



Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Kathleen A. Theoharides
Secretary

Martin Suuberg
Commissioner

February 11, 2022

Important Notice

Getting Ready for the Lead and Copper Rule Revisions: Service Line Inventories

Attention: Community and Non-transient Non-community Public Water Suppliers

As MassDEP's Drinking Water Program (DWP) gets ready to assist COM and NTNC public water systems (PWS) with the LCRR and the Lead and Copper Rule Improvements (LCRI), we will regularly be providing information on tips and tools to ensure that you are implementing or preparing to implement programs for lead abatement for safe drinking water.

Under Section §141.84 of the Lead and Copper Rule Revisions (LCRR), for the first time EPA will require all community systems (COM) and non-transient non-community systems (NTNC) systems to develop and submit a service line inventory (including public and private side) by October 16, 2024.

Below you will find information on:

- Service line inventories
- Getting consumers involved with LSL identification
- Examples of successful service line inventories and removal programs
- Grant opportunities

Service Line Inventories

Date service line inventory must be submitted to MassDEP/DWP

October 16, 2024. *We encourage you to submit your service line inventory as early as possible to ensure that you can access technical assistance, if needed, prior to the deadline.*

Areas to pay attention to when developing your inventory

MassDEP/DWP is continuing to work on defining the data points and structure of the data that will be accepted by MassDEP/DWP and will have more information to share with you soon. In the meantime, focus on the following areas when developing your inventory:

- Location Identifier: Examples include the street address, block, customer number, etc.
- Service Line Material: The categories in the LCRR are lead, galvanized requiring replacement, unknown, and non-lead. See EPA's definitions below. This applies to both the public and private side. MassDEP will also include identification of Goosenecks/Pigtails (if known) in the inventory.
 - Lead: where a portion of the service line is made of lead.
 - Galvanized requiring replacement: Any galvanized service line that is or has ever been downstream of a lead service line, or of an unknown material service line. If the water system is unable to demonstrate that the galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line.
These lines are included in the lead service line replacement program because they have demonstrated the ability to absorb lead from a lead service line, and release it in the future. Replacing these lines will reduce a source of lead to the customers.
 - "Unknown": where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line, such as where there is no documented evidence supporting material classification.
Please note that EPA has dis-incentivized having large numbers of unknown service lines by requiring annual public education and other requirements for all service connections listed as unknown. Please see 40 CFR 141.85 for more information at <https://www.federalregister.gov/documents/2021/01/15/2020-28691/national-primary-drinking-water-regulations-lead-and-copper-rule-revisions>.
 - Non-lead: EPA defines non-lead service lines as those with evidence-based record, method, or techniques that they are not lead or galvanized service lines requiring replacement. The water system may classify the actual material of the service line (i.e., copper, plastic).
- Verification of Service Materials for Each Address: PWS will need to take steps to verify service line materials and records. Verification may include sequential sampling, field inspections, records verification, statistical analysis, etc. A reliable inventory is important for service line replacement planning and notification of customers served by lead service lines. Water suppliers are not expected to physically verify every service line by October 16, 2024, but use of the example methods are some of the first steps PWSs take to create a reliable inventory.

Please note: MassDEP is developing a service line inventory template form with the required fields and associated guidance for PWSs.

Making your service line inventory public

All systems must make their service line inventories available to the public, and systems serving greater than 50,000 people must post their service line inventory on the internet. Here are some examples of systems with public service line inventories:

- BWSC: <https://www.bwsc.org/environment-education/maproom/lead-service-map>
- Malden: <https://www.cityofmalden.org/222/Find-out-if-You-Have-Lead-Service-Lines>
- Cincinnati: <https://gcww.maps.arcgis.com/apps/webappviewer/index.html?id=0a170c268c694e46a8a4e394630df0bd>

Please note: MassDEP/DWP is working on developing a program to assist PWS to post their inventories on the web.

What if you do not believe your system has lead service lines or galvanized service lines requiring replacement?

PWSs that can demonstrate that they have only non-lead service lines must submit an initial inventory by the compliance date but are not required to provide inventory updates to MassDEP or to the public. If, in the future, your system finds a lead service line within its distribution system, it must prepare an updated service line inventory on a schedule established by MassDEP/DWP.

Is MassDEP/DWP going to require excavation work to determine service line materials for those that are unknown where written documentation is lacking or non-existent?

MassDEP/DWP will not require excavation work to determine unknown service line materials by the compliance date unless directed by EPA to do so in the future. We recommend PWSs do their best due diligence to identify all unknown service line materials using different methods such as profile sampling, records verification, inspections, among others.

What to do NOW to get ready

Start preparing your service line inventory by finding and organizing the existing records/data. PWSs should survey all records documenting the materials used to construct and repair the distribution system and buildings connected to the distribution system:

- Original Service Cards
- Building Permits
- Plumbing Codes and Plumbing Permits
- Distribution Maps and Drawings;
- Inspection and Maintenance Records;
- Meter Installation Records;
- Capital Improvement and Master Plans;
- Standard Operating Procedures;
- Operation and Maintenance Manuals;
- Permit Files;
- Existing Water Quality Data;
- Interviews with Senior Personnel, Building Inspectors, and Retirees; and
- Community Survey.

Once all data is gathered, it should be combined into one database for lead service lines (LSLs) that meets MassDEP/DWP minimum data requirements.

MassDEP/DWP is continuing to work on defining the data points and structure of the data that will be accepted by MassDEP/DWP and will have more information to share with you soon.

Getting consumers involved with LSL identification

MassDEP/DWP is encouraging PWSs to work with local community groups to create an outreach strategy for targeting households with unknown service line materials.

MassDEP/DWP is also creating a web app (application) that will allow customers to report their service line material directly to their water supplier using pictures. MassDEP/DWP will have more information to share with you soon.

Examples of successful service line inventories and removal programs

To see how other PWSs in MA have been developing their service line inventories and lead replacement programs, see: <https://youtu.be/jcuup5Qnvag>

Grant opportunities

- MassDEP is working with the Massachusetts Clean Water Trust (CWT) on a grant program through the Drinking Water State Revolving Fund (DWSRF) to assist PWS with the development of their service line inventories. These inventories will serve as the basis for their LSL Replacement Programs. **More information will be available soon.**
- **Principal Forgiveness for Lead Abatement Projects**
PWS may benefit from \$30 million in funds available to provide principal forgiveness (grants) to DWSRF borrowers to help finance eligible lead abatement projects. These grants will help borrowers reduce the principal of the SRF loan and are in addition to standard subsidies offered by the DWSRF to disadvantaged communities. Importantly, these funds must be used by September 30, 2025, so PWS who wish to access these grants must participate in the DWSRF annual project solicitation that opens at the beginning of July of 2022, for consideration during the financing cycles in calendar year 2023. Project proposals (Project Evaluation Forms) must be submitted to MassDEP by August 19, 2022, for financing in calendar year 2023. For details visit <https://www.mass.gov/lists/state-revolving-fund-applications-forms>
- **Eligible Lead Abatement Projects**
Eligible lead abatement projects may include planning and construction projects such as service lines inventories, materials surveys, mapping, full LSL replacements, lead removal, corrosion control, capital improvements, and water main rehabilitation. Projects to be financed are selected using a priority ranking system based upon protection of public health, improved compliance, and affordability. Information is available at the following link: <https://www.mass.gov/service-details/lead-abatement-loan-forgiveness-program>

Learn More About DWSRF and MA Lead Abatement Grant Opportunities

If you and your community leaders would like to know more about the DWSRF loan program, please send contact Ms. Maria Pinaud, MassDEP/DWSRF Director at maria.pinaud@mass.gov to schedule a virtual meeting or call to discuss the benefits of the DWSRF program, the loan application process, and answer your questions.

Also attached is the Service Line Inventory Infographic. This is a quick guidance that can be shared with your staff to remind them about the upcoming service line inventory requirements.

Look for more tips and tools coming soon. Thank you for your continued work to provide safe drinking water.

If you have any questions on this information, please contact the MassDEP/DWP at program.director-dwp@mass.gov.
Subject: LCRR Getting Ready.

Yours Truly,



Yvette DePeiza
Program Director
MassDEP/BWR Drinking Water Program

Attachments

File: Y/DWPWQA/LCRR

LCRR

Service Line Inventories

Under Section §141.84 of the Lead and Copper Rule Revisions (LCRR), for the first time EPA will require systems to develop and submit a service line inventory (SLI) (including public and private side). See below to learn what will be required.

1

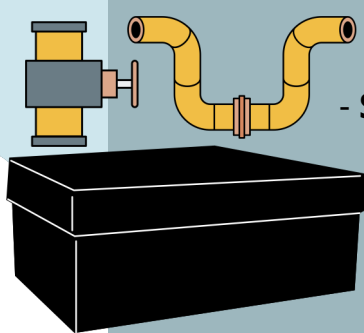
Who is impacted by the LCRR and SLI requirements?

All community and non-transient non-community (NTNC) systems

When must the SLI be submitted to MassDEP?

October 16, 2024. Please note that all systems must make their SLIs available to the public and systems serving greater than 50,000 people must post their SLI on the internet.

Areas to focus on when developing your inventory



- **Location Identifier**- it could be the street address, block, customer number, etc..
- **Service Line Material** for both public and private side. MassDEP will also include identification of Goosenecks/Pigtails (if known) in the inventory.
- **Verification of service line material** for each address.

MassDEP is developing a SLI form with guidance for PWSs. **Coming soon*

2

3

Service Line classification

Lead : where a portion of the service line is made of lead.

Galvanized requiring replacement: Any galvanized service line that is or has ever been downstream of a lead service line, or of an unknown material service line. *These lines are included in the lead service line replacement program because they have demonstrated the ability to absorb lead from a lead service line and release it in the future. Replacing these lines can reduce a source of lead to the customers.*

“Unknown”: where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line. *Please note that EPA has dis-incentivized having large numbers of unknown service lines by requiring annual public education and other requirements for all service connections listed as unknown. Please see 40 CFR 141.85 for more information.*

Non-lead: EPA defines non-lead service lines as those with evidence-based record, method, or techniques that they are not lead or galvanized service lines requiring replacement. The water system may classify the actual material of the service line (i.e., copper, plastic).

What if I have no lead service lines and no galvanized service lines requiring replacement?

PWSs that can demonstrate that they have only non-lead service lines must submit an initial inventory by the compliance date but are not required to provide inventory updates to MassDEP or the public.

4

For more information see

<https://www.mass.gov/lists/communication-to-public-water-suppliers#emails-and-direct-mail-> or contact program.director-dwp@mass.gov Subject: LCRR

EPA's website: <https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule>

LCRR

Developing Service Line Inventories - Checklist

A Service Line Inventory is important because it helps water systems and communities take action to eliminate possible sources of lead in drinking water. See steps below to start developing your LSL inventories.

1

Find and Organize Existing Data

PWSs should survey all records documenting the materials used to construct and repair the distribution system and connect buildings to the distribution system, including:

- Original service cards
- Building Permits
- Plumbing Codes and Plumbing Permits
- Distribution Maps and Drawings
- Inspection and Maintenance Records
- Meter Installation Records
- Capital Improvement and Master Plans
- Standard Operating Procedures
- Operation and Maintenance Manuals
- Permit Files
- Existing Water Quality Data
- Interviews with Senior Personnel, Building Inspectors, and Retirees
- Community Survey

Once all data is gathered, it should be combined into one database that meets DEP minimum data requirements.

2

Remember to identify service line materials for BOTH public and private side.

Determine if any galvanized service lines on the customer side were formerly downstream of an SLI.

Develop a strategy for identifying and verifying the lead status of unknown service lines.

MassDEP is developing a tool to help consumers share their LSL information with PWS for their verification. **Coming soon*

3

Validate the Inventory

There are some options to verify your inventory:

Profile Sampling
Records Validation
Field Inspection
Records Invalidation
Statistical Analysis
Homeowner Verification

4

Complete the Inventory and remember to share it with the public!

There are different options to share the inventory with the public-interactive maps, PDFs, dashboards, etc.

MassDEP is developing a program to help PWSs share inventories with the public. **Coming soon*

For more information see

<https://www.mass.gov/lists/communication-to-public-water-suppliers#emails-and-direct-mail-> or contact program.director-dwp@mass.gov Subject: LCRR

EPA's website: <https://www.epa.gov/ground-water-and-drinking-water/final-revisions-lead-and-copper-rule>