

## Service line notification frequently asked questions

### Frequently Asked Questions about service line material notifications

Why are the service line material notifications being sent to the customers?

**To comply with state and federal drinking water standards**, residents must be notified by their water system if they have a service line classified as lead, galvanized requiring replacement (GRR), or lead status unknown.

Is there an immediate risk to the drinking water?

These notifications are not an indication that there is an immediate problem with drinking water. Water systems routinely test drinking water for lead and copper and must notify residents according to LCRR § 141.85 separately if there's an issue.

Should these notifications be delivered to address or the owner?

The service line material notifications must be delivered to the resident's address. In instances where there is no physical mailing address available, it is acceptable to mail it to the owner's address or water-billed address. Electronic delivery is also available as an option. Please reference the notification certification form that will be supplied by MDH.

Notices are too lengthy; can the system change the format?

Yes, the notices can be modified, and reformatted but they must retain all the rule-required information (see next question below).

What is the information required by rule in the service line material notifications?

The content in the service line material notifications depends on the service line material for which the notification is being sent. For instance, if you have lead service line, you will use the appropriate service line notification for lead, and if you have unknown service line, you will use the appropriate service line notification for unknown service lines (LCRR § 141.85 (e)(3)).

**The following content is required in all the notification templates:**

- A statement that the service line is either: LEAD, GALVANIZED REQUIRING REPLACEMENT, or UNKNOWN BUT MAY BE LEAD.
- An explanation of the health effects of lead as specified in the rule. This language is required and cannot be changed.

- Steps customers can take to reduce exposure to lead in drinking water.

**Additional content systems must provide, on each type of notice:**

- **Lead:** Information about opportunities to replace LSLs as well as programs that provide financing solutions to replace the LSL. A statement indicating that the water system is required to replace its portion of a lead service line when the property owner notifies them that they are replacing their portion of the lead service line.
- **GRR:** Information about opportunities for replacement of the service line.
- **Lead Status Unknown:** Information about opportunities to verify the material of the service line.

Additionally, any public water system that serves a large proportion of non-English speaking consumers must include information in the appropriate language(s) regarding the importance of the notice or contain a telephone number or address where persons served may contact the water system to obtain a translated copy of the public education materials or to request assistance in the appropriate language (LCRR § 141.85 (b)(1)).

## Can the systems edit the information in the notices?

The systems may add relevant information to the notices but must not remove any rule-required information (see above).

## Are the notifications required to include the “health effects of lead” section?

Yes, this information is required by rule and must be included in all three types of service line material notices. The customers that are served by lead, GRR, or unknown service lines must be made aware of the risks involved with their service lines (public right-to-know).

## How would the systems know about recommended flushing times for a private service line?

This information will be specific to each water utility situation. Based on the length and diameter of the service line, the water system should be able to estimate how long flushing should occur at specific homes. Ultimately the goal of flushing is that the homeowner will not consume stagnant water that has been sitting in a lead service line. Instead, they would consume water that is fresh from the water main or from the in-home plumbing. EPA has a tool to estimate the plumbing volume and respective flushing time recommendations. Additionally, you may contact MDH or your district engineer.

## Do water systems need to pay for lead testing in water?

## SERVICE LINE NOTIFICATION FREQUENTLY ASKED QUESTIONS

According to LCRR § 141.85 (a)(2), community water systems are only required to inform consumers how to get their water tested. This may change after Nov. 1, 2027, which is the LCRI compliance date.

### Can MDH provide more resources on children's blood testing for lead?

For more resources on getting a blood lead test, systems can direct customers to the following MDH website [Lead Information for Families](https://www.health.state.mn.us/communities/environment/lead/families.html) (<https://www.health.state.mn.us/communities/environment/lead/families.html>).

### Why is there blood testing information in the template?

MDH requires this be included to provide a resource for citizens with concerns, and to get ahead of any questions the system may receive on this. This is one of the items EPA recommends, to reduce or monitor lead exposure (LCRR § 141.85 (a)(1)(iv)).

### How are the service lines classified if the system-owned portion and customer-owned portions are different?

Please see the table on the classification of entire service line based on the system- and customer-owned portion below. This is also available on MDH website at [Service Line Classification Determination: Systems with Shared Ownership \(PDF\)](https://www.health.state.mn.us/communities/environment/water/docs/servlineclass.pdf) (<https://www.health.state.mn.us/communities/environment/water/docs/servlineclass.pdf>).

#### Service Line Classification

System-owned portion	Customer-owned portion	Classification for entire service line
Lead	Lead	Lead
Lead	Galvanized requiring replacement	Lead
Lead	Non-lead	Lead
Lead	Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead	Unknown	Unknown
Non-lead but system is unable to demonstrate it was never previously lead.	Galvanized requiring replacement	Galvanized requiring replacement
Unknown	Lead	Lead

## SERVICE LINE NOTIFICATION FREQUENTLY ASKED QUESTIONS

System-owned portion	Customer-owned portion	Classification for entire service line
Unknown	Galvanized requiring replacement	Galvanized requiring replacement
Unknown	Non-lead	Unknown
Unknown	Unknown	Unknown

**A system wants to provide additional clarification for a notification when a system-owned portion was lead, but the other portion is not. Can they modify the content?**

Yes, the system could add the information that the system-owned portion is lead and customer-owned portion is non-lead, but the required content and the lead notification must still be sent to the customer.

**How should the system deliver these notifications?**

Systems may deliver the notices by mail, or by using electronic delivery. Electronic delivery includes postcards, newsletters, water bills, or emails that contain a direct URL link to **the residents specific Service Line Material notice**. Additionally, the notice can be sent as a PDF attachment or inserted directly into the body of an email message. Be sure to meet certification form requirements to ensure an acceptable delivery method is being used.

**The lead and galvanized service line notifications reference “requiring replacement”. When are these lines required to be replaced?**

Public water systems are required to replace all lead and GRR service lines under their control by Dec. 31, 2037. The information in the notifications indicates that these service lines must be replaced.

Under LCRI § 141.84 (c) all systems with one or more lead (LSL), GRR, or lead status unknown service line in their distribution system must create and submit a service line replacement plan to MDH (more information to come on this requirement in the future). MDH currently has information on service line replacement funding at [Lead Service Line Replacement Funding Application \(https://www.health.state.mn.us/communities/environment/water/lslrfund.html\)](https://www.health.state.mn.us/communities/environment/water/lslrfund.html). MDH highly recommends replacing lead and GRR service lines as soon as possible. You can apply for funding to complete these requirements.

**The “replacing lead service lines” section provides a MDH website link on local and state programs – can the water system provide contact information of MDH?**

The MDH template indicates the consumers should contact the local water system for additional information related to service line notification and replacement process. The replacement process will be unique to each water system and thus the water system must add relevant information to their situation such as the system's replacement plan and provide their utility contact information. MDH is not the contact for these notices. These are water system required notices, and the water system is the owner. MDH may assist the system with questions. Could you provide more guidance on the information related to "a customer replacing their service line on their own" in the service line notifications?

If a customer notifies the utility that the customer replaced their portion of the lead service line, the utility has a limited number of days to replace the publicly owned portion. Minnesota's lead service line replacement funding program requires proactive planning by the utility to ensure all applicable state and federal requirements are met. If a resident replaces their portion of the service line, it may require the utility to replace the publicly owned portion on a shorter timeline than planned for by the utility. The required timeline to replace the utility-owned portion of the service line may result in the service line replacement being ineligible for the state's lead service line replacement funding program.

### **What is the violation associated with failing to complete these notifications?**

A system that fails to complete the service line notifications by the due date or completes the notifications late will receive a Tier 3 violation from MDH and will be required to public notice within a year. This public notice is typically placed in the consumer confidence report (CCR) by MDH. The system is subject to additional violations if the public notice is not completed or completed late. The system will return to compliance (RTC) once it completes the notifications and submits the certification form to MDH. Systems that fail to address violations are also subject to additional enforcement with MDH or EPA.

### **Frequently asked questions about service line notification certification form**

#### **Is the "Date of completion/Delivery:" date when customers receive the service line material notifications?**

This is the date when the system completes the delivery of all service line notices to its customers.

#### **How many attachments do the systems need to provide along with the certification form for the service line notifications?**

The attachments must contain one each of lead, GRR, and unknown notifications as present in the inventory of water system. If electronic delivery was used, a copy of the direct URL links must also be submitted.

## What is the content placed by MDH for the accessibility notification in the CCR?

The accessibility notification will be placed in the CCR by MDH starting in 2025. Per LCRR §141.84 (a) (8)-(10), the accessibility notification in the CCR will include a statement declaring the number of lead, GRR, unknown, and non-lead service lines, general description of sources used to complete the inventory, and instructions to access the service line inventory. Systems with >50,000 population must add the link to the inventory on their website. Your system can post the link to the [UMN Lead Inventory Tracking Tool \(https://maps.umn.edu/LSL/\)](https://maps.umn.edu/LSL/).

## Do systems have to notify the customer when they move into a home that is served by a lead, GRR, or unknown service line?

Yes, systems must notify new residents who are served by lead, GRR, and unknown service lines of their service line material at the time-of-service initiation. This may be done as part of the billing process. This requirement is in addition to the annual requirement to send notices to residents served by lead, GRR, and unknown service lines. Systems certify this on their required certification form.

## Is electronic signature by the water system acceptable on the certification form?

Yes, it is acceptable.

## Some systems do not have access to printer and scan, can they skip the signature?

The printed name and email can serve as proof of signature.

## What is the violation associated with submitting the certification form late?

For untimely notices or not sending notices, see FAQs in the notifications section. For certifications not performed or completed late, the system will receive a Tier 3 violation from MDH and will be required to public notice within a year. This public notice is typically placed in the CCR by MDH. The system is subject to additional violations if the public notice is not completed or completed late. The system will return to compliance (RTC) once it completes the notifications and submits the certification form to the State. Additionally, systems that fail to address violations are subject to additional enforcement with MDH or EPA.