



Preparing for the Lead and Copper Rule Improvements (LCRI)

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Did you Know DWSRF Funding is available right now on a first-come, first-serve, rolling application basis for identifying unknowns and replacing lead service lines? Communities are strongly encouraged to submit their applications as soon as possible while funds are available. Applications can be submitted through the SRF Portal. Please contact Kaitlyn Connors, Director of Water Investment, Kaitlyn.Connors2@mass.gov, for more information.

This factsheet includes information to support Public Water Systems (PWS) in beginning to prepare for the Lead and Copper Rule Improvements (LCRI), which will become the compliant rule on November 1, 2027. This fact sheet contains both information specific to all Non-Transient Non-Community (NTNC) and Community (COM) PWS that must comply with the upcoming LCRI and for those that are currently or may in the future exceed the Lead Action Level of 10-ppb,

Section I: Summary of Applicable Preparation & Planning for LCRI Requirements for COM and NTNC PWS that currently or may in the future exceed the LCRI Lead Action Level of 10 ppb

Massachusetts Department of Environmental Protection (MassDEP) Drinking Water Program (DWP) encourages all PWS, **but especially those exceeding the 10-ppb LCRI Action Level**, to **consider and plan for the following**:

- 1. Identify/Replace all lead, Galvanized Requiring Replacement (GRR) and unknown service lines by December 31, 2037 or sooner if MassDEP/DWP determines that your PWS can meet a shorter deadline to expedite safe drinking water public health protection compliance (40 CFR 141.84(d)(5))**: This date can only be extended if PWS meet certain criteria including entering into a compliance agreement/order with MassDEP.

Please Note: Having an LSLRP is the first step for service line replacement and identification. See #2 above for more information.

- 2. Develop and submit a Lead Service Line Replacement Plan (LSLRP) to MassDEP/DWP by November 1, 2027 (or as soon as possible to access currently available DWSRF funding for LSL identification and removal)**: If your PWS has lead, GRR, and/or Lead Status Unknown service lines, have a plan in place to prioritize identifying unknowns and replacing all lead service lines (both public and privately owned) prior to the LCRI required timeline, if possible or required by MassDEP/DWP.

MassDEP DWP has created an LCRI compliant LSLRP Form for PWS to complete here: [LCRI LSLRP Form](#).

3. **24-Hour Tier 1 Public Notice (PN):** In accordance with 310 CMR 22.04(13), prepare a drafted Lead 24-Hour Tier 1 Public Notice (PN) and PN distribution plan in case you exceed the 15-ppb action level. **PWS with a 90th percentile exceeding 10 ppb are strongly encouraged to start thinking about their Tier 1 PN now by developing a pre-approved PN template and distribution plan with their MassDEP regional office ahead of any future exceedance.**

4. **Return to standard monitoring:** Begin to plan and allocate funding to return to standard monitoring in case you meet any LCRI criteria requiring your PWS to move to standard monitoring, if you are not already on standard monitoring. See *section IV* below for more information on the LCRI criteria for required changes in monitoring frequency.

Should a PWS be moved to standard monitoring under the LCRI, the PWS must meet the LCRI requirements listed in *section IV* below to apply for a reduced monitoring frequency. Please note that PWS must receive written approval from MassDEP to reduce their monitoring frequency, in addition to meeting the requirements listed below.

5. **Additional activities required after exceeding the LCRI lead action Level multiple times:** Beginning November 1, 2027, a PWS that exceeds the lead action level (10-ppb) at least three times in a rolling five-year period must conduct additional activities after learning of the third exceedance. See *section IV* below for the additional requirements on top of normal activities required when a PWS exceeds the lead 90th percentile under the LCRI.
6. **Corrosion Control Treatment:** Plan your budgeting for any future installation, optimization, or re-optimization of your corrosion control treatment. Under the LCRI, all water systems will be required to install, optimize, or re-optimize optimal corrosion control treatment (OCCT) a minimum of once if they exceed either the lead action level or copper action level, unless they meet certain criteria (40 CFR 141.81(d)(7)) including entering into a compliance agreement/order with MassDEP.
7. **Community Education and Outreach:** Begin working with your community now to educate them on lead and copper and document your activities in the LSLRP mentioned in #2 above. Early outreach helps build trust and ensures that your customers are better prepared should you need to conduct public meetings or provide additional communication if your system exceeds the lead action level once or multiple times under the LCRI. **MassDEP/ DWP encourages all PWS to include education for their customers on how to address lead in premise plumbing including copper pipe connected with lead solder.**

Section II: Summary of Applicable Preparation & Planning for Other LCRI Requirements for all COM and NTNC PWS

In addition to items 1-7 above, MassDEP/DWP encourages all PWS to **consider and plan for the following LCRI requirements:**

- 8. Prepare to submit an updated Baseline Service Line Inventory (SLI) on/by November 1, 2027.**
- 9. Conduct Non-Lead Validations after November 1, 2027:** All PWS with non-lead service lines will be required to validate the non-lead material of their service lines by inspecting a random subset of service lines in a 7-year period. The validation pool must contain all non-lead service lines, only excluding service lines that meet 1 or more of the following criteria (note, this criteria must be met for both sections of the service line for the line to be excluded):
- Have an installation date after the MA Lead Ban (01/01/1986) or an earlier local lead ban.
 - Visual inspection of the pipe exterior at a minimum of two points.
 - Service lines which were lead/GRR and have been replaced with non-lead material.

More information on the validation requirements and size of validation pools per system can be found in the [EPA's LCRI Inventory Validation Technical Fact Sheet](#).

- 10. Follow up Steps After Service Line Replacement:** After a Lead/GRR service line is replaced under the LCRI, PWS must perform the following actions:
- Provide written notification that consumers may experience a temporary increase of lead levels in their drinking water due to the replacement.
 - Provide written information about a procedure for consumers to flush service lines and premise plumbing.
 - Provide a point-of-use (POU) filter certified by an American National Standards Institute (ANSI) accredited certifier to reduce lead, six months of replacement cartridges, and instructions for use.
 - Offer to collect a follow up tap sample (1st and 5th liter) between 3-6 months after replacement.

Note, should a PWS disturb a service line which is lead, GRR, or unknown, the PWS will be required to complete the first 2 requirements as they would following replacement. If the disturbance is due to work such as replacement of a water main by cutting the service line, water meter, or connector, the PWS will also need to complete the 3rd requirement.

- 11. Offer to Sample lead at Schools and Child Care Facilities:** All Community PWS will be required to conduct public education to all schools and childcare facilities served annually, and to offer testing to all applicable primary schools and childcare facilities over a 5-year period. Schools/facilities can only be excluded if they meet certain criteria such as that all plumbing must have been replaced after January 1, 2014. When sampling, PWS will be required to collect 2 samples from childcare facilities and 5 samples from schools, meeting LCRI sample criteria.

PWS can get ahead of this requirement now by signing up for the MassDEP Pilot Program, which covers the cost of lead testing and provides all necessary outreach materials, sampling plans, and follow-up support. To join the pilot program or receive more information, email Program.Director-DWP@mass.gov with the subject line: “Pilot Program for PWS”.

- 12. 1st and 5th liter sampling:** All sampling sites served by a lead service line will be required to have a 1st liter and 5th liter sample for LCR Monitoring (for lead samples only). The sample with the highest analyzed result will be entered into the 90th percentile for that sampling site.

Section III: Opportunities and Resources to Assist PWS Prepare for the LCRI

- 1. SRF Funding: Did you Know DWSRF Funding is available right now on a first-come, first-serve, rolling application basis for identifying unknowns and replacing lead service lines?** Communities are strongly encouraged to submit their applications as soon as possible while funds are available. Applications can be submitted through the [SRF Portal](#). Please contact Kaitlyn Connors, Director of Water Investment, Kaitlyn.Connors2@mass.gov, for more information. PWS must have a Lead Service Line Replacement Plan to receive SRF funding. PWS can get ahead of this requirement by completing the LCRI LSLRP Form before applying: [LCRI LSLRP Form](#).

For more information on Drinking Water funding, visit the MassDEP [Water Resources Grants Financial Assistance](#) website and the [Funding Resources For Public Water Suppliers Communities Quick Reference Guide](#).

- 2. Water-Smart Pilot Program:** Starting November 1, 2027, PWS will be required to offer lead testing to all primary schools and childcare facilities under the Lead and Copper Rule Improvements (LCRI). Only schools and childcare facilities that were built on or after January 1, 2014-or have had full plumbing replacements since that date - and are not served by lead, galvanized requiring replacement (GRR), or lead status unknown service line may be excluded from this requirement.

Rather than wait, the Pilot Program gives PWS a head start—leveraging the well-established Water-Smart Program, which has already tested over 1,000 schools and childcare facilities across the Commonwealth. Through the pilot program, MassDEP and UMass Amherst cover the cost of lead testing and provide all necessary outreach materials, sampling plans, and follow-up support. PWS simply help identify eligible facilities, assist with local outreach and help collect samples. The process is simple, cost-free, and designed to set you up for success when the rule goes into effect. Participating in the Pilot Program allows PWS to:

- Offer a valuable service to schools and childcare centers now,
- Fulfill future federal requirements early,
- Build community trust, and
- Access expert technical support at no cost.

To join the pilot program or receive more information, email Program.Director-DWP@mass.gov with the subject line: “Pilot Program for PWS”.

3. **Upcoming! Small and Disadvantaged Systems Grant for service line replacement and identification assistance: MassDEP will be announcing a grant in 2026 to assist small and disadvantaged systems with service line replacement and identification.** Small and disadvantaged systems with lead, GRR, and/or unknown service lines are encouraged to keep an eye out for more information, and plan to apply!

Section IV: Preparing for LCRI Compliance: Additional Information

This section includes further information on Lead and Copper Rule Improvements (LCRI) requirements starting November 1, 2027, related to the exceedance of the LCRI Lead Action Level of 10 ppb.

LCRI Criteria Requiring PWS to Move to Standard Monitoring

Following November 1, 2027, systems will be required to move to standard monitoring if they meet any of the following criteria:

- Any PWS that has lead or galvanized requiring replacement (GRR) service lines in their inventories as of November 1, 2027,
- **Any PWS whose most recent 90th percentile lead and/or copper results as of November 1, 2027, exceeds the LCRI lead action level of 10 ppb or the copper action level of 1.3 mg/L.**
- **Beginning November 1, 2027:**
 - **Exceeds the new lead action level of 10 ppb or the copper action level of 1.3 mg/L.**
 - Fails to operate at or above the minimum value or within the range of values for MassDEP designated optimal water quality parameters (OWQPs) for more than nine days in any tap monitoring period.
 - Becomes a large water system (i.e., grows to serve more than 50,000 people) and has no corrosion control treatment (CCT).
 - Is a large water system, has no CCT, and its 90th percentile lead level exceeds the lead practical quantitation limit (PQL) of 0.005 mg/L.
 - Installs or re-optimizes OCCT or adjusts OCCT following a Distribution System and Site Assessment. Systems must continue standard monitoring until MassDEP designates new OWQPs.
 - MassDEP designates new values for OWQPs.
 - Installs source water treatment.
 - Notifies MassDEP of an upcoming addition of a new source or long-term change in treatment, unless MassDEP does not require more frequent monitoring.
 - Has no lead or GRR service lines in its inventory but subsequently discovers such a service line, unless the line(s) are replaced prior to the start of the next tap monitoring period.

For more information on LCRI Standard Monitoring Requirements, please review the [LCRI Tap Monitoring Protocol Fact Sheet](#).

Steps under LCRI to Move to Reduced Monitoring

PWS must receive written approval from MassDEP to reduce their monitoring frequency, in addition to meeting the requirements listed below.

- Systems that would like to reduce their monitoring to **annual monitoring** must meet the requirements below for at least **two** consecutive tap monitoring periods:
 - Collect the minimum number of samples required,
 - Do not exceed the lead and copper action levels,
 - Maintain the range of OWQPs designated by MassDEP (for PWS with OWQPs)
- **Small or medium PWS** that would like to reduce their monitoring to **triennial monitoring** must meet the requirements below for at least **three** consecutive years of monitoring (including monitoring conducted at both standard and annual frequencies):
 - Collect the minimum number of samples required,
 - Do not exceed the lead and copper action levels,
 - Maintain the range of OWQPs by MassDEP (for PWS with OWQPs)
- All Systems that would like to reduce their monitoring to **triennial monitoring** must meet the requirements below for at least **two** consecutive tap monitoring periods:
 - Collect the minimum number of samples required,
 - Their 90th percentile lead level is less than or equal to 0.005 mg/L,
 - Their 90th percentile copper level is less than or equal to 0.65 mg/L
 - Maintain the range of OWQPs designated by MassDEP (for PWS with OWQPs)

LCRI Requirements for Systems with Multiple Lead ALEs

The LCRI has additional requirements for PWS that exceed the action level multiple times. We encourage your PWS to review the section below about these requirements, so your PWS is aware of what you may need to do to maintain compliance, should your PWS have multiple exceedances.

Beginning November 1, 2027, a PWS that exceeds the lead action level at least three times in a rolling five-year period, must conduct additional activities after learning of the third exceedance. The requirements listed below are required on top of normal activities required when a PWS exceeds the lead action level.

Within 60 days of the third exceedance in a rolling five-year period:

- Make pitcher filters or point-of-use (POU) filters available to **all** consumers within 60 days of the tap sampling period.

- Note, when a PWS has a **second exceedance** within a rolling five-year period, the PWS is required to submit a **filter plan** under the LCRI.
- Conduct a community outreach activity to discuss the multiple lead action level exceedances, steps the system is taking to reduce lead in drinking water, measures consumers can take to reduce their risk, and how to obtain a filter certified to reduce lead.
- PWS must conduct at least one activity from the list below within six months of the start of the tap sampling period after the most recent lead action level exceedance and continue to do one activity from this list every six months.
 - Conduct a public meeting.
 - Participate in a community event where the PWS can make information about ongoing lead exceedances available to the public.
 - Contact customers by phone call or voice message, text message, email, or door hanger.
 - Conduct a social media campaign.
 - Use another method approved by MassDEP.

PWS may discontinue these requirements when the PWS no longer has at least three lead action level exceedances in a rolling five-year period.

LCRI Lead Service Line Replacement Plans

Develop and Submit a Lead Service Line Replacement Plan to MassDEP/DWP by November 1, 2027 (or as soon as possible to access currently available DWSRF funding for LSL identification and replacement. These funds are currently available and provided on a rolling, first-come, first-serve basis): If your PWS has lead, Galvanized Requiring Replacement (GRR), and/or Lead Status Unknown service lines, your PWS must have a plan in place to prioritize identifying unknowns and replacing all lead service lines (both public and privately owned) prior to the LCRI required timeline, if possible. [The MassDEP DWP LCRI LSLRP Form is available for PWS to complete.](#)

PWS should note that an LSLRP meeting LCRI requirements is due November 1, 2027, under the LCRI, with their Baseline SLI if the PWS has any lead, GRR and/or Unknown service lines.

- **If you have already completed and submitted an LSLRP** to MassDEP, please review your plan to ensure that it is up to date and accurate with your current Inventory and update it to meet all additional LCRI requirements.
 - PWS can use their previous LSLRP to update and answer all questions on the new MassDEP DWP [LCRI LSLRP Form](#) at your earliest convenience.
- **If you have not completed and submitted an LSLRP** to MassDEP, your PWS is encouraged to begin thinking about this plan now and creating an initial plan to get ahead of LCRI requirements. Having an LSLRP is the first step to replacing lead/GRR service lines and identifying unknowns.

Consumer Education on Lead in Premise Plumbing

- **MassDEP/ DWP encourages all PWS to include education for their customers on how to address lead in premise plumbing including copper pipe connected with lead solder.**
- See [EPA's Lead in Drinking Water Infographic](#) for a basic resource to utilize.