Frequently Asked Questions (FAQ) about the Lead and Copper Rule Revisions (LCRR)

Lead Service Line inventory (LSLI) and Lead Service Line Replacement Plan (LSLRP)

1) **Who is impacted by the LCRR and LSL inventory requirements?**

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

2) **When must the LSL inventory be submitted to MassDEP?**

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

3) **Are PWSs required to make the lead service line inventory publicly available?**

   Yes, all public water systems (PWSs) must make their lead service line inventory publicly accessible. The publicly accessible inventory must provide a location identifier (e.g., such as a street address, customer number, block, intersection, landmark, or any other geographic marker associated with the service line) for each lead or galvanized requiring replacement service line. Please note, if the system serves more than 50,000 people, you must make your inventory publicly available online.

4) **What are the basic requirements for the service line inventory?**

   Public water systems must conduct an inventory of all service lines. Inventory must include all service lines connected to the public water distribution system regardless of ownership status (e.g., where service line ownership is shared, the inventory would include both the portion of the service line owned by the water system and the customer-owned portion of the service line.

   Service line materials must, at a minimum, be classified as one of the following:

   - **Lead:** where the service line is made of lead both partial and full.
   - **Galvanized requiring replacement (GRR):** 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.
   - **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).
   - **Lead status 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 disincentivized 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 141.84 for more information.

5) 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 of October 16, 2024 but are not required to provide subsequent inventory updates to MassDEP or the public. If, in the future, your system finds a lead service line within its distribution system, it must prepare an updated LSL inventory on a schedule established by MassDEP drinking water program (DWP).

Systems with only non-lead service lines can complete and submit the LCRR-NONLSL-CERT form (more information about the LCRR-NONLSL-CERT form will follow) to MassDEP/DWP for approval once their service line inventory is ready.

If the LCRR-NONLSL-CERT is approved by MassDEP the PWS will not be required to make the inventory publicly accessible on-line and provide routine inventory updates to the State or to the public. In lieu of this requirement the PWS must post a written statement declaring that it has no LSL, GRR, or unknown service lines and explaining the sources used to make that determination.

Please note, in accordance with 310 CMR 22.19, DWP expects PWS to have an inventory of all piping material, including service lines. We encourage PWS to use this opportunity to develop and maintain such information if it is not currently compiled or maintained.

See Questions 10, 31 and 32.

6) What if only part of the service line is lead?

Any portion of the service line that is lead results in that service line being considered a lead service line.

7) What if there is no proof that a galvanized service line was never downstream of a lead line? Do these lines need to be replaced?

If the water system is unable to demonstrate that a galvanized service line was never downstream of a lead service line, it must presume there was an upstream lead service line and the galvanized line will be classified as "galvanized requiring replacement" per the LCRR.

8) Are PWSs required to verify each service line material?

Currently, the EPA LCRR does not require verification of all service lines and records. States have the option to adopt regulations that are more stringent than the federal regulation. To maximize public health protection from lead and to ensure that PWS are

providing their consumers and MassDEP with service line information that is based on their best program for providing the most accurate and best available knowledge, MassDEP/DWP recommends that all PWSs implement a program that includes verification of service line materials and records, when appropriate. 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.

Please note that MassDEP is evaluating whether to include verification in the MA Drinking Water Regulations.

9) How to identify the service line materials?

Start preparing your LSL 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, including:

- Utility records including customer complaint investigations, and all historical 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;
- Field/visual inspection with or without full excavation;
- MassDEP's Crowdsourcing "app" for consumer service line material identification;
- Interviews with Senior Personnel, Building Inspectors, and Retirees; and,
- Community Survey.

Once all data are gathered, it should be combined into one database for LSLs that meets MassDEP/DWP minimum data requirements.

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

See Questions 5, 31 and 32.

11) 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, and inspections, among others.

12) Are households with galvanized requiring replacement subject to the fifth liter sample?

The fifth liter (L5) should only be collected for lead service line. (141.86(b)(3))

13) What are the Lead Service Line Replacement Plans?

All water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must submit a lead service line replacement (LSLR) plan to the department by October 16, 2024. The lead service line replacement plan must be sufficiently detailed to ensure a system is able to comply with the lead service line replacement requirements in accordance with this section.
The plan must include a description of:

a. A strategy for determining the composition of lead status unknown service lines in its inventory;

b. A procedure for conducting full lead service line replacement;

c. A strategy for informing customers before a full or partial lead service line replacement;

d. For systems that serve more than 10,000 persons, a lead service line replacement goal rate recommended by the system in the event of a lead trigger level exceedance;

e. A procedure for customers to flush service lines and premise plumbing of particulate lead;

f. A lead service line replacement prioritization strategy based on factors including but not limited to the targeting of known lead service lines, lead service line replacement for disadvantaged consumers and populations most sensitive to the effects of lead; and

g. A funding strategy for conducting lead service line replacements which considers ways to accommodate customers that are unable to pay to replace the portion they own.

14) Are all PWSs required to submit a lead service line replacement plan?

No, only water systems with one or more lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must complete and submit a LSLR plan. The LSLR plan is intended to help systems comply with the lead service line replacement requirements of the LCRR and to ensure systems have a strategy for identifying lead status unknown service lines.

15) Will PWSs be required to identify the following service line materials in their LSL inventory?

- **a. brass service lines (both full and partial) — brass contains lead and these are long sections of pipe**
- **b. galvanized service downstream of an <u>existing</u> lead gooseneck**
- **c. galvanized service downstream of a <u>replaced</u> lead gooseneck**

Yes, the materials described above should be included in the service line inventory.

Brass service line does not currently meet the EPA definition of a lead service line or galvanized service line. Therefore, it does not need to be replaced at this time, but see below.

EPA defines a "Galvanized Requiring Replacement" line as those where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a "Lead Status Unknown" service line. Being downstream of a lead connector does not make a galvanized service line a galvanized requiring replacement. However, under the LCRR, the water system must replace any lead connector (gooseneck/pigtail) it owns when encountered during planned or unplanned water system infrastructure work. Please note that MassDEP is evaluating whether to include replacement of brass service lines as a requirement in the MA Drinking Water Regulations. States have the option to adopt regulations that are more stringent than the federal regulations.

Note: MassDEP will be revising the MA DW Regulations for Lead and Copper in the near future; State regulations must be at least as stringent as the federal regulations. Although brass service lines may not be common throughout the country, they are known to exist in New England. Brass is a metal alloy that often contains lead. There have been several regulations passed to reduce lead in drinking water. In 2011 the Lead Reduction Act changed the definition of "lead-free" from 8.0 percent to 0.25 percent and required new pipes, pipe fittings, plumbing fittings, and fixtures to be lead free nationwide. The final regulatory revisions to NPDWR for lead and copper published in the Federal Register January 15, 2021, identify that brass plumbing fittings and fixtures are known to leach lead, and thus should be considered when the system is triggered into conducting a site assessment (find-and-fix) following a tap sampling site above 15 ug/L for lead. Even though LCRR does not address brass service lines, an existing brass service could be a source of elevated lead. MassDEP strongly recommends that brass service lines be

identified for replacement and removed even if the PWS is currently meeting the lead AL. MassDEP is evaluating whether to require replacement of brass service lines as part of the LSLR program. States have the option to adopt regulations that are more stringent than the federal regulations.

16) If the PWS has a lead ALE, is the PWS required to remove the materials listed in 15a-c under LCRR? If not, will MassDEP require removal in MA regs? [1]

Brass service line does not currently meet the EPA definition of a lead service line or galvanized service line. Therefore, it does not need to be replaced at this time. Galvanized downstream of an existing or replaced lead connector does not meet the definition of galvanized requiring replacement. Therefore, it doesn't need to be replaced. See more detailed information in Q15.

17) Is the replacement of materials listed in 15a-c eligible for DWSRF?

Yes. Brass is a metal alloy that often contains lead and should be replaced (see Q18 below) and therefore, is DWSRF eligible.
Under the LCRR, the water system must replace any lead connector (gooseneck/pigtail) it owns when encountered during planned or unplanned water system infrastructure work; therefore, this work is DWSRF eligible.

18) Are brass service lines classified the same as lead and galvanized downstream of lead?

No, see Question 16. According to EPA, brass service lines do not meet the definition of a lead service line. However, EPA and MassDEP encourage systems to replace them and therefore replacement of brass service lines are DWSRF eligible. We also encourage water suppliers to identify them in their inventories.

19) A Massachusetts municipality that we work with is pretty certain that the only lead components in their water systems are goosenecks. Given that, must this municipality still conduct an inventory to research and confirm that the goosenecks are the only lead components in their system, and do they need to prepare an LSL Replacement Plan for approval by MassDEP? Based on your email below, we do understand that goosenecks need to be replaced if they are encountered as part of other infrastructure projects and that, if a municipality is preparing an LSL Replacement Plan for other LSL components, it must also address the removal of goosenecks if they are also present. However, if the municipality has good reason to believe that goosenecks are the only LSL components present, are they required to expend effort to research and confirm this to be the case? If such confirmation is required, can the LSL Planning Loan be used to cover the costs for the research effort?

MassDEP is yet to promulgate its LCRR regulations and EPA has plans to issue revisions to the LCRR called the LCRI (Lead and Copper Rule Improvements).

- If a municipality/PWS is certain, based on its review of all service line records and other data sources such as active/retired employee interviews, that it has no lead goosenecks it will be expected to describe its review process and submit a declaration that states it has no LSLs, no GRRs and no unknowns. If so, then a LSLRP is not required under the LCRR.
- Every PWS must submit an inventory and a statement (if applicable) "declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines." The alternative statement "must include a general description of all applicable sources…used to make this determination." [quotes from 40 CFR 141.84(9)]. See Q31 for more information.
- If the municipality/PWS is not prepared to submit the required declaration, then we would suggest the PWS seek funding to conduct an inventory.

Please note: If MA includes lead goosenecks in its definition of LSLs in its LCRR regulations goosenecks would be included with other LSLs and PWS would need to submit both an inventory and a LSLRP.

20) What are the CCR changes that were included in the LCRR?

PWS should include in their Consumer Confidence Reports (CCR) a statement that a service line inventory has been prepared and include instructions to access the service line inventory and the non-lead service line certification, if applicable; the CCR report shall notify consumers that complete lead tap sampling data are available for review and shall include information on how to access the data.

21) Requirements for Implementation of LSLs:

(i) Am I correct in understanding that LCRR does not require PWSs to actually implement their 5-year LSL Replacement Plans unless the action level is exceeded?

PWSs that serve >10,000 people must conduct Lead Service Line Replacement (LSLR) when either:

1) their 90th percentile lead level exceeds the lead Action Level (AL) of 15 ppb, or
2) when their 90th percentile lead level exceeds the lead Trigger Level (TL) of 10 ppb but is at or below the lead AL.

The difference between these two cases is the rate of LSLR. Those above the AL must replace Lead Service Lines (LSLs) at a rate of 3% calculated on a two-year rolling basis.

Those that only exceed the TL must replace LSLs at a rate approved by the state. Community PWSs that serve <=10,000 people and NTNC PWSs are subject to the small water system compliance flexibility options in the LCRR which may result in them conducting LSLR should they exceed the lead AL but need not if the PWS recommends and the state approves a different compliance option.

(ii) If that's true, is it correct that individual LSLs that are sampled under the new tiered structure and exceed the 15 ppb for lead will need to be replaced at an individual level?

MassDEP/DWP is currently not aware of an individual LSLR requirement in the LCRR based on each homeowner's result. There are several situations that require the PWS to communicate with such homeowners (e.g., delivery of individual test results, notification of known or potential service lines containing lead, notification due to a disturbance of a known or potential service line containing lead, information when the PWS exceeds the lead TL and outreach when the PWS fails to meet the LSLR goal) but none of these require the PWS to offer to remove individual LSLs with the exception of when the homeowner themselves removes the portion of a LSL that they own.

(iii) We are aware of the MassDEP template spreadsheet for service line inventories. If a water system is not seeking funding for the planning effort under the state's funding programs, is use of the MassDEP template still required for compliance?

The LCRR requires all systems to develop a lead service line inventory, make it public and update it with every annual or triennial monitoring round. If lead service lines are present the system must also develop a lead service line replacement plan. The LCRR also requires that customers be notified annually if their home/building is served by a lead service line. The MassDEP template spreadsheet for service line inventories is not required. However, MassDEP will only accept the required service line inventory in a CSV format that follows the rules defined in the template instructions for the MassDEP template spreadsheet for service line inventories.

22) Can you please confirm – we need to identify the material of the service line where it enters the building. We do not need to create an inventory of distribution line material, correct? We primarily operate VSS with populations of less than 500.

You don't need to identify the distribution system material. You do need to identify the entire service line material between the water main to the meter (enters the building). This includes the private side and public/customer side.

23) If a home/building was built after the 1986 lead ban, what documentation will the DEP accept as proof that the service line is lead free?

If you have confidence that service lines in structures built after 1986 are not lead you can classify them in the spreadsheet as "UNK-NOLG – Unknown, definitely does not contain lead or galvanized". Please see Q32 and Q44 for more information.

24) Where can I get the LCRR Tool training materials?

- A copy of the video training is available on the MassDEP YouTube channel at https://www.youtube.com/watch?v=xxi05Zh5QyM.
- The agenda is located at https://www.mass.gov/doc/massdep-service-line-inventory-training-agenda-september-29-2022 (permalink: https://www.mass.gov/media/2499811/)
- The Q&A's are located at https://www.mass.gov/doc/qa-from-lcrr-service-line-inventory-training (permalink: https://www.mass.gov/media/2499521/)

25) I understand that to be considered a replacement under LCRR, a complete service line needs to be replaced. Does this include the gooseneck if one is present?

You are correct, if the private side is lead and not replaced the service will be considered a lead service line in the system service line inventory.

If you are aware of lead goosenecks or discover a lead gooseneck in the field the expectation is that it is removed. You are not required to make an extra effort to identify goosenecks during the initial inventory identification when records are not available.

Please note: If MA includes lead goosenecks in its definition of LSLs in its LCRR regulations goosenecks would need to be replaced.

26) Secondly, under the LCRR, my understanding is that a utility has to offer to replace, but NOT offer to pay for replacement of the service line on private property. Has MassDEP offered guidance on what a good faith effort on the part of a utility is, even if a customer refuses to pay or allow work to be performed?

MassDEP currently has not provided specific criteria to indicate a good faith effort. Such guidance will be provided when MassDEP finalizes its' LCRR regulations and guidance for PWS. However, MassDEP/DWP strongly recommends that PWS develop and include the following programs to support the public health protection goal of removing lead service lines:

a. An active outreach program, including use of social media, local health departments and other local partners, to educate consumers on the health impact of lead and the need to remove lead service lines and "get the lead out". The success of the PWS outreach program should be evaluated and updated annually to improve positive responses.

b. Rebate or incentive programs for homeowners to remove lead service lines. For example, see Boston Water and Sewer Program at https://www.bwsc.org/environment-education/lead-your-water/lead-replacement-incentive-program#:~:text=To%20apply%2C%20call%20the%20Lead,and%20is%20subject%20to%20availability .
c. PWS utilizing the DWSRF programs should take full advantage of the below market-rate interest loans for LSL Replacement. The EPA's DWSRF Lead Service Line Replacement Grant also requires 49% of the grant to be allocated as principal forgiveness to Disadvantaged Communities; this is in addition to the tiered principal forgiveness available to Disadvantaged Communities for all SRF loans. For more information see https://www.mass.gov/info-details/the-disadvantaged-community-program#loan-forgiveness-
d. Documentation of all refusals of homeowners to remove lead service lines. If a PWS exceeds the lead action level this documentation should also be reported to MassDEP and copied to the local Board of health and MA DPH.

You may also find the Lead Service Line Replacement Collaborative information of interest. See https://www.lslr-collaborative.org/about-us.html#:~:text=The%20Lead%20Service%20Line%20Replacement%20Collaborative%20is%20a%20joint%20effort,to%20millions%20of%20American%20homes.

27) Lastly, regarding funding for private side lead service lines, I've heard many times over the years that public funds cannot be used for work on private property (i.e., the private side of a water service line between the curb stop and the meter). However, this EPA publication https://www.epa.gov/sites/default/files/2020-12/documents/ej_lslr_funding_sources-final.pdf states that "Complete service line replacement is an eligible expense regardless of pipe material and ownership of the property on which the service line is located." Can you please clarify what funding is available for both public AND private side replacement?

This is correct. Public and private side (curb to meter) LSL replacement is Drinking Water SRF eligible. You may wish to review local PWS rebate and incentive programs and the Lead Service Line Replacement Collaborative information.

28) Lead goosenecks:

(i) I have a question related to lead goosenecks; the EPA guidance indicates a service line is not considered a Lead Service Line if the only lead pipe serving the building is a lead gooseneck.

Correct, EPA has not included "connectors" in their definition of a lead service line.

(ii) Also, a galvanized service line that was never downstream of a Lead Service Line but is downstream of a lead gooseneck is not considered a Galvanized Pipe Requiring Replacement.

Correct, EPA defines a "Galvanized Requiring Replacement" line as those where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a "Lead Status Unknown" service line. Being downstream of a lead connector does not make a galvanized service line a galvanized requiring replacement.

Please note that MassDEP has not yet proposed our new lead regulations and States have the option to adopt regulations that are more stringent than the federal regulations.

29) Are we required to remove inactive services (i.e., cut off at the main) which are lead (e.g. services which previously led to buildings but the building has been razed and replaced with a parking lot)?

No. PWS are not required to remove inactive services as long as the service will not be used in the future to serve water. However, please note that the inactive lead service line should be identified in your initial service line inventory.

30) Are we required to, or do you foresee, that the "sensitive population" value will be required in order to prioritize replacement, as is stated in the EPA's Guidance for Developing and Maintaining a Service Line Inventory?

- **a. Section 5.5: Predictive Modeling**
  - **i. "Information on sensitive subpopulations and socioeconomic factors can be added as layers to enhance planning and prioritization of LSLR (Muylwyk, 2020)"**
- **b. Appendix A: Inventory Methodology**
  - **i. "3. How did you prioritize locations for service line materials investigations? For example, did you consider environmental justice and/or sensitive populations, did you use predictive modeling, and/or did you target areas with high number of unknowns?"**

MassDEP supports EPA's guidance on sensitive subpopulations and socioeconomic factors when developing replacement plans. For example, a family childcare facility in an EJ community with an unknown service line should be high priority for a verification, or if known to be lead, a LSL planned for removal. State and Federal funding opportunities for LSLR projects will incorporate, and favor, projects considering Environmental Justice as a component for the eligibility.

31) During the LSLI training a question was asked about water systems who have no lead – you responded that there was provision of the Rule that if they could document that, the Rule would allow that water system to provide a statement that

they have no lead in their system instead of a detailed inventory. Could you provide the regulatory reference for that section of the federal Rule?

Systems that have no lead, galvanized requiring replacement, or lead status unknown still have to submit the initial detailed service line inventory by the due date (October 16, 2024) to the State. The inventory should have all service lines categorized as non-lead or a non-lead subclassification (e.g., copper or plastic) and zero service lines categorized as lead, GRR, or unknown. However, such systems are not required to have the detailed inventory publicly accessible. Instead, a written statement declaring that the distribution system has no LSL or GRR service lines is acceptable (Template to be provided by MassDEP /DWP). Also, water systems whose inventories contain only non-lead service lines are not required to provide inventory updates to the State or to the public, provided the water system completes and submits the LCRR-NONLSL-CERT form (more information about this form will follow) to MassDEP/DWP for approval after their service line inventories have been completed. **If the LCRR-NONLSL-CERT** is approved by MassDEP the PWS will not be required to make the inventory publicly accessible on-line and provide routine inventory updates to the State or to the public. In lieu of this requirement the PWS must post a written statement declaring that it has no LSL, GRR, or unknown service lines and explaining the sources used to make that determination

If, in the future, such a water system finds a lead service line within its system, it must prepare an updated inventory. See regulatory reference below.

> *40 CFR 141.84(a)(9): When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the requirements in paragraph (a)(8) of this section using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines. The statement must include a general description of all applicable sources described in paragraphs (a)(3), (5), and (6) of this section used to make this determination.*

Please note, in accordance with 310 CMR 22.19, DWP expects PWS to have an inventory of all piping material, including service lines. We encourage PWS to use this opportunity to develop and maintain such information if it is not currently compiled or maintained.

32) Can a public water system get a waiver from the lead service line inventory and replacement plan requirements of the Lead and Copper Rule Revisions if the system was completely constructed in 1986 (i.e., after the state lead ban)? Or does the system still need to submit an inventory? Again, if it is known that the system was built in 1986, does there have to be any "verification" of the service line materials?

All systems need to submit their inventories by the compliance date. There is no specific waiver provision in the LCRR. However, PWSs that can demonstrate that they have no lead, galvanized requiring replacement or lead status unknown service lines may submit a

written statement, in addition to the inventory, by the compliance date but are not required to provide subsequent inventory updates to MassDEP or the public. To make such demonstration PWS must complete and submit to MassDEP for review and approval the LCRR-NONLSL_CERT (more information about this form will follow).

If, in the future, the system finds a lead service line within its distribution system, it must prepare an updated LSL inventory on a schedule established by MassDEP/DWP. See Q31 for more details.

Specific to the LCRR, see 40 CFR 141.84(a)(9): When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the requirements in paragraph (a)(8) of this section using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines. The statement must include a general description of all applicable sources described in paragraphs (a)(3), (5), and (6) of this section used to make this determination.

Please note, in accordance with 310 CMR 22.19, DWP expects PWS to have an inventory of all piping material, including service lines. We encourage PWS to use this opportunity to develop and maintain such information if it is not currently compiled or maintained.

33) What is DEP/DWP recommendations on Predictive Models?

MassDEP does not endorse third-party products and/or services including Predictive Modeling products, but we encourage consultants to educate their clients on the product being considered so that they can make an informed decision. PWSs considering Predictive Models, i.e., machine learning, for gathering service line information, required under the LCRR, need to ensure the product meets their goals for both the short and long term. MassDEP recommends that PWSs fully evaluate the options and ask all the necessary questions to make an informed decision prior to agreeing to any contract. Some considerations when evaluating Service Line Predictive Modeling products:

1. *Will the product meet the following objectives :*
    - Provide a Service Line Inventory acceptable for MassDEP reporting (See MassDEP Service Line Inventory (SLI) Workbook at https://www.mass.gov/media/2480901. Instructions can be found at https://www.mass.gov/media/2480886/)
    - Ability for improvement over time
    - Meet confidence level of 95% or greater
    - Minimize resource inputs to alternatives (in-person verification)
    - Meet LCRR October 16th, 2024, reporting deadline

2. *What can be the obstacles to getting this done?*

- Level of effort and resources to provide the data inputs, *i.e.*, collecting and feeding data to the predictive model to achieve desired confidence level.
    - PWSs should be looking for a confidence level of 95% or greater and MassDEP strongly recommends PWS verify 20 - 25% of the predicted service lines through field inspections.
- Data
    - Does your PWS have the capacity to handle the data output of a predictive model?
    - What format will the data be presented?
    - Whose responsibility is it to put this model into the MassDEP accepted format?

- Responsibilities for data collection
- *Cost?*
    - Upfront cost
    - Future maintenance costs

3. *Has the model encountered barriers in the past?*
    - Ask for references or examples from systems like yours
    - Follow up with provided references for their experience in their own words.

4. *If the project doesn't succeed, what are the implications?*
    - What are the guarantees to meet the 2024 deadline?

5. *PWS must carefully evaluate all products.*

PWS that are considering, or are in the process of using, a predictive or statistical model to create their SLI should review the MassDEP Statistical (Predictive) Modeling Guidance posted on the LCRR webpage for more information on MassDEP requirements [https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download].

34) What is MassDEP's stand on Swordfish Electroscan technology?

MassDEP does not endorse or promote any particular technology, but we encourage consultants to educate their clients on the particular product being considered so that they can make an informed decision. Public Water Systems considering electroscan technology or any other type of technology for gathering service line information required under the Lead and Copper Rule Revisions (LCRR), need to ensure the product meets their goals for both the short and long-term including whether the technology can disrupt or destroy the existing coating on the pipe possibly causing more lead to be released after using the technology. MassDEP recommends that PWS fully evaluate the options and ask all the necessary questions to make an informed decision prior to agreeing to any contract.

This FAQ is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

PWS are again reminded to carefully evaluate all products.

All PWS that are considering using electrical resistance testing when creating their SLI should review MassDEP's Electrical Resistance Testing Guidance, which includes requirements PWS must follow if using this verification method [https://www.mass.gov/doc/lead-and-copper-rule-revisions-lcrr-electrical-resistance-testing-guidance/download].

35) Resources

- Lead Service Line inventory template form with the required fields and associated guidance for PWS:
  - This workbook can be used to document the necessary information in your lead service line inventory for your use and submission to the state. This Excel workbook is located at https://www.mass.gov/media/2480901.
- The instructions for using the workbook are located at: https://www.mass.gov/doc/instructions-mass-lead-serviceline-identification-ma-lsli-web-app
- Mass Lead Service Line Identification (MA-LSLI) Web App:
  - MassDEP developed a "crowdsourcing application" (hereafter referred to as "the App") to assist both consumers and PWS to identify lead service lines. The App is a web-based tool for consumers to assist in the identification of lead service lines. The App is a collection of Smartsheet forms, sheets, and workflow automations that allows your customers to submit photos of their service line for identification purposes. This can be helpful for PWS in compiling their service line inventories and in prioritizing lead service line replacements.
  - The customer is asked to upload one or more photos of their service line and, by following EPA's service line identification guide "Protect Your Tap: A Quick Check for Lead," are asked to attempt to identify their service line material. Water suppliers that sign up to use this service will receive email notifications when their customers make submissions and will have access to their own Smartsheet to keep track of submissions.
- The App is located at https://app.smartsheet.com/b/form/f9ee39b7972f443ca63e8b936cd7f92b.
- Instructions for enrolling in the use of the App are located at https://www.mass.gov/doc/instructions-mass-lead-service-lineidentification-ma-lsli-web-app.
- EPA's "Protect Your Tap: A Quick Check for Lead" is located at https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead.
- MassDEP has prepared an example letter for PWSs to adapt and use when offering the App to their customers. You can download the template at

https://www.mass.gov/doc/template-letter-for-pws-to-send-to-customers-forma-lsli-app-availability.

- Lead Service Line Replacement Plan Summary Form. According to the US Centers for Disease Control (CDC), "because no safe blood level has been identified for young children, all sources of lead exposure for children should be controlled or eliminated." See https://www.cdc.gov/nceh/lead/prevention/sources/water.htm. To expedite MassDEP public health protection goals, PWSs are expected to both identify lead service lines and have a plan to remove and replace them as soon as possible. PWSs will be expected to have such plans by October 16, 2024, or, as part of applying for DWSRF funding, to remove lead service lines. The Lead Service Line Replacement Plan Summary Form allows a PWS to begin to document their strategy to remove all lead service lines. The Plan Summary must address: a) all lead service lines, b) all lines that are galvanized requiring replacement (GRR), c) a strategy for identifying the material in all lines categorized as "unknown," and d) plans for general lead education and consumer transparency to inform consumers about why it is necessary to remove lead plumbing and lead service lines. MassDEP has developed the Lead Service Line Replacement Plan Summary Form to aid PWS in developing their Lead Service Line Replacement Plans.
- Lead Service Line Replacement Plan Summary Form is located at https://app.smartsheet.com/b/form/8f676b18cc224884a7069e3cc727f968 . PWSs should use the Lead Service Line Replacement Plan Summary Form to document their plans until MassDEP LCRR regulations and programs are finalized.
- Funding Opportunities are or will be available for PWS to address Lead.
- Lead Service Lines Inventory and Replacement Plan Loans with 100% Loan Forgiveness: MassDEP is accepting Lead Service Lines planning loan applications, on a rolling basis, while funding is available. Please see the Application. Eligible activities for these planning programs include:
  - Lead Service Line Inventory - Completing a comprehensive Lead Service Line Inventory for both the public and the private portions that will be made publicly available. This comprehensive inventory project could include activities such as inspecting physical service lines, compiling paper records, initiating a consumer lead service line identification program, but must include submitting the complete inventory to MassDEP in a digital format specified by MassDEP or in an alternate format approved by MassDEP that can be readily compiled into the MassDEP data system.
  - Lead Service Line Replacement Program - Preparing a Lead Service Line replacement program for the PWS that complies with the LCRR. PWS' lead service line replacement plans need to incorporate the MassDEP public health protection goal by planning to replace all lead service lines in 5 years or as soon as possible. Use of the MassDEP-provided tools will ensure the submission of a lead service line inventory and lead service line replacement program summary in a digital form acceptable to MassDEP.
  - The information from the training is available:

- A copy of the video training is available on the MassDEP YouTube channel at https://www.youtube.com/watch?v=xxi05Zh5QyM.
- The agenda is located at https://www.mass.gov/doc/massdep-service-line-inventory-training-agendaseptember-29-2022 (permalink: https://www.mass.gov/media/2499811/).
- The Q&A's are located at https://www.mass.gov/doc/qa-from-lcrr-service-line-inventory-training (permalink: https://www.mass.gov/media/2499521/).

36) Lead goosenecks:

a) Are lead goosenecks considered "connectors" or "services"?

Lead connectors are not considered part of EPA's service line definition. However, states may choose to expand this definition when they propose state regulations.

b) If lead gooseneck is upstream of a galvanized water service pipe, is this water service pipe considered a "Galvanized requiring replacement" service?

No. Under the federal definition the connector itself does not play a role in determining if a galvanized service line a GRR.

37) In Massachusetts, are lead pipes considered hazardous waste?

Lead scrap metal, including lead pipes, destined for recycling are considered a generated hazardous waste **exempt** from MA Hazardous Waste Regulations 310 CMR 30.000.

38) Is it acceptable to leave lead lines in place?

Lead pipes left in the ground wouldn't be considered a generated hazardous waste; therefore, it wouldn't be subject to the MA Hazardous Waste Regulations 310 CMR 30.000.
Please note MassDEP strongly encourages removal and recycling of lead pipes.

39) Does Massachusetts have any regulations, or guidance that applies to lead disposal?

Lead scrap metal, including lead pipes, destined for recycling is exempt from the hazardous waste regulations. For more information see 310 CMR 30.202(5)(f) at https://www.mass.gov/doc/310-cmr-30000-hazardous-waste-regulations/download.

40) What happens if someone samples the soil or groundwater due to lead pipes' leakage and lead concentrations are high?

If the lead pipe contaminates soil or groundwater, the Reportable Quantity would likely apply if found to be at/above the Reportable Quantity.

41) Regarding the LSLI, how much weight do historic rules and regulations carry? Can a system classify service lines as non-lead based on local rules and regulations stating that after certain year (i.e., 1930) the use of lead pipe is prohibited?

A water system can classify those buildings constructed after the local or state lead ban date (for MA the effective date was 01/01/86) as not containing lead service lines. However, in addition, the system still needs to use another type of verification to classify buildings constructed prior to the local or state ban (i.e., buildings constructed prior to 1930).

An effective way to start validating your inventory is by using historic rules and regulations. However, systems should be aware that local lead bans prior to the federal/state ban could have been affected by external events such as wars. For example, the war years in the 1930's made many materials scarce and diverted necessary materials to war production, which could had had an effect in local lead bans.

Systems with historic rules and regulations effective prior to war time (i.e., local lead ban effective in 1930 prior to latest federal/state ban (1986)) need to make sure their rules and regulation documents were never replaced and that all subsequent versions also prohibit the use of lead service lines.

For examples of service line verification methods see Q.9.

42) Does the service line inventory that PWSs are required to complete by 10/2024 include all service lines regardless of type (domestic and fire suppression)?

Yes, systems must include all service lines (40 CFR 141.84(a)(2)), regardless of the actual or intended use. These include, for example, service lines with non-potable applications such as fire suppression or those designated for emergency. These service lines could be repurposed in the future for a potable or non-emergency use. Water systems must include in their inventory service lines connected to vacant or abandoned buildings, even if they are unoccupied and the water service is turned off.

43) What if I have no lead service lines and no galvanized service lines requiring replacement, do I still need to do the initial service line inventory?

Yes. See questions 5, 31, and 32.

44) If a utility were to select in the MassDEP Service Line Inventory Workbook the designation "[UNK-NOLG] unknown, definitely does not contain lead or galvanized steel" would the service still count as a lead service as with the other unknown designation?

If a utility were to select UNKNOWN - DEFINITELY DOES NOT CONTAIN LEAD OR GALVANIZED either for the public or private side of the service line, it is certifying that that section of the service line is known not to be lead or galvanized requiring

replacement based on a verification method even though the actual material is unknown. Verification methods such as records of pipe size or installation date are acceptable ways to make this identification. If both the public and private sides of the service line are UNK-NOLG, the entire service line will be classified as non-lead service under the LCRR.

45) Will the EPA allow a Public Water System who knows there is no lead in their service territory to submit a statement in lieu of submitting an inventory as is stipulated in 40 CFR 141.84(a)(9)?

No, Under 141.84(a)(1), "All water systems must develop an initial inventory by October 16, 2024, and submit it to the primacy agency in accordance with § 141.90(e).

Under 141.84(a)(9), "When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the requirements in paragraph (a)(8) of this section using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines. The statement must include a general description of all applicable sources described in paragraphs (a)(3), (5), and (6) of this section used to make this determination."

The stipulation does not alter the requirement to comply with paragraph (a)(1). Rather, if a system has no lead, GRR or unknown services lines paragraph (a)(8), which contains the requirement that "[t]he service line materials inventory must be publicly accessible" can be met by making a written statement available rather than the full inventory.

Systems can certify that the distribution system has no lead service lines, galvanized requiring replacement or unknown service lines using MassDEP LCRR-NONLSL-CERT form which will be located at https://www.mass.gov/lists/lead-copper-forms-templates (more information about this form will follow).

46) What are the requirements if a system finds a lead service line within its distribution system after being approved for a LCRR-NONLSL-CERT?

If the PWS were to identify LSL or GRR service lines after approval of the LCRR-NONLSL-CERT, the PWS will be required to notify MassDEP within 30 days of such discovery and submit an updated service line inventory and removal plan on a schedule established by the state.

47) If PWS later finds a GRR or unknown service line, must they notify MassDEP within 30 days?

Yes. In accordance with 40 CFR 141.90(e)(3)(ii), the PWS should notify the state within 30 days of such discovery.

48) How should systems without LSLs classify their service lines in the inventory?

The initial inventory must include the system- and customer-owned portions of all service lines in the system's distribution system (40 CFR §141.84(a)(2)) and each service line or portion of the service line must be categorized as non-lead or a non-lead subclassification (e.g., copper or plastic) and zero service lines categorized as lead, galvanized requiring replacement (GRR), or unknown.

49) What other requirements regarding the inventory are water systems with (inventory demonstrated) only non-lead service lines subject to under the LCRR?

Systems whose initial inventory contain only non-lead service lines may provide a written statement that the system has no LSLs or GRRs and a general description of methods used to make the determination to meet inventory public accessibility requirements of the LCRR as per 40 CFR §141.84(a)(9):

"When a water system has no lead, galvanized requiring replacement, or lead status unknown service lines (regardless of ownership) in its inventory, it may comply with the requirements in paragraph (a)(8) of this section using a written statement, in lieu of the inventory, declaring that the distribution system has no lead service lines or galvanized requiring replacement service lines. The statement must include a general description of all applicable sources described in paragraphs (a)(3), (5), and (6) of this section used to make this determination."

Paragraph (a)(8) cited above is referring to the requirement for systems to have their service line materials inventory publicly accessible. Therefore, systems with LSLs, GRRs and/or unknowns must make their service line materials inventory publicly accessible.

Include language in their annual Consumer Confidence Report (CCR) explaining how customers can access the inventory or provide a statement with the description of methods used to make the determination (40 CFR §141.153(d)(4)(xi)). *NOTE: this requirement applies to community water systems (CWSs) only*. However, MassDEP may provide a CCR for NTNC systems. When/if MassDEP provides a CCR to a NTNC system it must be posted. If the system subsequently finds an LSL or GRR service line (40 CFR §141.90(e)(3)(ii)) notify the state within 30 days and prepare an updated inventory on a schedule established by the state.

See Q45 for more information about certification of Non-lead service lines.

50) What is the definition for galvanized services with lead goosenecks? If a PWS has galvanized services with lead goosenecks, will they be considered galvanized service requiring replacement or not requiring replacement?

EPA defines a "Galvanized Requiring Replacement" line as those where a galvanized service line is or was at any time downstream of a lead service line or is currently downstream of a "Lead Status Unknown" service line.

Being downstream of a lead connector does not make a galvanized service line a galvanized requiring replacement. However, under the LCRR, the water system must replace any lead gooseneck, pigtail, or connector it owns when encountered during planned or unplanned water system infrastructure work. -

51) When a PWS replaces a lead gooseneck and galvanized service do they have to complete the LSL education with the customer and provide a water pitcher for 6 months?

If the disturbance of a lead, galvanized requiring replacement, or lead status unknown service line results from the replacement of a gooseneck, pigtail, or connector, the water system must provide the person served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance, public education materials, a pitcher filter or point-of-use device certified by an American National Standards Institute accredited certifier to reduce lead, instructions to use the filter, and six months of filter replacement cartridges.

If the system replaces a gooseneck, pigtail, connector, and the rest of the service line can be categorized as non-lead the system doesn't have to provide a pitcher or complete public education.

Please remember that it is important to always notify consumers of any disturbance created from construction or pipe replacement. This provision may change depending on the Lead and Copper Rule Improvements (LCRI) to be released.

52) When will MassDEP finalize the LCRR rule for Massachusetts?

The Drinking Water Program is drafting the regulations and we anticipate publishing a proposed rule in early 2024. Please note that EPA is currently working on the lead and copper rule improvements (LCRI) where the Agency is working on improvements to the lead service line replacement (LSLR) requirements, they are also working on strengthening compliance tap sampling to better identify communities most at risk of lead in drinking water and to compel lead reduction actions, and reducing the complexity of the regulation through improvement of the action and trigger level construct. EPA intends to promulgate the LCRI prior to October 16, 2024. For more information see https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements

53) What changes has EPA indicate it may make to the LCRR?

EPA is currently working on the lead and copper rule improvements (LCRI) where the Agency is working on improvements to the lead service line replacement (LSLR) requirements, they are also working on strengthening compliance tap sampling to better identify communities most at risk of lead in drinking water and to compel lead reduction actions, and reducing the complexity of the regulation through improvement of the action and trigger level construct. EPA intends to promulgate the LCRI prior to October 16, 2024. For more information see https://www.epa.gov/ground-water-and-drinking-water/lead-and-copper-rule-improvements.

54) We are evaluating meter replacement programs for our clients and utilizing these programs for compliance with the LSL inventory. 40 CFR 141.85(f)(2) of the LCRR – text pasted below – mentions water meter replacements. Is this piece of the LCR R valid right now if a meter installer comes across a lead service line during a water meter replacement program?

"If the disturbance of a lead, galvanized requiring replacement, or lead status unknown service line results from the replacement of an inline water meter, a water meter setter, or gooseneck, pigtail, or connector, the water system must provide the person served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance, public education materials that meet the content requirements in paragraph (a) of this section, a pitcher filter or point-of-use device certified by an American National Standards Institute accredited certifier to reduce lead, instructions to use the filter, and six months of filter replacement cartridges. The water system must comply with the requirements of this paragraph (f)(2) before the affected service line is returned to service."

The section cited above refers to the lead and copper rule revisions (LCRR) which will be effective on October 16, 2024. Even though under the current LCR there are no specific requirements to provide consumers with water pitchers, POU devices or public education materials after water meter replacements, if a PWS is in violation of the current LCR MassDEP may require the PWS to take additional actions to protect public health. As PWSs prepare for the upcoming LCRR, they must plan how they will address the LCRR requirements. Please note it is always a good safe drinking water and public health protection best practice to provide consumers with information about possible elevated levels if there is disturbance due to water meter replacement.

Please note*: LCRR information is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.*

55) Is the service line inventory required to be presented to the State on the Excel spreadsheet to be deemed acceptable?

States need to manage the inventories submitted by all PWSs and therefore MassDEP needs the inventories to be submitted in an electronic format that can be processed. PWS

must provide MassDEP with the required fields that are identified on the spreadsheet. To see more information about the required fields please see https://www.mass.gov/media/2480886/. The PWS may use another format but must submit the inventory to MassDEP as a CSV file. A CSV (comma-separated values) file is a text file that has a specific format which allows data to be saved in a table structured format. For assistance with submitting the service line inventory contact the Drinking Water Program at program.director-dwp@mass.gov. Subject LCRR.

56) Where should we put pictures of service lines [when submitting the service line inventory spreadsheet|? Are they supposed to somehow be embedded or attached to the Excel sheet?

The pictures should be stored safely in your database for your records. They don't need to be embedded or attached to the Excel sheet. Instead, your PWS can select Customer Self-Identification as the verification method for the service line.

Here is the definition for this type of verification method from the MassDEP SLI spreadsheet:

C = Customer Self-Identification: This verification method uses information collected from building occupants, and typically includes photos of the service line. The MassDEP Crowdsourcing application or a similar software solution can be used to collect and verify the information.

57) Since the [MA-LSLI] app doesn't ask people to answer questions about the sizes of their service lines, or the types of household plumbing, how should we complete those boxes on the Excel sheet?

Your PWS should review all available records to determine the materials and sizes of the service lines. This may include reviewing:

Utility records including customer complaint investigations, and all historical 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; Field/visual inspection with or without full excavation; Interviews with Senior Personnel, Building Inspectors, and Retirees; and, Community Survey.

If after the review of the listed records your system cannot identify this information for locations not selected for sampling, the field can be left blank. Please note that the size of the SL is one factor that can be used to rule out LSLs as they were not used for the larger services.

58) How do we know if a cast iron pipe is lined or unlined? There isn't an option for "unsure" about lined or unlined.

If the records don't identify which cast iron SLs are lined and the PWS know they exist in their system, then the PWS should select unknown so that these SLs are treated as if they could be lead lined. If, however, the PWS has records to support that no lined cast iron SLs were used then all such SLs should be classified as unlined cast iron. The SLI is meant to highlight what needs to be done going forward to improve records and identify with certainty what's out in the system. If the PWS can't distinguish these now then the PWS should default to unknown.

59) Regarding the schools that we sample for lead and copper, are these classified as routine sites or alternate sites for sampling plan locations?

Since all schools and childcare facilities have to be included in the sampling plan, there is no need to select either a routine or alternate site.

60) For businesses like restaurants, factories, and gas stations, would those be (NONRES) nonresidential, non-school, non-child care under the building type?

Correct.

61) I have questions regarding content requirements for a Lead Service Line Replacement (LSLR) Plan when the water system does not own any portion of the service line. An LSLR Plan is supposed to include the following:

1. **A strategy for determining the compositions of "lead status unknown" service lines in the Initial Inventory;**
2. **A procedure for conducting full LSL replacements;**
3. **A strategy for informing customers before a full or partial LSLR;**
4. **A LSLR goal rate recommendation to be implemented in the event of a lead trigger level exceedance;**
5. **A procedure for customers to flush service lines and premise plumbing of particulate lead;**
6. **A LSL Replacement prioritization strategy based on factors including but not limited to the targeting of known LSLs, and LSL replacement for disadvantaged customers and for populations most sensitive to the effects of lead; and**
7. **A funding strategy for conducting LSLRs which considers ways to accommodate customers that are unable to pay to replace the portion they own.**

If the water system does not own the service lines in their system and they are not required to pay for or conduct replacements of services lines they don't own, then some of these requirements would not apply to that system's LSLR Plan. Specifically, #2, #3, #4, and #6 would not apply as the system would not be doing any replacements. #1 and #7 would still apply, and they could do #5 and make it available when private owners replace their service lines. Would MassDEP still require #s 2, 3, 4 and 6 to be included in a system's LSLR Plan anyway?

Water systems that don't own any part of the service line are still required to conduct lead service line replacements. As per 40 CFR 141.84(d)(1), PWS must "offer to replace the portion of the service line not owned by the water system." The full LSLR requirements following a lead ALE, 40 CFR 141.84(g), cite this same subparagraph which includes making the offer to replace the SL. Similar language exists in 40 CFR 141.84(g)(7) following subsequent lead ALEs, "must contact all customers served by a full private or partial lead service line or a galvanized requiring replacement service line with an offer to replace the customer-owned portion."

Therefore, all the provisions of the LSLRP still apply. For example,
For #2, the system should describe the strategy to inform homeowners of the need for LSLR and explain ownership and their monetary responsibility to replace them (in case the system doesn't offer any monetary assistance).
For #3, if the system triggers a LSLR under the LCRR, the system still needs to offer to do the replacement and provide the customer with the required risk mitigation strategies like flushing guidance to remove particulate lead in case of a full or partial LSLR or refusals.
For #4, the system is still responsible for LSLR; who pays for it is the difference. For this case, the system will need to identify a LSLR goal rate, have a strategy in place to document any refusals, provide MassDEP with this information, and provide customers with risk mitigation measures.
For example, for #6, the PWS should have in place a prioritization strategy to inform customers of the need for LSLR.

Please note that systems that claim not to own any portion of the SL will be subject to verification by MassDEP. Therefore, it is recommended that municipalities consult with town counsel prior to submitting the SLI and LSLR plan for review and approval because MassDEP will require that copies of local ordinances or similar documentation be submitted as part of this verification.

In addition, please remember that MassDEP is developing outreach templates used to notify consumers of a PWSs' LCRR requirements. If a PWS is going to develop their own templates, all materials must be submitted for approval to MassDEP in advance prior to any notification deadline.

Note: LCRR LSLRP information is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

62) Will MassDEP require PWSs to list all pipe materials for every public and private line in addition to lead, copper, unknown, or other?

All pipe materials for every public and private line should be listed in the inventory if known. We are encouraging PWS to develop this inventory as complete as possible to prepare systems for future service lines inventory updates.

For example, in the spreadsheet, if the system doesn't know the material, the system can choose between UNK-LG = Unknown, may contain lead and/or galvanized or UNK-NOLG = Unknown, does not contain lead or galvanized, instead of the material. The verification method should be used to make this determination and should be listed in the spreadsheet.

63) Our system does not document age on a private service line and the public service lines we have some but document when replaced. Your team said that if there was a local ordinance post 1950 banning lead that would help narrow down the material of the service line. We have been unable to find a local ordinance banning lead service lines. To provide a date may not be possible. Right now, Columns I [Public SL Install Date] and L [Private SL Install Date] are listed as required. Are these columns now optional?

If the PWS is not certain of the installation date, the spreadsheet allows you to choose between different options. If the exact year is not known, PWS can enter the decade (e.g 1970s, 2000s). If unknown, a PWS can choose if the service line was installed Pre-Lead-Ban (PLB) or After-Lead-Ban (ALB).

The date field although not used in the calculation of another value in the spreadsheet, it is needed for systems that are using records as verification methods since PWS can use installation date to classify service lines as non-lead.

If [town] doesn't have a local ordinance that banned lead service lines, [town] can use the state's lead service line ban to narrow down materials classification. See Q41 of the FAQ for more information at https://www.mass.gov/media/2535461/download

64) MASSDEP has a program providing small public water systems serving less than 10,000 individuals with service line inventory assistance. We are a large PWS but we still need guidance and some assistance. How will MassDEP assist [PWS] staff with questions and guidance on the Lead Service Line Inventory and the MassDEP Excel Template?

MassDEP has been answering SLI questions and providing guidance to individual systems upon request. We have met with some PWS and contractors that request meetings and have had phone conversation or email conversations with other PWS that prefer this type of outreach. We also continue to provide training and update our guidance materials on a regular basis.

In addition, Large PWS can apply to the **Lead Service Lines Inventory and Replacement Plan Grant Program**
Eligible activities for these planning programs include the use of the MassDEP-provided tools to ensure the submission of a lead service line inventory and lead service line replacement program summary in a digital form acceptable to MassDEP. For more information about this grant program see Lead Service Line Planning Program | Mass.gov.

65) I recently read a concerning news article from the Wall Street Journal *(America Is Wrapped in Miles of Toxic Lead Cables*, July 9, 2023) about lead telecom cables in the ground. Should I be worried about these cables affecting drinking water?

MA requires routine testing of sources of drinking water under the Lead and Copper Rule (LCR). If a PWS had a Lead Action Level Exceedance they are required to conduct source water testing to evaluate what has contributed to the lead levels. There has yet to be a water source where testing has resulted in levels of lead.

66) What should I do if I am having trouble entering a service line material in the excel service line inventory spreadsheet? When we choose "P" for plastic from the drop-down list for private or public service material, the Entire Service Line Classification populates as "invalid criteria", when we believe it should be populating as "non-lead".

If you are receiving error messages from entering cruteria such as the service line material, make sure the version of the SLI Workbook is the most recent version. By producing the CSV output, the first column of data in the CSV output will identify the version number of the workbook. As of September 2023, the current version of the workbook is 1. 0. 3. This most recent version has updates, such as replacing "P" (plastic) with 2 plastic options, "HDPE" and "PVC".

67) If records only indicate "plastic" and we don't know if it is HDPE or PVC, what should we be using?

If your records only indicate "plastic", you can select PVC and use the comment field to express the uncertainty.

68) Do you charge residents any fees? how much would you charge? If we have to replace the whole service line all the way in the house, do we charge a fee to the resident?

Under the LCRR, the water system is not required to bear the cost of replacement of the portion of the lead service line not owned by the water system. You can choose to charge a fee for replacement. However, MassDEP and EPA strongly encourage customer-side service line replacement to be offered at no direct cost to the customer wherever possible to achieve higher customer participation rates and reduce potential environmental justice impacts that may result where customers cannot afford to replace their portion of the line.

There are several resources from EPA or MassDEP that can fund the removal of the private side making it unnecessary to pass along this cost. See Lead Service Line Replacement Program | Mass.gov.

69) If a COM PWS finds no lead service lines how are the sample sites then chosen?

The LCRR includes lower tiers that can be used in this case. These tiers are:

Tier 3 sampling sites, consisting of single-family structures that contain galvanized lines identified as being downstream of a lead service line (LSL) currently or in the past, or known to be downstream of a lead gooseneck, pigtail or connector.

Tier 4 sampling sites, consisting of single-family structures that contain copper pipes with lead solder installed before the effective date of the State's applicable lead ban.

Tier 5 sampling sites, consisting of single-family structures or buildings, including multiple family residences that are representative of sites throughout the distribution system.

70) Is DEP confident in the capacity of the program director email? I have stopped sending copies of our monthly reports to the program director email as several times they have bounced back as too large. Our service line inventory is greater than 43,000 service lines.

MassDEP is confident in the capacity of the program director email. Because of the expected size of the service line inventories (SLI), MassDEP is requiring that systems submit their SLIs as a **CSV file**. If PWS have had problems in the past with sending large files through program director, this may be because of the type of file you are sending. For example, PDF files are much larger than the same file in a word or excel format. If you have concerns regarding the size of your inventory, please contact program.director-dwp@mass.gov to discuss this more.

71) What are the repercussions if my Service line inventory is incomplete?

If your SLI is submitted and is incomplete, meaning there is a noticeable amount of service lines compared to your submitted total in the ASR that are unaccounted for and unexplained, MassDEP will report this information to the EPA. The EPA may take enforcement action if deemed necessary.

MassDEP may find that PWS are in violation of 310 CMR 22.03(15), should PWS not submit their SLI within 6 months of the LCRR deadline, and may provide enforcement based on this failure to provide requested information.

Note: If you submit your SLI with your total amount of service lines, however some are considered "unknown", **your SLI is still considered complete.** As long as all service lines are included in your SLI with a location identifier and all information you were able to document by the deadline, this SLI is considered complete.

72) What happens if my SLI isn't completed by 10/16/24?

If your SLI is not completed by October 16th, 2024, and is not submitted by this deadline, then EPA will take enforcement actions against your PWS. MassDEP recommends you submit you SLI by October 16th, 2024, even if it is "incomplete", to avoid enforcement actions.

Note: If you submit your SLI with your total amount of service lines, however some are considered "unknown", **your SLI is still considered complete.** As long as all service lines are included in your SLI with an identifier and all information you were able to document by the deadline, this SLI is considered complete.

73) Can we submit what we have so far from our spreadsheet to the program director address?

Yes, MassDEP recommends that any PWS that would like their SLI to be reviewed to submit your SLI as a draft by April 1st, 2024 to program.director-dwp@mass.gov, subject: LCRR Service Line Inventory Draft. MassDEP will review your SLI and provide comments.

74) Do all the UNKs have to be confirmed by 10/16/24?

No, unknown service lines (UNKs) do not have to be confirmed by October 16th, 2024.

75) Do you have to replace a galvanized service line if there are no lead service lines in your system?

If a galvanized service line is found in your system, systems must try to conduct a replacement under the following conditions:

- If the galvanized service line is downstream of a lead service line
- If the galvanized service line was ever downstream of a lead service line
- If the galvanized service line is downstream of an unknown service line

If the galvanized service line meets any of the 3 above conditions, then it is considered a Galvanized Requiring Replacement (GRR) service line and should be replaced. If the galvanized service line does not meet any of the 3 above conditions, then it is only a galvanized service line, and does not need to be replaced.

76) We have done our preliminary inventory in an excel form that was released last year. It is not the same as the one that you showed today. What do I do?

If you have created a SLI that is not in the same format as the current MassDEP example, that is okay. Your inventory, however, must mirror the same values as the MassDEP created workbook for MassDEP to accurately validate your SLI. Please review the SLI Workbook instructions, **Section: Structure of CSV File**, for more information on how to do this (https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-for-version-103/download).

Reach out to program.director-dwp@mass.gov, or tio.yano@mass.gov, subject: LCRR Service Line Inventory Workbook, if you have any questions.

77) Issues with residents allowing access to property for private side replacements (total refusal). Are partials in these cases allowed, due to construction scheduling?

In this case, under the LCRR*, partials are allowed, and must meet the requirements of the LCRR, including:

- Provide notification to the customer affected by the service line replacement, meeting the requirements in § 141.85(a).
- Provide information on service line flushing consistent with 141.83 (b)(5).
- Provide the customer with a pitcher filter or point of use filter with 6 months of replacement cartridges, and instructions to use the filter.
- Offer to conduct lead sampling in 3 to 6 months after completion of any partial replacement of a LSL.

Under the LCRR, partial lead service line replacements do not count towards the goal or mandatory replacement rate.
*The LCRI may change some of these requirements after it is published.

78) How do I address customer who refused to participate?

In reference to the identification of service lines, if customers refuse to participate, and there is no record or other way to verify their service line besides a field inspection, then the private section of the service line must be documented as "unknown". The customer will then, after the October 16th, 2024, deadline, be sent the required public notification documentation under the LCRR if they have an unknown service line.

79) It will be extremely difficult to gather information on private plumbing that is beyond the meter. The process to determine material for these "service lines" that run between buildings will not be possible due to the lack of authority a PWS has over plumbing. [How does MassDEP expect PWS to identify these service lines?]

MassDEP expects PWS to give their best effort to identify service lines but understand this process may vary in difficulty depending on the customers and types of buildings/service lines encountered.

Remember, a SLI with unknowns, while unpreferable, is acceptable and considered sufficient for completing the initial inventory. If there are service lines you are unable to gather information on/identify, submitting them as unknown is an acceptable avenue to submit your SLI on time.

80) In [Municipality], the customer owns the entire service line...does this present any issues?

The ownership of the service line does not present any changes to the requirement that your SLI must include all service lines in your service area, and that you must make an effort to identify all service lines in your service area.

81) If the private side service line is galvanized and the public side is non-lead, can the entire service line part be classified as non-lead or galvanized requiring replacement?

The classification of this service line would depend on the status of the public side, and if the public side has ever been a lead service line. See the table below, and the 2 yellow highlighted rows, for how to possibly classify this service line.

Exhibit 2-3: Classifying Service Line Materials When Ownership is Split According to the LCRR 40 CFR §141.84(a)(4)

System-Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead	Lead Status Unknown	Lead Status Unknown
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Lead	Lead
Lead Status Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Non-lead	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown

82) We had asked for an extension of the Oct deadline- due to insufficient records in our system. We have not heard back if we were approved for an extension. Can you please confirm the same?

A service line inventory must be submitted by the due date using whatever records you have available including unknowns for lines that lack records. MassDEP/DWP directly responded to this PWS and provided this information and information on technical assistance on 01/23/2024.

83) How do you expect to review and approve inventory submissions that include a "non-lead certification form" and a request to remain on reduced monitoring if these are only submitted by October 16, 2024, yet sampling is required to begin in January 2025? Will anyone be able to stay on reduced monitoring?

For inventories with no LSL, GRR, or unknown service lines, we will review the verification methods and make sure that the PWS submits the NON-LSL cert form along with the inventory.

If the LCRI is published by October 16, 2024, then PWS can continue with their LCR monitoring. If the LCRI is not published by then, PWS without LSL, GRR, or unknowns that have been monitored according to the LCRR between January 1, 2021, and October 16, 2024, can be eligible for reduced monitoring. See our LCRR initial monitoring guidance at https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-LCRR/download.

84) Our system has dual ownership of our service lines. If the private side is verified in the field and the public side is verified from a recorded date. Would the verification method be F or V?

If there are 2 methods used to verify multiple sections of a service line, you should enter the least certain method into the verification method column, and document other verification methods in the comments field for each section of the service line. In this example, the verification method would be "V", Records Review, and "F", Field Inspection would be entered into the comments field with the section of the service line verified using this method.

85) As far as the making the SLI available to our residents can we just share our SLI spreadsheet as a PDF on our Town website?
Yes.

86) If the public side is lead and the private side is copper, the entire line is classified as a lead service line. When a replacement is done, can a system replace just the public [lead] portion? Or are they required to replace the private side [copper] too?

No, in this case only the public lead side needs to be replaced. The existing private copper side remains. This would count as a replacement towards any required removal percentage.

87) We feed a trailer park to be a big meter and have nothing to do with anything at the meter. They take care of their own pipes and we have no records for them. How would I deal with that? Do we just have to put what kind of pipe is going into the meter and leaving the meter?

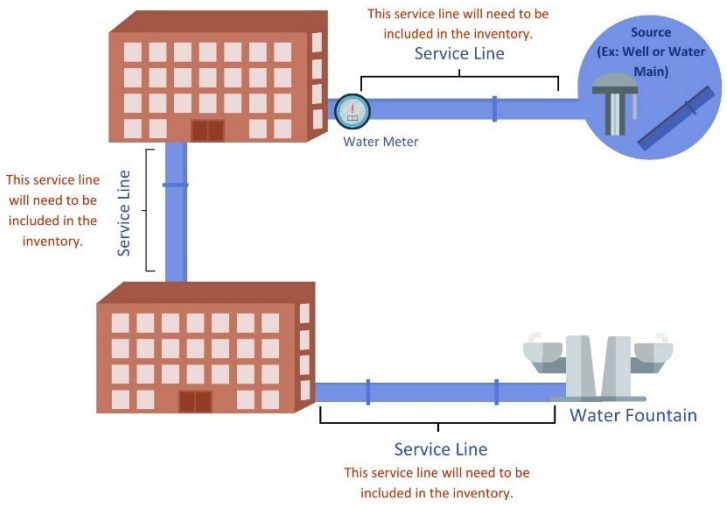
You will need to reach out to the park to get the materials downstream of the master meter. Ownership is not taken into consideration when developing the service line inventory.

88) Will we need to include service line materials for buildings that are served by a private well? not connected to our system?

If the building has a service line from your system, then it needs to be listed even if it is not being used. If the building does not have a service line connected to your PWS then it does not need to be in your service line inventory.

89) Can you clarify why the materials after the meter, in what I believe are slides 32 and 33, are considered service lines and not premise plumbing?

The multiple service lines included in this graphic would be considered service lines and not premise plumbing as the line, in this scenario, has left the building through an outlet and is underground until it enters the next building through another inlet.



90) In a scenario that we have a neighborhood of 20 houses built in the 1990's, and we are missing 1 or 2 tie cards in the middle but all other are copper, can we consider that verified by an alternate method?

Based on the year these homes were built (after the lead ban) you can report the missing ones as unknown but definitely not lead (UNKN-NOLG).

91) Can you confirm how we are to document materials when there might be more than two? One example may be a house with a meter pit. There is material 1 from

water main to curb stop, material 2 from curb stop to meter pit, then a third material from meter pit to the house itself. If ownership transitions from utility [public] to private after the curb stop, and there are two separate materials, how should we document this? Another circumstance may be at a large complex, like a shopping plaza, where there is a ductile iron line coming into the plaza, and the ductile iron continues past the master meter and off the ductile iron line, there are individual copper water services to each building. Would we lump these together and characterize the ductile as the "public" owned portion and the copper as the "private" side?

If your PWS has identified a service line with multiple portions of different materials along the customer (private) side, or the PWS owned (public) side, then the service line material that makes up the largest amount , i.e. percentage or majority, of the service line should be entered into the corresponding inventory column, and the other material(s) should be entered into the comments field, unless the smaller portion of the service line is lead, galvanized, or unknown.

If your PWS has identified a service line with any portion of lead, galvanized, or unknown, that material must be entered into the inventory, in the columns that track service line material. If the materials of a service line are equal length, use the ranking below to decide which material to enter into the main column that tracks service line material:

The rank of risk of contributing higher lead levels is as follows, with 1 being the highest priority, and 5 being the lowest.
1) Lead
2) Galvanized
3) Unknown
4) Iron/Steel and other Metal Materials
5) Plastic

92) I have our meter installation cards that my techs mark down the service types. If I use those cards would that be considered "V" for records review? or "F" for field inspection?

In this case, the meter installation card would likely only indicate the material on the private side of the service line (inspection at one point). Additional review would be needed to identify the material on the public side. As you are relying on a record use V (Records Review) for verification.

93) If a PWS employee was present for numerous water main replacement projects since 2000 to present where the public side of the services were replaced at the same time, and I interviewed that person. The foreman was present during all main replacements where the new mains were all DI and all public side services were replaced with copper. But there aren't records for all of it, just information from the foreman who still works there and did all the work since 2000. Do I put F because that person was physically present, or do I put V because it is a record review?

In this case, you should use records review, "V" for verification and use the comment field to indicate that the operator's knowledge is based on meter replacements since 2000.

94) If you have an office park and have one meter for the facility, an inventory of the service line to each building is still needed, correct?

Correct.

95) The MA plumbing code defines the areas and limits of responsibilities for PWS and the plumbers on water services and plumbing systems. Some of the slides contradict the language set forth in the MA plumbing code. Is a PWS now going to be responsible for pipes that are considered plumbing?

The service line inventory reporting requirement doesn't change the responsibility or ownership of these lines.

96) My PWS's rules and regulations from 1933 when our system was created state " No lead shall be used". Can I use that to state all our services are not lead?

If you can demonstrate that this rule/reg has remained effective and not replaced/edited since 1933 then it can be used to say all the lines installed since 1933 are not lead.

97) I am unclear on the scenario presented earlier detailing if an SLI cannot be submitted by compliance date and what that means a Utility needs to do.

A service line inventory must be submitted by the due date using whatever information is currently available. Under both the LCRR and the proposed LCRI, updates to the

inventory must be submitted as new information becomes available and changes the information previously submitted. Failure to submit the inventory by 10/16/24 is a violation of the LCRR and may result in enforcement from EPA.

98) By plumbing code any pipe beyond the outlet side of a meter is defined as plumbing but the slides indicate that a PWS is responsible to determine service line material after any meter.

EPA defined a service line as anything prior to the building inlet. This would include pipes downstream of a meter when, for example, a meter pit exists.

99) Would it be plausible to use a bore scope for inspection instead of vacuum. Train employees to use it, save money on private contractors.

MassDEP DWP is not familiar with a bore scope but we're open to having alternate methods described to us for our input. Please contact MassDEP at program.director-dwp@mass.gov with information on any alternative verification method PWS may wish to use.

So, in a case where there are series of houses fed through one common service line and one common meter, with the meter being located in the first house we would be obligated to determine service line material for all of the piping between the various houses even though MA plumbing code defines these pipes as plumbing?

Yes, that's what EPA shows in their guidance.

100) We have some trailer parks and campgrounds. Will I need to identify the service lines in those parks?

Yes, up to each building (trailer) inlet.

101) Can you review the predictive modeling, regards of the age of use of lead and galvanized material?

If your system plan to use predictive modeling and the model is trained using known service line records from your system and those known service lines include lead lines and galvanized lines, then the model's output should be able to predict other lead lines and galvanized lines from among the unknowns in the system.

For more information on predictive modeling and the expected standards PWS must meet to use predictive modeling, see the **Predictive Modeling Guidance** here: https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download.

102) To what extent can predictive modeling be used in MA? What are confidence requirements? Do exact materials need to be known, or is non-lead OK?

Predictive modeling can be used in MA, as a last resort verification method, however the standards for its approval are high and may be out of reach for many systems. MassDEP requires a standard confidence interval of 95%, and predictive modelling must be used with a variety of service line materials. A predictive modelling method can only predict the type of service line materials that are included in the records fed into the predictive model. Because of this, records of all expected service lines in the service area must be provided to the predictive model.

For more information on predictive modeling and the expected standards PWS must meet to use predictive modeling, see the **Predictive Modeling Guidance** (https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download) and Predictive Modeling/Statistical Modeling questions posed in the MassDEP LCRR Q & A (https://www.mass.gov/doc/frequently-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/download).

103) Is wrought Iron considered galvanized or unknown?

Neither. Galvanized is pipe that has been treated with zinc. If you know the material it is also not considered an unknown service line. Wrought Iron would be considered a "non-lead" service line. To classify this service line in the SLI workbook, enter the service line as "Unknown, definitely not lead" (UNK-NOLG), and specify it as "wrought iron" in the comments field.

104) 'Service lines" also include pipes exclusively used to feed private fire protection [fire suppression service lines] and must also be inventoried?

Yes, those must be included in the Service Line inventory (SLI) as well.

105) Do Lead Lined Elbows or Lead Line Tees need to be replaced? How do you classify these services?

If these are "connectors" then they need to be replaced under the LCRR when discovered during normal operations.

106) The LCRI now requires that connector/gooseneck info/material be included in the inventory. This was always included in the Massachusetts inventory template spreadsheet anyway, so it is not new for MA water systems**. Can you confirm that if a connector/gooseneck is lead, it still does not affect whether an entire service line is classified as lead?**

Under the current LCRR, a lead connector (gooseneck/pigtail) does not affect the classification of the entire service line.

107) Is UNK-NOLG acceptable, or must we define if it is copper or plastic?

This is an acceptable response when the material is unknown but for other reasons (e.g., age of home) it would not be lead.

108) Are galvanized service lines preceded by a lead gooseneck considered GRR?

No, based on federal definitions, a galvanized line is considered GRR only when the galvanized line is downstream of an existing lead service line or was previously downstream of a lead service line.

109) Why are Gooseneck treated as separate entity than the service line?

EPA does not include connectors (goosenecks/pigtails) as part of the definition of a service line.

110) The public service line material options have CI - lined and CI-unlined. If our records show it made of CI- Should we record it as CI-L or CI-U?

CI isn't lead, GRR or unknown. However, in this case, if it is unknown whether the CI is lined or unlined you can report it as unknown- not lead (UNKN-NOLG) and use the comments to add CI.

111) We've had a question come up on one of our Lead Service Line Inventory projects regarding what category a material should fall under in the inventory. We have records showing a "1-inch genuine wrought iron standard weight service pipe which shall be centrifugally lined with cement" installed in 1948. We are questioning if this should fall under the "lined cast iron" or the "galvanized" material category. There is no mention in these records anywhere of the wrought iron specifically being "galvanized". Has anyone from DEP run into a similar question, or have any input on this material classification?

The pipe should be classified as "lined cast iron" (CI-L).

112) If we can't tell if a service line is HDPE or PVC, or a record only documented a line as plastic, since we can only put HDPE or PVC, should we put "UNK-NOLG" as the material and then put "plastic" in the comments? We have the same issue where records only say "iron", but we don't know if it's ductile or lined or unlined cast iron.

Yes, that would work for both of your cases.

113) To confirm, if a service line is galvanized and may have been downstream of a lead gooseneck, but not downstream of a lead service line pipe, it is GRR or not?
In that scenario, the service line would not be considered GRR.

114) Why does it matter if Galvanized is up or down stream of lead?

If a galvanized pipe is downstream of lead pipe, lead can leach out of the lead pipe and then attach to the galvanized pipe (more so than other types of material).

115) What about lead poured cast iron lines that were installed with real lead in the early 1900's, would these be considered lead service lines?

Lead Poured Cast Iron describes the joint of a service line, not the service line itself. This could be considered **similar** to a lead connector, rather than an entire service line containing lead.

Lead Poured Cast Iron Joints are a byproduct of a much older method of connecting service lines, in which the cast iron pipes were connected by lining the joints of the pipes with oakum, a natural fiber rope like material, and pouring molten lead on it to create a permanent "lead and oakum" seal. The oakum swells and seals the joint, the tar in the oakum prevents rot, and the lead keeps the joint physically tight.

Currently, Cast Iron Service Lines with lead poured joins are not considered Lead Service Lines (LSLs). However, lead poured cast iron joints could be considered **similar** to a lead connector and as such, when they are encountered the recommendation is to replace them to protect the public health of consumers. There are multiple video tutorials available online on how to remove the lead portion of lead poured cast iron joints for PWS who are unfamiliar with this process.

116) How are galvanized lines with unknown connections to the water main classified?

If only the connector is unknown, and the entire line is and always has been galvanized then it is not GRR.

117) What do PWS do if we do find lead service lines and how long do we have to replace them after reported?

MassDEP recommends that PWS try to replace all lead service lines within 5 years of the SLI deadline, per MassDEP's public health goal of being lead free within 5 years. The federally required replacement rate differs between the LCRR and the LCRI.

Currently, under the LCRR, systems will be required to replace LSLs and GRR service lines at an annual rate of at least 3%, on a two-year rolling basis if their 90th percentile lead level exceeds the lead action level (15 ppb) under the LCRR.

However, under the proposed LCRI, systems will need to replace all LSLs and GRR service lines within 10 years, unless MassDEP institutes a stricter time frame, and at a replacement rate of 10% each year.

Note: Unknown service lines must be included in the calculation of service line replacements.

118) Can you go more in depth on the classifications of what a lead service line is and all the different make ups (gooseneck, service line, home line etc. how they all classify together.)?

A lead service line (LSL) means a service line that is made of lead or where a portion of the service line is made of lead. A service line may be divided by different "ownerships" depending on the PWS; many PWS may have a public - or PWS owned portion, and a private – or customer owned portion. The ownership of the service line does not affect the requirement that it must be included in the service line inventory, with the material of both "sides" documented, or that it must be included in your LSLRP if it is a LSL, GRR, or UNK service line.
A gooseneck or connector is NOT considered a part of the service line. However, it must be replaced if discovered during normal operations.

By home line we estimate you are referring to premise plumbing. Premise plumbing is plumbing found within the interior of the house, after the building inlet. Premise plumbing should not be included in your service line inventory.

119) Do plans need to start being made for removing lead goosenecks? [Still a bit confused with how "lead goosenecks" are to be addressed.]

Lead goosenecks should be replaced if they are discovered during normal operations, per the LCRR regulations and in the interest of protecting public health.. While goosenecks are not required to be included in the LCRR initial service line inventory (SLI), MassDEP recommends you include this information, to have this knowledge for the future, and as the baseline SLI required by the LCRI in the future <u>does</u> require that goosenecks be included in the SLI.

120) Can you please clarify what is considered "public" side vs "private" side for an NTNC system (Well to pumphouse = public? Pumphouse to inlet of building = private)?

For NTNC systems with multiple service line materials, the "public side" would be the upstream side and the private side would be the downstream side of the service line.

For a NTNC system with a well line to a pumphouse, this line is not classified as a service line. The line that goes from the pumphouse to the inlet of the building is considered the service line.

121) For a common larger Community system, a service line is often times more typical to the broadly recognized service line layout, and it is understood to consist of the PWS owned service line piping after the "Connector" and up through the property line/curb valve, as well as the privately owned piping prior to the household plumbing. **For the purpose of the SLI, what is the limit of the service line on the private side where it would transition to "Household Plumbing"? Is it at the foundation? If the meter is on the interior of the structure, is it the downstream connection of the meter?**

The transition would be where the pipe connects to the building inlet. In the case of the meter being on the interior structure, the private service line ends at the meter.

LCRI proposed definition: *Service line,* for the purpose of subpart I of this part only, means a portion of pipe which connects the water main to the building inlet. Where a building is not present, the service line connects the water main to the outlet.

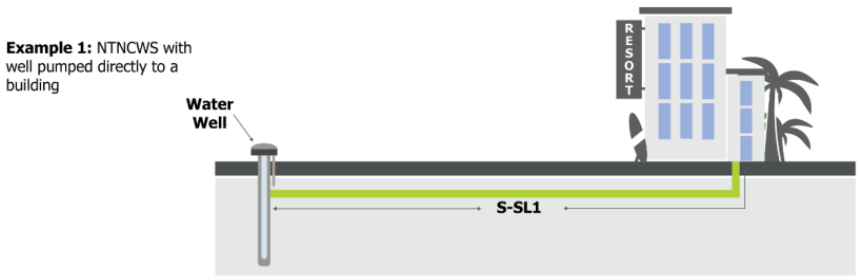
122) I run 2 NTNC systems. Built in 1995 and 2003, obviously there has never been a lead issue. Why am I being put through this?

EPA required all PWS that are subject to the LCRR to submit a SLI. Given the age of your two systems (after the lead ban) this should be straightforward as you can cite the construction dates to certify that all service lines are non-lead.

123) For commercial, industrial, or institutional type PWS, the service line definition as it applies to these new regulations is less clear to us based on the following factors:

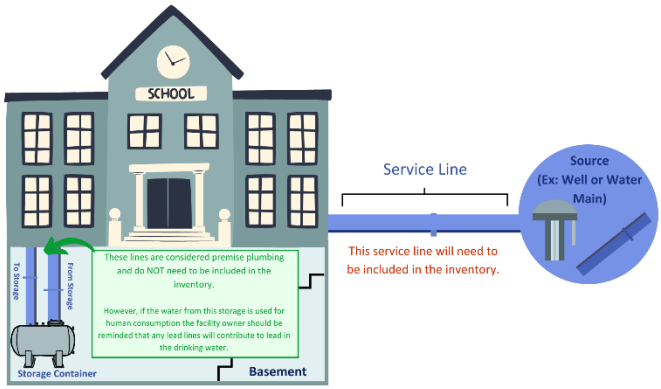
a. Is the water source supply line (well line to the building) considered a service line or a Source/Raw or Distribution line?

The well line to the building is the service line.

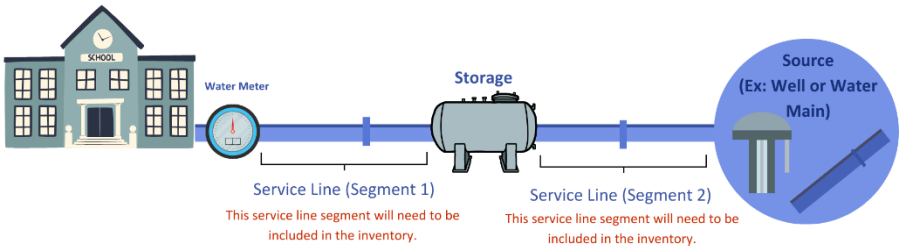


b. If there is a storage tank in the system, does that impact the definition of the water source supply line (referenced above) as a service or not?

Answer: It impacts it, depending on its location. If it is an internal storage tank, the service line will be the pipe connecting the well line to the building. The piping connecting the storage tank inside the building will be considered premise plumbing.

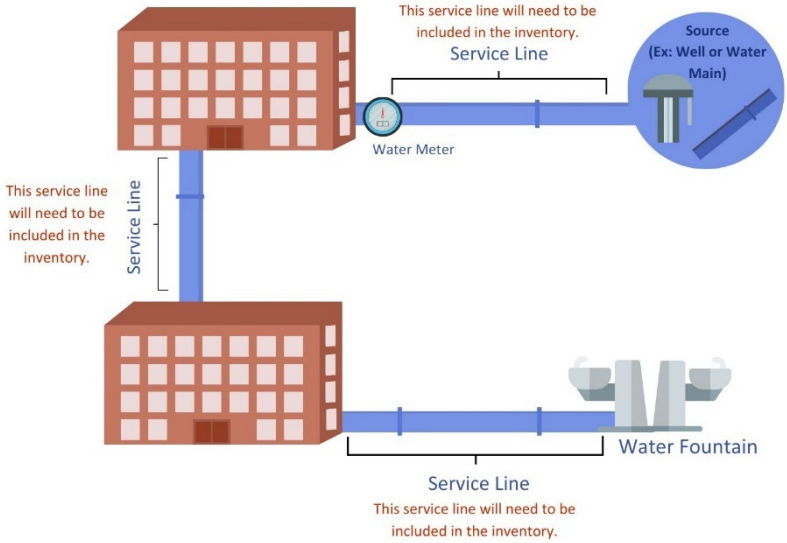


If the storage tank is located outside, the pipe connecting the well to the storage tank will be one segment of the service line, and the pipe connecting the storage tank to the building will be the second segment.



This FAQ is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

c. If there are multiple buildings on the property that are fed by a mainline passing through the primary building, is that piping a service or a main?



Answer: The piping will be service lines.

d. In the scenario stated in "C" above, where do the building plumbing limits start/stop relative to mains/service designations for the LSLI?

The building plumbing limits will start and stop at the building outlets and inlets.

e. If there is treatment inside the primary building, the well supply line is then Raw Water. How does the inclusion of a treatment process impact the definition of the water source supply line as being a service or not?

If this is for the scenario stated in "C", then the location of the treatment will impact the definition of the service line. For this case, the line from the well to the primary building will be the raw water transmission line, not a service line.

125) Our PWS does not have to sample until 2026.

If the LCR schedules continue (which we expect based on the LCRI proposal) then you would not sample until 2026. If the LCRR requirements continue (not as likely) you will have to conduct semiannual monitoring in 2025.

126) So, if my system is currently on a sample plan of every three years, I will now be sampling every year?

That is the requirement in the LCRR. However, the proposed LCRI would delay this change in frequency until 2027. We are waiting for the final LCRI to confirm.

This FAQ is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

127) Water systems are working to get their inventories completed and submitted by October 16, 2024. If they are doing well, then maybe they will have customer's new Tier classifications set **by September**, if they are lucky**. Is this enough time for the water systems contact customers, update their sampling plans with new sampling locations if needed, complete the forms to submit to MassDEP, AND get MassDEP approval to use those locations by the time they have to start sampling in January 2025?**

If the LCRI doesn't put a pause on the monitoring requirements under the LCRR, MassDEP will ensure your sampling plans are approved in a timely manner.

Contacting customers and ensuring participation can be a hard task due to the tight timeline. Therefore, if you think you will not have enough time to collect enough customers for 2025, please contact your regional office as soon as possible so a compliance plan can be developed.

128) Our 2023-2025 Sampling Schedule states that our next sampling for lead and copper is the 3rd QTR of 2025 and we have reduced monitoring of 30 sites, will that change depending on what comes out on or before October 16th? My boss was under the impression that we need to take lead and copper samples this year 3rd QTR with no reduced monitoring and what is on our sampling schedule is not applicable. if you could clarify it would be appreciated.

Correct, the expected sampling schedules for PWS may change based on if the LCRR takes affect October 16th, 2024, or if the LCRI goes into effect on or before 0ctober 16th, 2024.
If the LCRI takes effect on or before October 16th, 2024, systems will continue to sample as normal, based on the LCR regulations. This means, your PWS will sample during the 3rd QTR of 2025, as per your 2023-2025 sampling schedule.

If the LCRR takes effect, and the LCRI is not published by October 16th, 2024, then systems will need to sample based on the LCRR regulations. **If the LCRI does not take effect**, then your sampling schedule may change based on the contents of your SLI, and you may be put back on standard monitoring.

MassDEP recommends that PWS take a more cautious route and prepare for standard monitoring, however it is more likely that the LCRI will be published by October 16th, 2024.

129) Our PWS is required to submit a Lead Service Line Replacement Plan (LSLRP). While I have created a plan incorporating LCRI proposals, will there be upcoming guidance on deadlines to resubmit an LSLRP with included with LCRI mandates?
Yes, we expect EPA will issue additional guidance after the LCRI is finalized.

130) How will the LSLRP be submitted? The actual plan itself, not just the info on the DEP LSL app.

If required, the LSLRP should be submitted using our online form located at https://app.smartsheet.com/b/form/8f676b18cc224884a7069e3cc727f968. You will only need to fill it out and hit the submit button.

If you submit the form online, there is no need to attach the form when submitting the inventory but remember that the deadline to fill out this form is October 16, 2024, as well. We will be able to see your submission in our database.

If, for some reason, you cannot submit the form online, please request a PDF form at program.director-dwp@mass.gov. For this scenario, the PDF LSLRP form should be submitted along with the inventory.

If you have developed an LSLRP as a standalone document you can submit it to program.director-dwp@mass.gov, subject line: LSLRP.

131) Scenario: I am aware of all public and private service lines in my service area except for 1 private service line, I cannot get in contact with the owner. *[I have no known lead in the entire inventory.]* **Do I have to do a LSLRP for just one unknown private side in the entire system?**

If your system has any unknown service lines in your inventory, you will need to submit a LSLRP. However, if you know with certainty (based on the age of the building or other records) that the service line is not known to be lead, even if you don't know the exact material, you can classify it as "Unknown, definitely does not contain lead or galvanized" (UNK-NOLG).

132) For LSLRP, should PWS plan to remove service lines using the MassDEP 5-year removal goal, or should systems plan removal using the LCRI 10-year plan?

PWS should start to plan their LSLRP for the foreseeable future with the goal of removing LSL in 5 years to better protect public health. As you know, there is no safe level of lead, and it is the goal of the MassDEP/DWP to assist public water suppliers and their customers to get the lead out and to remove all drinking water lead service lines (LSL) in the Commonwealth as soon as possible in order to address the negative impacts of lead. If the LCRI is finalized as proposed, the regulatory deadline will be 10 years unless a determination is made that LSLR at the system can be accomplished sooner, or the system meets the criteria to be allowed more than 10 years.

133) Lead goosenecks will not be considered full lead service but will impact the replacement plan. How will it impact the replacement plan?

Lead goosenecks are not considered a part of a lead service line. However, under the LCRR and the proposed LCRI, lead connectors (goosenecks, pigtails are required to be replaced if discovered during normal operations.

Under the LCRR, these connectors are not required to be included in the initial SLI; however, the LCRI will require goosenecks/pigtails to be included in the baseline SLI.

1. **I have daycare facilities in town that aren't on town provided water [serviced by my PWS]. Do I still need to sample from these daycares?**

No, only schools and daycares that receive water from the PWS should be sampled from and included in your SLI.

134) How is a facility supposed to be aware of the various home day care facilities in the distribution system?

PWS will need to use the list from DEEC and your billing system.

DEEC Resources:
DEEC Website: https://www.mass.gov/orgs/department-of-early-education-and-care
DEEC Licensed Childcare Search: https://childcare.mass.gov/findchildcare

135) You mentioned a "care facility", what do you consider a care facility?

A childcare facility licensed by the Department of Early Education and Care (DEEC).

136) Who is responsible for the LCR sample collections at School and Daycares (PWS, or school & Day care owners)?

PWS are responsible for the LCR sample collections at schools and daycares.

138) Can you provide more information on unknown or galvanized services, and will there be a fund for homeowners with these types of water services?

There are no direct funding opportunities from EPA or MassDEP for homeowners themselves. However, Public Water Systems can obtain funding that can be used to assist these homeowners.

Funding Resources:
LCRR Webpage: https://www.mass.gov/info-details/lead-and-copper-rule-revisions
Small Systems Technical Assistance Program Application: https://www.mass.gov/forms/massdep-service-line-inventory-and-lead-service-line-replacement-plan-technical-assistance-survey
SRF Funded LCRR SLI and LSLRP Grants and Loans: https://www.mass.gov/info-details/lead-service-line-replacement-program
EPA LSLR Funding Sources Webpage: https://www.epa.gov/ground-water-and-drinking-water/identifying-funding-sources-lead-service-line-replacement

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139) My system is a small system [under 10,000] except in the summer when we are inundated by beach goers. Would my system be eligible for the Small Systems Technical Assistance Program?

EPA requires us to report the higher of either summer or winter populations. If your PWS summer population is above 10,000, you will not qualify for the Small Systems Technical Assistance Program.

1. **What resources are EPA and DEP providing for homeowner service line replacement that PWSs can apply for?**

MassDEP has 2 options for funding, provided through the SRF Program:

1. **0% Interest Loans for LSL Construction Projects**
   - Zero percent interest loans offer communities substantial savings on construction projects that remediate lead, a critical action in mitigating lead exposure and protecting public health. Further, the Trust offers loan forgiveness to disadvantaged communities completing LSL construction projects in addition to the 0% interest rate.
2. **The State Revolving Fund (SRF) Grant**
   - The Trust is offering grants while funding is available for activities assisting PWSs to complete planning projects for Service Line Inventories (SLI) and for the development of LSL replacement plans. MassDEP will accept grant applications on a rolling basis while funding is available.

For more information on these programs and how to apply visit the SRF webpage here: https://www.mass.gov/info-details/lead-service-line-replacement-program.

EPA has several funding programs, some awarded through Massachusetts such as through the SRF program, and others directly from the EPA and various United States Agencies.
For more information on EPA Funding visit the EPA LSLR Funding Sources Webpage: https://www.epa.gov/ground-water-and-drinking-water/identifying-funding-sources-lead-service-line-replacement

140) Is there financial assistance available for PWS's with over 14,000 services?

Financial assistance is not based on the number of service lines in a PWS, but the population the PWS serves. However, based on the provided number of service lines, this is likely a system serving over 10,000 people.

If your system is a larger Community (COM) PWS, there are multiple opportunities for your system provided by SRF. **SRF Funding consists of 2 options:**

1. **0% Interest Loans for LSL Construction Projects**

- Zero percent interest loans offer communities substantial savings on construction projects that remediate lead, a critical action in mitigating lead exposure and protecting public health. Further, the Trust offers loan forgiveness to disadvantaged communities completing LSL construction projects in addition to the 0% interest rate.

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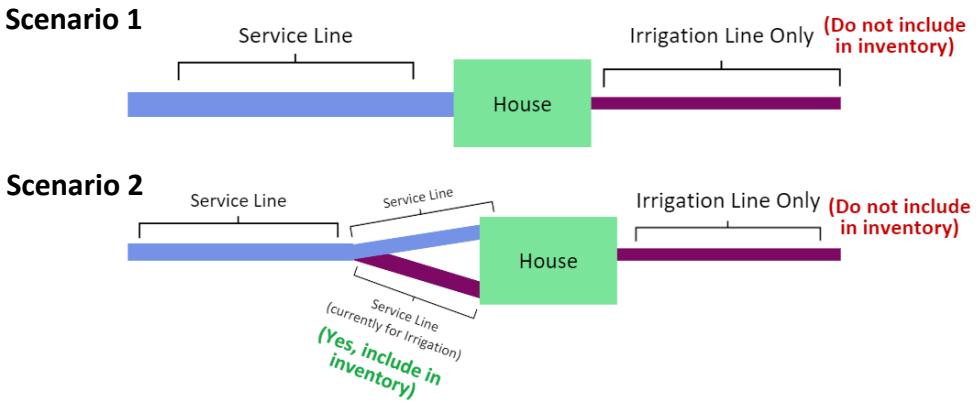
141) My PWS has houses within its service area which have irrigation lines connected to the service line. Do the irrigation lines need to be included in the inventory? And how should I include them if they branch off from the service line?

The status of the irrigation line as a service line is dependent on where the irrigation line splits from the main potable service line. Does the irrigation line split into a separate line from the service line before it reaches the house? Or does the irrigation line split from the service line after it has reached the building inlet?

Scenario 1: Should the irrigation line split from the potable service line prior to the building inlet while being subterraneous, that portion of the irrigation line would be considered a service line and should be inventoried.

Scenario 2: If the irrigation line does not split from the service line until it reaches the building inlet, then no portion of the irrigation line is considered a service line.

See the graphic below for a visual of both scenarios.



For scenario 2, the LCRR Service Line Identification Guidance, available on the MassDEP LCRR webpage, contains steps and examples on how to inventory such a scenario, where a service line splits into 2 service lines prior to entering a building.

142) My PWS has no service lines, what do I submit?

If you PWS has no service lines, the PWS should reach out to MassDEP directly by emailing the program.director-dwp@mass.gov email and requesting a No Service Lines Certification Form. Please provide an explanation on why you believe your PWS has no service lines. PWS should note that this form is not for systems that do not "own" their service lines. Your SLI is not dependent on the ownership of service lines.

Scenarios where a PWS has no service lines include:

- A PWS which has its water source (well) within the building and has no further buildings or service lines to distribute water.
- A PWS which treats its water after it enters the building and has no further buildings or structures which service lines connect to.
- A parent PWS/wholesaler PWS, which only connects to other PWS, and has no service lines. This type of PWS may only have water mains.

143) Can a PWS perform the LCRI required validation pool of non-lead service lines now?

Based on the language in the proposed LCRI, the validation pool is meant to be conducted after the LCRI baseline inventory is submitted. Validations should not begin until after your baseline inventory is submitted, after the LCRI goes into effect.

144) At what level must PWS notify the persons in multi-unit complexes, such as apartment buildings? Is notifying the property manager with instructions on the notification

that state to disperse the information to all tenants sufficient?

To ensure notices are delivered to all people served by the service line, PWS must send notices to each unit/apartment of any multi-unit buildings they serve. PWS may delegate this requirement to a property manager or another trusted staff member of the multi-family structure, if the property manager/trusted staff member certifies that all persons served by the service line have received the notice by the deadline (November 15, 2024).

145) My water system does not own of our service lines, why do I need to inventory them?

EPA states in the Lead and Copper Rule Revisions (LCRR) that the inventory must include all service lines connected to the public water distribution system regardless of ownership status. See https://www.ecfr.gov/current/title-40/part-141/subpart-I#p-141.84(a)(2). This means that any service line connected to the public water system, even where the water system owns no portion of the service line, must be included in the inventory. The underlying idea of developing a service line inventory under the LCRR and the Lead and Copper Rule Improvements (LCRI) regulations is protecting the public health. While ownership of the service line may not be held some PWS, there is a higher likelihood that PWSs keep information on what material service lines are made of, rather than each individual consumer (i.e. installation records, water meter replacement records, inspection records...). Therefore, for the purpose of the LCRR service line inventory, the responsibility of identifying these service lines will fall on the PWS.

146) If a Condo or Duplex (2 units) is fed from one service. Is that a Single or Multi Family?

If more than one unit is fed from one service line, this would be considered a multi family residence.

In the other scenario, if there is a multi-unit complex and each unit has it's own service line, then each unit would be considered a single family structure.

147) If an installation date is not available, do we need to estimate an installation date and, if so, what would you recommend as an approach? Alternatively, could we list "0" as the date when dates are unknown?

Both service line installation date columns must be completed in your service line inventory workbook (SLI). If the installation date is not available, we would recommend that PWS do their best to find a general timeline that matches this service lines installation. This can be the estimated decade (ex: 1980s) or time range ("PLB" - pre lead ban or "ALB" - after lead ban) of a service lines installation date, based on available records. If you are not able to find any information that can help you estimate a general time range, please enter "PLB". If you have entered a date/time range in your SLI and are not certain of its accuracy, please include this information in the comments section for future reference. This information can then be updated in an annual update if you are able to find a more specific date/time range.

Looking into the construction date of the building/structure can be one way to estimate the date of installation, just be careful and make sure that the current property was not rebuilt/reconstructed from an older structure, as that could point to the service line being installed earlier than the current property.

148) In our SLI we have cement lined steel pipes but it is not listed as an option for service line material. How should I classify them? Should they be listed as UNK-NOLG?

If you are inventorying service lines that do not match the material options provided in the SLI workbook, and the service line material does not contain lead/is not lead lined, please enter it as "UNK-NOLG", and include the material in the comments section (Column Z) of your SLI.

149) Which spreadsheet [SLI Workbook] should I use for my PWS?

If your PWS owns part of each service line, such as if the PWS owns the service line to the curb stop, and the consumer owns another section of the service line, such as from the curb stop to the building, your PWS should use the Split Ownership SLI Workbook.

The Split Ownership SLI Workbook* is available here: https://www.mass.gov/doc/service-line-inventory-excel-workbook-template-for-systems-with-split-ownership-of-service-lines-version-103/download

*PWS should note that the *Service Line Inventory Excel Workbook Template for Systems with Split Ownership of Service Lines* is the exact same workbook as the *Service Line Inventory Excel Workbook Template* and has only changed in name to distinguish it from the new secondary workbook option.

If your PWS owns the entirety of the service line, such as an NTNC PWS, or a COM PWS which is a multiunit complex, or a municipality with ownership of all service lines, you may prefer to use the Without Split Ownership SLI Workbook.

The Without Split Ownership SLI Workbook is available here: https://www.mass.gov/doc/service-line-inventory-excel-workbook-template-for-systems-without-split-ownership-of-service-lines-version-131/download

PWS should note that use of the no split ownership workbook is **not required** if your PWS owns the entirety of the service line, it is a second option available if you would like to use it. MassDEP understands that many PWS may have already begun work using what is now the split ownership workbook, and transferring over this data would be redundant in many cases.

150) When will Massachusetts have their LCRR/LCRI Regulations finalized?

MassDEP, and most other state agencies, have agreed with EPA to not update their regulations until the LCRI is published. Trying to release regulations at the state level for the LCRR and then needing to adjust those regulations immediately for the LCRI would be a very confusing and time-consuming process, both for state officials and for the public due to the public commenting

and reviewing period and would be confusing all around. MassDEP will begin to work on the regulations after the LCRI is published and will have state regulations finalized before the LCRI goes into effect. Due to this, the EPA will have primacy over the LCRR; meaning, if there are any needs for enforcement, EPA will coordinate with MassDEP/DWP but will be responsible for enforcement related to the LCRR until the state regulations are promulgated.

151) If a PWS is aware of the number of service lines on the public side, and aware of the number of service lines on the private side, but cannot match them, (i.e., they are not sure which public service line is attached to which private service line) can the service lines be considered unknown but definitely not lead or galvanized (UNK-NOLG) in the workbook?

This would depend on the information available to the PWS. If you are unaware of the materials of the service lines, and the date of installation is not after the lead ban (after 1986), then such service lines cannot be categorized as "UNK-NOLG". If the materials of all 3 service lines are known, or the date of installations are after the lead ban (after 1986), then this method can be used, and PWS should note this situation in the comments for future reference.

152) When should PWS submit their Service Line Inventory? Will submitting it before October 16, 2024 trigger any LCRR requirements, such as consumer notifications?

PWS may submit their SLI at any time they would like, prior to the October 16, 2024 deadline. MassDEP will accept SLIs prior to October 16th and not consider them final until the October 16th deadline. This is a stance that EPA's recent LCRR documentation released has upheld. PWS should, however, keep in mind that submitting a SLI with unknown, lead, and GRR service lines too early may be perceived negatively by the public. PWS that have unknowns, lead, and GRR service lines may benefit from holding off on submission to try and identify as many service lines as possible prior to the deadline. PWS are welcome to submit their SLIs as drafts to MassDEP, to receive feedback and comments to ensure their SLI is completed accurately through this process. MassDEP can ensure that comments will be provided to PWS if their draft SLIs are submitted to MassDEP prior to August 2nd, 2024. Drafts received after this date may not be reviewed or have comments provided in a fast enough time frame for PWS to utilize them prior to the October 16 deadline.

153) If the LCRI is published before the LCRR deadline (October 16, 2024) will PWS need to submit annual inventory updates?

No, If the LCRI is published before the LCRR deadline, PWS will be required to submit the initial inventory October 16, 2024, then they will be required to submit a baseline inventory, required under the LCRI, when the LCRI goes into effect. This will be 3 years after the LCRI is published. Annual updates between these two inventories will not be required. However, PWS should remember that annual consumer notifications are still required. Service line consumer notification templates can be found here: https://www.mass.gov/lists/lead-copper-forms-and-templates

154) The SLI Workbook has different Sampling Tiers than my sampling plan, why are they different?

The Tier categories for the sampling sites in the workbook are the ones required by the Lead and Copper Rule Revisions (LCRR), not the Lead and Copper Rule (LCR). These new sampling tier classifications will replace the LCR tier classifications, unless the Lead and Copper Rule Improvements (LCRI) is finalized prior to October 16, 2024, which has its own updated Tier Classifications. For more information on the LCRR Tier Classifications, see eCFR :: 40 CFR 141.86 -- Monitoring requirements for lead and copper in tap water.

Appendix

Helpful Guidance documents:

1. Guidance about how PWS can make their service line inventories accessible to the public: to be in compliance with the LCRR by October 16th, 2024, all PWS that have any Lead (LSL), Galvanized Requiring Replacement (GRR), or Unknown service lines must make their service line inventories accessible to the public. The guidance describes the requirements for systems that serve more than 50,000 people, 50,000 people or less, or do not have any LSL, GRR, or unknown service lines.
2. LCRR requirements for systems with "Lead Status Unknown" in their service line inventories: All Community and Non transient Non-Community PWS service line inventories are due October 16th, 2024! Since service line inventories are coming up soon, the guidance document lists the requirements that your system may trigger if you list any "lead status unknown" service lines in your inventory. All requirements listed are found in EPA's regulation 40 CFR 141, at eCFR: 40 CFR Part 141 Subpart I -- Control of Lead and Copper. Please note: MassDEP will provide templates for all LCRR information and notices.

   You can find these documents with the links provided above, or here: Lead and Copper Rule Revisions | Mass.gov.

LCR and LCRR Links of Interest

Please remember to do your Service Line Inventories!

Main Webpages

LCR/LCRR Forms

[Lead & Copper Forms & Templates | Mass.gov]

LCRR Webpage

[Lead and Copper Rule Revisions | Mass.gov]

LCRR Q&A

[https://www.mass.gov/media/2535461/download]

Service Line Inventory Tools and Forms

Important LCRR Materials	
Lead and Copper Rule Revisions (LCRR): Upcoming Deadlines	https://www.mass.gov/doc/lead-and-copper-rule-revisions-upcoming-deadlines/download
Service Line Inventory Immediate Requirements Flowchart	https://www.mass.gov/doc/service-line-inventory-immediate-requirements-flowchart/download
Frequently Asked Questions about the Lead and Copper Rule Revisions (LCRR)	https://www.mass.gov/doc/frequently-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/download
Service Line Inventory	
Service Line Inventory Excel Workbook Template for Systems with Split Ownership of Service Lines	https://www.mass.gov/media/2480901
Service Line Inventory Workbook (with Split Ownership) Template Instructions	https://www.mass.gov/media/2480886/
Service Line Inventory Excel Workbook Template for Systems WITHOUT Split Ownership of Service Lines	https://www.mass.gov/doc/service-line-inventory-excel-workbook-template-for-systems-without-split-ownership-of-service-lines-version-131/download
Service Line Inventory Workbook (without Split Ownership) Template Instructions	https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-template-for-systems-without-split-ownership-of-service-lines-for-version-131/download
MassDEP Drinking Water Program Service Line Inventory Workbook Training Video	https://youtu.be/2dMeccp976Y?si=yJooogzHuuCmGmDI
How to Submit your Initial Service Line Inventory Guidance	https://www.mass.gov/doc/how-to-submit-your-initial-service-line-inventory-guidance/download
Lessons Learned - Common Service Line Inventory Validation Errors Found	https://www.mass.gov/doc/lessons-learned-common-service-line-inventory-validation-errors-found/download
Verification Method Guidance	

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Lead and Copper Rule Revisions (LCRR): In-Pipe Verification Methods Guidance	https://www.mass.gov/doc/lead-and-copper-rule-revisions-lcrr-in-pipe-verification-methods-guidance/download
Statistical (Predictive) Modeling Guidance for Evaluating Unknown Service Lines	https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download
Guidance: Predictive/Statistical Modeling Flowchart	https://www.mass.gov/doc/predictivestatistical-modeling-guidance-flowchart/download
Service Line Identification Guidance	
LCRR NTNC and Small COM PWS Service Line Identification Guidance	https://www.mass.gov/doc/lcrr-ntnc-and-small-com-pws-service-line-identification-guidance/download
LCRR Service Line Identification Guidance	https://www.mass.gov/doc/lcrr-service-line-identification-guidance/download
Crowdsourcing Application for Service Line Material Identification	
Crowdsourcing App for homeowners to help identify LSL	https://app.smartsheet.com/b/form/f9ee39b7972f443ca63e8b936cd7f92b.
Crowdsourcing App Instructions	https://www.mass.gov/media/2480891/
Crowdsourcing App Toolkit with ready-to-use social media posts with images, postcards, and informational infographics.	https://www.mass.gov/media/2588216/
Template letter for customers to use the crowdsourcing App	https://www.mass.gov/media/2480921/
Service Line Inventory Outreach Materials and Toolkits	
LCRR Service Line Inventory Press and Media Toolkit	https://www.mass.gov/doc/frequently-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/download
PowerPoint Presentation of LCRR Service Line Inventory Press and Media Toolkit	https://www.mass.gov/doc/powerpoint-presentation-of-lcrr-service-line-inventory-press-and-media-toolkit/download
LCRR Service Line Inventory Public Outreach Toolkit	https://www.mass.gov/doc/lcrr-service-line-inventory-public-outreach-toolkit/download
How to Identify Service Line Materials: An Infographic for Customers (English)	https://www.mass.gov/doc/how-to-identify-service-line-materials-an-infographic-for-customers-english/download
Como Identificar Los Materiales de la Linea de Servicio: Infografia Para Clientes (Espanol)	https://www.mass.gov/doc/como-identificar-los-materiales-de-la-linea-de-servicio-infografia-para-clientes-espanol/download
Certification form for approval for PWS that claim no LSL, galvanized requiring replacement (GRR) or unknown service lines	
LCRR certification of non-lead service lines & request for approval form	https://www.mass.gov/media/2588731/
NO LSL Statement template	https://www.mass.gov/media/2587281/
Lead Service Line Replacement Plan	
LSL Replacement plan form	https://app.smartsheet.com/b/form/8f676b18cc224884a7069e3cc727f968
LCRR Requirements Following the SLI Submission	
Guide on initial LCRR monitoring for PWS on current LCR reduced monitoring	https://www.mass.gov/media/2587276/

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Lead and Copper Rule Revisions (LCRR) Requirements for "Lead Status Unknown" Service Lines	https://www.mass.gov/doc/lead-and-copper-rule-revisions-lcrr-requirements-for-lead-status-unknown-service-lines/download
Guidance: How PWS can make their Service Line Inventories Accessible to the Public	https://www.mass.gov/doc/guidance-how-pws-can-make-their-service-line-inventories-accessible-to-the-public/download
LCR Sampling Plan and Sampling Plan Change Form	
Video Training with Instructions	https://youtu.be/hJd9MAY8CGA
Recording of May 17, 2023 Training Webinar	https://youtu.be/qI97WxcteHA
Instructions for Lead and Copper Sampling Locations – Modification/Approval Request Form (LCR-LOC-MOD)	https://www.mass.gov/media/2598916/
Online LCR Sampling Plans	Public Water Supplier Document Search | Mass.gov
Links to Help Identify Schools and Childcare Facilities in PWS Service Areas	
Early Education and Childcare Facilities (EECFs)	https://childcare.mass.gov/findchildcare
Schools	https://profiles.doe.mass.edu/search/get_closest_orgs.aspx
MassDEP Funding Opportunities	
☐ Lead Service Lines Inventory and Replacement Plan Grant Program	Lead Service Line Planning Program | Mass.gov
☐ Assistance for Small Community Water Systems and Non-Transient Non-Community Systems - Lead Service Line Planning Program	MassDEP Small Systems Technical Assistance Program Application Survey: https://www.mass.gov/forms/massdep-service-line-inventory-and-lead- service-line-replacement-plan-technical-assistance-survey
DWP YouTube Training Videos	
Drinking Water Training - YouTube	
LCR-R 2-26-2024 Training Recording: https://youtu.be/L5FJ8PV9p1w. LCR-R Training Presentation Slide Deck: https://www.mass.gov/lists/lead-copper-forms-and-templates#lead-&-copper-rule- revisions-(lcrr)-	
EPA Links of Interest	
2021 LCRR Implementation Fact Sheet	https://www.epa.gov/system/files/documents/2024-04/revised-508_lcrr-compliance-fact-sheet_4.17.24.pdf
Fact Sheet for Developing and Maintaining a Service Line Inventory	https://www.epa.gov/system/files/documents/2023-06/EPA-Factsheet-Combined-06072023%20508-final.pdf
EPA Guidance for Developing and Maintaining a Service Line Inventory	https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf
Developing and Maintaining a Service Line Inventory: Small Entity Compliance Guide	https://www.epa.gov/system/files/documents/2023-06/Final%20Small%20System%20Entity%20Inventory%20Guide_508.pdf

This FAQ is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

In The Main	
To register to ITM articles please contact MassDEP DWP Program Director at program.director-dwp@mass.gov (subject: ITM).	To register to ITM articles please contact MassDEP DWP Program Director at program.director-dwp@mass.gov (subject: ITM).

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You may also contact the MassDEP Drinking Water Program at program.director-dwp@mass.gov or 617-292-5770.			

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