



Tips for Lead and Copper Rule Sampling During COVID-19

As a precautionary response to COVID-19, Ohio EPA Division of Drinking and Ground Waters has created this document to support community and non-transient non-community public water systems in collecting lead and copper tap samples during COVID-19. This document combines current sampling requirements and has integrated suggestions for reducing the spread of COVID-19. Water systems are recommended to consider potential COVID-19 exposure risk while conducting lead and copper compliance monitoring. This document is divided into three sections: Pre-Sampling, Sample Drop-Off/Sampling, and Sample Pickup/Post-Sampling.

Pre-Sampling

- Water systems should review and update their lead and copper sample monitoring point identification (SMP ID) spreadsheet as needed. The SMP ID spreadsheet should be used to determine the best electronic point of contacts (e.g., phone number, email) for each sampling location.
- Identify appropriate sample sites used in your last compliance sampling period; these sites should be the water system's first choices for sampling.
- Develop a message to the customer regarding the safety protocol taken by the public water system to ensure the sample kit (e.g., sample containers, SSR, instructions), was prepared in a way to limit the transmission of COVID-19. This message could be delivered to the customer via email/phone call or included in the sample kit.
- Contact the selected customers via phone or email to confirm the site can be used during this monitoring period.
- If the water system is unable to sample from the sites used during the prior sampling period, records should note that a sample could not be collected. Include the reason why a sample could not be collected from a previously used location on the updated SMP ID spreadsheet. For example, if a household does not consent to having sample collected, or if a person is ill at a sampling location, then the public water system should note this and select an alternate site that conforms to appropriate tier criteria
- Consider providing appropriate personal protection equipment (PPE) for the collection of a tap sample.
- Discuss (e.g., call, email) the following items with the customer prior to collecting the tap sample:
 - Verify their sample site will be available. If the customer chooses not to participate in the sampling event, note this on SMP ID spreadsheet and select an alternate, correctly tiered sample location.
 - Notify the customer of the dates and times that the sample kit will be dropped off and picked-up, and location of drop off.
 - Complete and review as much of the "Instructions for Collection of Lead and Copper Sample by Residents" as possible.
 - Check if there are symptoms of illness in the house, note answer. If illness is present, then recommend not collecting a tap sample from location.
 - Instruct the customer to return the sample kit to the same location where the kit was delivered (e.g., front porch) following collection of the sample. This will ensure that the water system staff know where to pick up the sample kit.
 - Instruct the customer to contact the water system for timely pick-up of the sample so the sample can be properly preserved.
- Prepare sample kits using the safety protocol as conveyed above. If providing a paper copy of the "Instructions for Collection of Lead and Copper Sample by Residents," include it with the sample kit.

Sample Drop-Off/Sampling

- Log the location where each sample kit has been left.
- Leave the sample kit at the location agreed upon with customer.
- Provide a phone number for customer to call/text when sample has been collected and is ready for pickup. If possible, the customer can also text/email a photo of sample site (e.g., kitchen or bathroom faucet) to that number.
- Provide all sampling supplies in a clear resealable plastic bag, including PPE, if provided.
- Consider providing the following information in the sample kit making sure it is visible to the customer:

This sampling packet was prepared on [insert date]. Studies have shown that COVID-19 is expected to live on surfaces for [insert length of time] based on [insert reference]. Upon drop-off, the outside of this packet was

disinfected using [insert method of disinfection] to help minimize the spread of COVID-19. [Please feel free to use the PPE (e.g., gloves, disinfecting wipes, etc.) provided while collecting the sample and handling the supplied materials.] If you should have any questions or concerns about the samples, please call or text [insert name] at [insert telephone number].

Sample Pick-Up/Post-Sampling

- Prior to pick-up, verify with customer that the sample has been collected and confirm sample location. Determine sample pickup time.
- As a safety precaution, use proper PPE for sample pickup and/or allow sufficient time (e.g., three days) between when the sample was last touched by the customer and pickup. The water system may also choose to disinfect the sample kit at the time of pickup.
- Check the sample collection instruction form for completeness. If the customer can send this information electronically, check it for completeness prior to picking up sample kit. If any information is missing, call the customer contact to request missing details.

Other items to check:

- Is the instruction sheet completely filled out and legible?
 - Is the instruction form signed? Is an electronic signature acceptable?
 - Is there a phone number?
 - Check for email address, request one if not provided.
- Was the sample collected per instructions?
 - Water faucet has a minimum six-hour stagnation-period?
 - Was the faucet intentionally flushed before the start of the six-hour period?
 - Was the sample first draw?
 - Verify if the sample was collected from a kitchen or bathroom cold water faucet. Request customer to provide a photo of the faucet from where sample was collected.
- Check sample bottle(s).
 - Was sufficient sample volume collected?
 - Is the sample bottle clearly labeled with the address, sample location, date, time, and sample collector?
 - Is the cap secured so no sample is leaking?
- Ensure preservative is added within 14 days from the day the sample was collected.

Contact

For more information, contact your Ohio EPA district office representative via email at firstname.lastname@epa.ohio.gov or call them directly using the contact information available on Ohio EPA's website: <https://epa.ohio.gov/Contact>. The following are the district office contact phone numbers if you do not know your district representative:

CDO – 614-728-3778
NEDO – 330-963-1200
NWDO – 419-352-8461
SEDO – 740-385-8501
SWDO 937-285-6357

Instructions for Collection of Lead & Copper Sample by Residents

Revised May 2020

Thank you for your participation and assistance in collecting a water sample for lead and copper analysis. With your help, we will be able to follow Ohio EPA monitoring requirements and ensure the safety of our water in regard to lead and copper contamination.

Collect samples from a cold-water faucet that has not been used for at least 6 hours. To ensure the water has not been used for at least 6 hours the best time to collect samples is either early in the morning or in the evening upon returning from work. **Be sure to use a kitchen or bathroom sink cold water faucet that has been used for drinking water consumption in the past few weeks.** The collection procedure is described below.

1. Prior arrangements will be made with you, the customer, to coordinate the sample collection. Dates will be set for sample kit delivery and pick-up by water system staff.
2. There must be a minimum of 6 hours during which there is no water used from the faucet where the sample will be collected, and any faucets adjacent or close to that faucet. Either early mornings or evenings upon returning home are the best sampling times to ensure that the necessary stagnant water conditions exist. Do not intentionally flush the water line before the start of the 6-hour period.
3. Use a **kitchen or bathroom cold-water faucet** for sampling. If you have a water softener on your kitchen tap, collect your sample from the **bathroom cold-water faucet** that is not connected to a water softener, if possible. If you have a point of use filter on your kitchen faucet, use a non-treated kitchen faucet or collect your sample from the bathroom cold-water faucet. Do not remove the aerator from the faucet prior to sampling. Place the opened sample bottle below the faucet and open the cold-water faucet as you would do to fill a glass of water. Fill the sample bottle to the line marked "1000-mL" and turn off the water **while not allowing any water to run into the sink basin.**
4. Once the bottle has been filled to the line marked "1000 mL", tightly cap the sample bottle and place it in the sample kit provided. Please review the sample kit label at this time to ensure that all information contained on the label is correct.
5. If any plumbing repairs or replacement has been done in the home since the previous sampling event (or within the last three years if not previously sampled), note this information on the label as provided. Also, if your sample was collected from a faucet with a water softener, filter or treatment, note this as well.
6. Place the sample kit in the same location the kit was delivered to so that water system staff may pick up the sample kit. Your sample will be picked up on: **[enter pick-up date].**
7. Sample results from this monitoring effort and information about lead will be provided to you as soon as practical but no later than two business days after the water system learns of the tap monitoring results. If lead levels are found above the action level of 0.015 mg/L, additional information will be provided.

Call **[insert name]** at **[insert telephone number]** if you have any questions regarding these instructions.

TO BE COMPLETED BY RESIDENT

(Please Print)

Address: _____ City: _____ Zip Code: _____

Age of house: _____ Are you the homeowner? Yes No

If not owner, Owner name: _____

Owner Address: _____ City: _____ Zip Code: _____

Do you have a lead service line? Yes No Don't Know

Do you have a water softener, filter, or treatment system? Yes No

Have you had any plumbing repairs or replacement in the last 3 years? Yes No

If yes, explain: _____

Water was last used: Date: _____ Time: _____

Sample was collected: Date: _____ Time: _____

Sample Location: Kitchen Sink (cold) Bathroom Sink (cold) 1st Floor 2nd Floor

I have read the above directions and have taken the sample in accordance with these directions.

Signature: _____ Date: _____ Phone: _____

Printed Name: _____ Email: _____