

Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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August 15, 2022

Important Notice

MassDEP Drinking Water Program Tools for Getting Ready for the Lead and Copper Rule Revisions Now Available!

Attention: Community and Non-transient Non-community Public Water Suppliers (PWSs)

For the first time EPA, under Section §141.84 of the federal Lead and Copper Rule Revisions (LCRR), will require all community public water systems (COMs) and non-transient non-community public water systems (NTNCs) to develop and submit a service line inventory (including public and private sides) by October 16, 2024.

The Massachusetts Department of Environmental Protection (MassDEP) is developing comparable state regulations to comply with the federal requirements. To support public water suppliers (PWS) as they prepare for the new requirements, MassDEP's Drinking Water Program is providing PWS with data collection tools to assist them. PWS seeking Drinking Water State Revolving Funds (DWSRF) to inventory and address lead service line replacement planning will be expected to use the MassDEP's Service Line Inventory Excel Workbook and the Lead Service Line Replacement Plan Summary Form or an alternative electronic format approved by MassDEP.

Today, we are providing information on and access to three (3) tools to assist COMs and NTNCs prepare for compliance with the upcoming LCRR. These tools and steps will help systems to work toward the MassDEP public health protection goal of removing all lead service lines as soon as possible. The **Resources** section of this document provides links to the USEPA's Lead and Copper Rule Revisions "Guidance for Developing and Maintaining a Service Line Inventory," where additional information is available to PWS on developing a service line inventory and should assist PWS in using the MassDEP tools.

Tools

- Service Line Inventory Excel Workbook
- Mass Lead Service Line Identification (MA-LSLI) Web App
- Lead Service Line Replacement Plan Summary Form

What is the Service Line Inventory Excel Workbook?

- MassDEP developed a Lead Service Line inventory template form with the required fields and associated guidance for PWS. This workbook can be used to document the necessary information in your lead service line inventory for your use and submission to the state.
- This Excel workbook is located at https://www.mass.gov/media/2480901.
- The instructions for using the workbook are located at: https://www.mass.gov/doc/instructions-mass-lead-service-line-identification-ma-lsli-web-app
- MassDEP will provide guidance and technical assistance to help PWS complete their inventory. See Resources Section below for more information.

What is the Mass Lead Service Line Identification (MA-LSLI) Web App?

- MassDEP developed a "crowdsourcing application" (hereafter referred to as "the App") to assist both consumers and PWS to identify lead service lines. The App is a web-based tool for consumers to assist in the identification of lead service lines. The App is a collection of Smartsheet forms, sheets, and workflow automations that allows your customers to submit photos of their service line for identification purposes. This can be helpful for PWS in compiling their service line inventories and in prioritizing lead service line replacements.
- The customer is asked to upload one or more photos of their service line and, by following EPA's service line identification guide "Protect Your Tap: A Quick Check for Lead," are asked to attempt to identify their service line material. Water suppliers that sign up to use this service will receive email notifications when their customers make submissions and will have access to their own Smartsheet to keep track of submissions.
- The App is located at https://app.smartsheet.com/b/form/f9ee39b7972f443ca63e8b936cd7f92b. Instructions for enrolling in the use of the App are located at https://www.mass.gov/doc/instructions-mass-lead-service-line-identification-ma-lsli-web-app. EPA's "Protect Your Tap: A Quick Check for Lead" is located at https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead
- MassDEP has prepared an example letter for PWSs to adapt and use when offering the App to their customers.
 You can download the template at https://www.mass.gov/doc/template-letter-for-pws-to-send-to-customers-for-ma-lsli-app-availability.

What is the Lead Service Line Replacement Plan Summary Form?

- According to the US Centers for Disease Control (CDC), "[b]ecause no safe blood level has been identified for young children, all sources of lead exposure for children should be controlled or eliminated." See https://www.cdc.gov/nceh/lead/prevention/sources/water.htm. To expedite MassDEP public health protection goals, PWSs are expected to both identify lead service lines and have a plan to remove and replace them as soon as possible. PWSs will be expected to have such plans by October 16, 2024, or, as part of applying for DWSRF funding, to remove lead service lines.
- The Lead Service Line Replacement Plan Summary Form allows a PWS to begin to document their strategy to remove all lead service lines. The Plan Summary must address: a) all lead service lines, b) all lines that are galvanized requiring replacement (GRR), c) a strategy for identifying the material in all lines categorized as "unknown," and d) plans for general lead education and consumer transparency to inform consumers about why it is necessary to remove lead plumbing and lead service lines.
- MassDEP has developed the Lead Service Line Replacement Plan Summary Form to aid PWS in developing their Lead Service Line Replacement Plans. It is located at https://app.smartsheet.com/b/form/8f676b18cc224884a7069e3cc727f968
- PWSs should use the **Lead Service Line Replacement Plan Summary Form** to document their plans until MassDEP LCRR regulations and programs are finalized.

What Resources are available to assist you with using these tools?

MassDEP Drinking Water Program will be partnering with technical assistance providers who will assist PWS.
When a list of providers is available, they will offer guidance and technical assistance to help PWSs complete and submit their inventory and plans. Until a list of providers is finalized, PWSs may contact by email the Drinking Water Program for assistance at program.director-dwp@mass.gov, Subject: LCRR Getting Ready.

- A web-based training and Question and Answer session is planned for September 29, 2022, 10 am to noon. It will be recorded for continued training. Information on the training will be sent in a separate email. Please also watch upcoming Program Director emails and "In The Main" newsletter announcements.
- See Resources Section below.

What Funding Opportunities are or will be available for PWS to address Lead?

- Lead Service Lines Inventory and Replacement Plan Loans with 100% Loan Forgiveness MassDEP is accepting Lead Service Lines planning loan applications, on a rolling basis, while funding is available. Please see the <u>Application</u>. Eligible activities for these planning programs include:
 - i) Lead Service Line Inventory Completing a comprehensive Lead Service Line Inventory for both the public and the private portions that will be made publicly available. This comprehensive inventory project could include activities such as inspecting physical service lines, compiling paper records, initiating a consumer lead service line identification program, but must include submitting the complete inventory to MassDEP in a digital format specified by MassDEP or in an alternate format approved by MassDEP that can be readily compiled into the MassDEP data system.
 - ii) Lead Service Line Replacement Program Preparing a Lead Service Line replacement program for the PWS that complies with the LCRR. PWS' lead service line replacement plans need to incorporate the MassDEP public health protection goal by planning to replace all lead service lines in 5 years or as soon as possible.

Use of the MassDEP-provided tools will ensure the submission of a lead service line inventory and lead service line replacement program summary in a digital form acceptable to MassDEP.

- Assistance for Small Community Water Systems and Non-Transient, Non-Community Systems Lead
 Service Line Planning Program This program is available for PWS serving a population of less than 10,000.
 MassDEP will use \$1.3 million of the set-asides from the DWSRF Lead Service Line Grant to contract with a
 qualified technical assistance provider to complete the following eligible planning projects working with the
 PWS:
 - i) Lead Service Line Inventory Find, map, and inventory water distribution and customer service lines to complete a comprehensive lead service line inventory that will be made publicly available by MassDEP.
 - ii) Lead Service Line Replacement Program Completion of a Lead Service Line Replacement program that complies with the LCRR. MassDEP's technical assistance program will support the MassDEP public health protection goal of planning to remove all lead service lines in 5 years or as soon as possible.

This program will be managed and operated by MassDEP's Drinking Water Program. Application information for this program will be available in the coming weeks. Use of the MassDEP provided tools will ensure submission of a lead service line inventory and lead service line replacement program summary in a digital form acceptable to MassDEP.

For inquiries about this program please send an email to: <u>program.director-dwp@mass.gov</u>. Subject: LCRR-Small Systems Grant

Given the many benefits of lead service line removal, funding opportunities and the upcoming federal LCRR regulatory deadlines, MassDEP encourages water systems to begin lead service line planning <u>and</u> replacement as soon as possible, regardless of the stage of their inventory development.

Thank you for your continued work to provide safe drinking water. If you have any questions on these tools, please contact the MassDEP/DWP at program.director-dwp@mass.gov. Subject: LCRR Getting Ready.

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Resources:

MassDEP

- MassDEP/DWP's February 11, 2022, letter for initial overview: https://www.mass.gov/doc/getting-ready-for-the-lead-and-copper-rule-revisions-lead-service-line-inventories/download.
- https://www.mass.gov/doc/getting-ready-for-the-lead-and-copper-rule-revisions-lead-service-line-inventories.
- https://www.mass.gov/doc/lcrr-lead-service-line-inventories-an-infographic/.
- SRF Financing: https://www.mass.gov/info-details/lead-service-line-planning-program

EPA

- EPA's Guidance for Developing and Maintaining a Service Line Inventory: <u>Guidance for Developing and Maintaining a Service Line Inventory (pdf)</u>
- EPA's <u>Lead Service Line Inventory Template</u> (Please note, EPA's version of the inventory template will not be accepted by Massachusetts. We are providing it here for reference only. Massachusetts PWS are expected to use the Service Line Inventory Excel Workbook provided by MassDEP.)
- EPA: https://www.epa.gov/ground-water-and-drinking-water/revised-lead-and-copper-rule
- EPA's "Protect Your Tap: A Quick Check for Lead" https://www.epa.gov/ground-water-and-drinking-water/protect-your-tap-quick-check-lead
 - o Biden-Harris Lead Pipe and Paint Action Plan
 - o Lead and Copper Rule Improvements to strengthen the key elements of the rule
 - o BIL SRF Implementation Memo
 - o Lead Service Line Inventory Guidance webpage
 - New Release on Lead Service Line Inventory Guidance

Other

• Lead Service Line Replacement Collaborative: https://www.lslr-collaborative.org/