

Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs

Department of Environmental Protection

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DRINKING WATER PROGRAM

VERY IMPORTANT NOTICE

Re: Important Reminder! PWS must distribute Service Line Inventory Consumer Notices by December 31, 2025 this year!

11/24/2025

Dear Public Water Supplier,

Please note, this reminder is being sent to all public water systems (PWS) that currently have one or more service lines identified as lead, galvanized requiring replacement (GRR), or lead status unknown in the most recently imported Service Line Inventory in the Massachusetts database. Service Line Inventory Importing is ongoing as updated inventories are reviewed.

Based on the Service Line Inventory (SLI) information the Massachusetts Department of Environmental Protection (MassDEP) has on file, your system has at least one or more lead, GRR, or lead status unknown service line(s). **Therefore, your PWS is required to distribute Service Line Inventory Consumer Notices (CNs) annually**. This is a new recurring requirement under the Lead and Copper Rule Revisions (LCRR) (40 CFR 141.85(e)(1) (Mar. 2, 2022)). **The SLI CNs for the year 2025 must be distributed no later than December 31, 2025!**

If you have already distributed and certified these notices, thank you for your diligence and you may disregard this reminder portion of the letter and proceed to the additional information section below.

Upcoming LCRR CN Deadline and Who to Distribute CNs To

The SLI CNs for the year 2025 must be distributed by December 31, 2025!

These notices must be delivered to the **premise address** of all service lies classified as lead, GRR or unknown. This requirement is mandated under the Lead and Copper Rule Revisions (LCRR). If the building served by the service line is owned by a person not residing

on the premise, an **additional consumer notice must be sent to the property owner**. This is a Massachusetts-specific requirement. This can be discovered best if the billing address for the owner is different from the premise address.

If the property the service line serves is inactive/abandoned, the notice should still be sent to the billing address if available, as the building/home owner can still replace the service line while the building is not occupied.

Meeting LCRR CN Requirements

Your SLI CNs must meet the following LCRR requirements. The MassDEP Drinking Water Program (DWP) created templates that meet all of these requirements, and are available on the Lead and Copper Forms and Templates webpage.

- A statement that the person's service line is lead/GRR/Unknown but may be lead.
- An explanation of the health effects of lead:
 - CCRI Language: There is no safe level of lead in drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups, especially pregnant people, infants (both formula-fed and breastfed), and young children. Some of the health effects to infants and children include decreases in IQ and attention span. Lead exposure can also result in new or worsened learning and behavior problems. The children of persons who are exposed to lead before or during pregnancy may be at increased risk of these harmful health effects. Adults have increased risks of heart disease, high blood pressure, kidney or nervous system problems. Contact your health care provider for more information about your risks.
- Steps a person can take to reduce lead exposure.
- Information about opportunities to replace lead/GRR service lines (required for lead and GRR service line CNs).
- Programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line (required for lead service line CNs, recommended for GRR service line CNs).
- Information about opportunities to verify the material of the service line (for unknown service line CNs).

Recent Changes to your SLI

If your system has identified any unknowns, or has replaced any lead/GRR service lines, MassDEP encourages you to submit an updated SLI to MassDEP when you distribute your consumer notices. Providing an updated SLI helps ensure that MassDEP has the most accurate information available when reviewing your certification form next year. This reduces the amount of follow-up needed and speeds up the approval process. If you

choose to submit an updated SLI, please review it carefully for errors as you did with your initial SLI submission in 2024. Instructions on how to validate your inventory for errors are available here: SLI Workbook Instructions.

Certifying your CN Distribution

After distributing your consumer notices, your PWS must certify the distribution of these notices by July 1, 2026. Certification must be completed by submitting the SLI CN Certification Form. This form has been updated since last year's certification form was released, and the new version is now available here: LCRR Certification of SLI CN Distribution Form.

Please note that if you have already certified the distribution of your SLI CNs with the old form, this is acceptable, and we will review those previous submissions as is. This form was revised for accessibility reasons, to be more up to date with the LCRR SLI CN deadlines, and to be easier to complete.

Service Line Inventory Consumer Notice Deadlines

The tables below contain the relevant SLI CN deadlines for PWS to follow, for both the LCRR and the upcoming Lead and Copper Rule Improvements (LCRI). Please note for the LCRI table, consumer notices will be required until the PWS has no more lead, GRR, or unknown lines. The table provided only contains the first 3 years of the rule provided to show the deadline pattern.

LCRR SLI CN Timeline Per Year (2024-2027)

Year	Rule	SLI Deadline	CN Timeline	CN Distribution Deadline	Certify
2024	LCRR	October 16, 2024	30 days	November 15, 2024	July 1, 2025
			after SLI Update/		
			Submission		
2025	LCRR	N/A	30 days	December 31, 2025	July 1, 2026
			after SLI Update/		
			Submission		
2026	LCRR	N/A	30 days	December 31, 2026	July 1, 2027
			after SLI Update/		
			Submission		

(Please note, CNs are required until all lead, GRR, and unknown service lines are non-lead)

Year	Rule	SLI Deadline	CN Timeline	CN Distribution Deadline	Certify
2027- 2028	LCRI	November 1, 2027	30 days after SLI Update /Submission	December 1, 2027	January 30, 2028
2029	LCRI	January 30, 2029	30 days after SLI Update /Submission	March 1, 2029	January 30, 2030
2030	LCRI	January 30, 2030	30 days after SLI Update /Submission	March 1, 2030	January 30, 2031
		And so on for LCRI timeline			

Additional Information: Compliance Responsibilities for PWS During the Interim LCRR to LCRI Process (as of 11/17/2025)

Below is a quick reminder summary of PWS responsibilities to maintain compliance with all current Lead and Copper Regulations, as this is a recent question we have received from PWS since October 16, 2024.

Lead and Copper Rule (LCR) Responsibilities:

All requirements of the LCR, as written in the Massachusetts Drinking Water Regulations, 310 CMR 22.00 are still required. PWS must continue with LCR activities/tasks/requirements as your PWS has for the previous years.

Lead and Copper Rule Revisions (LCRR) Responsibilities:

Many aspects of the LCRR were paused by the U.S. Environmental Protection Agency (EPA) due to the release of the LCRI, except for the following three requirements:

- 1. Initial SLI, due October 16, 2024
- 2. Annual Service Line Material Consumer Notifications
 - Required if a consumer is served by a Lead, GRR, or Unknown service line.
 - Certification is required the following year by July 1st.

3. Distribution of the 24 Hour Tier 1 Public Notice if a PWS's 90th percentile exceeds the Lead Action Level

PWS must follow the three requirements above to maintain compliance with the LCRR. If PWS are not compliant with any of these three requirements, enforcement will be conducted by U.S. EPA, as MassDEP does not have primacy for the LCRR at this time. All other LCRR requirements are paused and not in effect. These pieces of the LCRR are required in addition to the LCR requirements.

Lead and Copper Rule Improvements (LCRI) Responsibilities:

PWS will be required to be compliant with the LCRI beginning November 1, 2027. Until November 1, 2027, PWS are to continue maintaining compliance with the LCR, and the three LCRR requirements mentioned above.

In the meantime, PWS may begin to prepare for the LCRI by doing the following:

Begin to:

- Identify and reduce your Lead Status Unknown service lines.
- remove Lead and GRR service lines when possible.

Prepare for:

- Non-Lead Validations; Visit the EPA LCRI Non-Lead Validations Fact Sheet
- the possibility of going back to Semi-Annual (Standard) Monitoring in 2028; Visit the <u>EPA LCRI Tap Monitoring Requirements Fact Sheet</u>
- a lower Lead Action Level of 10 ppb;
- 1st and 5th liter sampling for applicable lead sampling sites; Visit the <u>EPA LCRI Tap</u> Monitoring Requirements Fact Sheet
- Offering to sample primary schools and childcare facilities for 5 years, at a rate of 20% each year. See Water Smart Program for information on opportunities for free testing on the <u>Lead and Copper Rule Revisions website</u>, "Massachusetts Free Water-Smart Pilot Program for Public Water Systems".
- Replacing all lead, GRR, and identifying all unknowns within a 10 year period for most systems. Visit the <u>EPA LCRI Service Line Inventory and Replacement</u> <u>Requirements Fact Sheet</u> for more information.

Sincerely, Yvette DePeiza

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Program Director

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This is important information for Public Water Suppliers (PWS) and their representative and as such PWS or PWS representatives should not unsubscribe from program.director-dwp@notice.mass.gov emails.