

STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH DRINKING WATER SECTION

Guidance for Lead Public Education Content and Delivery Requirements Pursuant to RCSA Section 19-13-B102i(6)

Community (CWS) and Non-Transient Non-Community Public Water Systems (NTNC) that exceed the lead action level based on tap water samples are required to deliver lead public education materials to customers not later than sixty (60) days after the end of the monitoring period in which the exceedance occurs. Although there is a maximum wait period in the regulations to issue the lead education and consumer notices, the Department expects the lead public education materials and to be issued to customers within 48 hours of learning of the lead test results. This document explains the content and delivery requirements of the public education materials to assist public water systems in developing these materials.

Content of written public education materials

Requirements for CWS and NTNC systems

The elements listed below must be included in the system's written public education materials (e.g., brochures and pamphlets). The items in *italics* must be included exactly as written, except for the text in brackets for which the system shall include system-specific information. The written public education materials must be submitted to the department for approval prior to delivery.

- I) IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER. {INSERT NAME OF WATER SYSTEM} found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

- II) *Health Effects of Lead*
Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys, and can interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children, and pregnant women. Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones, and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.

- III) Provide information regarding sources of lead:
 1. Explain what lead is;
 2. Explain possible sources of lead in drinking water and how lead enters drinking water. Include information on home/building plumbing materials and service lines that may contain lead; and,
 3. Discuss other important sources of lead exposure in addition to drinking water (e.g., paint).

- IV) Discuss the steps the consumer can take to reduce their exposure to lead in drinking water
 1. Encourage running the water to flush out the lead;
 2. Explain concerns with using hot water from the tap and specifically caution against the use of hot water for preparing baby formula;
 3. Explain that boiling water does not reduce lead levels;
 4. Discuss other options consumers can take to reduce to lead in drinking water, such as alternative sources or treatment of water; and,
 5. Suggest that parents have their child's blood tested for lead.

- V) Explain why there are elevated levels of lead in the system's drinking water (if known) and what the system is doing to reduce the lead levels in homes/buildings in this area.

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- VI) *For more information, call us at {INSERT PWS PHONE NUMBER} {(IF APPLICABLE)}, or visit our Web site at {INSERT YOUR WEB SITE HERE}}. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's Web site at <http://www.epa.gov/lead> or contact your health care provider.*

Additional Content requirements for a CWS

In addition to the elements listed above, CWS shall also include the following elements in the CWS's written public education materials:

- I) Tell consumers how to get their water tested; and,
- II) Discuss lead in plumbing components and the difference between low lead and lead free.

A CWS may submit an application to the department requesting approval to exclude the Additional Content Requirements for a CWS listed above. The department may approve such application if the department determines that the CWS satisfies the following requirements:

- I) The CWS is a facility, such as a prison or a hospital, where the population served is not capable of or is prevented from making improvements to plumbing or installing point of use treatment devices; and,
- II) The CWS provides water as part of the cost of services provided and does not separately charge for water consumption.

Delivery of public education materials

CWS and NTNC systems are required to deliver the lead public education materials following the protocol listed below not later than 60 days after the end of the monitoring period in which the exceedance occurred. Although there is a maximum wait period in the regulations to issue the lead education and consumer notices, the Department expects the lead public education materials and to be issued to customers within 48 hours of learning of the lead test results. For systems that are required to conduct tap monitoring annually or less frequently, the end of the monitoring period is September 30 of the calendar year in which the exceedance occurs. If a system requires an extension beyond the 60-day deadline, the system can apply for an extension from the Department in writing explaining why it is unable to comply with the 60-day implementation deadline. An approval for the extension must be received from the Department in writing prior to the 60-day deadline.

CWS Delivery Requirements

- I) Deliver printed materials meeting the content requirements above to all bill paying consumers. This task shall be completed every 12 months for as long as the CWS exceeds the lead action level.
- II) Deliver printed materials to at-risk consumer. This task shall be completed every 12 months for as long as the CWS exceeds the lead action level.
 - 1. Deliver education materials to local public health agencies, along with an informational notice that encourages distribution to all the organization's potentially affected consumers or CWS's users. If a local public health agency provides a specific list of additional community-based organizations serving target populations, the system shall deliver the education materials to all organizations on the provided list.
 - 2. Deliver materials to the organizations listed below that are located within the system's service area, along with an informational notice that encourages distribution to all the organization's potentially affected consumers or CWS's users:
 - A. Public and private schools or school boards;
 - B. Women, Infants and Children and Head Start programs;
 - C. Public and private hospitals and medical clinics;

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- D. Pediatricians;
 - E. Family planning clinics; and,
 - F. Local welfare agencies.
3. Locate the organizations listed below within the service area and deliver materials to them, along with an informational notice that encourages distribution to all potentially affected consumers or users:
- A. Licensed childcare centers, licensed group day care homes, and family day care centers;
 - B. Public and private preschools; and,
 - C. Obstetricians-gynecologists and midwives.

A CWS serving 3,300 or fewer people may submit an application to the Department requesting approval to limit the distribution of the public education materials required above to facilities and organizations served by the system that are most likely to be visited regularly by pregnant women and children.

- III) No less often than quarterly, provide information on or in each water bill as long as the system exceeds the action level for lead. The message on the water bill shall include the following statement exactly as written except for the text in brackets for which the system shall include system-specific information: *{INSERT NAME OF SYSTEM} found high levels of lead in drinking water in some homes. Lead can cause serious health problems. For more information please call {INSERT NAME OF SYSTEM} {or visit (INSERT THE SYSTEM'S WEB SITE HERE)}.* If the system is unable to include this information in the water bills, the system shall request approval from the Department to mail this public education information to the system's consumers in a separate mailing. The system shall obtain approval of such separate mailing before mailing such information in the separate mailing.
- IV) For systems serving a population greater than 100,000, post the public education materials on the system's Web site. The posting shall remain in place for as long as the CWS exceeds the lead action level.
- V) Submit a press release to newspaper, television and radio stations. The CWS shall repeat this task once every 6 months on a schedule approved in writing by the department for as long as the CWS exceeds the lead action level. To request approval of the CWS's schedule, the CWS shall submit an application to the department outlining the schedule.

A CWS serving 3,300 or fewer people may submit an application to the requesting approval to waive this requirement provided it has distributed the required notices to every household served by the CWS. Such application shall include a written certification verifying that the CWS distributed the required notices to every household served by the CWS.

- VI) Systems shall implement at least 3 activities from 1 or more categories listed below. The system shall consult with the department regarding the educational content and selection of these activities and, after such consultation, shall request an approval of the education content and activities selected in writing. The system shall obtain department approval of educational content and the activities selected before implementing such activities. This task shall be completed every 12 months for as long as the CWS exceeds the lead action level.
- 1. Public Service Announcements;
 - 2. Paid advertisements;
 - 3. Public area informational displays;
 - 4. E-mails to consumers;
 - 5. Public meetings;

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6. Household deliveries;
7. Targeted individual consumer contact;
8. Direct material distribution to all multi-family homes and institutions; and,
9. Other methods approved by the department.

A CWS serving 3,300 or fewer people may submit an application to the Department requesting approval to limit the implementation of the activities listed above to at least one (1).

- VII) A CWS may submit an application to the department requesting approval to use perform the tasks listed in the NTNC Delivery Requirements Section below. The department may approve such application if the department determines that the CWS satisfies the following requirements:
1. The CWS is a facility, such as a prison or a hospital, where the population served is not capable of or is prevented from making improvements to plumbing or installing point of use treatment devices; and,
 2. The CWS provides water as part of the cost of services provided and does not separately charge for water consumption.

NTNC Delivery Requirements

A NTNC shall repeat the tasks below at least once during each calendar year in which the system exceeds the lead action level.

- I) Post informational posters on lead in drinking water in a public place or common area in each of the buildings served by the system; and
- II) Distribute informational pamphlets or brochures, or both, on lead in drinking water to each person served by the NTNC. A NTNC may use electronic transmission in lieu of or combined with printed materials if the use of electronic transmission achieves at least the same coverage as use of printed materials. A NTNC requesting approval to use electronic transmission in lieu of or combined with printed materials shall submit an application to the department requesting approval to use electronic transmission. The department may approve such use of electronic transmission only if such use achieves at least the same coverage as use of the printed materials.

Discontinuing Delivery of Public Education Materials

A CWS or NTNC system may discontinue delivery of public education materials if the system has met the lead action level during the most recent 6 month monitoring period. The system shall resume the delivery of public education materials if the system subsequently exceeds the lead action level during any monitoring period.