Re: Updated Statistical Analysis and Predictive Modeling Guidance Released, PWS must be Approved to Use This Verification Method Going Forward

07/14/2025

Dear Public Water Suppliers,

MassDEP DWP has released an updated Statistical Analysis and Predictive Modeling Guidance, which is effective as of July 3, 2025. This guidance was updated after the review of all 2024 submitted PWS initial Service Line Inventories (SLI) reports and analysis of how statistical analysis was used for Massachusetts Public Water Suppliers (PWS).

The initial guidance was updated because it did not adequately address the complexity of Galvanized Requiring Replacement (GRR) service lines in a statistical analysis.

If your PWS is interested in using statistical analysis or predictive modeling as a verification for your SLI, your PWS must review the new guidance document prior to beginning work to create an analysis/model.

Please Note: **All systems that would like to use statistical analysis and/or predictive modeling as a verification method must be approved to use this method prior to conducting work (page 1).**

The updated guidance is available here: https://www.mass.gov/doc/statistical-predictive-modeling-guidance-for-evaluating-unknown-service-lines/download.

Key Points, New Additions, and New Requirements in the update are as follows:

1. All systems that would like to use statistical analysis and/or predictive modeling as a verification method must be **approved** to use this method prior to conducting work (page 1).
2. Clarification of section on the limitations of statistical analysis and predictive modeling, which PWS should consider prior to planning to conduct either method (pages 2-5)
   a. Systems which find lead in their initial investigations, **or have lead in their SLI already,** cannot use statistical analysis as a verification method alone (page 3)

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3. New GRR acceptance limit and process that systems must meet to have MassDEP/DWP approve their statistical analysis process:
   a. **MassDEP/DWP 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, could be GRR if the material is discovered to be a galvanized material is acceptable (page 4).**
   b. PWS which meet the GRR acceptance limit and process must also provide for MassDEP/DWP's approval a Non-Lead Validation Compliance Plan, which describes the PWS's approach to finding possible GRR service lines during non-lead validations) (page 4).
4. New Q&A section (pages 8-10).
5. Clarification of requirements listed in the General Statistical/Predictive Model Verification Method Requirements table (pages 5-7).

A redlined copy of this guidance, making clear the changes between the previous guidance document used in 2024 and the new guidance released July 3rd is available on our Communications to Public Water Suppliers webpage here: https://www.mass.gov/doc/lcrrlcri-statistical-modeling-and-predictive-model-guidance-redline-2024-2025-version/download.

For all questions on LCR, LCRR and LCRI, please contact the Drinking Water Program at program.director-dwp@mass.gov.

Sincerely,
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MassDEP/Drinking Water Program Director