



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

September 30, 2024

Important Updates Regarding the Service Line Inventory and Related Requirements

*You are receiving this letter as you are the Owner, Contact, or Distribution Operator of a PWS that is required to submit a Service Line Inventory. **If the person creating the Service Line Inventory is not the Owner, a Contact, or the Distribution Operator, please forward this email to them.***

Dear Public Water Supplier,

All MA Community (COM) and Non-Transient Non-Community (NTNC) **Public Water Suppliers (PWS) must complete and submit a Service Line Inventory (SLI) by October 16, 2024** to the Massachusetts Department of Environmental Protection (MassDEP) Drinking Water Program (DWP), as required under the federal Lead and Copper Rule Revisions (LCRR) 40CFR. See 40 CFR at [eCFR :: 40 CFR Part 141 Subpart I -- Control of Lead and Copper](#).

As we get closer to this deadline, MassDEP/DWP will provide more updates for PWS regarding requirements, forms, templates, and add new questions to our compiled Question and Answer document when we receive new questions from PWS. See [MassDEP LCRR Frequently Asked Questions](#).

Please see below for more information on these requirements. **These updates will affect all PWS.**

Updated #1: The Service Line Material Consumer Notification Templates have been Updated

MassDEP/DWP had posted the Massachusetts Service Line Material Consumer Notification (CN) Templates earlier this summer. These Templates have been updated to be consistent with the EPA versions. MassDEP has also included instructions on how to deliver these service line material CNs in the updated CN documents. **Please use the new versions of these templates for your consumer notifications in October and November.**

Each of the CN templates are available on the MassDEP Lead and Copper Forms and Templates webpage here: <https://www.mass.gov/lists/lead-copper-forms-and-templates>

- [Lead Status Unknown Service Line CN Template](#)
- [Galvanized Requiring Replacement Service Line CN Template](#)
- [Lead Service Line CN Template](#)

PWS should note that any PWS with **lead, galvanized requiring replacement, or lead status unknown service lines** must deliver CNs to each customer (both the owner and resident/occupant if they are not the same person) served by these 3 types of service lines. These CNs must be delivered by **November 15, 2024**, or upon the service initiation of every new customer (both the owner and resident/occupant if they are not the same person) added to the PWS distribution system following this date.

Update #2: New Information on the Requirements to Deliver CNs to Multifamily Structures and similar Buildings

EPA provided MassDEP/DWP with the following multiple family /school information to share with PWS:

Q1. For multifamily structures, would posting the CN in each building be enough to satisfy this notification requirement instead of delivering the CN to each unit?

A. Yes, posting a CN in each building is enough to satisfy this requirement.

Q2. How should we address the delivery of notices to school and education campuses, compared to multifamily buildings?

A. Posting a CN in each building of a school and educational campuses is enough to satisfy this requirement.

Q3. For schools, are PWS responsible for notifying parents of this information?

A. No, PWS are not required to do any further notification beyond the CN. However, MassDEP does recommend that PWS encourage schools to share this information with their student's parents/guardians.

This information has been included in the instructions of each CN template. Please see the section above (Update #1) for more information on how to find and download each CN template. This information is also added to MassDEP/DWP LCRR Q/A at [MassDEP LCRR Frequently Asked Questions](#).

MassDEP continued to encourage PWS to ask any questions they have regarding the Lead and Copper Rule Revisions (LCRR) and SLI. Please bring all questions to MassDEP DWP by contacting program.director-dwp@mass.gov.

Update #3: The NONLSL Certification Form has been Updated

MassDEP has updated the [LCRR Certification of Non-Lead Service Lines and Request for Approval](#) (also called the NONLSL Certification Form). **Please make sure that you download and use the updated NONLSL Certification Form.**

The NONLSL Certification form has been updated to include questions on how your PWS will be distributing the non-lead statement on October 16, 2024. PWS that have no lead, galvanized requiring replacement, or lead status unknown service lines in their distribution system must have and submit to MassDEP/DWP a non-lead statement instead or a service line inventory that is publicly accessible. Massachusetts has additionally required that PWS with a non-lead statement must distribute this non-lead statement using 2 or more methods, in a manner that is reasonably calculated to reach all persons served by the PWS. These methods include the following:

1. web posting,
2. hand or direct delivery,
3. posting in conspicuous locations,
4. local newspaper,
5. radio, television,
6. reverse 911 phone calls,
7. email,
8. social media postings and
9. other methods approved by MassDEP.

Update #4: The SLI Certification Form Has been Posted

All PWS that submit a SLI must submit a SLI Certification Form. This form is required as PWS must provide further information on topics such as how they verified the materials of their service lines, and how they will be making their SLI or non-lead statement publicly accessible after October 16, 2024. The Certification Form is available here:

<https://www.mass.gov/doc/lcrr-service-line-inventory-certification-form/download>.

Update #5: Concerning SLI Questions MassDEP Has Recently Received

In the past month, as we get closer to the SLI deadline, we are receiving additional questions that may be applicable to you. Please see the latest questions and answers below, in case you were unaware of these answers:

Q: When is the Service Line Inventory (SLI) due?

OCTOBER 16, 2024

Q: Can I submit a SLI with unknowns?

YES! Submitting a SLI with unknowns is acceptable, and we expect many PWS to submit a SLI with some unknowns. **Submitting a SLI with unknowns does NOT trigger any violations or enforcement**. Submitting a SLI with lead status unknown service lines does, however, trigger the

requirement to distribute consumer notices to all consumers served by a lead status unknown (and lead, and GRR) service line by November 15, 2024.

Q: My PWS doesn't think I can submit a SLI by October 16, 2024, can I receive an extension?

NO, PWS cannot receive an extension to comply with this rule. MassDEP does not have primacy over this rule, this rule will be enforced by EPA. EPA has stated that they will not provide a extension to any PWS, regardless of circumstances.

Please remember all LCCR Questions and Answers (Q/A) is located at [MassDEP LCRR Frequently Asked Questions](#)

The recommendation for PWS who are concerned about this deadline is to please do the following:

- (1) **Contact MassDEP/DWP at program.director-dwp@mass.gov or 617-292-5770 as soon as possible to inform us of this concern.**
- (2) **Prioritize, completing and submitting to MassDEP/DWP the inventory promptly.** Not submitting an inventory will cause EPA to take enforcement action.
- (3) **Please submit something.** An inventory, not completed, or full of unknowns, is much better than not submitting an inventory at all. Submitting an inventory with at a minimum all service lines marked as unknown can meet the minimum requirements for this rule, and MassDEP can work with you to create a more accurate inventory after the SLI deadline.

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