



## ***Lead and Copper Rule Revisions (LCRR) October 9, 2024 Training Questions and Answers (Q&A)***

- 1. For the two or more methods required to alert consumers of the NONLSL Statement, TAP filled in the box Web Posting with the Web URL: as MassDEP Website. Does this work as one of the methods?**

No, this section of the LCRR-NONLSL-CERT form requires the PWS to let MassDEP know how the PWS will inform its customers about the availability of the NONLSL Statement for that system.

If you reported to MassDEP that you planned to use a Web URL, you must provide it to MassDEP, who will check it to confirm the existence of the URL that you are using to comply with the SLI requirement. MassDEP's website will not include all information specific to each PWS.

- 2. The NONLSL customer notification date is a little confusing, under 50,000 what is the deadline?**

PWS, no matter the population size, must make their non-lead statement (or SLI) publicly accessible on or by October 16, 2024, in some manner. The statement or SLI may be publicly accessible by:

- Providing the SLI/non-lead statement to consumers upon request by email, mail, fax, public viewing, or a similar distribution method,
- Keeping your SLI/non-lead statement in a publicly accessible place for the public to view, such as your water department office,
- Posting it online, or
- Similar methods which may be proposed to MassDEP for approval.

- 3. Should we post the LCRR-NONLSL-CERT as we do the annual consumer confidence report (CCR)?**

You may post your non lead statement if you would like, it would meet the public accessibility requirements under the LCRR. However, you may also meet those requirements in other ways, see question 2 for more information.

PWS with a non-lead statement or SLI must also include information on how consumers may access the SLI or non-lead statement in their CCR annually.

- 4. Does the replacement goal rate in the replacement plan include classifying unknowns?**

MassDEP's LSLRP Summary form was developed using requirements in the LCRR including a 10-ppb trigger level and a replacement goal rate. Both requirements have been eliminated in the LCRI. The trigger level was replaced by lowering the action level to 10 ppb and the goal-based replacement program was replaced with mandated replacement for all PWSs.

Under the LCRI, all unknown service lines must be identified within the 10-year replacement window.

Please note: MassDEP still maintains a public health protection goal of encouraging lead removal in five years or as expeditiously as possible.

- 5. On the SLI cert, one of the methods for making the SLI publicly available is "available by mail"- this is likely what small systems will use. Does this mean the no lead SL posting is also required. Program director email is sending the following notification when SLIs are submitted: "Any PWS submitting an inventory with only NON-LEAD service lines, must post a NON-LEAD statement by October 16, 2024."**

No, for PWSs serving less than 50,000 persons, posting your non lead statement is not required. Posting is just one of the options a PWS may use to make the non-lead statement accessible. E.g., Making the statement available by mail would meet the public accessibility requirements.

- 6. Where is copy of the slides available?**

The slide deck and other materials from this training will be available on the MassDEP LCRR webpage here: <https://www.mass.gov/info-details/lead-and-copper-rule-revisions#massdep-past-trainings->.

- 7. Will an email go out with the link for Friday for us (attendees)?**

A link will be provided to all PWS and information about postings will be in the In the Main newsletter.

If you don't receive the In the Main newsletter, you can subscribe by sending a blank email (no subject, no body content) to [join-dep-dwp-subscribers@listserv.state.ma.us](mailto:join-dep-dwp-subscribers@listserv.state.ma.us). Please make sure the subject and body of the email message is empty. Remove your email signature as well. Emails that are not blank will receive a bounce back email and will not be added to the In the Main subscribers list.

- 8. We sampled for lead and copper in 2023 under our regular sampling plan. Our next sampling for lead and copper is 2026. Does this implementation [the Lead and Copper Rule Revisions/Improvements] change that?**

There is no change, LCR monitoring will continue until after the LCRI goes into effect, in October 2027.

**9. Will this presentation be available after this meeting?**

Yes, we will post this to our website here: <https://www.mass.gov/info-details/lead-and-copper-rule-revisions#massdep-past-trainings->.

**10. If a full Lead Service Line Replacement Plan is submitted prior to Oct 16, is the LSLRP Summary sheet also required? Or is it one or the other?**

A full Lead Service Line Replacement Plan is sufficient.

**11. Do we need to notify customers with service line unknown not likely to be lead (UNK-NOLG)? Or just Unknown likely Lead (UNK-LG)?**

You should notify service lines with entire classification as unknown. UNK-NOLG would be classified as non-lead as long as there are no lead components in the entire service line.

**12. Is there a Spanish version of the consumer notices?**

We are translating our consumer notices and PN to Spanish. We will be posting the Spanish versions on the Lead and Copper Forms and Templates webpage [<https://www.mass.gov/lists/lead-copper-forms-and-templates>] next week.

**13. What effort is expected/required to confirm that property owners/property managers have posted the notice(s) in their building(s)? What if they don't provide written notification back to the PWS? Also is the notice that is posted the same as the notice sent out to everyone else. Or is there some kind of poster form of the template? Also see question 51.**

The letter is the only template we have out now.

PWS are not required to post the notices in multi-family or multi-unit structures themselves. However, the PWS must provide the notice to the property manager/owners with detailed instructions to post the notices in each building **and** a request that the PWS is informed when the notices have been posted **and**

information on where the property manager/owners can send back confirmation to the PWS that the notice was posted. This notification will meet the notification requirements.

In addition, MassDEP/DWP requests the following:

- that PWS keep track of which multi-family and multi-unit structures the PWS delivered the notices to,
- that the PWS include multiple methods that property manager/owners can use to inform the PWS that the notices have been posted (e.g., email, fax, postal address),

and request that the manager/owners inform the PWS when the notices have been posted.

- If the property managers/owners do not confirm the distribution of the notices requested by the PWS no action to be taken against the PWS.
- MassDEP/DWP strongly encourages PWS to work with local partners or others to ensure consumers are getting appropriate notification.

**14. Must we still post SLI and complete the public accessibility section of the SLI Certification Form if we are posting a NON-Lead Statement?**

If your system has no lead, GRR or unknowns you may post a non-lead statement instead of the SLI. You should answer the public accessibility part of the SLI Certification Form with the ways you will be making your non lead statement publicly accessible.

**15. If applicable, should the LCRR-NONLSL\_CERTS [non-lead statement] be publicly accessible by October 16<sup>th</sup> even if the PWS has not received MassDEP's approval?**

- Correct, PWS should post the non-lead statement by October 16<sup>th</sup> whether approval was provided or not. However, PWS should use the MassDEP/DWP template if they have not received approval located here: <https://www.mass.gov/doc/lcrr-no-lead-service-lines-statement-template-for-pws-awaiting-sli-approval/download>. This template changes the language to "MassDEP has received your SLI documentation", instead of "MassDEP has approved your SLI documentation".
- When a PWS has received MassDEP/DWP approval, they may use the template located [here \[https://www.mass.gov/doc/lcrr-no-lead-service-lines-statement-template/download\]](https://www.mass.gov/doc/lcrr-no-lead-service-lines-statement-template/download) and include the date of approval from their approval letter.

**16. For the consumer notice, the November 15th deadline refers to send by November 15<sup>th</sup>, or does it mean that notices must be delivered by November 15th?**

PWS must deliver the notices by November 15, this is noted in the federal LCRR 40 CFR 141.85(e)(2): "A water system must provide the initial notification within 30 days of completion of the lead service line inventory". This means consumers must receive these notices by November 15<sup>th</sup>.

**17. I have service lines that are cement lined Iron pipe but there isn't a drop-down menu for Iron pipe besides Galvanized. Should I list it as UNK-NOLG and put in the comment it is cement lined Iron pipe?**

Yes, that would be acceptable. Make sure to include the correct material in the comment's column. If the material is not listed on the workbook, you should list it as UNK-NOLG and use the comment field to input the correct material

**18. When is the service line replacement plan due?**

Under the LCRI this is due October 2027. If you have an SRF loan, we require one as part of that process, which would be due by October 16, 2024.

- 19. How should Section D of the SLI Cert be completed? Should the 'Other' option be selected and add a notation that a Non-Lead Statement will/has been posted [made publicly accessible]?**

Yes, that will be acceptable.

- 20. Is the consumer notice that is posted [on the MassDEP webpage] the same as the consumer notice sent out to everyone else [in multi-family buildings]? Or is there some kind of poster form of the template?**

The letter is the only template that is currently available.

- 21. The [SRF LSL Planning Program] 100% loan forgiveness was changed to a grant program. Is it back to a loan program again where local appropriation will be required?**

It is still a grant program.

- 22. Can the chat thread be made available as well?**

No. However, all questions included in the chat have been included in this Q and A.

- 23. For the letter to customers that have unknowns or galvanized (we do not have any lead) can we send something out in our water bills, or do we need to send each individual customer a letter?**

The consumer notices must be sent to each individual customer with a lead status unknown, galvanized requiring replacement (GRR), or lead service line. The notification requirement is to provide it to "all persons served by the water system at the service connection." Limiting delivery to bill paying customers would not meet this requirement.

- 24. Why does the auto calculate column V (sampling site tier) flag red in the validation process when NA is in the field?**

MassDEP/DWP is not performing validating for column V anymore. If you have an error in column V, you can ignore it. HOWEVER, please note that the columns required to calculate column V are still required. Make sure you are using the most current version of the workbook templates. For split-ownership the current version is 1.0.3. For No-Split Ownership the current version is 1.3.1. The workbooks, and instructions, are available at <https://www.mass.gov/lists/lead-copper-forms-and-templates>. You can find the version of your workbook by outputting the csv file, it will be in the first "column". You can transfer your data from an old version to a newer version of the workbook by copying/pasting.

**25. I think it was stated that there is a specific form if you have a PWS with no service lines. Can you direct me to that form?**

You should request that form at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) .

**26. Does the inventory and certification get submitted via email to dep?**

Yes, it should be submitted to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). Please include the phrase "Service Line Inventory" and your PWSID # in the subject line of your email.

**27. Is this email address correct [join-dep-dwp-subscribers@listserv.state.ma.us](mailto:join-dep-dwp-subscribers@listserv.state.ma.us) to subscribe to the In the Main Newsletter, I received a bounce back.**

Please make sure the subject and body of the email message is empty. Remove your email signature as well. Emails that are not blank will receive a bounce back email and will not be added to the In the Main subscribers list.

**28. When you referred to identifying "connectors" in the next inventory update, are you talking about goosenecks or fittings?**

Yes, goosenecks and pigtails. Here is the LCRI definition: Connector, also referred to as a gooseneck or pigtail, means a short segment of piping not exceeding three feet that can be bent and is used for connections between service piping, typically connecting the service line to the main.

**29. I have a question regarding the Service line classification, column M [Split Ownership Workbook]. If the system is all "non-lead", but on the workbook there are dozens of accounts that want to be listed "lead unknown" Can we leave them all listed as non-lead?**

The workbook calculates the value based on other columns, so if you manually change column M to "Non-Lead" then it will result in a validation error. We will require you to correct those invalid values. Please email your inventory to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) . We'll look at it and get back you. Please include the phrase "Service Line Inventory" and your PWSID # in the subject line of your email.

**30. If we only know the material of the private side or the public side, does that clarify as an unknown?**

If the material is unknown for either side, you should classify it as "UNK-LG" (unknown, may contain lead or galvanized). The entire service line classification would be "LEAD STATUS UNKNOWN". If you don't know the material for one side, you should select unknown for that side. The entire classification of the service line depends on the material from both portions. If you have lead in one side and unknown on the other, the entire service line will be classified as lead. Copper + Unknown = Unknown

**31. Is the no lead posting required even if the SLI is being made publicly available?**

No, the statement is an alternative to making the SLI available. If you are making the full SLI available, even without any LSL, GRR and Unknowns, that meets the public accessibility requirement.

**32. If we have unknowns in our system will we not be on a reduced sampling schedule anymore for lead and copper and if so, when can we expect to see a change on our compliance monitoring schedule?**

Your LCR compliance monitoring schedule would not change until after October 2027, when the LCRI will go into effect.

**33. Do we have to post to the public now the inventory? I am a little confused.**

The inventory or the non-lead service line statement should be publicly available by October 16. Systems serving more than 50,000 people will have to post their SLI or non-lead statement online.

**34. How often will the systems be submitting updated inventories as we have done with expansive inventory?**

If you have any updates, you should submit them to us once a year. However, we encourage systems to maintain any publicly available inventory updated often. Under the LCRR, a PWS with no LSL, GRR or unknowns is not required to submit and updated SLI. However, if an LSL or GRR is discovered notification to MassDEP is required within 30 days of identifying that line.

**35. So, we have to include fire lines and sewer exception meters?**

Non potable lines such as fire suppression or those designated for emergency must be included in the inventory.

**36. If the service materials are all non-lead, and all the fields are capitalized and it still doesn't change the result to non-lead, what would you suggest?**

Please email your inventory to [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov). We'll look at it and get back you. Please include the phrase "Service Line Inventory" and your PWSID # in the subject line of your email.

**37. When will bi-annual sampling be required if you are currently completing reduced monitoring?**

When the LCRI becomes effective in October 2027.

**38. That is also when the new tier classifications for sites come into play? Our current sampling plan should be good until 2027?**

Correct. You will continue to sampling using your current LCR sampling plan until October 2027. After October 2027 the tier categories will change to those in the LCRI.

**39. Do we still follow 15 Parts Per Billion (PPB) as the Action Level for Lead or 10 PPB with respect to the sampling?**

The action level published in the LCRI will not take effect until October 2027, meaning 15 PPB is still the action level for lead. Other than the three changes we highlighted in our presentation the old rules from the LCR remain intact.

**40. Do we still have 10 years to implement these changes [ to replace lead service lines]?**

Our goal is always to reduce lead exposure as fast as possible. The LCRI has a 10-year window starting in 2027 to replace lead service lines and there is currently no shorter time frame proposed by the state at this point. However, The Massachusetts public health protection goal is still 5 years. We encourage implementation the public health protection measures as fast as possible.

**41. How do I submit my inventory?**

For the inventory and the certification forms these should be submitted to [Program.Director-DWP@mass.gov](mailto:Program.Director-DWP@mass.gov). The inventory should be submitted as a CSV File. If you look through the [workbook instructions](#) available on the [Lead and Copper Forms and Templates webpage](#). The certification form should also be submitted to that email. We are blocked from accessing local file servers meaning we need the CSV as an email attachment. Please include the phrase “Service Line Inventory” and your PWSID # in the subject line of your email. All required Service Line Inventory documentation is available here: [https://www.mass.gov/lists/lead-copper-forms-and-templates#lead-&-copper-rule-revisions-\(lcrr\)](https://www.mass.gov/lists/lead-copper-forms-and-templates#lead-&-copper-rule-revisions-(lcrr)).

**42. If you have no lead in your system do you need to post the inventory?**

If you have no lead, GRR or unknowns you can post a statement to that effect rather than the service line inventory. You don’t have to post both a no lead statement and the full inventory. If you have LSL, GRR’s, or unknowns you MUST make your inventory publicly accessible.

**43. Does DEP need to approve that you don’t have lead?**

Our approval is to make sure you have a complete submission meaning your inventory is similar size to what you have told us and that it is complete. The LCRR requires you to update your inventory regularly and the LCRI will require you to find out what your unknowns are. We will accept your certification of your information.

**44. If water systems specify why everything doesn’t matchup is this acceptable?**

We expect higher numbers of service lines than the number of service connections you give us in the ASR. If numbers are significantly smaller, we will ask why they do not match up. We will be looking at the submitted information and if there's anything that needs to be addressed, we will work with you on any corrections or clarifications. We want to make sure there is a level of consistency with what is submitted. We will check all submittals to ensure things are correct.

**45. If we sent letters to our galvanized replacements already, will this count to the notifications needed by the 15<sup>th</sup>?**

If you already sent out your GRR notifications using our template and provided such documentation to us this is acceptable as long as the mandatory language is included. When you certify delivery of these notices, you will be required to include one example of each type of letter which MassDEP will review.

**46. If we don't have line by line inventories, but have an online map for customers to check their location is this acceptable?**

Yes, there are different acceptable mechanisms and as long as people have the ability to look up their address then this is okay. The certification form includes the option of an interactive online map to demonstrate that your inventory is accessible.

**47. For communities that want to get a head start on their validation requirements can DEP approve early validations and have those count? Seems the validation pool has to be developed after the LCRI goes into effect. Does this mean Water Suppliers are punished for being proactive and addressing this before then?**

Yes, MassDEP will credit activities that are consistent with the LCRI requirements and follow our Massachusetts public health protection goal of supporting removal of all lead service lines within 5 years or as expeditiously as possible.

**48. Can you review the steps to update the online submission process? How do we report the lead map and when do we need to report it?**

This is in Section D of the service line inventory submission due on the 16th. Tell us I Section D that you made it publicly available via an online map.

**49. Can a small, disadvantaged community allow homeowners to replace their line if they find lead lines running into their home?**

- EPA has announced some grants and funding for homeowner replacement, but we will have to check into it and follow up with more details. See <https://www.epa.gov/ground-water-and-drinking-water/identifying-funding-sources-lead-service-line-replacement>
- We are also aware while homeowners' insurance provides some amount of coverage for water damage caused by household plumbing systems, it typically does not cover

replacement of service lines running underneath your property. However, some insurance companies offer a service line coverage add-on, or endorsement, that customers can add onto their homeowner's policy for a small additional cost to protect different utility lines that connect to their home. Customers should be encouraged to contact their insurance providers to see if replacement of lead service lines is covered by their policies.

- DWP will continue to check into this issue and provide updates in the MassDEP/DWP bi-weekly In the Main Newsletter.

**50. Will you get credit for verifications for anything called non lead before the baseline inventory went in? Will validations now be covered under SRF funding that is available?**

Will have check on this issue and will include updates in the MassDEP/DWP In the Main Newsletter.

**51. What do we have to do to document notices have been posted in multi-unit buildings? Do we need confirmation from property owners that they have posted notices? What do we need to do to document this?** Also see Question 13.

Your instructions to the property owners should be reasonably calculated to ensure the notice is posted and reaches all people served at that address, but you do not have to do the postings. PWS are not required to post the notices in multi-family or multi-unit structures themselves. However, the PWS must provide the notice to the property manager/owners with detailed instructions to post the notices in each building **and** a request that the PWS is informed when the notices have been posted **and** information on where the property manager/owners can send back confirmation to the PWS that the notice was posted. This notification will meet the notification requirements.

In addition, MassDEP/DWP requests the following:

- that PWS keep track of which multi-family and multi-unit structures the PWS delivered the notices to,
- that the PWS include multiple methods that property manager/owners can use to inform the PWS that the notices have been posted (e.g., email, fax, postal address), and request that the manager/owners inform the PWS when the notices have been posted.
- If the property managers/owners do not confirm the distribution of the notices requested by the PWS no action to be taken against the PWS.
- MassDEP/DWP strongly encourages PWS to work with local partners or others to ensure consumers are getting appropriate notification.

**52. For small systems can service lines be made available by mail? Does non lead service line statement need to be posted as well if this is the selection made?**

The rule doesn't require you to do both, if you have no lead. If you don't have lead you don't need to post the service line inventory. The no lead statement is an alternative. Tell customers you don't have lead, if they ask for the service line inventory. This should cover the rule. NTNCs should post the no lead statements.

**53. For the notice of non-lead service lines, are we able to post these in the same ways we do the Consumer Confidence Reports?**

Yes, you can do the posting in the same ways as long as it's within 30 days and as long as all your consumers can see it.

**54. Are you required to do an instantaneous notice for new customers? What is the timeframe for these notices?**

The LCRR requires that notification be provided "at the time-of-service initiation." MassDEP interprets this to mean when the new service account is established.

**55. What is the deadline for the customer certification. Is the 15<sup>th</sup> the send by or the deliverance date?**

PWS must deliver the notices by November 15, this is noted in the LCRR at 40 CFR 141.85(e)(2): "A water system must provide the initial notification within 30 days of completion of the lead service line inventory". Consumers must receive these notices by November 15<sup>th</sup>.

**56. When are we giving comments back about errors in the inventories submitted?**

We will get back to you as quickly as possible.

**57. We're an under 50,000 population. We'll be sending in our inventory on time, but our interactive map won't be published until the 22<sup>nd</sup>. Is this acceptable?**

You don't need to post your SLI on the web if your PWS population is under 50,000. You are only required to make it available. You could provide/post a phone number and contact name, or something along those lines by the 16<sup>th</sup>. Whatever method you select to comply with the inventory availability requirement should be acceptable if it meets the requirement.

**58. Do we just need something on our door saying it's publicly accessible upon request?**

Yes.

**59. The non-lead service line statement includes the date that DEP approved the inventory. Our inventory hasn't been approved, what should we do?**

See answer to question 15 for more information.

**60. Now that LCRI is released, are we required to submit LSL Replacement plans? And the requirement to make it publicly accessible does that apply if you are getting SRF funding?**

- If you are receiving SRF or other funding, then yes, you need to provide a lead service line replacement plan (LSLRP) to apply for funding to remove LSLs. If you are not receiving SRF funding, then you won't be required to submit a plan until 2027 or if required by MassDEP/DWP as part of an enforcement action.
- It is required for everyone to make their SLI publicly accessible. The lead service line replacement plan is a summary (MassDEP/DWP provides a template) if you are getting SRF funding.