information about ways that homeowners can verify the material of their service lines and a statement that the service line material is unknown but may be lead. This notice must also include the health effects of lead and the action people can take to reduce their exposure to lead.
- This notification must be delivered within 30 days of the completion of the LSL inventory and continue annually thereafter. This notification must be delivered at the time-of-service initiation for new customers.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85

Lead Service Line Replacement Plan

All water systems with LSLs or "lead status unknown" service lines must develop and submit an LSL replacement plan (LSLR plan).

Timing

The LSLR plan must be submitted to the water system's primacy agency by **October 16, 2024** and must be implemented if a water system exceeds the Trigger Level for lead.

Additional Requirements to Consider

LEAD CONNECTORS

- Lead connectors, such as goosenecks and pigtails, must be replaced when they are encountered by the water system under the LCRR.

CUSTOMER-INITIATED LSLR

- If a customer replaces their section of a LSL, water systems must complete their side of the LSL within 45 days of being notified by the customer, with a possible extension to 180 days after notification to the primary regulator.

FILTERS AND POINT-OF-USE DEVICES

- If a partial LSLR takes place, the water system must provide the consumer a pitcher filter or point-of-use (POU) device as well as six months of replacement cartridges and instructions for use until the full replacement is completed.
- If a full LSLR takes place, the water system must provide the consumer a pitcher filter or POU device as well as six months of replacement cartridges before the service line is returned to service.
- Water systems must provide a filter within 24 hours of learning of a customer replacement that left a system-owned LSL in place within the past six months.

TESTING

- The water system must offer the customer a follow-up tap sample between three months and six months after completion of any full replacement of a lead service line.

REPLACEMENT RATE

- Water systems with lead above the Trigger Level but at or below the Lead Action Level must conduct goal-based full lead service line replacement at a rate approved by the primary agency.
- Water systems must fully replace at least 3% of their total LSLs, galvanized requiring replacement, and lead status unknown service lines annually after a Lead Action Level Exceedance. States must set this replacement rate higher if it is determined to be feasible.
- The water system must provide the results of the sample to the consumer within 30 days if below 15 µg/L.
- Speak with your primacy agency to see how they want to handle customer refusals and customer non-responses. The rule does include requirements related to customer refusals and non-responses (see Federal Register 141.84(g)(7))

Communication Requirements

Water systems must develop a strategy to inform customers before full or partial LSLRs.

- Water systems must provide customers with a procedure to flush service lines and premise plumbing during LSLRs before the service line is returned to service.
- The notification must explain that consumers may experience a temporary increase of lead levels in their drinking water due to the replacement. It must also include information about the health effects of lead and actions consumers can take to minimize their exposure to lead in drinking water.
- In instances where multi-family dwellings are served by the lead service line to be replaced, the water system may elect to post the information at a conspicuous location instead of providing individual notification to all residents.

Source: § 141.84 Lead service line replacement requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.84

Sampling, Action Level Exceedances, Water Disturbances: 10 µg/L Trigger Level

The LCRR introduces a new Trigger Level of 10 µg/L (micrograms per liter) in addition to the Lead Action Level of 15 µg/L.

Water Systems Serving 10,000 People or More

- Water systems serving 10,000 people or more that exceed the Trigger Level, but not the Action Level, must implement requirements based on their corrosion control treatment and LSL status.
- Without LSLs: Water systems that exceed the Trigger Level without LSLs must re-optimize their Corrosion Control Treatment (CCT), or conduct a CCT study and obtain state approval for CCT, and conduct annual tap sampling.
- With LSLs: Water systems that exceed the Trigger Level with LSLs must also implement a goal-based LSLR program.

Water Systems Serving 10,000 People or Fewer

- Water systems serving 10,000 people or fewer that exceed the Trigger Level must evaluate small system flexibilities offered by the LCRR and identify the action they will take if they exceed the Action Level.
- These compliance alternatives include: Full LSLR within 15 years, implementation of state-approved CCT, filters and POU devices for every household — including every faucet used for cooking or drinking — throughout the system, and replacement of lead bearing plumbing materials within one year.

Communication Requirements

- Water systems that serve more than 10,000 persons that fail to meet their annual LSLR goal must conduct public outreach activities until they meet their replacement goal or they are no longer required to perform a goal-based LSLR program.
- Water systems with LSLs, galvanized requiring replacement, and/or "lead status unknown" service lines must provide information to consumers about their LSLR program and opportunities for LSLRs within 30 days of the end of the monitoring period when the Trigger Level exceedance occurred. This information must continue annually until the system no longer exceeds the Trigger Level.
- If small water systems select the POU compliance alternative, they must provide public education materials to inform users how to properly use POU devices to maximize the units' effectiveness in reducing lead levels in drinking water.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85
Source: § 141.93 Small water system compliance flexibility, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.93

Tap Sampling

Collecting Samples from Lead Service Lines

- The LCRR changed the criteria used to select sites to sample water for lead to prioritize the highest risk lead sources.
- If LSLs are present, water systems must sample water from sites with LSLs.
- Sites with galvanized service lines downstream of a LSL or lead connector are now prioritized ahead of buildings with copper pipe and lead solder.

Communication Requirements

- There are no additional communication requirements for the sample tiering criteria, but water systems will likely sample at new locations where additional outreach to these specific locations would be an important consideration.

Sampling Protocol

- The LCRR changes the LCR sample collection protocol to require a first liter sample for copper and fifth liter sample for lead to be collected at sites served by LSLs to increase the likelihood that the highest levels of lead are captured.
- Sampling is required every six months following the addition of a new source water or a long-term change in treatment unless the state determines that these changes do not warrant more frequent monitoring.

Communication Requirements

- The LCRR requires water systems to notify persons served at the sampling site with a tap sample that exceeds 15 µg/L as soon as practicable but no later than three days after receiving the sampling results. This requirement is for an exceedance of 15 µg/L at a single sampling site. System-wide notice is required within 24 hours for an Action Level Exceedance.
- The existing LCR requirement of providing sampling results to each sampling site within 30 days remains for individual samples ≤ 15 ug/L.

Find and Fix Process

- If a water system serving more than 10,000 persons receives a tap sample result exceeding 15 µg/L, it must sample a different tap in the same pressure zone, on a similarly sized main, within a half mile of the tap sample site, within 14 days. The water system must also conduct follow-up sampling at the tap sampling site that registered above 15 µg/L to determine the source of the lead.
- If a source of lead at the sampling location caused the elevated sampling result or if the source remains unknown, no additional action to fix the cause of the elevated lead is needed. If corrosive water quality is determined to be the cause, the water system must determine if operation or treatment changes are necessary to restore optimal water quality parameters.

Communication Requirements

While there is no specific requirement, water systems are encouraged to consider the following guidance:

- If the source of the lead is determined to be in the customer's plumbing, the water system should notify the customer of the issue and encourage them to fix the problem.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85
Source: § 141.82 Description of corrosion control treatment requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.82

Action Level Exceedance

As part of the 1996 amendment to the Safe Drinking Water Act, the Public Notification Rule requires varying levels of notice to be delivered by water systems to consumers when there is a problem with their drinking water. The 2016 Water Infrastructure Improvements for the Nation Act (WIIN) added a new requirement for water systems to notify the public no later than 24 hours after an exceedance of the Lead Action Level.

The LCRR adds exceedances of the Lead Action Level of 15 µg/L to the Tier 1 violation list under the Public Notification Rule, requiring the distribution of system-wide notices within 24 hours.

This 24-hour notice is required when the 90th percentile value of lead sample results exceed 15 µg/L as opposed to the three-day notice requirement for individual sample results exceeding 15 µg/L.

Communication Requirements

- In addition to the major changes, there are several communication requirements, in terms of both content and delivery, that apply to water systems that exceed the Action Level. These requirements include delivering public education materials to organizations such as pediatricians, local welfare agencies, Obstetricians-Gynecologists, and Midwives (§ 141.85 paragraph (a) and (b) at **www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85#p-141.85(a)**)
- Water systems must deliver Tier 1 notices to all water system customers within 24 hours of receiving and calculating the 90th percentile value exceeding the Lead Action Level.
- Water systems must meet Tier 1 notice requirements as defined by their primary regulator.
- A copy of the notice must be sent to the water system's primacy agency and the EPA within 24 hours.
- The mandatory health effects language must be included in public notifications.
- Water systems must translate their public education materials into other languages upon request by a customer.
- Water systems should prepare materials and messaging, and plan for dissemination in advance.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85

When a disturbance happens

The LCRR requires notification to persons served by lead, "galvanized requiring replacement," or "lead status unknown" service lines when a disturbance is caused. Provide materials in advance of water disturbances.

Disturbances include: (1) the service line being shut off or bypassed, (2) partial or full LSLR, or (3) the replacement of an inline water meter, water meter setter, gooseneck, pigtail, or connector.

Communication Requirements

+ The notice must include information on how to reduce exposure to potentially elevated lead levels.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85

Public Education Health Effects Language

Communication Requirements

The following mandatory health effects language must be included in Consumer Confidence Reports, public notices, and public education materials:

"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."

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85

Outreach to State and Local Health Agencies

+ The LCRR requires water systems to conduct annual outreach to state and local health agencies to discuss the sources of lead in drinking water, the health effects of lead, steps to reduce exposure to lead in drinking water, information on find-and-fix activities, and any changes made to corrosion control.
+ State and local health agencies include the state health department and city or county health department. For tribal systems, this would be the Indian Health Service Area, Division of Environmental Health Services program, or applicable tribal program.

Communication Requirements

+ The annual outreach to local and state health agencies must include information about find-and-fix activities conducted in the previous calendar year, including the location of tap sample sites that exceeded 15 µg/L, the result of the initial tap sample, the result of the follow-up tap sample, the result of water quality parameter monitoring, and any distribution system management actions or corrosion control treatment adjustments made.
+ Water systems must also provide school sampling results to local and state health agencies.
+ This outreach can be in the form of a letter that provides information on find-and-fix activities and school sampling results to local and state health agencies.

Source: § 141.85 Public education and supplemental monitoring and mitigation requirements, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.85

Updated Information in Consumer Confidence Reports

Communication Requirements

The LCRR requires additional information to be added to the CCR related to the LSL inventory, sampling results, and mandatory health effects statement.

- All water systems are required to include information on how to access the LSL inventory in their Consumer Confidence Report (CCR).
- Each CCR must include the 90th percentile concentration of the most recent rounds of sampling, the number of sampling sites exceeding the Action Level, and the range of sampling results for lead and copper. If water systems are on a six-month monitoring schedule, both rounds of results must be included.
- The report must include information on how to access the complete lead tap sampling data.

Source: § 141.153 Content of the reports, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-O/section-141.153#p-141.153(d)(4)(xi)

Testing at Schools and Child Care Facilities

See also Sampling and Monitoring section on pages 17-19.

The LCRR requires all community water systems to sample for lead in elementary schools and licensed child care facilities once during the first five years after October 16, 2024. Refusals and non-responses from the facilities may be accounted for to meet testing requirements.

- Water systems must compile a list of all schools and licensed child care facilities they serve.
- The LCRR also requires water systems to sample for lead in secondary schools on request during the first five years, and then on request for all schools and child care facilities thereafter.
- After all elementary schools and licensed child care facilities are tested once, water systems are required to test at all schools and licensed child care facilities they serve when requested.
- A state may waive some, or all, of these requirements for a water system if existing state or local programs meet the requirements.

Communication Requirements

- Water systems are required to contact all elementary schools and licensed child care facilities, provide information about health risks of lead in drinking water within the first five years after the compliance date, complete testing at five water outlets per school and two water outlets per child care facility, and provide EPA's 3T's Toolkit. Water systems must also contact secondary schools with information about the health risks of lead in drinking water and information on how to request sampling.
- Water systems are required to contact and attempt to test 20 percent of elementary schools and 20 percent of licensed child care facilities per year such that all facilities are sampled once over the five years.
- After the water system has met the requirements for elementary schools and licensed child care facilities once, the water system is still required to provide annual information on the health risks of lead in drinking water and provide information on how to request sampling.
- A water system must provide analytical results as soon as practicable but no later than 30 days after receipt of the results to the school or child care facility, along with information about remediation options.

Source: § 141.92 Monitoring for lead in schools and child care facilities, www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-I/section-141.92

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