



Frequently Asked Questions Regarding Lead and Copper Sampling at this Time 5/14/2020

During this time, the EPA has provided some guidance regarding monitoring requirements: “Of highest priority is monitoring required under National Primary Drinking Water Regulations to protect against microbial pathogens. Additional priorities include nitrate/nitrite and Lead and Copper Rule monitoring followed by contaminants for which the system has been non-compliant.”

The following are answers to some common questions regarding lead and copper testing during this time.

We are scheduled for lead and copper sampling in 2020. We are concerned about interaction and social distancing during this process for both our customers and our staff. Does the Maine Drinking Water Program (DWP) still expect us to meet this requirement?

Answer: Yes, you are still required to collect lead and copper samples. Failure to collect all necessary samples will result in a failure to monitor violation being issued. As Lead and Copper Rule sampling is a homeowner-based sampling program (for community systems), you should consider reaching out to your volunteer homeowners now to confirm whether they plan to continue their participation. There does not need to be in-person contact between residents collecting samples and those dropping off sample bottles/picking up samples. Explaining to them that bottles can be left outside their residence on a specific day, so that they can collect samples the next morning, may reassure them that contact with your staff may be kept to a minimum. Providing them with a phone number where they can reach staff, should they have questions, and asking if they would be willing to provide the same to you, could also reduce the need for face-to-face contact. If a customer is unwilling to collect a sample, you need to find an alternative site with the same tier designation as the current site, if at all possible.

Can the DWP provide any guidance on lead and copper sampling? We are required to collect 60 samples twice a year. It might be difficult to get residents to collect samples. How should we handle this?

Answer: Systems that sample for lead and copper twice a year collect samples between January and June and again between July and December. So, you have some flexibility as to when during those time periods sampling will get done. Now is a good time to contact the residences on your primary list to determine whether they are willing to continue participation in the lead and copper sampling program in 2020. If you need to change sampling locations based on refusals to participate, you need to refer to your lead/copper sampling pool and select another location from your pool that has the same tier designation as the location that no longer wishes to test. If you have no other sites that meet that tier designation, you may move to the next tier to find a site. You may want to contact your Public Water System Inspector to discuss selection of an alternative location if the tier designation is changing.

Our current lead and copper sampling requirement is for 40 samples every 6 months. It is difficult to collect this many samples under normal circumstances. Would we be eligible to collect a reduced number of samples at this time?"

Answer: Your testing requirement would remain unchanged. Per EPA's enforcement discretion policy, dated March 26, 2020 (<https://www.epa.gov/sites/production/files/2020-03/documents/oecamemooncovid19implications.pdf>), they emphasize the importance of protecting public health but also prioritize monitoring in the case of a worker shortage. For further questions, please contact your Public Water System Inspector.

With the recommendation/guidance for schools to flush to mitigate lead and copper levels prior to their re-opening, how soon after re-opening and flushing can the samples be conducted? Depending on when facilities are able to re-open, there may be a short time-frame before the end of June for schools that are required to test in the first half of 2020 to conduct their required sampling on top of flushing.

Answer: Flushing should be completed prior to the schools' opening and the system should be allowed to "stabilize" before lead/copper samples are collected. The DWP recommends waiting 24 hours after flushing before taking a sample. Lead and copper samples should be collected under normal operations after a minimum of 6 hours stagnation.

If there are a lot of systems re-opening that are required to collect lead and copper samples before the end of June, will there be flexibility on the reporting timeline for these samples if the labs are inundated with samples and cannot get the reports or e-filing done by the 10th of the month?

Answer: LCR reporting deadlines are federal and state requirements and a violation may be assessed. However, if a lab contacts the DWP prior to the 10th and indicates that they have received an inordinate number of lead/copper samples, and their lab is unable to analyze all before the 10th, the state will use discretion to allow late results, on a case by case basis.

I'm hearing of some schools deciding to just shut their buildings down and lock the doors during this crisis. I'm not a big fan of this as I'm a licensed plumber and know too much about issues with stagnant water. Does the DWP have any guidance for schools here in Maine regarding what they should be doing during these shutdowns? At least during our summer breaks, water is moving with all the cleaning going on. This is different- as the water will be sitting anywhere from a minimum of 2 weeks to potentially much longer.

Answer: The potential for lead and copper to leach into water can increase the longer the water remains in contact with lead or copper in plumbing. As a result, facilities that closed their buildings due to COVID-19, may have elevated lead and/or copper concentrations. The Federal Lead Contamination Control Act (LCCA) Program, in coordination with the EPA's 3Ts program guidance on lead in school drinking water, recommends you perform a thorough flushing of your drinking water pipes and fixtures prior to re-opening your facility. For guidance on school flushing see https://www.epa.gov/sites/production/files/2018-09/documents/flushing_best_practices_factsheet_508.pdf. For further assistance, please contact the DWP at 207-287-2070.