



Drinking Water Bureau

Community and Non-Transient Non-Community Water System Service Line Public Notification Guide

Lead and Copper Rule Revisions (LCRR)

Overview

Environmental Protection Agency (EPA) regulations require New Mexico Community Water System (CWS) and Non-Transient Non-Community (NTNC) systems to submit service line inventories (SLIs) and lead service line replacement plans (LSLRPs) to the New Mexico Environment Department (NMED) no later than October 16, 2024.[1]

Public notices are an integral part of the SLI and LSLRP procedures. This Guide provides CWSs and NCNTs:

- a general overview of the required public notification tasks related to the SLI and important deadlines,
- links to relevant legal authority, and
- links to available templates that can be used for required public notices and other available guidance documents.

While these requirements and timelines are mandated by law and are generally not negotiable, EPA rulemaking is ongoing, and there may be changes made to certain timelines, or additional notices required at a later date. Please read this guide and linked materials carefully. If you have any questions, please reach out immediately to:

Diana Ixchel Aranda
NMED DWB Lead and Copper Rule Administrator
505-372-8166
lcr.manager@env.nm.gov

Or use the SLI assistance request form found online [here](#).

While all SLI-related notifications and (where required) lead exposure mitigation information should be sent to the customers served, it is recommended that the same information be sent to property owners, and authorized owner agents, where non-owner residents are impacted by LSLs. There is no safe level of lead exposure, and the goal of the LSI and related public notifications is to ensure that everyone that could be impacted by a lead service line in a CWS distribution system is notified of potential hazards and options for hazard mitigation. If you serve a significant number of non-English speakers, educational materials must be provided in appropriate languages.

[1] Detailed EPA guidance about SLI requirements, and developing and maintaining a SLI can be found in the EPA's [Guidance for Developing and Maintaining a Service Line Inventory](#). Complete requirements for SLIs and LSLRPs are found in the Code of Federal Regulations at [40 CFR Part 141 Subpart I](#).



Community and Non-Transient Non-Community Water System Regulatory Timeline for Lead Service Line-Related Public Notices

Requirement	Date	CFR references (40 CFR Part 141 Subpart I)	Links to available templates and guidance documents
Service Line Inventory (SLI) complete and submitted to NMED	No later than October 16, 2024. Service line material status notification timelines start when the SLI is submitted to NMED – plan accordingly. Updated inventories must be submitted in within 30 days of tap sample monitoring schedule (no more than annually) until no LSL, GRR or Unknown Services lines exist.	40 CFR § 141.84(a). 40 CFR 141.90(e)(3)	EPA’s Guidance for Developing and Maintaining a Service Line Inventory EPA Lead Service Line Inventory Template (Link will download Excel file)
Lead Service Line Replacement Plan (LSLRP) completed and submitted to NMED if one or more lead or GRR service lines are found, or if any service line status is unknown	No later than October 16, 2024	40 CFR § 141.84(e)(2) and 40 CFR 141.90(e)	Requirements for LSLRP can be found in 40 CFR 141.84(b) ; details about when to stop updating LSI can be found at 40 CFR 141.90(e)
Customer notification of known or potential LSL status	No later than 30 days after SLI is completed, or November 15, 2024, whichever comes first. Annually thereafter until line is replaced or determined not to be leak or GRR.	40 CFR § 141.85(e)(2) and 40 CFR 141.90(e)(3)	A sample letter templates is available free from the AWWA in Section A-8 of the free AWWA Customer Communication Guide .
Make SLI or statement of no lead lines publicly available (Systems serving more than 50,000 persons must make SLI available online)	No later than 30 days after SLI is completed, or November 15, 2024, whichever comes first.	40 CFR 141.84(a)(8) & 40 CFR 141.84(a)(9)	Public data sharing best practices and alternatives and recommendations can be found in section 7.2 of the EPA’s Guidance for Developing and Maintaining a Service Line Inventory .



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Requirement	Date	CFR references (40 CFR Part 141 Subpart I)	Links to available templates and guidance documents
Notification to state if LSL or GRR lines are discovered after submitting inventory showing no LSLs or GRRs	Within 30 days of discovery (updated inventory must be prepared) Note that an LSLRP will be required	40 CFR 141.90(e)(3)(ii)	
Notice of disturbance to a known or potential LSL (for example in conjunction with emergency repairs)	Before the affected line goes back into service	40 CFR 141.85(f)	A sample door hanger is available free from the AWWA in Section A-10 of the free AWWA Customer Communication Guide .
Customer Notice of <u>partial</u> LSL replacement	A minimum of 45 days prior to actual replacement	40 CFR 141.84(d)(1)	A sample letter is available free from the AWWA in Section A-9 of the free AWWA Customer Communication Guide .
Optional Customer Re-notification of <u>partial</u> LSL replacement	48 hours prior to LSL replacement appointment	Optional, but recommended by AWWA	A sample door hanger is available free from the AWWA in Section A-9 of the free AWWA Customer Communication Guide .
Customer Notice of <u>full</u> LSL replacement	Within 24 hours of completion	40 CFR 141.84(e)	
Risk mitigation notices (see Events Impacting the Notice Timelines section below for variations due to emergency repairs or proactive LSL replacements by customer)	Provide when the LSL is actually replaced before the service line goes back into service	40 CFR 141.84(d)(1)(i) (partial LSL replacement) 40 CFR 141.84(e)(3) (full LSL replacement)	
Provide pitcher or point of use device certified to reduce lead with 6 months of refill cartridges and instructions for use	Provide when the LSL is actually replaced but before the service line goes back into service (one pitcher or point of use device for each residence served by the replaced line)	40 CFR 141.84(d)(1)(iii) (partial LSL replacement) 40 CFR 141.84(e)(2) (full LSL replacement)	



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Requirement	Date	CFR references (40 CFR Part 141 Subpart I)	Links to available templates and guidance documents
Post-LSL replacement water tap sample for lead where requested by customer (applies to partial and full LSL replacements)	To be taken between 3 and 6 months following LSL replacement if requested by customer; results to be submitted to customer as soon as they are available.	40 CFR 141.84(d)(1)(iv) (partial replacement) 40 CFR 141.84(e)(4) (full LSL replacement)	Language regarding testing options is included in the partial and full lead service line replacement templates linked above
CCR Lead information including information on accessing SLI or statement of no LSL	Provided annually in CCR until all LSLs are removed from distribution system	40 CFR 141.84(a)(10) , 40 CFR 141.153(d)(4)(xi) & 40 CFR 141.153(f)(3)	
Completion of all LSLs replacements	<i>Proposed EPA rules include a requirement for full replacement no later than October 16, 2034. Generally, all LSLs must be replaced within 10 years at a minimum of 7% per year, though exceptions based on system size or lead testing results for small CWS (serving less than 10,000 persons) may be made extending the replacement time frame not to exceed 15 years with specific State approval.</i>	EPA Proposed Lead and Copper Rule Improvements Summary Small system compliance flexibility: 40 CFR 141.93	