

LCRR

Lead Service Line Inventories

Under Section §141.84 of the Lead and Copper Rule Revisions (LCRR), for the first time EPA will require systems to develop and submit a lead service line (LSL) inventory (including public and private side). See below to learn what will be required.

1

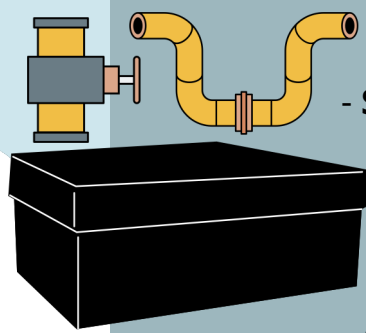
Who is impacted by the LCRR and LSL inventory requirements?

All community and non-transient non-community (NTNC) systems

When must the LSL inventory be submitted to MassDEP?

October 16, 2024. Please note that all systems must make their LSL inventories available to the public and systems serving greater than 50,000 people must post their LSL inventory on the internet.

Areas to focus on when developing your inventory



- **Location Identifier**- it could be the street address, block, customer number, etc..

- **Service Line Material** for both public and private side. MassDEP will also include identification of Goosenecks/Pigtails (if known) in the inventory.

-**Verification of service line material** for each address.

MassDEP is developing an LSL inventory form with guidance for PWSs. **Coming soon*

2

3

Service Line classification

Lead : where a portion of the service line is made of lead.

Galvanized requiring replacement: Any galvanized service line that is or has ever been downstream of a lead service line, or of an unknown material service line. *These lines are included in the lead service line replacement program because they have demonstrated the ability to absorb lead from a lead service line and release it in the future. Replacing these lines can reduce a source of lead to the customers.*

“Unknown”: where the service line material is not known to be lead, galvanized requiring replacement, or a non-lead service line. *Please note that EPA has dis-incentivized having large numbers of unknown service lines by requiring annual public education and other requirements for all service connections listed as unknown. Please see 40 CFR 141.85 for more information.*

Non-lead: EPA defines non-lead service lines as those with evidence-based record, method, or techniques that they are not lead or galvanized service lines requiring replacement. The water system may classify the actual material of the service line (i.e., copper, plastic).

4

What if I have no lead service lines and no galvanized service lines requiring replacement?

PWSs that can demonstrate that they have only non-lead service lines must submit an initial inventory by the compliance date but are not required to provide inventory updates to MassDEP or the public.

For more information see

<https://www.mass.gov/lists/communication-to-public-water-suppliers#emails-and-direct-mail-> or contact program.director-dwp@mass.gov Subject: LCRR

EPA's website <https://www.epa.gov/ground-water-and-drinkingwater/final-revisions-lead-and-copper-rule>



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Developing Service Line Inventories - Checklist

A LSL Inventory is important because it helps water systems and communities take action to eliminate possible sources of lead in drinking water. See steps below to start developing your LSL inventories.

1

Find and Organize Existing Data

PWSs should survey all records documenting the materials used to construct and repair the distribution system and connect buildings to the distribution system, including:

- Original service cards
- Building Permits
- Plumbing Codes and Plumbing Permits
- Distribution Maps and Drawings
- Inspection and Maintenance Records
- Meter Installation Records
- Capital Improvement and Master Plans
- Standard Operating Procedures
- Operation and Maintenance Manuals
- Permit Files
- Existing Water Quality Data
- Interviews with Senior Personnel, Building Inspectors, and Retirees
- Community Survey

Once all data is gathered, it should be combined into one database that meets DEP minimum data requirements.

2

Remember to identify service line materials for BOTH public and private side.

Determine if any galvanized service lines on the customer side were formerly downstream of an LSL.

Develop a strategy for identifying and verifying the lead status of unknown service lines.

MassDEP is developing a tool to help consumers share their LSL information with PWSs for their verification. **Coming soon*

3

Validate the Inventory

There are some options to verify your inventory:

Profile Sampling
Records Validation
Field Inspection
Records Invalidation
Statistical Analysis
Homeowner Verification

4

Complete the Inventory and remember to share it with the public!

There are different options to share the inventory with the public-interactive maps, PDFs, dashboards, etc.

MassDEP is developing a program to help PWSs share inventories with the public. **Coming soon*

For more information see

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