

Lead and Copper Rule Revisions (LCRR) Requirements for “Lead Status Unknown” Service Lines

All Community and Non transient Non-Community Public Water System (PWS) service line inventories are due **October 16th, 2024**! Since service line inventories are coming up soon, let’s look at the requirements that your system may trigger if you list any “**lead status unknown**” service lines in your inventory. All requirements listed are found in EPA’s regulation 40 CFR 141, which you can find here: [eCFR :: 40 CFR Part 141 Subpart I – Control of Lead and Copper](#). MassDEP will provide templates for all LCRR information and notices.

Initial and Annual Consumer Notices

Within 30 days after submitting the service line inventories to MassDEP in 2024, all systems are required to inform all persons with a lead status unknown service line that their service line may potentially contain lead.

This notification must be **repeated every year** until there is no longer a single lead, galvanized requiring replacement, or lead status unknown service line in the PWS distribution system (section 141.85 (e)).

This notice must include:

- a statement that the service line material is 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, and
- information about opportunities to verify the material of their 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 status unknown service line to MassDEP 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.

LCRR Initial and annual Consumer Notice and certification templates will be available soon.

Updated Inventory Submission

Annually, within 30 days of the end of each tap sampling monitoring period, PWS with lead status unknown service lines in their inventories must provide MassDEP with updated versions of the inventory in accordance with its tap sampling monitoring period schedule.

The system must demonstrate that there are no lead, galvanized requiring replacement, **or lead status unknown service lines** in their inventory to no longer be required to submit inventory updates to MassDEP (141.90 (e)(3)).

Lead Service Line Replacement Plan

PWS with lead status unknown service lines in their inventories must submit a lead service line replacement plan (LSLRP) by October 16th, 2024. When submitting your replacement plan, the PWS must also include a **strategy** to determine the composition of any lead status unknown service lines included in your inventory (141.84 (b)(1)).

To see what should be included in the LSLRP see [Lead Service Line Replacement Plan \(LSLRP\) Summary \(smartsheet.com\)](https://smartsheet.com).

Reporting requirements for tap water monitoring for lead

PWS with lead service lines, galvanized service lines requiring replacement, **or lead status unknown service lines** in the lead service line inventory must re-evaluate and report on the tap sampling locations used in their sampling pool prior to the next round of tap sampling conducted by the system, or annually, whichever is more frequent (141.90(a)(iii)).

If a system exceeds the lead action level and/or the lead trigger level

After the PWS service line inventory is submitted in 2024, systems will need to begin LCRR monitoring by January 2025*.

If the system exceeds the 90th percentile for lead or the lead trigger level and is serving a population of over 10,000 people, the PWSs must conduct a full lead service line replacement program or a goal-based full lead service line replacement program, at a rate approved by the State (MassDEP).

If your system **exceeds the action level** and it serves a population greater than 10,000 and you are required to conduct a full lead service line replacement at an average annual rate of at least 3%, calculated on a two-year rolling basis, the PWS is required to **provide information/notice to any customer who has a lead status unknown service line** (141.84 (g)(4)).

To calculate the number of service line replacements, the replacement rate must be applied to the sum of known lead and galvanized requiring replacement service lines when the system first exceeds the trigger or action level **plus the number of lead status unknown service lines in the beginning of each year of a system's annual goal or mandatory lead service line replacement program.**

- The information for the customer must be **provided by mail or another method that has been approved by MassDEP.**
- The information must be sent to customers **within 30 days** of the end of the sampling period when the action level exceedance occurred. This notification must be **repeated annually** until sampling results are at or below the lead action level.

The number of service lines requiring replacement must be updated annually to subtract the number of lead status unknown service lines that were discovered to be non-lead and to add the number of non-lead service lines that were discovered to be a lead or galvanized requiring replacement service line.

Verification of a lead status unknown service line as non-lead in the inventory does not count as a service line replacement.

If your system **exceeds the trigger level** and it serves a population greater than 10,000 and you are required to conduct a goal-based full lead service line replacement at a rate approved by the state, the PWS is required to **provide information/notice to any customer who has a lead status unknown service line** (141.84 (f)(4)).

- The information for the customer must be **provided by mail or another method that has been approved by MassDEP**.
- The information must be sent to customers **within 30 days** of the end of the sampling period when the trigger level exceedance occurred. This notification must be **repeated annually** until sampling results are at or below the lead trigger level.

Notification due to a disturbance to a known or potential service line containing lead

PWS that cause disturbance to a lead, galvanized requiring replacement, **or lead status unknown service line** that results in the water to an individual service line being shut off or bypassed, such as operating a valve on a service line or meter setter, and without conducting a partial or full lead service line replacement, must provide the persons served by the water system at the service connection with information about the potential for elevated lead levels in drinking water as a result of the disturbance as well as instructions for a flushing procedure to remove particulate lead. The water system must comply with these requirements before the affected service line is returned to service.

If the disturbance of a lead, galvanized requiring replacement, **or lead status unknown service line** results from the replacement of an inline water meter, a water meter setter, or gooseneck, pigtail, or connector, the water system must provide the person served by the water system at the service connection with:

1. Information about the potential for elevated lead levels in drinking water as a result of the disturbance,
2. Public education materials that meet the content requirements for lead Public Education (141.85(a)).
3. A pitcher filter or point-of-use device certified by an American National Standards Institute accredited certifier to reduce lead, instructions to use the filter, and six months of filter replacement cartridges.

The water system must comply with these requirements before the affected service line is returned to service.

Please note: LCRR information is subject to change depending on the USEPA Lead and Copper Rule Improvements (LCRI) and the promulgation of MassDEP LCRR regulation.

If you have any questions regarding the requirements of the LCRR regulations, contact the DWP at program.director-dwp@mass.gov.

*For more information on maintaining reduce monitoring in 2025 see <https://www.mass.gov/media/2587276/>.