



Massachusetts Department of Environmental Protection (MassDEP)

Drinking Water Program (DWP)

## Preparing for Non-Lead Validations

*Updated January 2025*

Accurate service line inventories are essential to ensure replacement of all lead and galvanized requiring replacement (GRR) service lines. To increase the accuracy of inventories, the final Lead and Copper Rule Improvements (LCRI) requires all water systems to validate a subset of non-lead service lines in their inventory. The validation tests the reliability of certain methods, techniques, and alternative sources of information used to identify non-lead service lines in the inventory; facilitates action to remedy inventory discrepancies; and provides systems, States, and consumers with additional confidence in the accuracy of the inventory.

Under the LCRI, starting November 1, 2027, **PWS should identify a validation pool** consisting of all non-lead service lines in the inventory excluding those that are identified by:

1. Records that indicate the service line was installed after the federal lead ban became enforceable or the compliance date of a State or local lead ban, whichever is earlier.
2. Visual inspection of the pipe exterior at a minimum of two points.

### What is in the validation pool?

- Non-lead lines identified by exclusively using other records such as tie cards, operational knowledge, etc., or other verification methods such as statistical analysis/predictive modeling must be included in the validation pool.
- The total number of required validations is dependent on the PWSs total number of non-lead services lines and vary system to system.
- Once the PWS has identified the validation pool, it must randomly select non-lead service lines for conducting visual inspections at a minimum of two points along the service line exterior. See the [EPA LCRI Validation guidance](#) for more information.
- For systems on a 10-year mandatory replacement schedule and systems that have reported only non-lead lines in their inventories, validation must be completed by December 31, 2034, and the validation results are due to MassDEP DWP by January 30, 2035.
  - MassDEP may establish a shorter validation deadline for water systems conducting mandatory service line replacement.
  - MassDEP may allow systems to extend deadlines under an administrative consent order based on the PWS ability to ensure public health protection. PWS may reach out to MassDEP DWP for further information on extending deadlines and eligible criteria at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov).

### When should a PWS begin to prepare for or implement validation?

- **MassDEP recommends that PWS begin work on validation efforts as soon as possible, provided that the validation methodologies are at least as stringent as the LCRI requirement.** The process of validation may involve significant work and may require identifying and applying

for funding to complete the validation process. PWS that begin validation as soon as possible can then submit a waiver request for early initiation after the LCRI goes into effect in 2027. **As these validations are required under the LCRI, funding will be available for PWS to assist with this process through the [SRF Program](#).**

- For more information on these requirements, please review [EPA's validation guidance](#) here. **PWS MUST review this guidance before beginning any validation efforts, to ensure your methods are as stringent as the LCRI.**

Please contact MassDEP DWP prior to beginning the validation process if you have any questions, to ensure you meet the LCRI requirements. PWS may reach out to MassDEP DWP at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov), subject: LCRI Validation Requirements.