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| --- | --- |
| **Important:** When filling out forms on the computer, use only the tab key to move your cursor – do not use the return key.keysFor information on brass service lines see MassDEP LCRR Q&A question #15 and #16 at <https://mass.gov/doc/frequently-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/>. | **Background and Instructions** |
| This form was developed in response to Community (COM) and Non transient Non-Community (NTNC) public water suppliers preparing for the Lead and Copper Rule Revisions (LCRR) requesting a process to certify that their system has no lead service lines. MassDEP may request this information per 310 CMR 22.03(15).* All Public Water Systems (PWS) subject to the Lead and Copper Revisions (LCRR) must submit an initial service line inventory by October 16, 2024, including systems without lead service lines (LSL) which can be documented and includes unknown and galvanized requiring replacements (GRR).
	+ Note: lead lined steel service lines are a form of lead service lines.
* If a PWS can demonstrate and certify that it has no lead service lines, no galvanized requiring replacement and no service lines of unknown material, the PWS may complete and submit this LCRR-NONLSL-CERT form to MassDEP for review and approval.
* Please note that if MassDEP approves a PWS’ LCRR-NONLSL-CERT, the PWS will still be required to post a “NONLSL Statement” declaring that it has no LSL, GRR, or unknown service lines and explaining the sources used to make that determination. The form and manner to post this statement must be reasonably calculated to reach all persons served by the system and approved by MassDEP. The PWS must use two or more of the following methods to deliver the statement to consumers:
	+ 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.
* If the LCRR-NONLSL-CERT is approved by MassDEP the PWS will not be required to make the inventory publicly accessible on-line and provide routine inventory updated to the State or to the public but will be required to post the NONLSL Statement as noted above.
* If in the future, after MassDEP approves a LCRR-NONLSL-CERT, a PWS finds a lead service line or GRR within its distribution system, the PWS must notify MassDEP within 30 days of discovery and submit an updated inventory on a schedule established by MassDEP.
* The LCRR-NONLSL-CERT must be completed by the primary distribution operator of the system or an approved PWS representative and submitted to MassDEP Drinking Water Program at program.director-dwp@mass.gov from the email account listed in section D. Email Subject Line: [City/Town]-[PWS ID#]–NONLSL-CERT.
* Please note, for PWS without LSL, GRR, or unknown service lines that are interested in continuing reduced monitoring under the LCRR, the completion, submittal, and MassDEP’s approval of a LCRR-NONLSL-CERT is one of the eligibility criteria. For more information on maintaining reduced monitoring in 2025 see <https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-lcrr/>.
 |
| **A.**  | **Public Water System (PWS) Information** |
|  |  | System Class: | [ ]  COM (Community) | [ ]  NTNC (Non-Transient Non-Community) |
|      PWS NAME |      PWS ID # |      CITY/TOWN |
| **B.**  | **Inventory Verification** |
|  |  | **1.** | When did your Public Water System finalize the verification of its service line inventory? |       |
| **2.** | Provide a link to the completed service line inventory\* or attach the CSV file described in the [MassDEP Instructions for use of the Service Line Inventory Excel Workbook](https://www.mass.gov/media/2480886/download) located at <https://www.mass.gov/media/2480886/>.  |
|  |
| \* Service line inventories must be provided as described in the Instructions for Use of the Service Line Inventory Excel Workbook which can be found on the mass.gov website at <https://www.mass.gov/media/2480886/>. Please note that some CWSs and NTNC PWSs may not have an extensive distribution system, such as those with a direct connection from a well to a single building. Systems must report the material from the well to the building inlet for their inventory. |
| **3.** | Select and check ☑ below all verification methods used to develop your system’s Service Line Inventory. For each method selected explain in detail the records or tools used to verify the inventory. See EPA’s Guidance for Developing and Maintaining a Service Line Inventory for more information at <https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf>.  |
| [ ]  Records Review |
| Details:       |
| [ ]  Field Inspection by PWS |
| Details:       |
| [ ]  Customer Self-Identification |
| Details:       |
| [ ]  Statistical Analysis |
| Details:       |
| [ ]  Sequential Monitoring |
| Details:       |
| [ ]  Other MassDEP-Approved Method |
| Details:       |
| **4.** | What is your overall level of confidence in the inventory? | [ ]  Low | [ ]  Medium  | [ ]  High |
| Explain your rationale for the selected confidence level:  |
| **5.** | Does your system’s inventory consist of all Non-Lead Service Lines, determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement? | [ ]  Yes | [ ]  No |
| **6.** | Does your system contain any service lines of unknown material? | [ ]  Yes | [ ]  No |
| **7.** | Did your community/town ban lead service lines? | [ ]  Yes | [ ]  No |
|  | If yes, identify the state or local ordinance that banned the use of lead in the system and provide a link to the information or attach a PDF to your response.      |
| **8.** | Does your system have lead goosenecks, pigtails, or connectors in the distribution system? | [ ]  Yes | [ ]  No | [ ]  I do not know |
| If yes, or do not know, is your system removing or have a plan for removing any lead goosenecks, lead pigtails, or lead connectors encountered during maintenance or construction? | [ ]  Yes | [ ]  No |
|  |  |  | If yes, describe the plan:      |
|  | **C.** | **NONLSL Written Statement** |
| For an example of NONLSL Statement see <https://www.mass.gov/media/2587281/>.  |  | **1.** | System Size: | [ ]  Less than 50,000 | [ ]  Equal to or more than 50,000 |
|  | **2.** | If your PWS LCR-NONLSL-CERT form is approved, where will your PWS post the NONLSL Statement? Check all applicable. |
|  |  | [ ]   | Online, i.e., website | Web URL:  |       |
| Posting duration: |       |
|  |  | [ ]   | Post in a location accessible for public viewing at PWS office | Where in the office: |       |
|  |  |  | [ ]  | By mail | Frequency of mailing:  |       |
|  |  |  | Format, e.g., water bill:  |       |
|  |  |  | [ ]  | Other |  Describe:  |       |
|  | **D.** | **List of Attachments** (if applicable) |
|  | My system has attached the following PDF documents to this form using the following naming convention: “[City/Town]- [PWS ID#]- [Program or Form]- [Name of Attached Document],” e.g., Boston-3035000-LCRR-NONLSL-CERT-MyFileName.pdf |
| **1.** |  |
| **2.** |  |
| **3.** |  |
| **4.** |  |
|  |
| **Note, any forms submitted using an email address other than the one in Section E will NOT be accepted.**If you have any questions, please contact the MassDEP Drinking Water Program at program.director-dwp@mass.gov or (617) 292-5843. | **E.** | **Certification** |
|  | My signature below indicates that 1) I am certifying under penalties of law that the information contained herein is true, accurate, and complete to the best extent of my knowledge, 2) I am the person authorized to fill out and submit this form to the Massachusetts Department of Environmental Protection, 3) My PWS does not have any lead service lines (LSL), galvanized requiring replacement (GRR), or unknown service lines, 4) My PWS has reviewed all available records, 5) My PWS has provided MassDEP with a service line inventory demonstrating no LSL, GRR, or unknowns exist in the system, and 6) My PWS understands that if MassDEP approves this **Lead & Copper Rule Revisions (LCRR) – Certification of Non-Lead Service Lines** Request for Approval, and any LSL or GRR are found in the course of routine work after this approval, my PWS shall report them to MassDEP within 30-days of discovery by submitting an updated service line inventory. |
| Full Name |      Job Title |
| Phone Number |      Email Address of individual identified in Full Name of this section E (form and attachments must be submitted from this email address). |
| Signature | Date |
| **F.** | **MassDEP/DWP Use Only** |
|  | [ ]  Approved | [ ]  Denied |
| Comments:       |
|      MassDEP/DWP Staff Name |      Date |