



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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June 12, 2024

IMPORTANT NOTICE

Your PWS should Be Aware of This Information Prior to the Upcoming LCRR Deadline (October 16, 2024)

Dear Public Water Supplier,

On or by October 16th, 2024, all Non-Transient Non-Community (NTNC) and Community (COM) Public Water Suppliers (PWS) are required to submit a CSV file containing Service Line Inventory (SLI) to the Massachusetts Department of Environmental Protection (MassDEP) Drinking Water Program (DWP). This is required by the federal Lead and Copper Rule Revisions (LCRR).

**MassDEP has prepared a file, attached to this mailing, which includes the following
IMPORTANT TOPICS for your perusal:**

- How to validate and submit your SLI correctly by October 16, 2024.
- New guidance and visuals of unusual service line configurations, based on your submissions!
- How to apply to the FREE Small Systems Technical Assistance Program.
- Tools to encourage your consumers participation, including a NEW Press and Media Toolkit.
- The release of LCRR compliant consumer notice templates and accompanying documentation, and where they are posted.

Thank you for your proactiveness and assistance to meet the federal Lead and Copper Rule Revisions requirements, and to prioritize the inventorying and eventual removal of all lead service lines in Massachusetts.

Sincerely,

Yvette DePeiza
Program Director
MassDEP Drinking Water Program

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

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IMPORTANT INFORMATION that Your PWS should Be Aware of Prior to the Upcoming LCRR Deadline (October 16, 2024)

HOW TO SUBMIT YOUR LCRR REQUIRED SLI

- Your SLI must contain **all of your service lines**. This Inventory is a true, full inventory. It should contain all service lines, made of all materials, whether they are potable or non-potable. ALL service lines of ALL ownership types (i.e. customer owned and/or PWS owned) must be included in this inventory.
- **Your SLI MUST be submitted in the form of a CSV (Comma Separated Value) file.**
 - Why? Excel files are larger, and a CSV is much smaller. This reduced the stress on the MassDEP email account and eliminates the possibility of your email with your SLI being bounced back/not received by the MassDEP email account. The MassDEP SLI Template is a macro-enabled file. Macro-enabled files can be blocked by outgoing and incoming email service providers. The CSV file format ensures we will receive your submission. **Please follow the instructions provided in the SLI workbook [here](#) to convert your SLI to a CSV file.** This process is not as simple as saving the file as a CSV.
- Your SLI workbook MUST be either of the MassDEP created workbooks or a workbook your PWS has created which matches the columns and values of the MassDEP workbook. **Your SLI CANNOT be submitted using another state/organization's workbook/excel template.**
 - MassDEP **WILL NOT** accept the following SLI Templates:
 - EPA SLI Template
 - AWWA SLI Template
 - Another State's SLI Template
 - **How do I make sure my PWS created Workbook will be accepted?** See the MassDEP workbook instructions [here](https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-template-for-systems-with-split-ownership-of-service-lines-for-version-103/download) [<https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-template-for-systems-with-split-ownership-of-service-lines-for-version-103/download>]*. The acceptable column headers are described in the second to last section, titled "Structure of CSV File" and the valid, acceptable values to use in the workbook are listed in the table in the section titled "Populating Cell Values".
 - Why does MassDEP only accept certain columns and values?
 - ❖ MassDEP is stringent on the columns and values used as MassDEP will need to review and validate almost 800 SLIs after October 16th, 2024. To do so, MassDEP has created a validation process, based on those columns and values in the MassDEP workbook and described in the workbook instructions. MassDEP cannot validate

the workbooks created by other states or organizations, and therefore cannot accept SLIs created using those templates.

- ❖ If your PWS has been creating your SLI using another, incompatible state/organization template, the recommendation is to switch over to the MassDEP Workbook or edit your workbook to match the MassDEP formatting ASAP. *If you are a small system, the MassDEP / UMass Amherst Free Small Systems SLI / LSLRP Technical Assistance Program can help with this process. Apply [here](#).*

➤ **PWS should VALIDATE their SLI workbook BEFORE submitting it to MassDEP.**

- What is validation?
 - Validation is the process of running a macro in your workbook, which was created by MassDEP staff. This macro will review your workbook and highlight workbook errors based on the information entered into the workbook. Errors include **invalid values, leaving cells empty, and incorrect classifications of service lines**. *These errors MUST be corrected before the SLI is submitted.*
 - The [MassDEP Workbook instructions](#) includes a section on how to validate your workbook under the “Validating Data” section [<https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-template-for-systems-with-split-ownership-of-service-lines-for-version-103/download>].
- Please review the other attached file, titled *Lessons Learned: Common Errors Found When Reviewing and Validating Lead and Copper Rule Revisions (LCRR) Required Service Line Inventories (SLI)* for a more in depth explanation of common errors found in draft SLIs that have been submitted.

➤ **PWS should CONFIGURE their SLI Workbook Settings** [page 3 of the [Workbook Instructions](#)] BEFORE submission.

- What does “Configuring” the settings mean?
 - The **initial Configuration of your settings** is an important step in the workbook, to complete information particular to your system. For your SLI, you must include your PWS ID number, and include information on the number of Multi Family (MF) homes in your service area, this information is needed to calculate sampling tiers within the workbook. Rather than have that information required for every row, the initial configuration of your settings allows you to only enter that information once. This step is very quick and is described in page 3 of your SLI workbook instructions.

Do You Prefer a Visual Guide of This Process?

MassDEP has created a *Service Line Inventory Workbook Training Video*, which demonstrates how to:

- Configure your initial workbook settings.

- Validate your inventory.
- Export your inventory as a CSV file.

This training video is available on the MassDEP YouTube page here:
<https://youtu.be/2dMeccp976Y>.

If you have any questions about the Inventory process, email MassDEP/DWP at
program.director-dwp@mass.gov; subject: Service Line Inventory.

Are you Aware of What is Considered a Service Line, and how to Inventory Unusual Service Line Configurations?

MassDEP has received a larger number of questions from PWS that have unusual service line configurations, or unique scenarios where they are unsure of how to inventory a service line. Due to these many situations, MassDEP has cataloged many of these questions and created visual graphics of these scenarios into 2 guidances, for your benefit. The guidances are:

[LCRR Service Line Identification Guidance](#): This guidance is a general guide for all PWS, which contains over 20 different visuals for your benefit.

[LCRR NTNC and Small COM PWS Service Line Identification Guidance](#): This guidance focuses on NTNC and Small COM PWS, specifically PWS that may be unsure of whether or not they have a service line, and service lines that PWS may not be aware are classified as service lines, such as non-potable lines, and service lines connected to outside structures/buildings PWS may not think of when creating a SLI.

If you have any questions regarding what is considered a service line, reach out to MassDEP DWP at program.director-dwp@mass.gov, subject; Service Line Inventory.

Do you Need Assistance Compiling your Service Line Inventory?

NTNC PWS and Small COM PWS (serving under 10,000 people) can request help from the *MassDEP / UMass Amherst Free Small Systems SLI / LSLRP Technical Assistance Program* to catchup with the LCRR requirements. The *Free Technical Assistance Program* is available to help all NTNCs and small COMs complete both the SLI and their Lead Service Line Replacement Plan (LSLRP) if needed.

How does it work: The Free Technical Assistance Program will help you identify, compile, and review service line records, create a customer outreach plan, and complete the service line inventory before the **October 16, 2024** deadline.

MassDEP strongly recommends that all eligible PWS [apply for the free assistance by completing the application survey](#), or emailing lsl@umass.edu with the subject, “Requesting assistance for the SLI”.

Do you Need Assistance in Encouraging Consumer Participation, to Identify Private Service Lines?

MassDEP has heard from multiple PWS regarding the amount of consumer refusals PWS have received to verify private service line materials. We understand that for many PWS, private service line sections can be harder to inventory, specifically to inventory without consumer support.

To combat this, MassDEP has created the following tools:

- The [MA Lead Service Line Identification Web Application](#) (MA-LSLI App).
 - This app is 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. No downloading of software is required. The App is a collection of Smartsheet forms, sheets, and workflow automations that allow your customers to submit photos of their service line for identification purposes. Instructions for using the App can be found [here](#).
- The **NEW** LCRR SLI Press and Media Toolkit
 - This toolkit is a collection of outreach materials; such as talking points, social media posts with images and captions, and a prewritten article and PowerPoint presentation. These tools can be shared with local media outlets and community outreach organizations to reach your consumers regarding the importance of this SLI, through both online and physical media they produce. The Press and Media Toolkit can be found [here](#).

New LCRR Compliant Consumer Notification Templates Released

MassDEP has released the following documents for PWS use after the LCRR deadline of October 16, 2024, and prior if PWS would like to get a head start on LSLRs:

- **LCRR Consumer Notification Template – Confirmed Lead Service Line**
- **LCRR Consumer Notification Template – Confirmed Galvanized Requiring Replacement Service Line (GRR)**
- **LCRR Consumer Notification Template – Unknown Service Line**
- **Procedures Following a Full LSL Replacement Notice Template**
- **Procedures Following a Partial LSL Replacement Notice Template**
- **Filter Cartridge Notice** – A notice with information on why a consumer may be receiving a filter because of a lead service line replacement, and instructions for installation.
- **PWS Offer to Sample Letter Template** – This document is a template which meets the LCRR requirements PWS must meet, by offering sampling within 3-6 months of a service line replacement.
- **Chain of Custody (COC) for Lead Sampling After Service Line Replacement**
- **Consumer Tap Sampling Collection Letter Template** – This template is meant to be included with a sampling kit and COC if a consumer has requested sampling to be provided after their service line is replaced.

MassDEP has also created notification templates if PWS would like to do further outreach for service line replacements, such as a Lead Service Line Replacement Program. These documents are divided into notification templates for consumers with unknown service lines, or known LSLs and GRRs, and consent forms for service line investigations and replacements:

- Lead Service Line Replacement Program Notification Template: Consumers with an Unknown Service Line
- Lead Service Line Replacement Program Notification Template: Consumers with a GRR or LSL
- Lead Service Line Investigation Consent Form
- Lead Service Replacement Consent Form

* All references to workbook instructions are referencing the *Service Line Inventory Excel Workbook Template for Systems with Split Ownership of Service Lines (version 1.0.3)*. This workbook, previously titled the *Service Line Inventory Excel Workbook Template*, **is the workbook that has been available for the past many months** and is based on the average COM PWS that has split ownership of their service lines and may categorize their records as such. **This workbook has ONLY changed in name.** No other changes have taken place in this workbook.

For NTNCs, COM PWS that do not record their service lines using a split ownership method, or COM PWS that own all segments of their service lines, a new workbook has been created to make this process easier for these PWS. Using this Workbook instead of the other is **NOT REQUIRED**. If PWS, such as NTNCs or other systems without split ownership, have already begun to use the other workbook, you do NOT need to switch over to this workbook. **This is an OPTIONAL version of the workbook.** That is meant to make this process easier for some systems should they choose to use this. This workbook allows systems to categorize service lines as only 1 or 2 materials and categorizes multiple materials as “upstream” and “downstream” rather than “public” and “private”.

Both workbooks and instructions are available here: <https://www.mass.gov/lists/lead-copper-forms-and-templates>.