



Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs

Department of Environmental Protection

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DRINKING WATER PROGRAM

Re: Reminders of Statistical Analysis Requirements - Sent to Systems Using SRF Funds.

April 24, 2026

Dear Public Water System,

If your Public Water System (PWS) is using Statistical Analysis/Predictive Modeling or plans to use this method in the future, please read this email carefully. Please share this email with any consultants or other PWS staff involved in your Service Line Inventory (SLI) and service line identification/replacement work. This email is being shared with PWS which have or are currently receiving State Revolving Fund (SRF) funds for the development of an SLI and/or to identify/replace lead service lines.

This email contains information and reminders regarding MassDEP's Statistical Analysis/Predictive Modeling Requirements to ensure all systems creating a Statistical Analysis and Predictive Model to identify unknown service lines are creating a compliant and representative analysis/model.

1. MassDEP Statistical Analysis/Predictive Modeling Requirement Updates

In July 2025, and again in September 2025, MassDEP updated the [Statistical Analysis/Predictive Modeling Guidance Document](#). A summary is provided below for your review.

July 2025 Guidance Updates Summary:

- **Systems must submit a request to MassDEP for approval to use Statistical Analysis/Predictive Modeling as a verification method prior to beginning investigation work (Page 1).**
- New limitations of statistical analysis and predictive modeling which PWS should consider prior to planning to use either method (pages 2-5).
 - **Systems which find lead in their initial investigations, or have lead in their SLI, cannot use statistical analysis as a verification method alone (page 3).**
- **Galvanized Requiring Replacement (GRR) acceptance limit and process:** A maximum of 2.5% of all service lines verified by statistical analysis, which must be less than or equal to 25 service lines, that could be GRR if the material is discovered to be a galvanized material is acceptable (page 4).

- Provide for MassDEP/DWP's approval a Non-Lead Validation Compliance Plan, which describes the PWS approach to finding GRR service lines during non-lead validations (page 4).
- The General Statistical/Predictive Model Verification Method Requirements table was made clearer (pages 5-7).

September 2025 Guidance Updates Summary:

- Clarification was included that “MassDEP reserves the right to reject a statistical or predictive model as a verification method if the required submitted documentation does not demonstrate an unbiased or representative model of the system.”
- **Clarified that if a PWS is using both known and unknown service lines to create their model or analysis PWS cannot include service lines installed after 1986.** Including service lines installed post 1986 can skew data to represent service lines which are clearly non-lead due to the installation date, which are not the focus of this endeavor.
 - Note: Systems which submitted an SLI and received approval prior to September 2025 were re-reviewed for compliance with this new requirement, and all have been determined to meet the requirement.
- The Q&A section of the guidance document has been separated into another document and additional questions and answers have been added. Clarity has also been provided for question 4, “How is the GRR acceptance limit calculated, i.e., what is the GRR acceptance process?”

2. Reminder Regarding Consumer Notification When Updating Your SLI using Statistical Analysis/Predictive Modeling

PWS which are using Statistical Analysis/Predictive Modeling as a verification method must submit their updated SLI and the required Statistical Analysis/Predictive Modeling Report for review and acceptance prior to considering any service lines verified by Analysis/Modeling to be reclassified as NON-LEAD. This means that a **PWS cannot use a SLI with the verification method of Statistical Analysis/Predictive Modeling to distribute Consumer Notices or post a NON-LEAD SLI Statement unless the PWS has received MassDEP approval.**

If you have any questions regarding Statistical Analysis or Predictive Modeling reach out to MassDEP DWP by emailing program.director-dwp@mass.gov, subject: SLI Statistical Analysis (or Predictive Modeling).

Sincerely,

Michael Celona

Michael Celona
Acting Program Director
MassDEP Drinking Water Program