

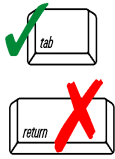


Massachusetts Department of Environmental Protection
Bureau of Water Resources – Drinking Water Program
Lead & Copper Rule Revisions (LCRR) – Certification of Non-Lead Service Lines
& Request for Approval

LCRR-NONLSL-CERT

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.gov/doc/frequently-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 program.director-dwp@mass.gov **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 <https://www.mass.gov/doc/monitoring-frequency-guide-for-systems-subject-to-the-lcrr/>.

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.
 - 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 **will not** 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.



A. Public Water System (PWS) Information

System Class: ☒ COM (Community) ☐ NTNC (Non-Transient Non-Community)

Dalton Fire District
PWS NAME

1070000
PWS ID #

Dalton
CITY/TOWN

B. Inventory Verification

1. When did your Public Water System finalize the verification of its service line inventory? August 2025
2. Provide a link to the completed service line inventory* or attach the CSV file described in the [MassDEP Instructions for use of the Service Line Inventory Excel Workbook](https://www.mass.gov/media/2480886/) located at <https://www.mass.gov/media/2480886/>.

CSV file is attached.

* 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 <https://www.mass.gov/media/2480886/>.

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 https://www.epa.gov/system/files/documents/2022-08/Inventory%20Guidance_August%202022_508%20compliant.pdf.

☒ Records Review

Details: Reviewed data from water service curb stop cards, water main as-built records, and assessor's records.

☒ Field Inspection by PWS

Details: Conducted basement inspections and vacuum excavations.

☒ Customer Self-Identification

Details: Provided a self-identification platform to customers via mailers and jotform

☒ Statistical Analysis

Details: Separate statistical analyses were done for the private side and the public side materials.

Originally, based on the system having 2,289 service lines, a random pool of 328 services was generated where all of their public and private side materials would be verified. However, due to responses received from customer survey and basement inspections



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requests, 338 services were able to be physically inspected and materials verified on the private side. This random pool of 338 services based on responses served as the investigation pool for the private side statistical analysis. All 338 services that were inspected were not lead, but 1 was galvanized on the private side. The 1 galvanized private side represents only 0.3% of the investigation pool, which is below the MassDEP GRR acceptance criteria of 2.5%, and 0.3% of the remaining unknowns (1,146) is only 4 services, which is below the GRR acceptance criteria of 25 services. Based on the statistical analyses performed for the private side, the remaining 1,146 services with unknown materials on the private side can be assumed to be UNK-NOLG with a confidence level of 95%.

For the public side, the statistical analysis was conducted based on the original random investigation pool of 328 services. Of these, 74 had unknown materials ("UNK-LG") on the public side and were subsequently physically inspected via vacuum excavation, which is above the 66 (20%) required. The other 254 services in the investigation pool had public side materials verified to be non-lead through records review including curb stop cards and service/water main installation years. Based on the statistical analyses performed for the public side, the remaining 1,018 services with unknown materials on the public side can be assumed to be UNK-NOLG with a confidence level of 95%.

In total, 1,409 services lines will have entire service line classifications of "Non-Lead" based on Statistical Analysis ("A") in the updated water service line inventory.

☐ Sequential Monitoring

Details:

☐ Other MassDEP-Approved Method

Details:

4. What is your overall level of confidence in the inventory? ☐ Low ☐ Medium ☒ High

Explain your rationale for the selected confidence level:

The inventory is based on a large volume of reliable records, with strong alignment from independent sources like the staff knowledge, desktop analysis, basement inspections, and vacuum excavations. The physical inspections conducted for both the private side and public side exceeded the minimum requirements as defined in the MassDEP guidance document for statistical analysis, and meets the GRR acceptance criteria.

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? ☒ Yes ☐ No

6. Does your system contain any service lines where the entire service line is classified* as "Lead Status Unknown"? ☐ Yes ☒ No

**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? ☐ Yes ☒ No ☐ I Do Not Know



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☐ 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.

8. Does your system have lead goosenecks, pigtails, ☐ Yes ☐ No ☒ I Do Not Know or connectors in the distribution system?

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? ☒ Yes ☐ No

If **yes**, describe the plan:

There are no known records of the District using lead goosenecks, pigtail, or connectors. The District would replace them if discovered during maintenance or construction.

C. NONLSL Written Statement

For an example of NONLSL Statement see <https://www.mass.gov/media/2587281/>.

1. System Size: ☒ Less than 50,000 ☐ Equal to or more than 50,000

2. PWS must ensure that their NONLSL Statement is **always** publicly accessible in some fashion. Please review the options below and select which option(s) your PWS will be utilizing.

☐ Available by mail

☐ Available by in-person review

☒ Post in a location accessible for public viewing at PWS office

Where in the office: 20 Flansburg, Dalton, MA 01226

☒ Posted online* Web URL: daltonfiredistrict.org/lsl-data/

*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 **NONLSL Statement** after it has been posted? **Two or more methods are required.** Please check all methods to be used.

☐ Mailing

☐ Radio

☐ Television

☐ Phone Calls

☐ Email

☐ Hand or Direct Delivery

☐ Reverse 911 Phone Calls

☐ Local Newspaper

☒ Web Posting

Web URL: daltonfiredistrict.org/lsl-data/



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☐ Social Media Posting Social Media Account:

☒ Posting in Conspicuous Locations Locations Chosen: **20 Flansburg,**
Dalton, MA 01226

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).

D. List 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. Dalton-1070000-Service Line Inventory Certification-Updated August 2025.pdf
2. Dalton-1070000-BlueConduit No Lead Report
- 3.
- 4.

E. Submission of Form

Please 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.**

☒ 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 **person listed below** has been given permission to submit these items on our behalf.

Jennifer Gilbert

Full Name of Person Submitting this Form

JEGilbert@tighebond.com

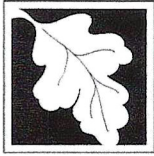
Email Address of Person Submitting this Form

If the person submitting this form has completed section F below, completing the information fields above is not required.

F. Certification

My signature below indicates that 1) I am certifying under penalties of law that the information contained herein is true, accurate, and complete to the best extent of my knowledge, 2) I am the person authorized to fill out and submit this form to the Massachusetts Department of Environmental Protection, 3) My PWS does not have any lead service lines (LSL), galvanized requiring replacement (GRR), or unknown service lines, 4) My PWS has reviewed all available records, 5) My PWS has provided MassDEP with a service line inventory demonstrating no LSL, GRR, or unknowns exist in the system, and 6) My PWS understands that if MassDEP approves this **Lead & Copper Rule Revisions (LCRR) – Certification of Non-Lead Service Lines** Request for Approval, and any LSL or GRR are found in the course of routine work after this approval, my PWS shall report them to MassDEP within 30-days of discovery by submitting an updated service line inventory.

Note, any forms



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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](mailto:program.direct@mass.gov)
or-
dwp@mass.gov
or (617) 292-
5843.

Robert A. Benlien

Full Name

413-684-6124

Phone Number

Water Superintendent

Job Title

bob.benlien@daltonfiredistrict.org

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

9/12/25
Date

F. MassDEP/DWP Use Only

☐ Approved

☐ Denied

Comments:

MassDEP/DWP Staff Name

Date