

Guide on initial Lead and Copper Rule Revisions (LCRR) monitoring for PWS on current LCR reduced monitoring.

All Public Water Systems (PWS) subject to the LCRR, **including those with currently approved reduced LCR monitoring schedules**, must begin standard (semiannual) monitoring by January 2025 **unless all of the conditions described below apply**:

1. PWS does not have any lead service line (LSL), galvanized requiring replacement (GRR) or unknowns.
2. **Community (COM)**
 - COM PWS monitored for lead in LCR Tier 1B and/or Tier 3H sites between January 1, 2021, and October 16, 2024 (these sites will become Tier 4 and Tier 5 respectively under the LCRR).

Non-Transient Non-Community (NTNC)

- NTNC PWS monitored for lead in LCR Tier 3 sites between January 1, 2021, and October 16, 2024 (these sites will become Tier 5 under the LCRR).

Current COM LCR Tiers	Future COM LCRR Tiers
Tier 1B: SFR with lead pipes or copper pipes with lead/tin solder–Built in 1983, 1984, or 1985	Tier 4: Single-family structures that contain copper pipes with lead solder installed before the effective date of the State’s applicable lead ban.
Tier 3H: Other (representative sites throughout the distribution system).	Tier 5: Single-family structures or buildings, including multiple family residences that are representative of sites throughout the distribution system. A representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the water system. Water systems may use non-residential buildings that are representative of sites throughout the distribution system if and only if there are an insufficient number of single-family or multiple family residential Tier 5 sites available.
Current NTNC LCR Tiers	Future NTNC LCRR Tiers
Tier 3: Other (representative sites throughout the distribution system)	Tier 5: Sampling sites that are representative of sites throughout the distribution system. A representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the water system.

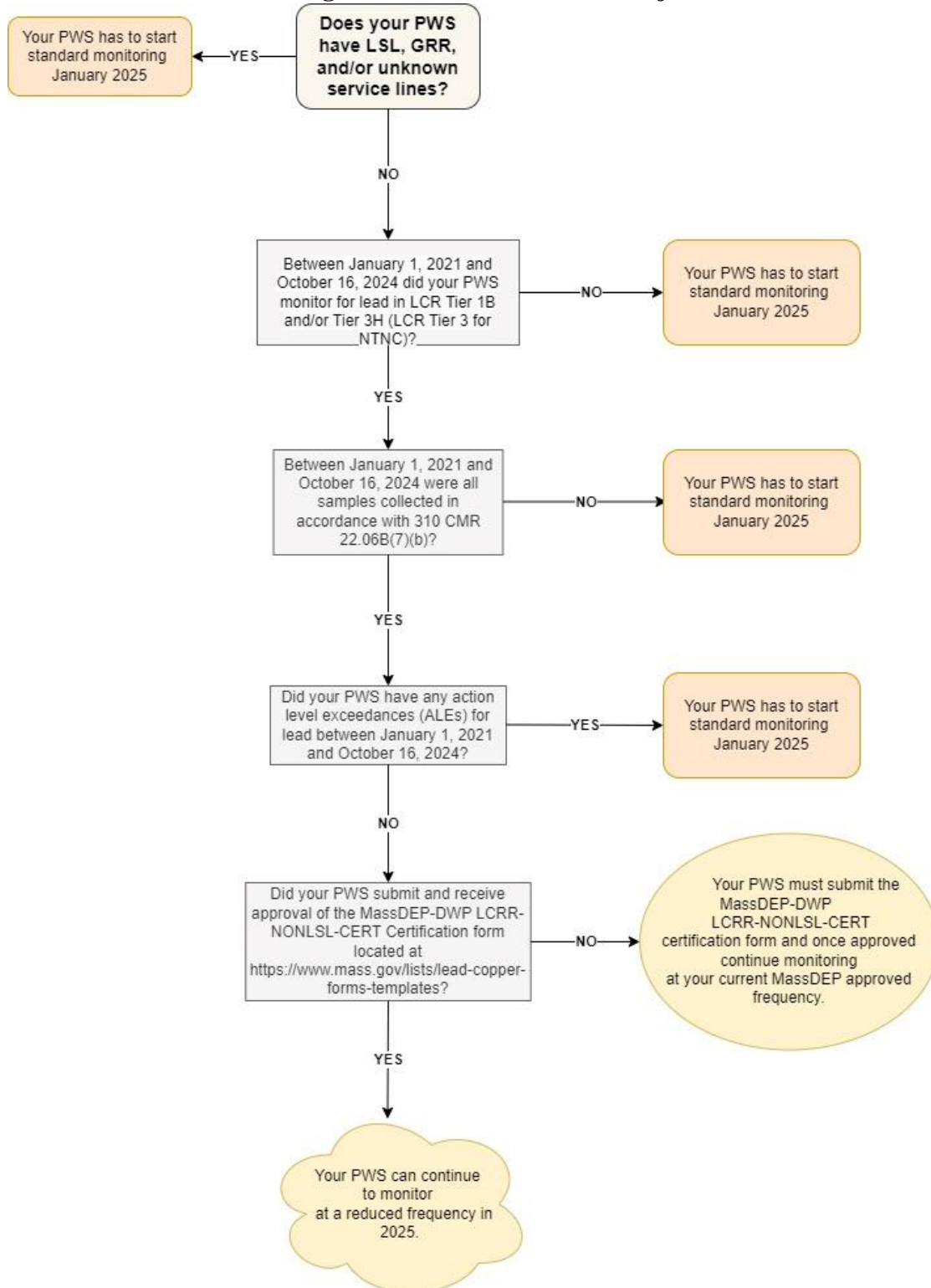
3. All samples were collected in accordance with 310 CMR 22.06B(7)(b). See Appendix for more information on sample collection.
4. PWS did not exceed the lead action level during **the currently approved reduced LCR monitoring schedules** e.g., between January 1, 2021, and October 16, 2024.

PWSs that comply with all the criteria described above can continue monitoring at a reduced frequency in 2025 after submitting and receiving approval of the LCRR-NOLSL-CERT Certification form located at <https://www.mass.gov/lists/lead-copper-forms-templates>.

Note: This provision may change depending on the Lead and Copper Rule Improvements (LCRI) to be released and the promulgation of MassDEP LCRR regulations.

Follow the flowchart below to see if your PWS is required to comply with standard monitoring in January 2025.

2025 Initial Monitoring for the LCRR for PWS Subject to the LCRR



Appendix

Sample Collection Methods for Lead Under the LCR and the LCRR

Current LCR	Future LCRR
Sample Collection Methods	Sample Collection Methods
<ul style="list-style-type: none"> First draw samples 	<ul style="list-style-type: none"> First draw samples
	<ul style="list-style-type: none"> Fifth liter sample for sites with LSL
<ul style="list-style-type: none"> Stagnation time: at least 6 hours 	<ul style="list-style-type: none"> Stagnation time: at least 6 hours
<ul style="list-style-type: none"> Wide-mouth one-liter sample bottles 	<ul style="list-style-type: none"> Wide-mouth one-liter sample bottles
<ul style="list-style-type: none"> First-draw samples from residential housing shall be collected from the cold-water kitchen tap or bathroom sink tap. 	<ul style="list-style-type: none"> First-draw samples from residential housing shall be collected from the cold-water kitchen tap or bathroom sink tap.
<ul style="list-style-type: none"> First-draw samples from a non-residential building shall be collected at an interior tap from which water is typically drawn for consumption. 	<ul style="list-style-type: none"> First-draw samples from a non-residential building shall be collected at an interior tap from which water is typically drawn for consumption.
<ul style="list-style-type: none"> Samples may be collected by the system, or the system may allow residents to collect first draw samples after instructing the residents of the sampling procedures (No pre-stagnation flushing, no cleaning or removing aerators). 	<ul style="list-style-type: none"> Samples may be collected by the system, or the system may allow residents to collect first draw samples after instructing the residents of the sampling procedures (Sampling instructions provided to customers must not direct the customer to remove the aerator or clean or flush the taps prior to the start of the minimum six-hour stagnation period).
<ul style="list-style-type: none"> Acidification of first draw samples may be done up to 14 days after the sample has been collected. 	<ul style="list-style-type: none"> Acidification of first draw samples may be done up to 14 days after the sample has been collected.

Please note: The number of samples required under the LCR is the same under the LCRR.