

Lead and Copper Rule Requirements (LCRR) Training

Q&A – February 26th, 2024

Training Specific Questions

- 1. Are the presentation slides going to be available?**
 - A. Yes, we will post the slides on our website at <https://www.mass.gov/info-details/lead-and-copper-rule-revisions>.
- 2. Will this presentation be available for our future reference and information?**
 - A. Yes, we will post it after the training at <https://www.mass.gov/info-details/lead-and-copper-rule-revisions>.
- 3. Would it be possible to obtain a summary or similar overview document of our meeting today?**
 - A. Yes, MassDEP will provide a copy of the Q&A on our website at <https://www.mass.gov/info-details/lead-and-copper-rule-revisions> along with the presentation slides. The entire recording of the training will also be provided on the MassDEP YouTube channel at <https://youtu.be/L5FJ8PV9p1w>.
- 4. I have a list of questions that attendees had that might require EPA attention. Does DEP have a list to that we can cross check?**
 - A. You can check our LCRR Q/A located at [Frequently Asked Questions about the LCRR](#).
- 5. I know that the presentation will be available after, will all the links be available after as well?**
 - A. Yes, the links will be provided in a separate document, available on our website at <https://www.mass.gov/info-details/lead-and-copper-rule-revisions>.
- 6. Will we get links and transcript of the power point by e-mail?**
 - A. Attendees who are receiving TCHs will be emailed on Friday, March 8th, 2024, with their certificate and a link to the MassDEP LCRR webpage, which will have the following posted:
 - The LCRR Training Q&A
 - The Presentation Slide Deck
 - A document with all links provided in the chat and presentation slides throughout the training, titled “LCR and LCRR Links of Interest”.
 - The LCRR Training Recording, also posted on YouTube.

All information will also be provided in the next *In the Main Newsletter* sent out March 8th, 2024.

General Questions

7. What is a COM PWS?

A. Community Public Water System

8. Please post the consumer notification letter samples.

A. The LCRR service line inventory consumer notification letters will be posted soon in our LCRR forms webpage located at <https://www.mass.gov/lists/lead-copper-forms-and-templates>

9. Do you charge residents any fees? how much would you charge? If we have to replace the whole service line all the way in the house, do we charge a fee to the resident?

A. Under the LCRR, the water system is not required to bear the cost of replacement of the portion of the lead service line not owned by the water system. You can choose to charge a fee for replacement. However, MassDEP and EPA strongly encourage customer-side service line replacement to be offered at no direct cost to the customer wherever possible to achieve higher customer participation rates and reduce potential environmental justice impacts that may result where customers cannot afford to replace their portion of the line.

There are several resources from EPA or MassDEP that can fund the removal of the private side making it unnecessary to pass along this cost. See [Lead Service Line Replacement Program | Mass.gov](#).

10. If a COM PWS finds no lead service lines how are the sample sites then chosen?

- A. The LCRR includes lower tiers that can be used in this case. These tiers are:
- Tier 3 sampling sites, consisting of single-family structures that contain galvanized lines identified as being downstream of a lead service line (LSL) currently or in the past, or known to be downstream of a lead gooseneck, pigtail or connector.
 - Tier 4 sampling sites, consisting of single-family structures that contain copper pipes with lead solder installed before the effective date of the State's applicable lead ban.
 - Tier 5 sampling sites, consisting of single-family structures or buildings, including multiple family residences that are representative of sites throughout the distribution system.

11. Is DEP confident in the capacity of the program director email? I have stopped sending copies of our monthly reports to the program director email as several times they have bounced back as too large. Our service line inventory is greater than 43,000 service lines.

- A. MassDEP is confident in the capacity of the program director email. Because of the expected size of the service line inventories (SLI), MassDEP is requiring that systems submit their SLIs as a **CSV file**. If PWS have had problems in the past with sending large files through program director, this may be because of the type of file you are sending. For example, PDF files are much larger than the same file in a word or excel format. If you have concerns regarding the size of your inventory, please contact program.director-dwp@mass.gov to discuss this more.

12. Who should I contact if I do have any questions?

- A. If you have further questions, contact program.director-dwp@mass.gov. Subject: LCRR.

Service Line Inventory (SLI) Questions

13. What are the repercussions if my Service line inventory is incomplete?

- A. If your SLI is submitted and is incomplete, meaning there is a noticeable amount of service lines compared to your submitted total in the ASR that are unaccounted for and unexplained, MassDEP will report this information to the EPA. The EPA may take enforcement action if deemed necessary.

MassDEP may find that PWS are in violation of 310 CMR 22.03(15), should PWS not submit their SLI within 6 months of the LCRR deadline, and may provide enforcement based on this failure to provide requested information.

Note: If you submit your SLI with your total amount of service lines, however some are considered “unknown”, **your SLI is still considered complete**. As long as all service lines are included in your SLI with a location identifier and all information you were able to document by the deadline, this SLI is considered complete.

14. What happens if my SLI isn't completed by 10/16/24?

- A. If your SLI is not completed by October 16th, 2024, and is not submitted by this deadline, then EPA will take enforcement actions against your PWS. MassDEP recommends you submit you SLI by October 16th, 2024, even if it is “incomplete”, to avoid enforcement actions.

Note: If you submit your SLI with your total amount of service lines, however some are considered “unknown”, **your SLI is still considered complete**. As long as all service lines are included in your SLI with an identifier and all information you were able to document by the deadline, this SLI is considered complete.

15. Can we submit what we have so far from our spreadsheet to the program director address?

- A. Yes, MassDEP recommends that any PWS that would like their SLI to be reviewed to submit your SLI as a draft by April 1st, 2024 to program.director-dwp@mass.gov, subject: LCRR Service Line Inventory Draft. MassDEP will review your SLI and provide comments.

16. Do all the UNKs have to be confirmed by 10/16/24?

- A. No, unknown service lines (UNKs) do not have to be confirmed by October 16th, 2024.

17. Do you have to replace a galvanized service line if there are no lead service lines in your system?

- A. If a galvanized service line is found in your system, systems must try to conduct a replacement under the following conditions:
- If the galvanized service line is downstream of a lead service line
 - If the galvanized service line was ever downstream of a lead service line
 - If the galvanized service line is downstream of an unknown service line

If the galvanized service line meets any of the 3 above conditions, then it is considered a Galvanized Requiring Replacement (GRR) service line and should be replaced. If the galvanized service line does not meet any of the 3 above conditions, then it is only a galvanized service line, and does not need to be replaced.

18. We have done our preliminary inventory in an excel form that was released last year. It is not the same as the one that you showed today. What do I do?

- A. If you have created a SLI that is not in the same format as the current MassDEP example, that is okay. Your inventory, however, must mirror the same values as the MassDEP created workbook for MassDEP to accurately validate your SLI. Please review the [SLI Workbook instructions, Section: Structure of CSV File](#), for more information on how to do this (<https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-for-version-103/download>).

Reach out to program.director-dwp@mass.gov, or tio.yano@mass.gov, subject: LCRR Service Line Inventory Workbook, if you have any questions.

19. Issues with residents allowing access to property for private side replacements (total refusal). Are partials in these cases allowed, due to construction scheduling?

- A. In this case, under the LCRR*, partials are allowed, and must meet the requirements of the LCRR, including:
- Provide notification to the customer affected by the service line replacement, meeting the requirements in [§ 141.85\(a\)](#).
 - Provide information on service line flushing consistent with 141.83 (b)(5).
 - Provide the customer with a pitcher filter or point of use filter with 6 months of replacement cartridges, and instructions to use the filter.

- Offer to conduct lead sampling in 3 to 6 months after completion of any partial replacement of a LSL.

Under the LCRR, partial lead service line replacements do not count towards the goal or mandatory replacement rate.

*The LCRI may change some of these requirements after it is published.

20. How do I address customer who refused to participate?

- A. In reference to the identification of service lines, if customers refuse to participate, and there is no record or other way to verify their service line besides a field inspection, then the private section of the service line must be documented as “unknown”. The customer will then, after the October 16th, 2024, deadline, be sent the required public notification documentation under the LCRR if they have an unknown service line.

21. It will be extremely difficult to gather information on private plumbing that is beyond the meter. The process to determine material for these "service lines" that run between buildings will not be possible due to the lack of authority a PWS has over plumbing. [How does MassDEP expect PWS to identify these service lines?]

- A. MassDEP expects PWS to give their best effort to identify service lines but understand this process may vary in difficulty depending on the customers and types of buildings/service lines encountered.

Remember, a SLI with unknowns, while unpreferable, is acceptable and considered sufficient for completing the initial inventory. If there are service lines you are unable to gather information on/identify, submitting them as unknown is an acceptable avenue to submit your SLI on time.

22. In [Municipality], the customer owns the entire service line...does this present any issues?

- A. The ownership of the service line does not present any changes to the requirement that your SLI must include all service lines in your service area, and that you must make an effort to identify all service lines in your service area.

23. If the private side service line is galvanized and the public side is non-lead, can the entire service line part be classified as non-lead or galvanized requiring replacement?

- A. The classification of this service line would depend on the status of the public side, and if the public side has ever been a lead service line. See the table below, and the 2 yellow highlighted rows, for how to possibly classify this service line.

Exhibit 2-3: Classifying Service Line Materials When Ownership is Split According to the LCRR 40 CFR §141.84(a)(4)

System-Owned Portion	Customer-Owned Portion	Classification for Entire Service Line
Lead	Lead	Lead
Lead	Galvanized Requiring Replacement	Lead
Lead	Non-lead	Lead
Lead	Lead Status Unknown	Lead
Non-lead	Lead	Lead
Non-lead and never previously lead	Non-lead, specifically galvanized pipe material	Non-lead
Non-lead	Non-lead, material other than galvanized	Non-lead
Non-lead	Lead Status Unknown	Lead Status Unknown
Non-lead, but system is unable to demonstrate it was not previously Lead	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Lead	Lead
Lead Status Unknown	Galvanized Requiring Replacement	Galvanized Requiring Replacement
Lead Status Unknown	Non-lead	Lead Status Unknown
Lead Status Unknown	Lead Status Unknown	Lead Status Unknown

24. We had asked for an extension of the Oct deadline- due to insufficient records in our system. We have not heard back if we were approved for an extension. Can you please confirm the same?

A. A service line inventory must be submitted by the due date using whatever records you have available including unknowns for lines that lack records. MassDEP/DWP directly responded to this PWS and provided this information and information on technical assistance on 01/23/2024.

25. How do you expect to review and approve inventory submissions that include a “non-lead certification form” and a request to remain on reduced monitoring if these are only submitted by October 16, 2024, yet sampling is required to begin in January 2025? Will anyone be able to stay on reduced monitoring?

A. For inventories with no LSL, GRR, or unknown service lines, we will review the verification methods and make sure that the PWS submits the NON-LSL cert form along with the inventory.

If the LCRI is published by October 16, 2024, then PWS can continue with their LCR monitoring. If the LCRI is not published by then, PWS without LSL, GRR, or unknowns that have been monitored according to the LCRR between January 1, 2021, and October 16, 2024, can be eligible for reduced monitoring. See our LCRR initial

monitoring guidance at <https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-LCRR/download>.

26. Our system has dual ownership of our service lines. If the private side is verified in the field and the public side is verified from a recorded date. Would the verification method be F or V?

A. If there are 2 methods used to verify multiple sections of a service line, you should enter the least certain method into the verification method column, and document other verification methods in the comments field for each section of the service line. In this example, the verification method would be "V", Records Review, and "F", Field Inspection would be entered into the comments field with the section of the service line verified using this method.

27. As far as the making the SLI available to our residents can we just share our SLI spreadsheet as a PDF on our Town website?

A. Yes.

28. If the public side is lead and the private side is copper, the entire line is classified as a lead service line. When a replacement is done, can a system replace just the public [lead] portion? Or are they required to replace the private side [copper] too?

A. No, in this case only the public lead side needs to be replaced. The existing private copper side remains. This would count as a replacement towards any required removal percentage.

29. We feed a trailer park to be a big meter and have nothing to do with anything at the meter. They take care of their own pipes and we have no records for them. How would I deal with that? Do we just have to put what kind of pipe is going into the meter and leaving the meter?

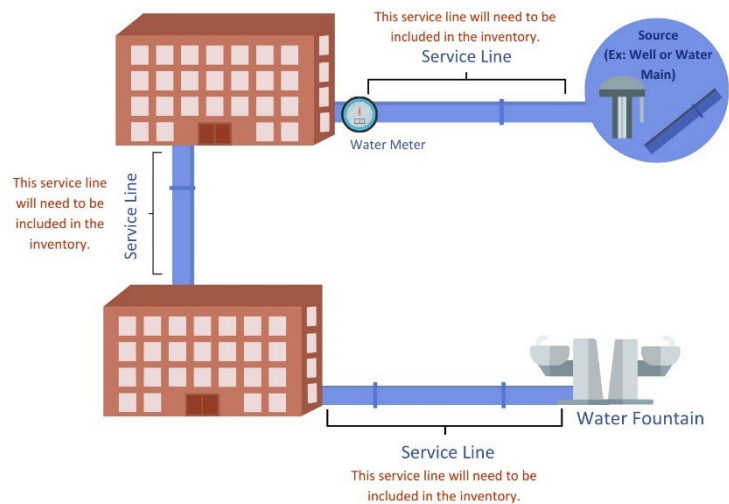
A. You will need to reach out to the park to get the materials downstream of the master meter. Ownership is not taken into consideration when developing the service line inventory.

30. Will we need to include service line materials for buildings that are served by a private well? not connected to our system?

A. If the building has a service line from your system, then it needs to be listed even if it is not being used. If the building does not have a service line connected to your PWS then it does not need to be in your service line inventory.

31. Can you clarify why the materials after the meter, in what I believe are slides 32 and 33, are considered service lines and not premise plumbing?

The multiple service lines included in this graphic would be considered service lines and not premise plumbing as the line, in this scenario, has left the building through an outlet and is underground until it enters the next building through another inlet.



32. In a scenario that we have a neighborhood of 20 houses built in the 1990's, and we are missing 1 or 2 tie cards in the middle but all other are copper, can we consider that verified by an alternate method?

A. Based on the year these homes were built (after the lead ban) you can report the missing ones as unknown but definitely not lead (UNKN-NOLG).

33. Can you confirm how we are to document materials when there might be more than two? One example may be a house with a meter pit. There is material 1 from water main to curb stop, material 2 from curb stop to meter pit, then a third material from meter pit to the house itself. If ownership transitions from utility [public] to private after the curb stop, and there are two separate materials, how should we document this? Another circumstance may be at a large complex, like a shopping plaza, where there is a ductile iron line coming into the plaza, and the ductile iron continues past the master meter and off the ductile iron line, there are individual copper water services to each building. Would we lump these together and characterize the ductile as the “public” owned portion and the copper as the “private” side?

A. If your PWS has identified a service line with multiple portions of different materials along the customer (private) side, or the PWS owned (public) side, then the service line material that makes up the largest amount, i.e. percentage or majority, of the service line should be entered into the corresponding inventory column, and the other material(s) should be entered into the comments field, unless the smaller portion of the service line is lead, galvanized, or unknown.

If your PWS has identified a service line with any portion of lead, galvanized, or unknown, that material must be entered into the inventory, in the columns that track service line material. If the materials of a service line are equal length, use the ranking

below to decide which material to enter into the main column that tracks service line material:

The rank of risk of contributing higher lead levels is as follows, with 1 being the highest priority, and 5 being the lowest.

- 1) Lead
- 2) Galvanized
- 3) Unknown
- 4) Iron/Steel and other Metal Materials
- 5) Plastic

34. I have our meter installation cards that my techs mark down the service types. If I use those cards would that be considered "V" for records review? or "F" for field inspection?

- A. In this case, the meter installation card would likely only indicate the material on the private side of the service line (inspection at one point). Additional review would be needed to identify the material on the public side. As you are relying on a record use V (Records Review) for verification.

35. If a PWS employee was present for numerous water main replacement projects since 2000 to present where the public side of the services were replaced at the same time, and I interviewed that person. The foreman was present during all main replacements where the new mains were all DI and all public side services were replaced with copper. But there aren't records for all of it, just information from the foreman who still works there and did all the work since 2000. Do I put F because that person was physically present, or do I put V because it is a record review?

- A. In this case, you should use records review, "V" for verification and use the comment field to indicate that the operator's knowledge is based on meter replacements since 2000.

36. If you have an office park and have one meter for the facility, an inventory of the service line to each building is still needed, correct?

- A. Correct.

37. The MA plumbing code defines the areas and limits of responsibilities for PWS and the plumbers on water services and plumbing systems. Some of the slides contradict the language set forth in the MA plumbing code. Is a PWS now going to be responsible for pipes that are considered plumbing?

- A. The service line inventory reporting requirement doesn't change the responsibility or ownership of these lines.

38. My PWS's rules and regulations from 1933 when our system was created state " No lead shall be used". Can I use that to state all our services are not lead?

- A. If you can demonstrate that this rule/reg has remained effective and not replaced/edited since 1933 then it can be used to say all the lines installed since 1933 are not lead.

39. I am unclear on the scenario presented earlier detailing if an SLI cannot be submitted by compliance date and what that means a Utility needs to do.

- A. A service line inventory must be submitted by the due date using whatever information is currently available. Under both the LCRR and the proposed LCRI, updates to the inventory must be submitted as new information becomes available and changes the information previously submitted. Failure to submit the inventory by 10/16/24 is a violation of the LCRR and may result in enforcement from EPA.

40. By plumbing code any pipe beyond the outlet side of a meter is defined as plumbing but the slides indicate that a PWS is responsible to determine service line material after any meter.

- A. EPA defined a service line as anything prior to the building inlet. This would include pipes downstream of a meter when, for example, a meter pit exists.

41. Would it be plausible to use a bore scope for inspection instead of vacuum. Train employees to use it, save money on private contractors.

- A. MassDEP DWP is not familiar with a bore scope but we're open to having alternate methods described to us for our input. Please contact MassDEP at program.director-dwp@mass.gov with information on any alternative verification method PWS may wish to use.

42. So, in a case where there are series of houses fed through one common service line and one common meter, with the meter being located in the first house we would be obligated to determine service line material for all of the piping between the various houses even though MA plumbing code defines these pipes as plumbing?

- A. Yes, that's what EPA shows in their guidance.

43. We have some trailer parks and campgrounds. Will I need to identify the service lines in those parks?

- A. Yes, up to each building (trailer) inlet.

44. Can you review the predictive modeling, regards of the age of use of lead and galvanized material?

- A. If your system plan to use predictive modeling and the model is trained using known service line records from your system and those known service lines include lead lines and galvanized lines, then the model's output should be able to predict other lead lines and galvanized lines from among the unknowns in the system.

For more information on predictive modeling and the expected standards PWS must meet to use predictive modeling, see the **Predictive Modeling Guidance** here:

<https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download>.

45. To what extent can predictive modeling be used in MA? What are confidence requirements? Do exact materials need to be known, or is non-lead OK?

- A. Predictive modeling can be used in MA, as a last resort verification method, however the standards for its approval are high and may be out of reach for many systems. MassDEP requires a standard confidence interval of 95%, and predictive modelling must be used with a variety of service line materials. A predictive modelling method can only predict the type of service line materials that are included in the records fed into the predictive model. Because of this, records of all expected service lines in the service area must be provided to the predictive model.

For more information on predictive modeling and the expected standards PWS must meet to use predictive modeling, see the **Predictive Modeling Guidance** (<https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download>) and Predictive Modeling/Statistical Modeling questions posed in the **MassDEP LCRR Q & A** (<https://www.mass.gov/doc/frequently-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/download>).

46. Is wrought Iron considered galvanized or unknown?

- A. Neither. Galvanized is pipe that has been treated with zinc. If you know the material it is also not considered an unknown service line. Wrought Iron would be considered a “non-lead” service line. To classify this service line in the SLI workbook, enter the service line as “Unknown, definitely not lead” (UNK-NOLG), and specify it as “wrought iron” in the comments field.

47. ‘Service lines’ also include pipes exclusively used to feed private fire protection [fire suppression service lines] and must also be inventoried?

- A. Yes, those must be included in the Service Line inventory (SLI) as well.

48. Do Lead Lined Elbows or Lead Line Tees need to be replaced? How do you classify these services?

- A. If these are "connectors" then they need to be replaced under the LCRR when discovered during normal operations.

49. The LCRI now requires that connector/gooseneck info/material be included in the inventory. This was always included in the Massachusetts inventory template spreadsheet anyway, so it is not new for MA water systems. Can you confirm that if a connector/gooseneck is lead, it still does not affect whether an entire service line is classified as lead?

- A. Under the current LCRR, a lead connector (gooseneck/pigtail) does not affect the classification of the entire service line.

50. Is UNK-NOLG acceptable, or must we define if it is copper or plastic?

- A. This is an acceptable response when the material is unknown but for other reasons (e.g., age of home) it would not be lead.

51. Are galvanized service lines preceded by a lead gooseneck considered GRR?

- A. No, based on federal definitions, a galvanized line is considered GRR only when the galvanized line is downstream of an existing lead service line or was previously downstream of a lead service line.

52. Why are Gooseneck treated as separate entity than the service line?

- A. EPA does not include connectors (goosenecks/pigtails) as part of the definition of a service line.

53. The public service line material options have CI - lined and CI-unlined. If our records show it made of CI- Should we record it as CI-L or CI-U?

- A. CI isn't lead, GRR or unknown. However, in this case, if it is unknown whether the CI is lined or unlined you can report it as unknown- not lead (UNKN-NOLG) and use the comments to add CI.

54. We've had a question come up on one of our Lead Service Line Inventory projects regarding what category a material should fall under in the inventory. We have records showing a "1-inch genuine wrought iron standard weight service pipe which shall be centrifugally lined with cement" installed in 1948. We are questioning if this should fall under the "lined cast iron" or the "galvanized" material category. There is no mention in these records anywhere of the wrought iron specifically being "galvanized".

Has anyone from DEP run into a similar question, or have any input on this material classification?

- A. The pipe should be classified as "lined cast iron" (CI-L).

55. If we can't tell if a service line is HDPE or PVC, or a record only documented a line as plastic, since we can only put HDPE or PVC, should we put "UNK-NOLG" as the material and then put "plastic" in the comments? We have the same issue where records only say "iron", but we don't know if it's ductile or lined or unlined cast iron.

- A. Yes, that would work for both of your cases.

56. To confirm, if a service line is galvanized and may have been downstream of a lead gooseneck, but not downstream of a lead service line pipe, it is GRR or not?

- A. In that scenario, the service line would not be considered GRR.

57. Why does it matter if Galvanized is up or down stream of lead?

- A. If a galvanized pipe is downstream of lead pipe, lead can leach out of the lead pipe and then attach to the galvanized pipe (more so than other types of material).

58. What about lead poured cast iron lines that were installed with real lead in the early 1900's, would these be considered lead service lines?

- A. Lead Poured Cast Iron describes the joint of a service line, not the service line itself. This could be considered **similar** to a lead connector, rather than an entire service line containing lead.

Lead Poured Cast Iron Joints are a byproduct of a much older method of connecting service lines, in which the cast iron pipes were connected by lining the joints of the pipes with oakum, a natural fiber rope like material, and pouring molten lead on it to create a permanent "lead and oakum" seal. The oakum swells and seals the joint, the tar in the oakum prevents rot, and the lead keeps the joint physically tight.

Currently, Cast Iron Service Lines with lead poured joins are not considered Lead Service Lines (LSLs). However, lead poured cast iron joints could be considered **similar** to a lead connector and as such, when they are encountered the recommendation is to replace them to protect the public health of consumers. There are multiple video tutorials available online on how to remove the lead portion of lead poured cast iron joints for PWS who are unfamiliar with this process.

59. How are galvanized lines with unknown connections to the water main classified?

- A. If only the connector is unknown, and the entire line is and always has been galvanized then it is not GRR.

60. What do PWS do if we do find lead service lines and how long do we have to replace them after reported?

- A. MassDEP recommends that PWS try to replace all lead service lines within 5 years of the SLI deadline, per MassDEP's public health goal of being lead free within 5 years. The federally required replacement rate differs between the LCRR and the LCRI.

Currently, under the LCRR, systems will be required to replace LSLs and GRR service lines at an annual rate of at least 3%, on a two-year rolling basis if their 90th percentile lead level exceeds the lead action level (15 ppb) under the LCRR.

However, under the proposed LCRI, systems will need to replace all LSLs and GRR service lines within 10 years, unless MassDEP institutes a stricter time frame, and at a replacement rate of 10% each year.

Note: Unknown service lines must be included in the calculation of service line replacements.

61. Can you go more in depth on the classifications of what a lead service line is and all the different make ups (gooseneck, service line, home line etc. how they all classify together.)?

- A. A lead service line (LSL) means a service line that is made of lead or where a portion of the service line is made of lead. A service line may be divided by different "ownerships"

depending on the PWS; many PWS may have a public - or PWS owned portion, and a private – or customer owned portion. The ownership of the service line does not affect the requirement that it must be included in the service line inventory, with the material of both "sides" documented, or that it must be included in your LSLRP if it is a LSL, GRR, or UNK service line.

A gooseneck or connector is NOT considered a part of the service line. However, it must be replaced if discovered during normal operations.

By home line we estimate you are referring to premise plumbing. Premise plumbing is plumbing found within the interior of the house, after the building inlet. Premise plumbing should not be included in your service line inventory.

62. Do plans need to start being made for removing lead goosenecks? [Still a bit confused with how “lead goosenecks” are to be addressed.]

- A. Lead goosenecks should be replaced if they are discovered during normal operations, per the LCRR regulations and in the interest of protecting public health.. While goosenecks are not required to be included in the LCRR initial service line inventory (SLI), MassDEP recommends you include this information, to have this knowledge for the future, and as the baseline SLI required by the LCRI in the future does require that goosenecks be included in the SLI.

63. Can you please clarify what is considered “public” side vs “private” side for an NTNC system (Well to pumphouse = public? Pumphouse to inlet of building = private)?

- A. For NTNC systems with multiple service line materials, the “public side” would be the upstream side and the private side would be the downstream side of the service line.

For a NTNC system with a well line to a pumphouse, this line is not classified as a service line. The line that goes from the pumphouse to the inlet of the building is considered the service line.

64. For a common larger Community system, a service line is often times more typical to the broadly recognized service line layout, and it is understood to consist of the PWS owned service line piping after the “Connector” and up through the property line/curb valve, as well as the privately owned piping prior to the household plumbing. **For the purpose of the SLI, what is the limit of the service line on the private side where it would transition to “Household Plumbing”? Is it at the foundation? If the meter is on the interior of the structure, is it the downstream connection of the meter?**

- A. The transition would be where the pipe connects to the building inlet. In the case of the meter being on the interior structure, the private service line ends at the meter.

LCRI proposed definition: *Service line*, for the purpose of subpart I of this part only, means a portion of pipe which connects the water main to the building inlet. Where a building is not present, the service line connects the water main to the outlet.

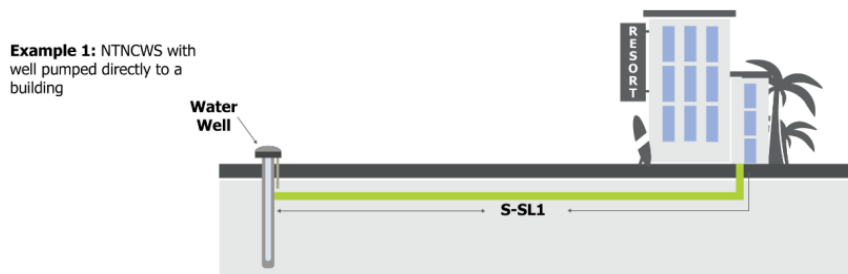
65. I run 2 NTNC systems. Built in 1995 and 2003, obviously there has never been a lead issue. Why am I being put through this?

A. EPA required all PWS that are subject to the LCRR to submit a SLI. Given the age of your two systems (after the lead ban) this should be straightforward as you can cite the construction dates to certify that all service lines are non-lead.

66. For commercial, industrial, or institutional type PWS, the service line definition as it applies to these new regulations is less clear to us based on the following factors:

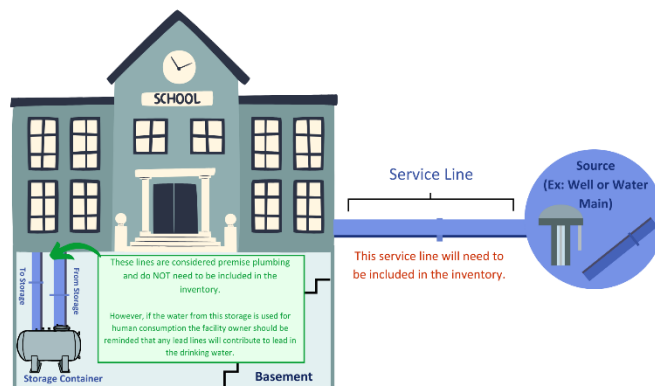
a. Is the water source supply line (well line to the building) considered a service line or a Source/Raw or Distribution line?

Answer: The well line to the building is the service line.

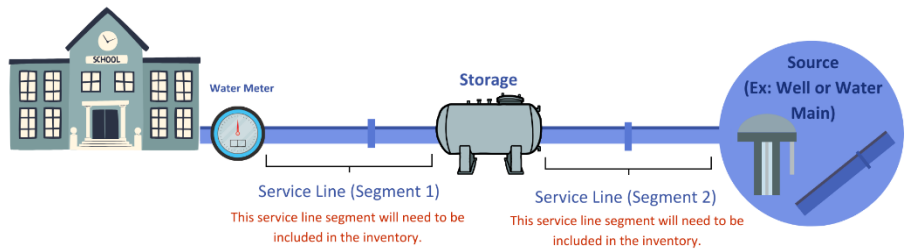


b. If there is a storage tank in the system, does that impact the definition of the water source supply line (referenced above) as a service or not?

Answer: It impacts it, depending on its location. If it is an internal storage tank, the service line will be the pipe connecting the well line to the building. The piping connecting the storage tank inside the building will be considered premise plumbing.

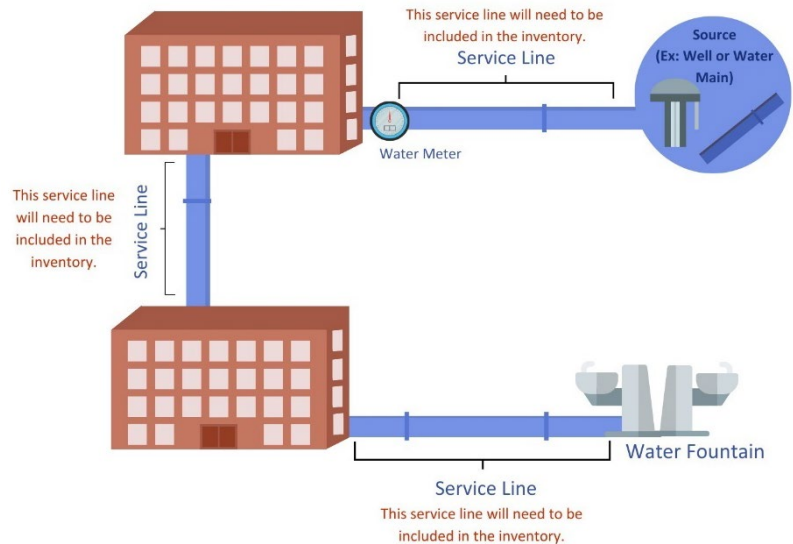


If the storage tank is located outside, the pipe connecting the well to the storage tank will be one segment of the service line, and the pipe connecting the storage tank to the building will be the second segment.



- c. If there are multiple buildings on the property that are fed by a mainline passing through the primary building, is that piping a service or a main?

Answer: The piping will be service lines.



- d. In the scenario stated in “C” above, where do the building plumbing limits start/stop relative to mains/service designations for the LSLI?

Answer: The building plumbing limits will start and stop at the building outlets and inlets.

- e. If there is treatment inside the primary building, the well supply line is then Raw Water. How does the inclusion of a treatment process impact the definition of the water source supply line as being a service or not?

Answer: If this is for the scenario stated in “C”, then the location of the treatment will impact the definition of the service line. For this case, the line from the well to the primary building will be the raw water transmission line, not a service line.

Sampling Schedule Questions

67. Our PWS does not have to sample until 2026.

- A. If the LCR schedules continue (which we expect based on the LCRI proposal) then you would not sample until 2026. If the LCRR requirements continue (not as likely) you will have to conduct semiannual monitoring in 2025.

68. So, if my system is currently on a sample plan of every three years, I will now be sampling every year?

- A. That is the requirement in the LCRR. However, the proposed LCRI would delay this change in frequency until 2027. We are waiting for the final LCRI to confirm.

69. Water systems are working to get their inventories completed and submitted by October 16, 2024. If they are doing well, then maybe they will have customer's new Tier classifications set by September, if they are lucky. Is this enough time for the water systems contact customers, update their sampling plans with new sampling locations if needed, complete the forms to submit to MassDEP, AND get MassDEP approval to use those locations by the time they have to start sampling in January 2025?

- A. If the LCRI doesn't put a pause on the monitoring requirements under the LCRR, MassDEP will ensure your sampling plans are approved in a timely manner.

Contacting customers and ensuring participation can be a hard task due to the tight timeline. Therefore, if you think you will not have enough time to collect enough customers for 2025, please contact your regional office as soon as possible so a compliance plan can be developed.

70. Our 2023-2025 Sampling Schedule states that our next sampling for lead and copper is the 3rd QTR of 2025 and we have reduced monitoring of 30 sites, will that change depending on what comes out on or before October 16th? My boss was under the impression that we need to take lead and copper samples this year 3rd QTR with no reduced monitoring and what is on our sampling schedule is not applicable. if you could clarify it would be appreciated.

- A. Correct, the expected sampling schedules for PWS may change based on if the LCRR takes affect October 16th, 2024, or if the LCRI goes into effect on or before October 16th, 2024.

If the LCRI takes effect on or before October 16th, 2024, systems will continue to sample as normal, based on the LCR regulations. This means, your PWS will sample during the 3rd QTR of 2025, as per your 2023-2025 sampling schedule.

If the LCRR takes effect, and the LCRI is not published by October 16th, 2024, then systems will need to sample based on the LCRR regulations. **If the LCRI does not take effect**, then your sampling schedule may change based on the contents of your SLI, and you may be put back on standard monitoring.

MassDEP recommends that PWS take a more cautious route and prepare for standard monitoring, however it is more likely that the LCRI will be published by October 16th, 2024.

Lead Service Line Replacement Plans (LSLRP)

71. Our PWS is required to submit a Lead Service Line Replacement Plan (LSLRP). While I have created a plan incorporating LCRI proposals, will there be upcoming guidance on deadlines to resubmit an LSLRP with included with LCRI mandates?

A. Yes, we expect EPA will issue additional guidance after the LCRI is finalized.

72. How will the LSLRP be submitted? The actual plan itself, not just the info on the DEP LSL app.

A. If required, the LSLRP should be submitted using our online form located at <https://app.smartsheet.com/b/form/8f676b18cc224884a7069e3cc727f968>. You will only need to fill it out and hit the submit button.

If you submit the form online, there is no need to attach the form when submitting the inventory but remember that the deadline to fill out this form is October 16, 2024, as well. We will be able to see your submission in our database.

If, for some reason, you cannot submit the form online, please request a PDF form at program.director-dwp@mass.gov. For this scenario, the PDF LSLRP form should be submitted along with the inventory.

If you have developed an LSLRP as a standalone document you can submit it to program.director-dwp@mass.gov, subject line: LSLRP.

73. Scenario: I am aware of all public and private service lines in my service area except for 1 private service line, I cannot get in contact with the owner. *[I have no known lead in the entire inventory.]* **Do I have to do a LSLRP for just one unknown private side in the entire system?**

A. If your system has any unknown service lines in your inventory, you will need to submit a LSLRP. However, if you know with certainty (based on the age of the building or other records) that the service line is not known to be lead, even if you don't know the exact material, you can classify it as "Unknown, definitely does not contain lead or galvanized" (UNK-NOLG).

74. For LSLRP, should PWS plan to remove service lines using the MassDEP 5-year removal goal, or should systems plan removal using the LCRI 10-year plan?

A. PWS should start to plan their LSLRP for the foreseeable future with the goal of removing LSL in 5 years to better protect public health. As you know, there is no safe level of lead, and it is the goal of the MassDEP/DWP to assist public water suppliers and their customers to get the lead out and to remove all drinking water lead service lines (LSL) in the Commonwealth as soon as possible in order to address the negative impacts of lead. If the LCRI is finalized as proposed, the regulatory deadline will be 10 years unless a determination is made that LSLR at the system can be accomplished sooner, or the system meets the criteria to be allowed more than 10 years.

75. Lead goosenecks will not be considered full lead service but will impact the replacement plan. How will it impact the replacement plan?

- A. Lead goosenecks are not considered a part of a lead service line. However, under the LCRR and the proposed LCRI, lead connectors (goosenecks, pigtails are required to be replaced if discovered during normal operations.
Under the LCRR, these connectors are not required to be included in the initial SLI; however, the LCRI will require goosenecks/pigtails to be included in the baseline SLI.

Childcare Facilities Questions

76. I have daycare facilities in town that aren't on town provided water [served by my PWS]. Do I still need to sample from these daycares?

- A. No, only schools and daycares that receive water from the PWS should be sampled from and included in your SLI.

77. How is a facility supposed to be aware of the various home day care facilities in the distribution system?

- A. PWS will need to use the list from DEEC and your billing system.

DEEC Resources:

DEEC Website: <https://www.mass.gov/orgs/departments-of-early-education-and-care>

DEEC Licensed Childcare Search: <https://childcare.mass.gov/findchildcare>

78. You mentioned a “care facility”, what do you consider a care facility?

- A. A childcare facility licensed by the Department of Early Education and Care (DEEC).

79. Who is responsible for the LCR sample collections at School and Daycares (PWS, or school & Day care owners)?

- A. PWS are responsible for the LCR sample collections at schools and daycares.

Funding Opportunity Questions

80. Can you provide more information on unknown or galvanized services, and will there be a fund for homeowners with these types of water services?

- A. There are no direct funding opportunities from EPA or MassDEP for homeowners themselves. However, Public Water Systems can obtain funding that can be used to assist these homeowners.

Funding Resources:

LCRR Webpage: <https://www.mass.gov/info-details/lead-and-copper-rule-revisions>

Small Systems Technical Assistance Program Application:

<https://www.mass.gov/forms/massdep-service-line-inventory-and-lead-service-line-replacement-plan-technical-assistance-survey>

SRF Funded LCRR SLI and LSLRP Grants and Loans: <https://www.mass.gov/info-details/lead-service-line-replacement-program>

EPA LSLR Funding Sources Webpage: <https://www.epa.gov/ground-water-and-drinking-water/identifying-funding-sources-lead-service-line-replacement>

81. My system is a small system [under 10,000] except in the summer when we are inundated by beach goers. Would my system be eligible for the Small Systems Technical Assistance Program?

A. EPA requires us to report the higher of either summer or winter populations. If your PWS summer population is above 10,000, you will not qualify for the Small Systems Technical Assistance Program.

82. What resources are EPA and DEP providing for homeowner service line replacement that PWSs can apply for?

A. MassDEP has 2 options for funding, provided through the SRF Program:

1. 0% Interest Loans for LSL Construction Projects

- Zero percent interest loans offer communities substantial savings on construction projects that remediate lead, a critical action in mitigating lead exposure and protecting public health. Further, the Trust offers loan forgiveness to disadvantaged communities completing LSL construction projects in addition to the 0% interest rate.

2. The State Revolving Fund (SRF) Grant

- The Trust is offering grants while funding is available for activities assisting PWSs to complete planning projects for Service Line Inventories (SLI) and for the development of LSL replacement plans. MassDEP will accept grant applications on a rolling basis while funding is available.

For more information on these programs and how to apply visit the SRF webpage here:

<https://www.mass.gov/info-details/lead-service-line-replacement-program>.

EPA has several funding programs, some awarded through Massachusetts such as through the SRF program, and others directly from the EPA and various United States Agencies.

For more information on EPA Funding visit the EPA LSLR Funding Sources Webpage:

<https://www.epa.gov/ground-water-and-drinking-water/identifying-funding-sources-lead-service-line-replacement>

83. Is there financial assistance available for PWS's with over 14,000 services?

A. Financial assistance is not based on the number of service lines in a PWS, but the population the PWS serves. However, based on the provided number of service lines, this is likely a system serving over 10,000 people.

If your system is a larger Community (COM) PWS, there are multiple opportunities for your system provided by SRF. **SRF Funding consists of 2 options:**

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