Massachusetts Department of Environmental Protection (MassDEP)
Drinking Water Program (DWP) Frequently Asked Questions (FAQ)

Lead Service Line Replacement Funding and Regulatory Requirements Webinar: Questions and Answers

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1. Lead and Copper Rule Improvements (LCRI) Compliance

1.1. What counts as a "connector" (gooseneck/pigtail), and how is it reported in the Baseline Service Line Inventory?

US Environmental Protection Agency (EPA) defines a connector (gooseneck/pigtail) as a short segment of piping not exceeding 3 feet that can be bent and is used for connections between service piping, typically connecting the service line to the water main.

Under the LCRI, the Baseline Inventory (due Nov 1, 2027), systems must include connector material information and categorize connectors as Lead / Non-lead / Unknown / No connector present; starting with the Baseline Inventory, the publicly accessible inventory must include the street address for each service line and identified connector (or a unique locational identifier if no street address is available). Please note that MA will still require the locational identifiers used in the initial service line inventory in addition to the street addresses.

1.2. Is the Baseline Service Line Inventory due November 1, 2027, different from the initial inventory submitted in 2024? If so, what specifically changes?

Yes. The baseline inventory builds on the initial inventory and is due Nov 1, 2027. The baseline inventory must include connector information plus updated/new information on service line materials and locations. The baseline inventory must also now include the street address for each service line, if available.

1.3. Do we need to submit the inventory annually to MassDEP, and will MassDEP update the inventory template for the Baseline submission?

By January 30, 2029, and every January 30th thereafter, public water systems (PWS) must submit an inventory update annually. PWS with all non-lead service lines are not required to submit or post inventory updates unless they later discover a lead or Galvanized Requiring Replacement (GRR) service line or lead connector during the validation process or other work. MassDEP will update the inventory template for the

LCRI and post it on the Lead and Copper Forms and Templates webpage, when available.

1.4. What are the key compliance deadlines for: Baseline Inventory, Replacement Plan, non-lead validations, replacing unknowns, and replacing LSL/GRR?

- **Baseline Inventory due to MassDEP:** Nov 1, 2027.
- **Lead Service Line Replacement Plan due to MassDEP:** Nov 1, 2027.
- **Validate a subset of non-lead service lines:** Dec 31, 2034
- **Identify all unknown service line materials:** by the system's mandatory service line replacement deadline, for most PWS within 10 years (by Dec 31, 2037).
- **Replace all lead and GRR service lines under system control**: within 10 program years (by Dec 31, 2037), unless on a shortened or deferred deadline.

1.5. When does the requirement to offer sampling to 20% of elementary schools and childcare facilities each year for five years start, and what exactly triggers it?

When the LCRI becomes the compliant rule on November 1, 2027, public water systems will have to conduct public education and offer sampling to 20% of all elementary schools and childcare facilities they serve each year for five years unless those schools or child care facilities:

1. Were constructed or had full plumbing replacement on or after January 1, 2014, and
2. Are not served by a lead, a galvanized requiring replacement, or an unknown service line.

1.6. What does it mean that partial replacements are prohibited, especially when the property owner refuses replacement on their side?

Under the LCRI, water systems must replace all lead service lines and galvanized service lines which require replacement that are under their control, **except when doing so would result in a partial lead service line**. If the system has access (legal or physical), it must complete the full replacement. If owner consent is required for access, systems must make a "reasonable effort" to obtain consent. (Reasonable effort to obtain owner consent = 4 attempts, 2 methods). If access is not available, the system is not required to replace the line but must document why access is not possible and provide that information to MassDEP.

Partial replacements are **prohibited** by the LCRI except when done as part of an emergency repair or in coordination with certain planned infrastructure work that impacts the service line (e.g., water main replacement, meter replacement).

If a customer replaces part of a lead or galvanized service line, the water system must replace its remaining portion—generally within 45 days—and provide required notifications and risk mitigation. If the system cannot meet the deadline, it must notify MassDEP and complete the work within 180 days. If the system learns of a partial replacement within six months, similar timelines apply. If the replacement occurred more than six months earlier, the system must still track the line in its inventory and replace it under its standard replacement schedule.

1.7. What documentation is required to show "reasonable effort" to obtain owner consent (4 attempts, 2 methods), and what counts as separate "methods"?

PWS must record their outreach attempts and methods and document any owner refusals. Outreach methods may include in-person conversation, phone call, text message, email, written letter, postcard, door hanger, or other methods determined acceptable by MassDEP.

1.8. If the resident owns the entire service line from the main to the house, what obligations does the PWS still have under LCRI (payment, inspection, replacement plan, replacement execution)?

Replacement and Payment

Under the LCRI, if a PWS does not have "access" (legal/physical), the PWS is not required to replace the service line. However, when the PWS can conduct replacement if property owner consent is obtained, the PWS must make a "reasonable effort" to obtain property owner consent (40 CFR 141.84(d)(3)). See question 1.7 for more information on reasonable efforts.

Should the PWS not obtain property owner consent during the reasonable efforts, the PWS is not required to replace the service line. Should property ownership change, the process restarts. PWS under the LCRI are not required to pay for the private service line replacement.

Please note that while under the LCRI, PWS are not required to pay for private service line replacement, should a PWS conduct replacement using SRF grants/loans, the private service line must be replaced using the SRF grant/loan money.

PWS must include private service lines in their LCRI replacement plan, and planned replacement execution. Should a PWS not be able to replace the private service line (as stated above) the PWS must provide MassDEP with documentation of their reasonable efforts.

Inspections

Regarding service line inspections, this can impact two LCRI requirements: (1) Unknown Identification and (2) Non-Lead Validation.

1) Unknown service lines must be identified in the 10 years allotted for service line replacement. Unlike lead/GRR service line replacement, the LCRI does not take into consideration "access" to the service line, PWS must identify all unknowns by their replacement deadline.
2) PWS must validate the total required number of non-lead service lines for their system at 2 exterior inspection points, regardless of ownership. If a PWS cannot access the service line for validation due to customer refusal, PWS may swap the service line with another randomly selected from the validation pool (40 CFR 141.84(b)(5)).

1.9. In cases where a resident refuses entry to inspect, refuses replacement, or refuses to sign access permissions, what compliance steps should the PWS take to stay on track?

The PWS should document the refusal and continue to provide annual notifications to owners with known GRR/LSLs or service lines potentially containing lead regardless of whether access is obtained after making a reasonable effort to obtain property owner consent. For inspections, unknown service lines must be identified in the 10 years allotted for service line replacement. Unlike lead/GRR service line replacement, the LCRI does not take into consideration "access" to the service line. PWS must identify all unknowns by their replacement deadline. See question 1.8 above for more information.

1.10. What qualifies as a deferred (or shortened) deadline for replacement, and how will MassDEP determine eligibility for a deferred deadline?

A PWS may extend the deadline for replacement if replacing 10% annually would require more than 39 replacements per 1,000 service connections per year. MassDEP will use this ratio to determine if a PWS qualifies for a deferred deadline. See EPA's factsheet on Deferred Deadlines for more information.

1.11. What's an acceptable method to resolve large numbers of unknowns before test pits (records review standards, tie-card ambiguity handling, install-date assumptions, neighborhood inference, etc.)?

PWS may use a number of methods to identify unknowns besides test pits / excavations. Acceptable methods may include records review (tap/tie cards, main and/or meter replacement records, plumbing and building permits), year of

construction (post lead-ban), statistical analysis (with prior approval from MassDEP), customer material self-identification, or other method approved by MassDEP.

1.12. Is it acceptable to pothole at the curb stop for a large set of unknowns to confirm both sides, or are there other MassDEP-acceptable approaches?

Yes, this is an acceptable method. PWS may also use other approved methods for unknown identifications, including records review, year of construction (post lead-ban), customer material self-identification for private side lines, or statistical analysis with prior approval from MassDEP.

1.13. For neighborhoods of similar age/materials, is "composite" or representative excavation acceptable, or must each unknown be physically verified?

If the neighborhood was built by a developer all at the same time, then yes, the PWS may extrapolate the results of a subset of representative excavations based on the entire area being built by the same developer at the same time, which would be considered a mix of statistical analysis and operator institutional knowledge. However, if development occurred over a long period of time and new services were installed on varying timeframes, then this approach would not be acceptable.

PWS with such a scenario should discuss using statistical analysis with MassDEP DWP at program.director-dwp@mass.gov to ensure your planned method meets MassDEP requirements.

1.14. How should we treat UNK-LG vs. UNK-NOLG classifications (notifications, prioritization, confirmation expectations)?

A service line segment with the material "UNK-NOLG" (Unknown, definitely not lead or galvanized) is classified as a non-lead material. A service line segment with the material "UNK-LG" (Unknown, may contain lead or galvanized material) is classified as Lead Status Unknown.

Since service lines segments with the material classified as UNK-NOLG are considered non-lead, the consumer does not need to be sent a consumer notification (unless the other segment is a material which requires notification). These service lines are expected to be included in the LCRI required Non-Lead Validation pool starting Nov 1, 2027, unless any of these service lines meet certain criteria to exclude them from validations.

If a PWS conducts any work on service lines with an UNK-NOLG material, PWS are encouraged to update the material following the work done, to keep their inventory

accurate and up to date, as is recommended with all service line and distribution system work.

1.15. If the public side is galvanized, should we assume a lead gooseneck/connector, and how does that affect classification and replacement scope?

If the city / town had a practice of installing lead goosenecks with galvanized service lines, then the PWS should assume a lead gooseneck/connector.

A gooseneck/connector does not impact the service line classification. A lead gooseneck/connector would not cause a galvanized service line to be considered GRR under the LCRI.

1.16. Do known lead goosenecks/connectors have to be replaced within the 10-year replacement deadline, even if they're "not part of the service line"?

Lead goosenecks/connectors must be replaced if encountered during planned or unplanned water system infrastructure work, unless the connector is not under the control of the PWS.

1.17. For non-lead validations, can validation start before November 1, 2027, and how should the random subset be selected and documented?

Yes, PWS can start validating non-lead service lines prior to November 1, 2027, provided that the validation methodologies are at least as stringent as the LCRI requirements. See EPA's Inventory Validation factsheet for guidance on identifying the validation pool, determining the number of required validations, and reporting requirements.

1.18. Where do less common materials (e.g., black iron pipe, cement line) fall in LCRI classification and replacement planning?

All materials which do not have a specific material category in the MassDEP Service Line Inventory which are non-lead and non-galvanized materials should be included as "UNK-NOLG", with a comment in the comment's column stating the exact material. If a material is lead or lead lined, it must be classified as "L" (lead) and the service line will be classified as a Lead Service Line. If a service line material contains an interior galvanized coating, the material must be classified as "G" (Galvanized), and a comment can be included for the service line if more specific information is needed.

If the service line material is not lead or Galvanized Requiring Replacement, the LCRI does not require the service line to be replaced. If your PWS has its own replacement requirements or standards for certain materials, such as cement-lined pipe or black

iron, then this may be something your PWS should consider when creating your LCRI service line replacement plan, to make sure your system is planning and budgeting effectively.

1.19. If we already submitted an Lead and Copper Rule Revisions (LCRR) inventory and replacement plan and completed early replacements, what needs to be updated or reformatted for LCRI?

A baseline inventory will need to be submitted by November 1, 2027, that includes information about connectors, as well as any updated or new information on service line materials or locations. Additionally, the service line inventory should be continually updated over time as LSLs and/or GRRs are replaced or any unknowns are identified. The Lead Service Line Replacement Plan will need to be updated and resubmitted by November 1, 2027 as well, and include the new LCRI required elements: a strategy to inform customers and consumers about the plan and replacement program, and an identification of any legal requirements or water tariff agreement provisions that affect a system's ability to gain access to conduct full service line replacement.

1.20. If communities conduct their school lead testing through the Water-Smart program now, does it count towards the 5-year requirement?

Yes. A PWS that participates, or have participated previously, in MassDEP's *Water-Smart Pilot Program for PWSs* will exceed the LCRI school and childcare facility outreach / education and sampling requirements and will be eligible to receive a waiver.

2. State Revolving Fund (SRF) Application Process and Eligibility

2.1. Are SRF funds available for systems that missed earlier inventory grants, specifically to support catch-up inventory refinement and resolving unknowns?

Yes. The Trust is offering 0% interest rate LSL Planning Loans that will be paired with loan forgiveness for project scopes that include inventory development/refinement and resolving unknowns. Grants are no longer offered for planning inventories.

Applications for LSL Planning Loans are accepted on a rolling basis while funding is available. Applications can be accessed on the SRF Website here.

2.2. Are there eligible SRF project types specifically for LSL identification when we have hundreds of unknowns?

Yes. If the project scope is intended to resolve the unknown status of service lines (SLs) within your inventory to comply with LCRI requirements then those projects would be eligible under the LSL loan program.

2.3. What's the practical boundary between a planning project and a construction project (inventory refinement vs. test pits vs. full replacement program)?

Construction loans typically include:

- Full LSL replacement work (public and/or private side).
- Investigations that require excavation, test pits, curb stop work, or other invasive methods.

Planning loans typically include:

- Inventory development, refinement, and updating inventories (records review, data cleanup, mapping/GIS, and customer outreach programs/workflows). Prioritization approaches, replacement plan development, and other LSL-related planning activities.

2.4. Are predictive modeling/statistical analysis, vacuum excavation, consultant field verification, and other non-invasive methods (e.g., Electroscan) eligible under planning loans?

Vacuum excavation is an invasive method and not eligible under planning loans. The MassDEP Drinking Water Program would need to review and approve the other individual methods mentioned in this question. For more information on statistical analysis and predictive modeling see MassDEP's Statistical Analysis and Predictive Modeling guidance.

2.5. Are public outreach, education, and routine inventory updates eligible SRF activities (e.g., customer contact workflows, access/consent process design, replacement program communications)?

Yes, these are eligible planning activities, as long as the inventory update is the first documentation of the inventory funded with SRF. Routine inventory updates (subsequent to the first inventory) are not eligible.

2.6. Under the construction loan, are GRR replacements and lead gooseneck/connector removals eligible, or is it strictly LSL replacements?

Yes, these would be eligible activities.

2.7. Will water main replacements be eligible if they're being used as the delivery method?

Per the EPA, water main replacement projects are not eligible under Lead Service Line Replacement funding.

2.8. What documentation does MassDEP require for a complete application (planning vs. construction), and what triggers issuance of a Project Approval Certificate (PAC)?

For construction loans, please refer to the SRF construction loan application. For planning loans, please refer to the SRF planning loan application. A PAC will not be issued unless all requirements are met.

2.9. Are there Disadvantaged Business Enterprise (DBE) requirements for LSL planning/construction projects under SRF, and what reporting/documentation is needed?

Federal DBE requirements have been replaced with the following procurement considerations: Six Good Faith Efforts. 40 CFR, Part 33, Subpart C: Pursuant to 40 CFR Section 33.301, the sub-recipient agrees to make good faith efforts whenever procuring construction, equipment, services, and supplies under an EPA financial assistance agreement, and require that sub-recipients, loan recipients, and prime contractors also comply. Records documenting compliance with the six good faith efforts shall be retained. The specific six good faith efforts can be found at: 40 CFR Section 33.301 (a)-(f).

2.10. Are there still SRF funds available to help fund last year's inventory?

Funding that was used to support planning grants has been exhausted. However, public water systems may apply for a planning loan to support the development of lead service line inventories and/or replacement plans. These loans are offered with a 0% interest rate and loan forgiveness.

2.11. Is the planning loan just for lead lines or all lines since we are trying to determine if we have lead lines?

The purpose of the LSL planning loan is to create an inventory of lead lines or develop a replacement plan. While developing the inventory, the borrower may identify non-lead lines.

2.12. Can you use SRF with principal forgiveness money to purchase equipment, for example a mini excavator to conduct exploratory work?

No, this purchase is not eligible for SRF funding.

3. Trust Finance - Loan Forgiveness

3.1. How is Disadvantaged Community status determined for SRF (including "Environmentally Disadvantaged" and tiering), and how can a system confirm its tier?

Disadvantaged Community status is based on an annual calculation and communities may find that on the Trust's website.

Any eligible project for SRF LSL Loan funds will be treated as an **Environmentally Disadvantaged Communities (EDC).** An EDC is a PWS that has lead in the water supply and/or LSLs in the system. This designation is applied to lead mitigation loans, and does not transfer to other SRF projects.

3.2. Are disadvantaged communities prioritized for getting loans, or only for the loan forgiveness component? Will non-disadvantaged communities still receive 0% loans?

LSL loan applications are accepted on a rolling basis and will be prioritized by the order in which they are received. All loans are currently offered at a 0% interest rate, subject to available funding.

The loan forgiveness for all LSL projects has been 40%, with future projects expected to receive the same amount subject to available funds.

3.3. What prerequisites apply for enhanced SRF subsidy/loan forgiveness (enterprise fund vs. restricted utility account), and what documentation does the Trust require?

Communities are required to have Enterprise Fund or equivalent. The Acts of 2014 – Chapter 259: An Act Improving Drinking Water and Wastewater Infrastructure requires municipalities to establish a sewer enterprise fund or water enterprise funds (or equivalent separate restricted accounts) to be eligible for loan forgiveness. Additionally, the Acts disqualify any municipality from receiving loan forgiveness if any transfers from the enterprise fund are not related to the funds intended purposes.

3.4. For loan forgiveness eligibility, what does "the system has lead" mean (known LSL/GRR vs. lead detections vs. both)?

For the purposes of the LSL Loan Program, any loan for the purpose of identifying, removing or mitigating LSLs or GRRs would be eligible for 0% interest and loan forgiveness.

3.5. If SRF funds are used to replace the private side, can the municipality recover costs from owners (betterments/fees/surcharges on the water bill), and are there restrictions on doing so?

EPA requires SRF funds to support both the public and private side lead service lines being replaced. Offering loans at 0% interest rate along with principal forgiveness is intended to offset the costs to communities. The Massachusetts SRF encourages PWS to utilize the interest and loan forgiveness to reduce the cost to ratepayers. PWSs should consult state law and appropriate authorities regarding betterments or charges to homeowners before proceeding. Those agreements would be between the PWS and the homeowners.

3.6. Can SRF funds be used to reimburse homeowners who have already replaced their LSL at their own expense?

No, EPA's SRF funds are not available to reimburse homeowners.

3.7. Are there any programs for homeowners, in home daycare centers, etc., for replacement of their portion of the service lines that we can direct individuals towards?

No. There are currently no programs operated by the Massachusetts SRF, or MassDEP, that will assist individual homeowners.