



Lead and Copper Rule Revisions (LCRR) and MassDEP DWP Associated Service Line Inventory (SLI) Requirements

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For questions contact Program.director-dwp@mass.gov.

This document contains a list of all associated SLI requirements under the LCRR, and additional requirements MassDEP has instituted, that Massachusetts Public Water Systems (PWS) must follow. Please read all sections applicable to your PWS (check the table of each section for applicability) to ensure that your PWS is in compliance with all SLI associated requirements.

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1. Public Access to SLIs

Which PWS is this applicable for:	All NTNC and COM PWS. Specific information for Non Lead vs lead service line (LSL), galvanized requiring replacement (GRR), Lead Status unknown (UNK) systems is separated.
When did this requirement begin:	October 16, 2024
Description:	See below.

Requirements and Instructions for all PWS:

- All PWS must make their SLI publicly accessible. Your SLI must be accessible until further notice.
 - Guidance on how to make your inventory publicly accessible is available at: <https://www.mass.gov/doc/guidance-how-pws-can-make-their-service-line-inventories-accessible-to-the-public/download>.
- Instructions on how to access your SLI (including your non-lead statement as an SLI) must be included in your **Consumer Confidence Report (CCR)**. Accessibility may include ability to request by mail/email, ability to request in-person access, publishing the SLI or statement online, having it available at the water system office, or another approved method.
- If the system serves more than **50,000 people**, you must make your inventory publicly available online.

Requirements and Instructions for Non-Lead Systems:

- Non-Lead Systems (with no Lead, GRR, or Lead Status Unknown service lines) may meet the LCRR SLI accessibility requirement by making a Non-Lead Statement, which meets all LCRR requirements, accessible instead of their full initial SLI.
- PWS that are posting a non-lead statement must also, in addition to having the non-lead statement publicly accessible, meet MassDEP requirements to deliver the non-lead statement to all consumers in a manner reasonably determined to reach all persons served by the system. 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, and other methods approved by MassDEP.

- If your PWS has not already conducted this outreach and provided the two or more methods in your NONLSL Certification Form, please inform MassDEP of your planned two methods of delivery.
- If a Non-Lead PWS prefers to post a full SLI rather than a non-lead statement, this is acceptable, please see the section below for more information:

Requirements and Instructions for PWS with SLIs with Lead, GRR, and/or Lead Status Unknown Service Lines:

- In Massachusetts, the publicly accessible inventory must provide a locational identifier (e.g., such as a street address, customer number, block, intersection, landmark, or any other geographic marker associated with the service line) for each lead, Galvanized Requiring Replacement (GRR), and Lead Status Unknown service line. **This locational identifier MUST be the same identifier as used in your SLI in the column titled “Locational Identifier”.** Non-Lead service lines must be included in your publicly accessible SLI, but it is not required that they have a locational identifier. However, MassDEP encourages PWS to include locational identifiers for all non-lead service lines.

2. Service Line Material Consumer Notifications

Which PWS is this applicable for:	PWS with LSL, GRR, and/or UNK Service Line(s)
When did this requirement begin:	October 16, 2024
Description:	See below.

Within 30 days of the deadline to submit your SLI (October 16, 2024) to MassDEP, all systems were required to inform all persons served by a service line documented as lead, GRR or “lead status unknown” that their service line either contains lead or may potentially contain lead, as appropriate. This notification must be repeated every year to all applicable consumers until there is no longer any lead, GRR, or Lead Status Unknown service lines in the PWS distribution system (section 141.85(e)). This notice must be distributed annually in accordance to this table:

Year	Rule	SLI Deadline	Distribute Deadline	Certify by...
2024	LCRR	October 16, 2024	November 15, 2024	July 1, 2025
2025	LCRR	N/A	December 31, 2025	July 1, 2026
2026	LCRR	N/A	December 31, 2026	July 1, 2027
2027	LCRI	November 1, 2027	December 1, 2027	January 30, 2028
2028	LCRI	<i>None, first program year includes 2027 and 2028</i>		
2029	LCRI	January 30, 2029	March 1, 2029 <i>For Leap Years the date will change to February 29 (2032, 2036, 2040, etc.)</i>	January 30, 2030

Additional years will continue using the LCRI timeline.

Please note this table can change pending LCRI litigation.

Remember, the SLI consumer notice must include the following:

- a statement that the service line material is lead, GRR, or unknown but may be lead,

- an explanation of the health effects of lead (this must meet the requirements of section 141.85(a)(1)(ii)),
- steps a person at the service connection can take to reduce exposure to lead in drinking water,
- information about opportunities to replace lead/GRR service lines or verify the material of their service line if the lead status is unknown,
- information on programs that provide financing solutions to assist property owners with replacement of their portion of a lead/GRR service line

Systems must demonstrate (certify) that they have delivered the initial and annual consumer notifications and lead service line informational materials to consumers that have a lead, GRR, or Lead Status Unknown service line to MassDEP by submitting the SLI Consumer Notification Certification Form and must provide a copy of the notification and informational materials (141.90(e)(13) and 141.90(f)(4)) by July 1st for the previous calendar year.

MassDEP has released LCRR-compliant consumer notification templates regarding service line material notification, which PWS are encouraged to use. All templates are available here: <https://www.mass.gov/lists/lead-copper-forms-and-templates>.

3. Non-Lead System Status Requirements and Important Information

Which PWS is this applicable for:	Non-Lead PWS
When did this requirement begin:	October 16, 2024
Description:	See below.

No future SLI updates are expected to be required for systems reporting and certifying they have no lead, GRR or Lead Status Unknown service lines under the Lead and Copper Rule Revisions (LCRR). If, in the future, your system finds a lead, GRR, or Lead Status Unknown service line within its distribution system, it must prepare an updated SLI on a schedule established by MassDEP Drinking Water Program.

Please be aware that the Lead and Copper Rule Improvements (LCRI) has changed the definition of a system with “No Lead” to exclude any system with lead connectors or connectors of an unknown material in your SLI. If you have any lead connectors or connectors of an unknown material, after the LCRI goes into effect in 2027, you will be required to withdraw your non-lead statement and publish a publicly accessible inventory. The LCRI also requires the submission of a Baseline SLI for all NTNC and COM PWS by November 1, 2027.

4. Statistical Analysis/Predictive Modeling Requirements

Which PWS is this applicable for:	PWS which used Statistical Analysis and/or Predictive Modeling to identify service line materials in their SLI
When did this requirement begin:	October 16, 2024
Description:	See below.

PWS that have used Statistical Analysis as a verification method must follow the MassDEP requirements regarding use of Statistical Analysis/Predictive Modeling, which are listed in the Statistical/Predictive Modeling Guidance here: <https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download>. These requirements include the addition of wording relating to statistical/predictive modeling in consumer notifications and publicly accessible documentation.