



Service Line Inventory Material (SLIM) Notification Guidance

The federal Lead and Copper Rule Revisions (LCRR) (§ 141.85(e)) requires all NTNC and Community public water systems (PWSs) to provide notification of materials to persons served by lead, galvanized requiring replacement (GRR), or lead status unknown (unknown) service lines.

Requirements

Community and Non-Transient Non-Community PWSs that have lead, GRR, or lead status unknown service lines reported on their Service Line Inventory (Inventory) must provide notification to customers and all persons served by those lines. Service Line Inventory Material (SLIM) Notifications are required to be issued annually by December 31st until the entire service connection is no longer a lead, galvanized requiring replacement (GRR), or lead status unknown (unknown) service line. There are three Ohio EPA approved notification templates available, one for each material type that requires the direct notification. These notifications were first required on November 15, 2024.

PWSs are also required to submit an example of each type of notification issued (lead, GRR, or unknown) and the completed Service Line Inventory Material Notification (SLIM) Verification Form annually to DDAGW_Lead_Inventory@epa.ohio.gov by January 30th.

Who Receives the Notice?

Notification is required for customers and all persons served by the water system when their service line is classified as lead, galvanized requiring replacement (GRR), or lead status unknown.

Customers and persons served include the owner and all occupants of the building or home. If tenants are not billed separately, the owner/management should receive the notices with a request to post the information in areas for tenants to see. If tenants are billed separately, each tenant is considered a person served and should receive a notice.

NTNC or Single-Structure Community PWSs with a limited distribution system (correctional institutions, nursing homes and care facilities, etc.) should either directly deliver the notice(s) or post the notice(s) in common areas for all consumers to view. For systems that are schools, day cares, nursing homes, or correctional institutions, the legal guardians or power of attorney shall also be directly provided with the notification.

No service line material notice is required for locations where the service line is categorized as fully "Non-Lead" on the inventory submission.

When Must Customers be Notified?

Customers and all persons served can be notified as soon as the service line material is given a classification of lead, GRR, or unknown; however, they must be notified no later than December 31st. This notification must be completed annually until the service line is no longer classified as lead, GRR, or unknown.

For new customers, water systems must provide the necessary notice at the time-of-service initiation. This could look like a new account being created at a recently sold property or a new tenant at an apartment (if they are an account holder).

Delivery of Notice

Delivery of the notice to customers/persons served must be completed by mail or another direct delivery method approved by Ohio EPA. In addition to mail delivery, Ohio EPA is allowing hand delivery, email, and posting notices. NTNC and Single-Structure Community PWSs (e.g., correctional institutions, nursing homes, and care facilities) can post the notice(s) in conspicuous locations throughout the building(s).

Email delivery must provide the specific notice in a manner that is direct; this could look like an email with the specific notice attached, embedded in the body of the email, or a direct URL link that is sent to the bill-paying customer or persons served. If the PWS is aware of a customer's inability to receive a notice by electronic delivery, they must provide the notice by an approved alternative method. For questions about direct delivery, please reach out to the Ohio EPA Lead and Copper Team for clarification.

The tables below outline examples of approved and not approved delivery methods.

Approved Delivery Methods for Service Line Inventory Material (SLIM) Notice	
Delivery Method	Description
Hand Delivery – Paper Copy	Handing the specific notice to each bill-paying customer or dropping off the specific notice to each bill-paying customer.
Mail – Paper copy	Mail a paper copy of their specific SLIM Notice to each bill-paying customer.
Mail – Notification that the SLIM notice is available on website	Mail each bill-paying customer a notification that states the SLIM Notices are available and provides a direct URL to their SLIM Notice where it can be viewed.
Email – Direct URL to SLIM	Email each bill-paying customer with a direct link to their specific SLIM Notice.
Email – Notice sent as an attachment to the email	Email each bill-paying customer with their specific SLIM Notice as a file attachment (EX: PDF, Word doc, etc).
Email – Notice sent as an embedded image in an email	Email each bill-paying customer with their specific SLIM Notice information embedded in the body of the email.

Not Approved Delivery Methods for Service Line Inventory Material (SLIM) Notice	
Delivery Method	Description
Mail - Generic paper copy	Mailing a generic paper copy with nonspecific information on service line materials does NOT meet the requirements.
Mail - Link to a website where the notice is not specific	Mailing each bill-paying customer a non-direct URL that requires the customer to search for the SLIM does NOT meet the requirements.
Email – Notice sent as a link in an attachment to the email	Emailing each bill-paying customer an attachment with a link to the SLIM does NOT meet the requirements.

Completing the Template

To help PWSs meet notification content requirements, Ohio EPA has developed notification templates for the three types of material classifications: lead, GRR, and unknown. PWSs may choose to include additional language as long as it meets the requirements outlined in § 141.85 (e)(3) of the federal Lead and Copper Rule Revisions (LCRR). Notification templates are not required to have the consumers name and address listed at the beginning of each notification, but consumers must be provided their notice directly.

Step 1: Service Line Material Classification – Determining the Appropriate Notice

If a service line has more than one material type that requires a notice, issue the notice for the material type with the highest risk. For example, if the line is made of galvanized material on the customer owned side of the line and lead on the public water system owned side, use a Lead Service Line Notification. If the lead line (PWS owned) is removed, but the galvanized line (customer owned) remains, the customer would then start to receive a GRR Service Line Notification. PWSs can also choose to include a statement for the additional material found (e.g., include that both lead and GRR materials were found in their service line). As replacements occur or unknowns are determined, reclassification of the service line should occur. **The order of material risk is the following: lead, GRR, then unknown.**

The table below shows examples of different materials in a single service line and the corresponding material notice that must be delivered.

System-Owned Portion Material	Customer-Owned Portion Material	Classification - Material notice sent
Lead	Lead, Galvanized, Non-lead, Unknown (any type of material)	Lead Service Line Notification
Lead	Galvanized	Lead Service Line Notification
Lead, Galvanized, Non-lead, Unknown (any type of material)	Lead	Lead Service Line Notification
Non-Lead	Lead	Lead Service Line Notification
Unknown	Lead	Lead Service Line Notification
Non-Lead, but previously lead or system is unable to demonstrate it was not previously lead	Galvanized	Galvanized Requiring Replacement (GRR) Service Line Notification
Unknown	Galvanized	Galvanized Requiring Replacement (GRR) Service Line Notification
Unknown	Non-Lead	Lead Status Unknown (Unknown) Service Line Notification
Unknown	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Galvanized	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Non-Lead	Unknown	Lead Status Unknown (Unknown) Service Line Notification
Galvanized	Non-Lead	No notice sent
Non-Lead	Non-Lead	No notice sent
Non-Lead and never previously lead	Galvanized	No notice sent
<p><i>Notes:</i> Non-Lead material includes copper, plastic, steel, iron, etc. Line installed after the Ohio lead service line ban (9/12/1988) are also considered non-lead “Non-Lead – Other”. Classification looks at both sides of the service line materials regardless of ownership for notice requirements.</p>		

Step 2: Filling out the Template

At the beginning of each template, PWSs will find brief instructions detailing how to complete and edit the template. This highlighted text should be deleted before issuing the notice. In the notification templates, everything highlighted in yellow with black text is required to be edited based on the instruction provided. Sections that are highlighted in yellow with red text are optional and will be listed as (OPTIONAL) or (OPTIONAL, LIKELY REQUIRED WITH LCRI IN 2027). These optional areas can be filled in if applicable or desired; if not used, they should be deleted before issuing to customers. Sections should not be removed from the notification template unless listed as optional in red. PWSs can include additional language as they see fit, as long as it meets the requirements outline in § 141.85 (e) of the LCRR.

Template Instruction Examples:

Highlighted text should be edited: Required text that must be filled in.

Red text is optional, delete if not using: Optional text/sections that can be filled in if information is appropriate to provide.

Step 3: Ensuring all Required Content is Included

Depending on the material notice being used, there are individual content requirements that must be met. Content requirements for each type of material notice are listed below. To meet the requirements of § 141.85 (e)(3), Ohio EPA recommends following the instructions provided in the notice templates. To further assist, Ohio EPA has suggested language that can be used if the PWS does not have any relevant information to provide.

Required Content: LCRR § 141.85 (e)(3)

Lead Service Line Notification: A statement that the person's service line is lead, an explanation of the health effects of lead that meets the requirements of paragraph §141.85 (a)(1)(ii), steps persons at the service connection can take to reduce exposure to lead in drinking water, information about opportunities to replace lead service lines as well as programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line, and a statement that the water system is required to replace its portion of a lead service line when the property owner notifies them they are replacing their portion of the lead service line.

Galvanized Requiring Replacement (GRR) Service Line Notification: The notice must include a statement that the person's service line is galvanized requiring replacement, an explanation of the health effects of lead that meets the requirements of paragraph §141.85 (a)(1)(ii), steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities for replacement of the service line.

Lead Status Unknown (Unknown) Service Line Notification: The notice must include a statement that the person's service line material is unknown but may be lead, an explanation of the health effects of lead that meets the requirements of paragraph §141.85 (a)(1)(ii), steps persons at the service connection can take to reduce exposure to lead in drinking water, and information about opportunities to verify the material of the service line.

Health Effect language must match paragraph §141.85 (a)(1)(ii) of either LCRR or Lead and Copper Rule Improvements (LCRI).

LCRI Language: *“There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreases in IQ and attention span. Lead exposure can also result in new or worsened learning and behavior problems. The children of persons who are exposed to lead before or during pregnancy may be at increased risk of these harmful health effects. Adults have increased risks of heart disease, high blood pressure, kidney or nervous system problems. Contact your health care provider for more information about your risks.”*

Required Content: “What Can You do About Your Service Line” Section

Under this section, PWSs will find requirements to insert specific information depending on the material notice being used. This information should be specific to what the PWS is offering and any planned projects available. Please see the table below for content requirements and examples of what could be included.

Material Notice	Required Content – LCRR § 141.85 (e)(3)	Potential information to include	Example of what to include if PWS does not have information available
Lead Service Line Notification	Information about opportunities to replace lead service lines as well as programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line	Insert what your PWS can offer to help the property owners with their replacement (e.g., planned replacement events scheduled in the distribution system, a contractor or person they can contact for replacement work, any financial opportunities that your PWS is able to offer, or other additional opportunities or financial information).	<p>Replacement Opportunities: “As your PWS, we are required to provide you with information on opportunities for replacing your lead line. Currently, we do not have any scheduled opportunities. Once available, you will be notified.”</p> <p>Financial Solutions: “As your PWS, we are required to provide you with information on programs that provide financial solutions to assist with the replacement of your portion of the lead service line. Currently, we do not have any programs. Once available, you will be notified.”</p>
Galvanized Requiring Replacement (GRR) Service Line Notification	Information about opportunities for replacement of the service line	Insert what your PWS can offer to help the property owners with their GRR service line replacement (e.g., planned replacement events in the distribution system, a contractor or person they can contact for replacement work, or additional opportunities).	“As your PWS, we are required to provide you with information on opportunities for replacing your GRR line. Currently, we do not have any scheduled opportunities. Once available, you will be notified.”
Lead Status Unknown (Unknown) Service Line Notification	Information about opportunities to verify the material of the service line	<p>Insert what your PWS can offer to help the property owners identify or verify their unknown material type (e.g., scheduled educational campaigns, onsite surveys/inspections, or PWS projects planned to help determine the material).</p> <p>If the privately owned side of the service line is unknown, this may be a good time to ask your customer to investigate their line material. An example customer survey template is available on Ohio EPA’s website.</p>	<p>If the Unknown material is on the PWS side: “As your PWS, we are working to identify the material of the public portion of the service line.”</p> <p>If the Unknown material is on the customer owned side: “To limit cost and disruption to residents, we need your help identifying your home’s service line. Please use the (QR code or attached survey) or contact us for a paper copy to complete a short questionnaire.”</p> <p>If unsure or no opportunities to provide: “As your PWS, we are required to provide you with information regarding opportunities to determine the material of the service line. Currently, we do not have any planned opportunities. Once available, you will be notified.”</p>

Copies of the completed notifications should be retained in your files for a minimum of 12 years.

SLIM Notification Verification Form

By January 31st annually, PWSs are required to submit the completed SLIM Verification Form with a copy of each type of notification used to Ohio EPA. This form requires systems to provide information on how many notices were issued, the types of notice(s) used, the delivery method used, and the delivery date.

While the PWSs are required to provide the total number of notices being sent, only one completed example of each type of notice is required to be submitted as proof. For example, if a PWS has lead and unknown service lines in the distribution, they would issue Lead Service Line Notification(s) and the Lead Status Unknown (Unknown) Service Line Notification(s) to the specific customers with those lines. Once completed the PWS would submit the SLIM Verification Form to Ohio EPA and include an example of one Lead Service Line Notice issued and an example of one Lead Status Unknown (Unknown) Service Line Notice issued. The total count of each is required to be reported on the form.

By January 31, 2025, and annually afterwards, PWSs must submit the completed SLIM Verification Form and notice examples to DDAGW_Lead_Inventory@epa.ohio.gov.

Copies of the completed verification forms should be retained in your files for a minimum of 12 years.

SLIM Templates

[Lead Service Line Notification](#)

[Galvanized Requiring Replacement \(GRR\) Service Line Notification](#)

[Lead Status Unknown \(Unknown\) Service Line Notification](#)

[SLIM Verification Form](#)

Service Line Replacement

It is important to remember to follow the current service line replacement requirements. This can be found in [PWS-06-001: Guidelines for Water Line Repairs and Replacements in Areas with Lead Service Lines](#). Also, AWWA C810-17 *Replacement and Flushing of LSL* for replacement should be followed. Replacement requirements will change with the Lead and Copper Rule Improvements (LCRI) proposed for 2027.

Questions

For more information, please visit [Ohio EPA's Service Line Inventories website](#), or contact the Lead and Copper Compliance Team at DDAGWLeadCopper@epa.ohio.gov.