Instructions for Lead and Copper Sampling Locations – Modification/Approval Request Form (LCR-LOC-MOD version 1.4.4)

The Lead and Copper Sampling Locations – Modification/Approval Request Form (LCR-LOC-MOD) replaces the following two (2) forms:

- Lead and Copper Sampling Plan (LCR-SP-A, LCR-SP-B, LCR-SP-C)
- Lead & Copper Sampling Plan Change in Sampling Site (LCR- Site Change)

Two training videos are posted to the MassDEP YouTube channel.

- https://www.youtube.com/watch?v=hJd9MAY8CGA (17 minute video on how to use the form)
- https://www.youtube.com/watch?v=qI97WxcteHA (1 hour video that includes background information)

The attached pre-populated form includes all currently approved primary and alternate LCR sampling locations and all schools/early education and care facilities (EECFs) for your PWS based on your current approved sampling plan.

General instructions:

- **You must use Microsoft Word to fill out this form. Forms that have been printed and marked by hand and/or scanned will NOT be accepted. If you do not have access to Microsoft Word please contact MassDEP/DWP via email at program.director-dwp@mass.gov.**
- **Completed forms should remain in Word format, do not print or convert to PDF.**

Section 1: PWS Information

Verify the prepopulated information, including the population served and number of required samples. Do not make changes to the prepopulated information. If information is not accurate, please reach out to your regional office.

Section 2: Request Type

- Select one or more of the three options for submitting the form. Changing sites in my existing plan: use this option for any changes to sites (but not number of samples), such as adding new alternate or primary sites due to changes in tier status or participation.
- Switching from Standard to Reduced: use this option if you are currently on semi-annual sampling and you wish to reduce the number of sample locations (one time reduction) based on the criteria specified in 310 CMR 22.06B(7)(c)
- Switching from Annual to Triennial: use this option if you are currently on annual sampling and you wish to reduce your monitoring frequency to triennial monitoring based on the criteria specified in 310 CMR 22.06B(7)(d).
- Switching from Reduced to Standard: use this option if your reduced monitoring frequency has been revoked. Please note that if your current sampling plan was approved for reduced monitoring number of samples, your new plan must have the standard number of primary sampling locations according to 310 CMR 22.06B.

System size (number of people served)	Number of sites (standard monitoring)	Number of sites (reduced monitoring)
>100,000	100	50
10,001 to 100,000	60	30

3,301 to 10,000	40	20
501 to 3,300	20	10
101 to 500	10	5
≤100	5	5

Section 3: Certification of No Lead Service Lines

- Checking the box along with a digital signature in section 10 is required if no lead service lines are present in the distribution system.

Section 4: Request for Correction/Removal of Currently Approved Primary Sampling Locations

- **Confirm that all listed sites are accurate.** The information in the left-hand columns (CURRENT LOCATION INFORMATION) is NOT editable. If the information for a location is inaccurate, use the form fields in the right-hand columns (CORRECTION/CHANGE) to update the information.
  Examples:
    - If a location is no longer used as a sampling location then check the box "DELETE THIS LOCATION".
    - If a location is listed as a primary site but is actually an alternate site then check the box "CHANGE TO ALTERNATE LOCATION".
    - If there is typo in the location address then enter the correct address in the column labeled CORRECTED LOCATION ADDRESS.

- For all listed sites, except EECFs, select the VERIFICATION METHOD that was used to confirm the site's tier and class. Note, we have updated our data systems to store the verification method so we need you to provide this additional data. Every sampling location requires a verification method. (See verification method table at the end of the instructions).
- For all listed sites, except schools/EECFs, select the tier and class (CORRECTED TIER AND CLASS). Note, we have updated our data systems to store the tier class so we need you to provide this additional data. Every sampling location requires the tier and class to be indicated. (see the tier/class table at the end of the instructions).
- In the space provided at the end of section 4, explain ALL corrections/changes being made.

Section 5: Request for Approval of New Primary Sampling Locations

- If there are LCR sites not listed in the "Currently Approved" section then enter those new sites in the section titled "Request for Approval of NEW PRIMARY Sampling Locations".
- All new sampling locations require a verification method and tier/class designation.
- **Section 6: Request for Correction/Removal of Currently Approved Alternate Sampling Locations Confirm that all listed sites are accurate.** The information in the left-hand columns (CURRENT LOCATION INFORMATION) is NOT editable. If the information for a location is inaccurate, use the form fields in the right-hand columns (CORRECTION/CHANGE) to update the information.
  Examples:
    - If a location is no longer used as a sampling location then check the box "DELETE THIS LOCATION".
    - If a location is listed as an alternate site but is actually a primary site then check the box "CHANGE TO PRIMARY LOCATION".
    - If there is typo in the location address then enter the correct address in the column labeled CORRECTED LOCATION ADDRESS.

- For all listed sites, except EECFs, select the VERIFICATION METHOD that was used to confirm the site's tier and class. Note, we have updated our data systems to store the verification method so we need you to provide this

additional data. Every sampling location requires a verification method. (see verification method table at the end of the instructions).

- For all listed sites, except schools/EECFs, select the tier and class (CORRECTED TIER AND CLASS). Note, we have updated our data systems to store the tier AND class so we need you to provide this additional data. Every sampling location requires the tier and class to be indicated. (see the tier/class table at the end of the instructions).
- In the space provided at the end of section 6, explain ALL corrections/changes being made.

Section 7: Request for Approval of New Alternate Sampling Locations

- If there are LCR sites not listed in the "Currently Approved" section then enter those new sites in the sections titled "Request for Approval of NEW ALTERNATE Sampling Locations".
- All new sampling locations require a verification method and tier/class designation.

Section 8: Request for Correction/Removal of Currently Approved Schools/Early Education and Care Facilities (EECFs)

- Verify to make sure that the schools/EECFs in your distribution have not changed by visiting the childcare search website (https://childcare.mass.gov/findchildcare) to make sure no new facilities have been added since you submitted the sampling plan for approval.
- Confirm that all the schools/EECFs served by your PWS are listed along with the address of the facility.
- The name of the school/EECF only should appear on the sampling plan. The specific taps within the facility to be sampled are to be indicated on the chain of custody during the sampling event.
- Two taps from two schools should be sampled each round, using first draw 250mL samples.
- Avoid taking school samples when school is not in session (during school break).

Section 9: Request for Approval of New School/Early Education and Care Facilities(EECFs)

- Use this section to add any schools/EECFs that do not appear in section 8.

Section 10: Certification

- Certify the information by entering your name, job title, email address, phone number and today's date in the fields Person certifying must be a person authorized to submit on behalf of the PWS .
- Digital signature in section 10 is certifying the information submitted in section 3 and the rest of the form, including sample locations, tier/class and verification methods are true, accurate and complete to the best extent of your knowledge.
- Submit the form to program.director-dwp@mass.gov from the email account listed in section 10. **Note, any forms submitted using an email address other than the one in listed in Section 10 will NOT be accepted.**
- MassDEP will review the form and respond with a determination within 2-3 weeks.

Tier Classification Information for COM Systems

Within each tier, use higher classification locations before lower classification locations (ex. Tier 1A before Tier 1B)

Tier 1 Class		Tier 2 Class		Tier 3 Class	
A	Single Family Residences (SFR) with Lead Service Line (LSL) (partial or full) or lead-lined.	**C**	MFR with LSL and/or lead goosenecks/pigtails	**G**	SFR built prior to 1983.
A2	Multifamily Residence (MFR) with LSL if ≥ 20% connections served by PWS are MFRs	**D**	MFR with lead pipes or copper pipes with lead/tin solder built in 1983, 1984, or 1985.	**H**	Other/exceptional cases.
A3	SFR with lead goosenecks/pigtails	**E**	Private building with LSL and/or with lead goosenecks/pigtails.		
B	SFR with lead pipes or copper pipes with lead/tin solder built in 1983, 1984, or 1985.	**F**	Private building with lead pipe or copper pipe with lead/tin solder installed in 1983, 1984, or 1985.		
B2	SFR with verified Lead/Tin solder built in 1986 or later.				

Note: Per 310 CMR 22.06B(7)(a)8, any water system whose distribution system contains lead service lines shall draw 50% of the samples it collected during each monitoring period from sites that contain lead pipes, or copper pipes with lead solder, and 50% of the samples from sites served by a lead service line. A water system that cannot identify a sufficient number of sampling sites served by a lead service line shall collect first-draw samples from all of the sites identified as being served by such lines.

Tier Classification for NTNC Systems

Tier 1	Tier 2	Tier 3
Contain copper pipes with lead solder installed after 1982 or contain lead pipes; and/or are served by a lead service line (LSL).	Copper pipes with lead solder installed before 1983.	Other – Representative sites throughout the distribution system.
Note: A representative site is a site in which plumbing materials used would be commonly found at other sites served by the water system.		

Verification Methods

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 the most accurate and best available knowledge, all sampling sites should include a verification method. If more than one method was used pick the most accurate/highest verification method.

Verification Method	Description
Field Inspection	Field inspection by PWS. This is considered the most accurate verification method that uses a physical and visual inspection by a trained staff person. Typically, at the time of meter replacement, service line replacement, or special inspections such as pot holing and vacuum excavation.
Records Review	This verification method includes review of PWS current or past records, including tap/tie cards, distribution system main replacement or leak detection, or any projects where service line material may have been recorded by the PWS. Other potential sources of information in a community might include plumbing and building permits, inspectional services records, or year of construction.
Statistical Analysis	This verification method uses statistical modeling and machine learning to predict the presence of lead service lines.
Customer Self-Identification	This verification method uses information collected from building occupants and typically includes photos of the service line.
Sequential Monitoring	This verification method can be used if the physical inspections, records review, or statistical analysis are not feasible. This method employs a process of taking five 1-liter samples and analyzing the samples for lead to determine if the service line is likely lead.
Other	Other MassDEP-approved method. Alternative methods, such as electrical resistance acoustic wave, eddy current, and other technologies that may be developed. MassDEP can and will review these approaches for validity and accuracy.