Instructions for Failure to Complete Initial Service Line Inventory Notice

Initial Service Line Inventory treatment technique violation requires Tier 2 public notification and you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [[40 CFR 141.203(b](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.203#p-141.203(b)))]. Check with Drinking Water Services (DWS) to make sure you meet all its requirements.

Community systems must use one of the following methods [[40 CFR 141.203(c)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.203#p-141.203(c))]:

* Hand or direct delivery
* Mail, as a separate notice or included with the bill (if delivered within 30 days of the violation)

Non-Transient Non-Community (NTNC) systems must use one of the following methods [[40 CFR 141.203(c)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.203#p-141.203(c))]:

* Posting in conspicuous locations
* Hand delivery
* Mail

**Additionally**, both community and NTNC systems must use another method reasonably calculated to reach others if they would not be reached by the first method [[40 CFR 141.203(c)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.203#p-141.203(c))]. Such methods could include newspapers, e-mail, or delivery to community organizations. If you mail, post, or hand deliver, print your notice on your system’s letterhead, if available.

The following notice is appropriate for mailing, posting, or hand delivery. If you modify this notice, you must still include all required public notice elements from [40 CFR 141.205(a)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.205#p-141.205(a)) and leave the mandatory language unchanged (see below).

**Mandatory language on health effects (from** [**Appendix B to 40 CFR 141 Subpart Q**](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/appendix-Appendix%20B%20to%20Subpart%20Q%20of%20Part%20141)**) must be included as written and is presented in this notice in italics with an asterisk on either end.**

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [[40 CFR 141.205(d)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-Q/section-141.205#p-141.205(d))]. This language is also presented in this notice in italics with an asterisk on either end.

Corrective Action

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with initial lead service line inventory violations.

* We are working with [local/state agency] and our technical assistance provider to complete an initial service line inventory. The inventory will be completed and available for the public to view by [add timeframe].

After Issuing the Notice

Make sure to send a copy of and a certification that you have met all the public notification requirements to DWS within 10 days after the original or any repeat notice(s) [[40 CFR 141.31(d)](https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-141/subpart-D/section-141.31#p-141.31(d))]

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Failure to Complete an Initial Service Line Inventory

Public Water System: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date distributed: \_\_\_\_\_\_\_\_\_\_\_\_\_

Our water system recently violated a drinking water requirement. Although this situation was not an emergency, as our customers, you have a right to know what happened, what you should do, and what we did (are doing) to correct this situation.

We supply water to our customers through water pipes (called service lines) that connects your building to the watermain. We were required to complete and submit an inventory of all service lines to Drinking Water Services (DWS) by October 16, 2024, and classify lines as non-lead, lead, galvanized requiring replacement, or unknown. We failed to comply with this requirement.

**What should I do?**

Listed below are some steps you can take to reduce your exposure:

* Find out whether your service line or pipes contain copper, lead, or lead solder.
* Run your water for 15-30 seconds or until it becomes cold before using it for drinking or cooking. This flushes any standing lead or copper from the pipes.
* Don’t cook with or drink water from the hot water tap, lead and copper dissolves more easily into hot water.
* Do not boil your water to remove lead or copper. Boiling water makes the lead and copper more concentrated because it remains when the water evaporates.
* Call us at the number below to find out how to get your water tested for lead and copper.

What does this mean?

This is not an emergency. If it had been, you would have been notified within 24 hours. However, exposure to lead in drinking water can cause serious health effects in all age groups. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects.

*\*Infants and children who drink water containing lead in excess of the action level could experience delays in their physical or mental development. Children could show slight deficits in attention span and learning abilities. Adults who drink this water over many years could develop kidney problems or high blood pressure. \**

What is being done?

We are working with DWS and technical assistance providers to complete and submit a complete initial service line inventory. The inventory will be completed and available for the public to view by \_\_\_ / \_\_\_ / \_\_\_ at [location].

*\*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.\**

**Contact Person: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Phone: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Public Notification Certification Form**

Public Water Systems must provide initial Tier 2 public notice as soon as practical, but no later than **30 days** after receiving the DWS service line inventory - failure to report letter. You must repeat Tier 2 public notices **every three months** until the violation has returned to compliance.

Complete the section which corresponds to your water system type.

**Community Water Systems:**

Public notice mailed or directly delivered to all consumers receiving water within the form, manner and frequency required in [40 CFR 141.203](https://www.ecfr.gov/current/title-40/section-141.203).

Provide information of another method used to reach others regularly served if they would not normally be reached by the method above. Such methods could include posting in public places or internet, newspapers, email, social media, delivery to community organizations, etc.

Describe alternate method:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Non-Transient Non-Community (NTNC) Water Systems:**

Public notice posted at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ within the form, manner and frequency required in [40 CFR 141.203](https://www.ecfr.gov/current/title-40/section-141.203).

Provide information of another method used to reach others served if they would not normally be reached by the method above. Such methods could include mail, posting on the internet, newspapers, email, social media, delivery to community organizations, etc.

Describe alternate method:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

I hereby affirm that public notice has been provided to consumers in accordance with the delivery, content, format, and deadlines required in [40 CFR Part 141 Subpart Q](https://www.ecfr.gov/current/title-40/part-141/subpart-Q).

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Water System Name PWS ID#

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Date

Email a copy of the public notice and this certification form within **10 days** of completing initial public notice or any repeat public notice to**:** [dwp.dmce@odhsoha.oregon.gov](mailto:R10TribalDW@epa.gov)