

Guidance: How PWS can make their Service Line Inventories Accessible to the Public

To be in compliance with the lead and copper rule revisions (LCRR) by the compliance date of 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. Below are the requirements for systems if they serve more than 50,000 people, 50,000 people or less, or do not have any LSL, GRR, or unknown service lines.

What information must PWS include in their Publicly accessible Service Line Inventories:

Service line inventories must include *all service lines* connected to the public water distribution system, regardless of ownership status. Public inventories are required to include a *location identifier for lead or GRR service lines*. Non-lead or unknown service lines are not required to have a location identifier in the publicly available inventory; however, MassDEP strongly recommends that PWS include unknowns and non-lead service lines with location identifiers in their publicly available inventory.

For more information see EPA's <u>Guidance for Developing and Maintaining a Service Line</u> Inventory (epa.gov).

PWS serving more than 50,000 People

Systems serving more than 50,000 people **are required to** *post their inventories online*. Some examples of different formats of inventories that meet this requirement are a GIS map, a PDF, an excel document, or a word document. Inventories need to include a location identifier for each lead service line (LSL) and galvanized requiring replacement (GRR). Location identifiers can be street addresses, blocks, intersections, or landmarks.



Image belongs to Malden GIS

PWS Serving 50,000 People or Less

Systems serving 50,000 people or fewer are required to have their service line inventories *publicly accessible*. This does not have to be in an online format, though MassDEP and the EPA are encouraging all PWS to consider providing online inventory access.

Type your STREET # and STREET NAME, then hit RETURN/ENTER. Click on a match to view details.	
Full Address	Service Materia
Full Address 0 ALBION ST	Service Materia Copper
0 ALBION ST	

PWS not providing the inventory online, can mail copies or available through in person visits to the water system's office. This does, however, increase costs for PWS because of costs to print, and staff time to process additional customers requesting copies.

Acceptable online inventory formats include GIS maps, PDFs, an excel documents, or word documents.

Image belongs to City of Somerville

PWS that do Not Have Lead, GRR, or Unknown Service Lines

Systems with no LSL, GRR, and unknowns can **post a written NONLSL statement, instead of a publicly accessible service line inventory**. The NONLSL statement should include a declaration that the distribution system has no lead service lines or galvanized requiring replacement service lines and explain the sources used to make that determination.

Please note that PWS will need to submit to MassDEP the <u>LCRR-NONLSL-CERT form</u> and be approved to certify that they do not have Lead, GRR, or unknown service lines in their inventory prior to posting the NONLSL statement. Once the LCRR_NONLSL-CERT form is approved, PWS must use **two of the following method**s to deliver the statement to consumers:

INSERT PWS NAME INSERT PWS ID

Our Public Water System has no Lead, Galvanized Requiring Replacement (GRR) or Unknown Service Lines On [Insert Date] [Insert PWS Name] provided MassDEP with a request for approval of no Lead, Galvanized Requiring Replacement (GRR) or Unknown service lines and a service line inventory that was developed using the following verification method(s): (*PWS must insert all*) ods used in its e n of se □Field Inspection by PWS Records Review Statistical Analysis □Customer Self-Identification □Sequential Monitoring Other(s) MassDEP-Approved Method(s): (Insert the name of the alternative al resistance acoustic wave, eddy current, other technolog iods. Examples – el hat may be developed. MassDEP can and will review these approaches for validity and accuracy.) On [Insert Date], MassDEP approved our certification for no Lead, Galvanized Requiring Replacement (GRR) or Unknown service lines For information on all service lines in the [Insert PWS Name] see [Insert Webpage (if applicable)] or contact the [Insert PWS Name] at [Insert contact information].

 Web posting, hand or direct delivery, posting in conspicuous locations, local newspaper, radio, television, reverse 911 phone calls, email, social media postings; and other methods approved by MassDEP, since the statement must be provided in a manner reasonably calculated to reach all persons served. Systems that serve more than 50,000 persons must post the statement online.

The NONLSL Statement must be included in the Consumer Confidence Report (CCR) for all systems required to provide a CCR.

The NONLSL statement can be created using the template found here: <u>https://www.mass.gov/media/2587281/</u>.

The LCRR-NONLSL-CERT form can be found here: <u>lcrr-nonlsl-cert.docx | Mass.gov</u>.

Examples of Public Inventories in MA

Listed are a few PWS that currently have public LSL inventories in various formats:

Mapped Inventories:

BWSC: Lead Service Map | Boston Water and Sewer Commission (bwsc.org) Everett: Lead Safe Community (arcgis.com) Malden: Water Service Map (arcgis.com)

Listed Inventories:

Somerville: <u>Lead Service Line Replacement Program | City of Somerville (somervillema.gov)</u> Quincy:

https://www.quincyma.gov/Document%20Center/Department/Public%20Works/Water%20Se wer%20and%20Drain%20Division/Lead%20or%20Lead%20Lined%20Water%20Service/LL%20lis t%20Oct19.pdf

Cambridge: <u>MASTER FILE BY SERVICE CARDS REVISED FOR CWD USE AUGUST 29 2017.xlsx</u> (cambridgema.gov)