Lessons Learned: Common Errors Found When Reviewing and Validating Lead and Copper Rule Revisions (LCRR) Required Service Line Inventories (SLI)

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After reviewing and validating the many SLIs that have been received in the past few months, there are some common errors that have come up more than once. The Drinking Water Program recommends that Public Water Systems (PWS) be aware of these errors, and check for these in your own SLI prior to submission.

ALL ERRORS LISTED BELOW will require MassDEP to ask PWS to fix the errors and resubmit your SLI.

Common Errors:

Invalid and/or incorrect service line classifications

An incorrect service line classification error can be caused when the private and/or public service line material values are invalid or blank. Correcting the invalid values and recalculating the service line classifications can resolve this error.

Locational Identifiers are not unique

If there are multiple service lines on one property, a way to continue to use the address of the property as a unique locational identifier is to append letters, such as "a" and "b" to the address of both service lines. For example: "100 Smith Road-a" and "100 Smith Road-b".

o Completed cells that must be left blank.

PWS should note that certain cells should be left blank, and completing cells that are not required, even with a "N/A" or a space, will cause a validation error for that cell. If you are confused on which cells are required and which are not/optional, please review the "column definitions" tab, or click on the column header.

Empty cells that must be completed.

Required cells MUST be completed to avoid validation errors. If there is unknown information regarding your service line, please enter the valid value for "unknown" where applicable and enter all other information to the best of your ability. If you are confused on which cells are required and which are not/optional, please review the "column definitions" tab, or click on the column header.

Empty Rows

Empty rows, rows which include NO service line information at all, will cause errors in your validation and SLI. Please delete all empty rows in your SLI excel file and csv file.

A PWS ID # was not set in the SLI workbook.

Please enter your seven-digit PWS ID # and information as outlined on page 3 of the attached instructions. This is a required field that must be filled out. This value is used in the export file that gets generated from this tool. Also remember to check if your (COM) PWS contains more than 20% of structures are multi-family (MF) when in this context menu.

SLI was not submitted as a CSV file, using the workbook instructions.

A CSV file, created using the method described in the workbook instructions, is important for MassDEP to review and validate your SLI.

To submit it as a CSV file, please follow the instructions outlined on page 16 of the attached instructional file. When using the instructions, this method to creating a CSV file includes the creation of 3 columns not included in your workbook (SLI Workbook version, PWS ID, and whether your PWS contains more than 20% of multi-family (MF) structures).

SLI contains the information for multiple service lines in one (1) row.

Each service line in your SLI must be categorized in its own row, with its own unique locational identifier. All service lines in your service area must be included in the SLI.

Empty Sampling Location cells that must be completed.

Columns R, T, and U are **required** for all service lines marked as **LCR Sampling Locations** ("YES" in Column C). Column V is also listed in this error file, however, with the likelihood of the LCRI being finalized prior to October 16, 2024, errors regarding column "V", Sampling Tier, will not be accounted for.

o Incorrect use of "UNK" in for "Presence of a Connector" (Column C)
Column D (Connector Material) should not be completed if the status of a connector is unknown ("UNK").

PWS are <u>strongly encouraged</u> to validate their own SLI throughout the process of creating their SLI, and prior to submitting it to MassDEP. Instructions on how to validate your inventory, and find these possible errors, are available in the <u>SLI workbook instructions</u> here:

https://www.mass.gov/doc/instructions-service-line-inventory-excel-workbook-template-for-systems-with-split-ownership-of-service-lines-for-version-103/download.