

#### Massachusetts Department of Environmental Protection Bureau of Water Resources – Drinking Water Program Lead & Copper Rule Revisions (LCRR) – Certification of Non-Lead Service Lines & Request for Approval

#### Important:

When filling out forms on the computer, use only the tab key to move your cursor – do not use the return key.



For information on brass service lines see MassDEP LCRR Q&A question #15 and #16 at https://mass.go v/doc/frequentl y-asked-questions-about-the-lead-and-copper-rule-revisions-lcrr/.

#### **Background and Instructions**

This form was developed in response to Community (COM) and Non transient Non-Community (NTNC) public water suppliers preparing for the Lead and Copper Rule Revisions (LCRR) requesting a process to certify that their system has no lead service lines. MassDEP may request this information per 310 CMR 22.03(15).

- All Public Water Systems (PWS) subject to the Lead and Copper Revisions (LCRR) must submit an initial service line inventory by October 16, 2024, including systems without lead service lines (LSL) which can be documented and includes unknown and galvanized requiring replacements (GRR).
  - Note: lead lined steel service lines are a form of lead service lines.
- If a PWS can demonstrate and certify that it has no lead service lines, no galvanized requiring replacement and no service lines of unknown material, the PWS may complete and submit this **LCRR-NONLSL-CERT form** to MassDEP for review and approval.
- The LCRR-NONLSL-CERT Form must be completed by the primary distribution operator of the system or an approved PWS representative and submitted to MassDEP Drinking Water Program no later than October 16, 2024 at <a href="mailto:program.director-dwp@mass.gov">program.director-dwp@mass.gov</a> from the email account listed in section E and/or F. Email Subject Line: [City/Town]-[PWS ID#]—NONLSL-CERT.
- Please note, for PWS without LSL, GRR, or unknown service lines that are interested in continuing reduced monitoring under the LCRR, the completion, submittal, and MassDEP's approval of a LCRR-NONLSL-CERT is one of the eligibility criteria. For more information on maintaining reduced monitoring in 2025 see <a href="https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-lcrr/">https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-lcrr/</a>.

#### APPROVED PWS' LCRR-NONLSL-CERT

- When MassDEP approves a PWS' LCRR-NONLSL-CERT, the PWS will still be required to do the following:
  - By October 16, 2024, have a "NONLSL Statement" publicly accessible, declaring that it has no LSL, GRR, or unknown service lines and explaining the sources used to make that determination.
  - Share the "NONLSL Statement" with all consumers in a manner approved by MassDEP that
    is reasonably calculated to reach all persons served by the system.
  - $\circ$  Use **two or more** of the following methods to share the statement to consumers:
    - Web posting, hand or direct delivery, posting in conspicuous locations, local newspaper, radio, television, reverse 911 phone calls, email, social media postings and other methods approved by MassDEP, since the statement must be provided in a manner reasonably calculated to reach all persons served
  - For Systems that serve more than 50,000 persons: post the "NONLSL Statement" online.
  - For all systems required to provide a CCR Include the "NONLSL Statement", or instructions to access the "NONLSL Statement", in the Consumer Confidence Report (CCR).
  - If the LCRR-NONLSL-CERT is approved by MassDEP the PWS <u>will not</u> be required to make
    the inventory publicly accessible online and provide routine inventory updated to the State
    or to the public but will be required to post the NONLSL Statement as noted above.
  - If in the future, after MassDEP approves a LCRR-NONLSL-CERT, a PWS finds a lead service line or GRR within its distribution system, the PWS must notify MassDEP within 30 days of discovery and submit an updated inventory on a schedule established by MassDEP.

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A.	Pι	Public Water System (PWS) Information							
	Sys	System Class: X COM (Commu		munity)	NTNC (No	Transient Non-Community)			
	Fds	artown Wa	ter Department	4089000		Edgartown			
		S NAME	ос. д ораненноне	PWS ID #		CITY/TOWN			
В.	In	ventory	Verification	1					
<u> </u>	1.	Inventory Verification  1. When did your Public Water System finalize the verification of its							
			e inventory?	i System iiii	anze the verme	10/15/2024			
	2.	2. Provide a link to the completed service line inventory* or attach the CSV file described in the <a href="MassDEP Instructions for use of the Service Line Inventory Excel Workbook">MassDEP Instructions for use of the Service Line Inventory Excel Workbook</a> located at <a href="https://www.mass.gov/media/2480886/">https://www.mass.gov/media/2480886/</a> .							
		* Service line inventories must be provided as described in the Instructions for Use of the Service Line Inventory Excel Workbook which can be found on the mass.gov website at <a href="https://www.mass.gov/media/2480886/">https://www.mass.gov/media/2480886/</a> .							
		Please note that some CWSs and NTNC PWSs may not have an extensive distribution system, such as those with a direct connection from a well to a single building. Systems must report the material from the well to the building inlet for their inventory.							
	3.	Select and check ☑ below all verification methods used to develop your system's Service Line Inventory. For each method selected explain in detail the records or tools used to verify the inventory. See EPA's Guidance for Developing and Maintaining a Service Line Inventory for more information at <a href="https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance August%202022 508%20compliant.pdf">https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance August%202022 508%20compliant.pdf</a> .							
		Records Review							
		Details: All tie cards were reviewed, as well as replacement records							
		Field In	spection by PWS						
		Details: Any connection in question was inspected by E.W.D. staff							
		Customer Self-Identification Details:							
		Statistical Analysis							
		Details: Lead service lines haver never been used in Edgartown. Public or private side.							
	Sequential Monitoring								

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	Other MassDEP-Approved Method						
	Details:						
4.	What is your overall level of confidence in the inventory? $\begin{tabular}{ll} Low & \begin{tabular}{ll} Medium & \begin{tabular}{ll} High \\ \hline \end{tabular}$						
	Explain your rationale for the selected confidence level: Lead service lines have never been installed in this community						
5.	Does your system's inventory consist of all Non-Lead Service Lines, determined through an evidence-based record, method, or technique not to be lead or galvanized requiring replacement?						
6.	Does your system contain any service lines where the entire service Yes No line is classified* as "Lead Status Unknown"?  *This classification is found in the "Entire Service Line Classification" Column of the MassDEP SLI Workbook.						
7.	Did your community/town ban lead service lines?						
	Not Applicable, PWS was Constructed after 1986						
	If yes, identify the state or local ordinance that banned the use of lead in the system and provide a link to the information or attach a PDF to your response.  There is nio ordinance but lead has never been allowed and is not now.						
8.	Does your system have lead goosenecks, pigtails,						
	If yes, or do not know, is your system removing or have a plan for removing any lead goosenecks, lead pigtails, or lead connectors encountered during maintenance or construction?						
	If yes, describe the plan: We only have 24 goosenecks in our system. They are being removed during service line replacments.						
N	NONLSL Written Statement						
1.	System Size:						
2.	PWS must ensure that their NONLSL Statement is <u>always</u> publicly accessible in some fashion. Please review the options below and select which option(s) your PWS will be utilizing.						
	Available by mail						

of NONLSL Statement see https://www.m ass.gov/media/ 2587281/.

For an example

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C.



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	🔀 Available by in-person review						
	Post in a location accessible for public viewing at PWS office						
	Where in the office: 58 Kavanagh Way, Edgartown, MA						
	Posted online* Web URL:						
	*This option is required for PWS serving 50,000 or more people						
	Other Describe:						
3.	How will your PWS alert consumers on how to access the <a href="MONLSL Statement">MONLSL Statement</a> after it has been posted? Two or more methods are required. Please check all methods to be used.						
	☐ Mailing ☐ Radio ☐ Television						
	Phone Calls						
	Reverse 911 Phone Calls Local Newspaper						
	Web Posting Web URL: www.edgartown-ma.us						
	Social Media Posting Social Media Account:						
	Posting in Conspicuous Locations Locations Chosen:						
Community PWS should note that instructions on how to access the NONLSL statement, or the statement itself, must be provided in the Consumer Confidence Report (CCR).							
Lis	st of Attachments (if applicable)						
My system has attached the following PDF documents to this form using the following naming convention: "[City/Town]- [PWS ID#]- [Program or Form]- [Name of Attached Document]," e.g., Boston-3035000-LCRR-NONLSL-CERT-MyFileName.pdf							
1.	Edgartown-4089000-Service Line Inventory Certification.pdf						
2.	Edgartown-4089000-Lead Service Line Inventory.csv						
3.	Edgartown-4089000-LCRR-NONLSL-CERT.DOC						
4.	Edgartown-4089000-LCRR-NONLSL-STATEMENT.DOC						
Submission of Form							
Ple	ase chose the applicable scenario for your PWS:						
	My PWS's Service Line Inventory and related documents have been submitted by the person authorized to fill out and submit forms on behalf of the PWS, who has been listed in section F of this form.						

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D.

E.



Note, any forms submitted using an email address other than the one in Section F will NOT be accepted, unless section E is completed.

If you have any questions, please contact the MassDEP Drinking Water Program at program.direct

dwp@mass.gov or (617) 292-5843.

or-

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	My PWS's Service Line Inventory and related documents have been submitted on behalf of the person listed in section F, and my PWS certifies that the <b>person listed below</b> has been given permission to submit these items on our behalf.						
	Full Name of Person Submitti	ng this Form	Email Address of Person Submitting this Form				
	If the person submitting this form above is not required.	has completed se	ction F below, completing the information fields				
F.	Certification						
	information contained herein in knowledge, 2) I am the person Massachusetts Department of service lines (LSL), galvanized in PWS has reviewed all available inventory demonstrating no LSU understands that if MassDEP at Certification of Non-Lead Service the course of routine work after 30-days of discovery by submit William R. Chapman Full Name 508-627-4717	is true, accurate, authorized to fil Environmental Fequiring replace records, 5) My SL, GRR, or unknopproves this <b>Leavice Lines</b> Requeser this approval, tting an updated	m certifying under penalties of law that the ccurate, and complete to the best extent of my ed to fill out and submit this form to the nental Protection, 3) My PWS does not have any lead replacement (GRR), or unknown service lines, 4) My 5) My PWS has provided MassDEP with a service line or unknowns exist in the system, and 6) My PWS this Lead & Copper Rule Revisions (LCRR) — Request for Approval, and any LSL or GRR are found in proval, my PWS shall report them to MassDEP within updated service line inventory.  Water Superintendent Job Title wchapman@edgartown-ma.us				
	Phone Number		Email Address of individual identified in Full Name of this section F (form and attachments must be submitted from this email address, unless section E is completed).				
	Signature	<del></del> -	Date				
F.	MassDEP/DWP Use	Only					
	Approved	Denied					

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Comments:

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LCRR-NONLSL-CERT

MassDEP/DWP Staff Name	Date	

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