



Did this disturb a lead service line?

A decision flowchart for water utility operations and compliance staff

*Based on [40 CFR § 141.85\(f\)](#)

How to use this guide: This tool is for water utility staff responsible for operations, compliance, engineering or customer notification decisions under the Lead and Copper Rule Improvements (LCRI). Use this tool any time work may have disturbed a service line in a non-replacement scenario. The LCRI defines a separate protocol for service line replacement.

Follow these steps in order to find out:

- If notification is required
 - Who must be notified
- What materials must be provided
 - When notification must occur

STEP 1: Was the service line disturbed?

A service line disturbance includes any activity that could dislodge pipe scale and release particulate lead into the water that didn't involve a service line replacement. Service line replacements follow a different communications protocol under the LCRI.

Some examples of disturbances include:

- Operating a valve on a service line or meter setter
- Cutting or reconnecting a service line at the water main
- Physical work or vibration that impacts the service line such as a test pit
- Loss of pressure in the service line
- Replacing a meter

Decision: Did your work disturb a service line?

Yes

Go to Step 2

No

This rule does not apply, no action required.

STEP 2: What is the status of the disturbed line?

Notification requirements apply only if the disturbed line is listed in your inventory as or found at the time of disturbance to be:

- Lead
- Galvanized requiring replacement (GRR)
- Lead status unknown *(If the line is listed as unknown in the inventory, but as a result of the disturbance is confirmed to be non-lead, a notification is not required.)*

Decision: Is the disturbed line lead, GRR or unknown?

Yes

Go to Step 3

No (confirmed non-lead)

No action required, stop here.

STEP 3: What type of work was performed?

The level of response depends on if the work physically cut or separated a section of the service line pipe compared with a vibration disturbance.

Decision: Did the work involve replacing:

- An inline water meter
- A meter setter or connector
- A water main where the service line pipe was physically cut or disconnected
- A gooseneck
- A service line valve

Yes

Go to Step 4A & 4B

No

Go to Step 4A

STEP 4A: Standard response: required notifications

For all disturbances (like valve operation, vibration, loss of pressure) you must notify:

- Residents/occupants at the impacted address, and
- Any associated customers, like non-resident property owners

Provide both of the following:

1: Lead disturbance notification

Written materials need to include:

- A clear explanation that work may have temporarily increased lead levels at the tap
- Your water system's contact info
- Content that meets public education requirements in 40 CFR 141.85(f) and 40 CFR 141.85(a)(1) (ii-iv, vi)

2: Flushing instructions

- Step-by-step flushing guide to remove the dislodged particulate lead
- Instructions should be specific to the affected connection, not generic

STEP 4B: Enhanced response: additional requirements

If work physically cut or separated a fitting, valve, meter or a section of the pipe, the risk of disturbing the lead scale is higher.

In addition to all items in Step 4A, you must also provide residents at the location with:

3: Lead certified filter and cartridges

- A pitcher filter or point of use (POU) device certified for lead reduction (filters must be certified to meet NSF/ANSI standard 53)
- Clear instructions on how to use it and and maintain the filter
- Replacement cartridges for a minimum 6 months of filter usage

When must notification happen?

The timing depends on if the service was interrupted and who is being notified. Regardless, for any account holder that does not live on-site (like a rental property) the account holder/customer must be notified of the disturbance **within 30 days of the disturbance in addition to notifying the residents per the below.**

Situation	Who to notify	Deadline
Service was shut off or bypassed	Residents/occupants	Before service is restored; Don't turn water on until materials are delivered
Service remained on through work	Residents/occupants	As soon as possible, but no later than 24 hours after disturbance

This tool is intended for internal decision support and does not constitute legal advice. Confirm how this applies to your system with your state primary agency or with regulatory council.

* This guide covers notification requirements for disturbances only. Replacement requirements under §141.84(h) are substantially similar, except systems must offer a follow-up sample with a replacement. See §141.84(h) for further clarification.