

# LEAD AND COPPER SAMPLING AND COMPLIANCE GUIDE

## Non-Transient, Non-Community

You are receiving this insert because your water system is required to collect lead and copper compliance samples this year. Please read this information carefully and contact your DNR Representative if you have any questions. Your regional DNR Representative is listed at the top of your drinking water monitoring schedule.

### Checklist for Completing Lead and Copper Monitoring Requirements:

- Before you collect any samples:* Verify sample **SITES** meet Tier Criteria and are on your approved Monitoring Site Plan. Call your DNR Representative if you have any questions **before** you sample.
- Collect samples from **TAPS** on your approved monitoring site plan that meet Sample Tap Criteria.
- Collect **SAMPLES** in accordance with EPA Rules and Recommendations – see Do's and Don'ts.
- NOTIFY** Consumers of the lead and copper sample results within 30-days of receipt from the lab.
- SEND SIGNED CERTIFICATION** to your DNR Representative showing you have notified consumers of lead and copper test results.

### Non-Transient, Non-Community Systems Sampling Site Tier Criteria

#### TIER 1 Sites: Drinking water outlets where structures contain:

- Lead service lines and/or Lead goose necks; and/or
- Lead plumbing; and/or
- Copper plumbing with lead solder constructed between January 1983 and September 1984.

#### TIER 2 Sites: Drinking water outlets where structures contain:

- Copper plumbing with lead solder constructed before January 1983.

\*If you do not have enough Tier 1 and Tier 2 sites, use Exceptional sites where water is typically drawn for drinking or cooking.

#### EXCEPTIONAL Sites: Drinking water outlets where plumbing materials are representative of what is commonly found throughout the water system, including:

- Copper plumbing with lead solder constructed after 1984.
- Tier 1 or Tier 2 sites with whole-system water softeners or filters

**\*DO NOT use Exceptional sites unless you do not have enough Tier 1 and Tier 2 sites available to complete your sampling or they are the only drinking water sites available for testing.**

### SAMPLE TAP CRITERIA

Cold water kitchen, breakroom, bathroom sinks or drinking fountains - **No** mixed hot or hot/cold faucets

Taps within the interior of a residence or other building - **No** outside hose bibbs

Taps where water is used for human consumption - **No** mop or utility sinks or pressure tank taps

Taps where water is untreated by softening or filters - unless that's all you have

Taps where water is used on a regular basis for drinking water - **No** vacant room taps

### What if my facility does not have enough taps to meet the minimum sampling requirement?

Water systems that do not have enough taps to supply **first-draw samples**, may work with their DNR Representative to develop an alternative Monitoring Site Plan. Regardless of the number of available taps at a facility, all samples must be **first-draw** which means sample collection may need to be completed over several days to meet the minimum sample requirement. **Non-first draw samples may only be collected with written approval from the Department.**

**What if my facility operates 24-hours a day and a pre-sampling stagnation period of 6-hours cannot be achieved?** Water suppliers may work with their DNR Representative to develop an alternative Monitoring Site Plan. Water suppliers should identify sampling locations with the longest standing time prior to sampling. Water suppliers should consider 'locking-out' sample taps to create a minimum 6-hr standing time prior to sampling. ***Non-first draw samples may only be collected with prior written approval from the Department.***

**What if my facility does not have any lead or copper and is generally free of metallic components?** Water suppliers may apply to the Department to reduce the frequency of monitoring for lead and copper to once every 9 years if they meet both criteria listed below. Work with the Department to determine if you are eligible.

- 1) Provide documentation that the public water system is free of all lead and/or materials containing lead including: Plastic pipes or service lines containing lead plasticizers, lead services lines, lead pipes, lead soldered joints, leaded brass or bronze alloy fixtures or fittings unless the fittings meet specifications of 42 USC 300g-6e, or copper pipes or copper service lines
- 2) Demonstrate the 90<sup>th</sup> percentile lead and copper values do not exceed 5 and 650 ug/L respectively.

### **SAMPLING DO'S AND DON'Ts**

#### **SAMPLING DO'S**

- Sample during the appropriate monitoring period - Your monitoring schedule tells you when to sample.
  - Standard Monitoring: Jan 1 – June 30 and July 1 – Dec 31
  - Reduced: June 1 – September 30
  - Schools: September 1 – September 30
- **SAMPLE EARLY IN YOUR MONITORING PERIOD!** Give yourself time to re-sample if you have issues with shipping or lab procedures or need to take corrective actions (Systems with Lead and Copper Action Level Exceedances will be required to collect water quality parameter samples in the same monitoring period).
- Collect samples at the same location as all previous sampling events in accordance with your MONITORING SITE PLAN (contact your DNR Rep if you need to adjust your system's monitoring sites).
- Collect as many **first-draw samples** as required on your monitoring schedule (water is to have stood motionless throughout the facility for at least six hours unless you have special approval to do otherwise). All non-first draw samples must be pre-approved by the Department.
- Collect samples in 1-liter wide-mouth sample containers provided by your SDWA certified laboratory.
- When samples are sent to the laboratory for analysis, make sure that all sections of the lead and copper sample form are completed, and the form is included with your lab sample. Clearly note the date and time the sample was collected, sample ID, the address, and the location and tap description (example: Bathroom cold water tap) where the sample was collected.

#### **SAMPLING DON'Ts**

- DO NOT pre-flush the tap prior to the 6-hour stagnation period or prior to collecting the sample.
- DO NOT remove the aerator prior to sampling.
- DO NOT collect samples from taps where water has remained motionless for significantly longer than 6-hours (i.e. vacant properties, schools over break periods).
- DO NOT use a tap that is downstream of a filter or softener unless all your water is filtered or softened.

### **CONSUMER NOTIFICATION and DNR CERTIFICATION**

**Notify your water system consumers** of the lead and copper results within 30-days of receipt from the lab. The Department recommends you notify the consumer within 24 hours. A Consumer Notice of Lead and Copper Results form can be found at: <http://dnr.wi.gov/topic/drinkingwater/owneroperator.html>

**Certify to DNR** that you have notified consumers of lead and copper test results by sending the signed certification form to your DNR Representative within 30-days. A signed Certification of Consumer Notification is due to the Department 90-days from the end of the applicable lead and copper monitoring period.