Iowa Public Water Supply Lead and Copper Sample Plan Requirements





Acknowledgement

The following lead and copper sample plan template was developed jointly with the Iowa Department of Natural Resources and the Iowa Rural Water Association to assist public water systems in developing and maintaining their lead and copper sample plans in the state of Iowa. Many thanks to everyone who participated and provided input in the development of this document.

The forms used in this document were developed by the United States Environmental Protection Agency and the Iowa Department of Natural Resources.

The sample plan template was revised in October 2018.

This plan should be provided to and reviewed by all persons responsible for lead and copper sample collection.

The model plan can be modified as needed as long as the required components as listed in the rules are contained in the plan.

If you have any questions please contact the Iowa DNR:

Regional Field Offices

FO 1, Manchester	563-927-2640
FO 2, Mason City	641-424-4073
FO 3, Spencer	712-262-4177
FO 4, Atlantic	712-243-1934
FO 5, Des Moines	515-725-0268
FO 6, Washington	319-653-2135

Iowa DNR WSO contact listed on the cover page of your current operation permit

Iowa DNR Water Supply 515-725-8200 FAX: 515-725-8202

Be sure to include your 7-digit Public Water Supply Identification number (PWSID)/Permit Number located on the front page of your operation permit on all correspondence and sample sheets. This number should also be available when contacting your contract lab or the DNR.

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Section 1: Site Selection Criteria

Lead and Copper Sample Site Plan Selection Criteria for Community Systems

All community public water supplies must complete a materials evaluation of their system to identify their pool of sample sites. Samples must be collected from Tier 1 sites unless there are none in the distribution system, and then Tier 2 sites may be used. If there are not sufficient Tier 1 and 2 sites then Tier 3 sites may be used. If there are no sites that meet the Tier site selection criteria, then sites representative of the materials in the distribution system must be used. Do not use a site where there is a point-of-entry treatment device (e.g., whole-house water softener) or a faucet with a point-of-use treatment device designed to remove inorganic contaminants such as hardness or iron. Only if there are no other available sites should such sites be used by a system to meet the rule requirements.

Keep the materials evaluation survey with your records and update it as work is done in the system and new information is found on buried water lines, or when lines are replaced. This will help you in the future when new sites are needed.

Tier definitions are as follows:

- Tier 1 includes single family structures that;
 - o Contain copper pipes with lead solder which was installed after 1982 or;
 - Contain lead pipes or;
 - o Is served by a lead service line
 - Multi-family structures may be used as a Tier 1 site when multi-family structures comprise at least 20% of the structures served by the water system.

Note: If the distribution system contains lead service lines, 50% of the samples must be collected from sites with lead service lines. If the system cannot get 50% of the samples from sites with lead service lines, all of the known sites must be used.

- Tier 2 includes multi-family structures and buildings that;
 - o Contain copper pipes with lead solder which was installed after 1982 or;
 - Contain lead pipes or;
 - o Is served by a lead service line
- Tier 3 Includes single family structures that contain copper pipes with lead solder which were installed prior to 1983

Tier Categories - Use the following to identify the Tier and category of each site:

Tier 1

- A. Single family copper pipe with lead solder constructed after 1982
- B. Single family lead pipes
- C. Single family lead service line
- D. Multi-family copper pipe with lead solder constructed after 1982
- E. Multi-family lead pipes
- F. Multi-family lead service line

Tier 2

- A. Building copper pipe with lead solder constructed after 1982
- B. Building lead pipes
- C. Building lead service line

Tier 3

A. Single family – copper pipe with lead solder constructed before 1983

If not enough Tier 1, 2, or 3 sites are available, random sites may be chosen.

• Random location with plumbing materials representative of those found in the system.

Lead and Copper Sample Site Plan Selection Criteria for Non-transient Non-Community (NTNC) Systems

All NTNC public water supplies must complete a materials evaluation of their system to identify their pool of sample sites. Samples must be collected from Tier 1 sites unless there are none. If there are not sufficient Tier 1 sites, use sites with copper pipes and lead solder installed before 1983. If there are no sites that meet the Tier criteria, then sites representative of the materials in the distribution system must be used. Do not use a site where there is a point-of-entry treatment device (e.g., water softener) or a faucet with a point-of-use treatment device designed to remove inorganic contaminants such as hardness or iron. Only if there are no other available sites should such sites be used by a system to meet the rule requirements.

Keep the materials evaluation survey and update it as work is done in the system and new information is found on buried water lines, or when lines are replaced.

NTNC Tier definitions:

- Tier 1 NTNC sample sites at buildings that:
 - Contain copper pipes with lead solder installed after 1982 or lead pipes
 - Served by a lead service line
- Other sample sites, to be used when insufficient Tier 1 sites are available:
 - o First, use sites that contain copper pipes with lead solder installed before 1983; then,
 - Use representative sites throughout distribution system, in which the plumbing materials used at that site would be commonly found at other sites served by the water system

NTNC Tier Categories - Use the following to identify the Tier and category of each site: NTNC Tier 1

- A. Copper pipe with lead solder constructed after 1982 or lead pipes
- B. Lead service lines

NTNC Other

- A. Sites that contain copper pipes with lead solder installed before 1983
- B. Use representative sites throughout distribution system, in which the plumbing materials used at that site would be commonly found at other sites served by the water system

Iowa Public Water Supply Lead and Copper Sample Sites

System Name:	
PWSID#:	Number of Samples Required:

NO.	Address		Selection Criteria	Primary or Alt.
00	Example: 0000 Any Street – Anytown, Iowa	1	Α	Primary
01				
02				
03				
04				
05				
06				
07				
08				
09				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				

Lead and Copper Sampling Procedures

All lead and copper samples must be first-draw samples and must be 1 liter in volume. The water must be motionless (not used) in the plumbing system of each residence or building that is sampled for a minimum of six hours. While the water cannot be used for more than six hours, do not collect samples from sites which have not been used for an extended period of time; such as a site which has had no water use for several days, e.g., a weekend.

First-draw residential samples shall be collected from the cold, hard water kitchen or bathroom sink only. First-draw nonresidential samples shall be collected from an interior, cold, hard water tap from which water is typically drawn for consumption.

Sample sites <u>must not</u> include faucets which have point-of-use or point-of-entry treatment devices designed to remove inorganic contaminants. This includes devices such as filters, softeners, reverse osmosis (RO) systems, etc.

First-draw samples may be collected by the system or the system may allow residents to collect samples after receiving instruction on the proper sampling procedures.

A water supply system shall collect each first-draw tap sample from the same sample sites used in the previous round of sampling unless a change of sample site is documented and submitted to the DNR. (See section 3)

Sites and Situations to Avoid

Do not use

- A mop sink, outside faucet, or a tap that is not generally used or intended for human consumption.
- A site which is vacant (don't make special arrangements to get access to site).
- A site which has undergone recent (within the last 6 months) plumbing improvements or changes including faucets at the specific sample location.
- A tap that has any type of treatment.
- A site where the owner or resident is uncooperative.

Caution

The PWS is ultimately responsible for the sample result. Improper sampling by a resident may not be grounds for invalidation of a sample result by DNR. The PWS must review the plumbing with the property owner to ensure the location still meets the site selection criteria assigned, and to determine if there have been any plumbing changes in the home that disqualify the location from the sampling pool. The PWS must also provide clear instructions to the residents when the sample containers are provided to the property owner and should thoroughly review the information and comments provided on the sample sheet prior to submitting the sample to the laboratory.

Example of Lead and Copper Sampling Instructions for Property Owner or Resident

Please read these instructions before opening the sample bottle

Sampling Requirements

- Do not rinse or overfill the bottle
- Samples must be collected from the cold, hard water kitchen or bathroom faucet. Do not use an
 outdoor faucet. If you have sampled before, please use the same kitchen or bathroom faucet
 you have used previously.
- Collect the sample after at least 6 hours of no use before the water in the house or building is used for anything else.
 - A. Before the 6-hour no usage time, use the faucet as you normally would, such as filling a glass of water, brushing teeth, or washing face; do not flush the water line. Then, do not use water from the faucet for at least 6 hours.
 - B. For single family homes, do not use water in the whole house during the no-use period.
 - C. For other sampling sites that cannot discontinue water use at the entire site for 6 hours (e.g., a factory that operates 24 hours per day), the faucet that will be sampled must be tagged out for the minimum six hours.

Sampling Steps

- 1. Open the bottle and hold under the faucet.
- 2. Slowly turn the cold, hard water on and collect the first water that comes out of the faucet. (DO NOT RUN WATER FROM THE TAP BEFORE FILLING THE BOTTLE)
- 3. Fill the bottle to the shoulder.
- 4. Place lid on bottle and tighten cap securely.
- 5. Fill in label completely except for the sample ID.
- 6. Place bottle in shipping or pickup container.
- 7. Return the sample to the water supply as soon as possible.

Please note on the sample sheet and notify your water supply of the following conditions:

- If any plumbing repairs or pipe replacements have been done in the last 5 years.
- If you have a water softener or other home treatment, or water filter on the faucet you used to collect the sample.

If you have any questions contact the following:

Thank you for your help!

I have read the directions and have taken a tap sample in accordance with these instructions.			

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Section 2: How to Calculate 90th Percentile

How to Calculate the 90th Percentile

The DNR WS Operations staff calculates the 90th percentile value for lead and for copper, using the data submitted directly to DNR by the laboratory. The system is not required to submit the 90th percentile each sampling period to DNR. Shown below are the methods to calculate the 90th percentile.

- A. System that collects 5 samples: Rank your samples in order of concentration (mg/L) from lowest to highest.
- B. Find the average of the two highest results by adding the results together and dividing by two.
- C. The resulting number (average) is the 90th percentile

EXAMPLE

Sample Site Ranking #	Sample Results
1	0.001
2	0.001
3	0.006
4	0.008
5	0.014

B. 0.008 + 0.014 = 0.022

0.022/2 - 0.011 mg/L

C. 90^{th} percentile = 0.011 mg/L

System that collects 6 or more samples:

- A. Rank your samples in order of concentration (mg/L) from lowest to highest.
- B. Take the total number of samples collected and multiply by 0.90. The result will tell you which sample to record.
- C. If the number is not a whole number, round to the nearest whole number. 12.7 would be rounded to 13.0; 12.2 would be rounded to 12.0
- D. If the number is exactly in the middle of two whole numbers, round to the nearest even number.
 - 12.5 would be rounded to 12.0; 13.5 would be rounded to 14.0
- E. The sample result of that sample site is the 90th percentile.

EXAMPLE FOR 10 SAMPLES

B. 10 samples X 0.9 = 9. Sample #9 is the 90^{th} percentile.

Sample Site Ranking #	Sample Results
1	0.001
2	0.001
3	0.001
4	0.001
5	0.001
6	0.004
7	0.005
8	0.006
9	0.008
10	0.010

E. In this example, the 90th percentile is 0.008 mg/L.

(To cal	Percentile Summ culate your 90 th pero ary for you. You do r ditional rows or pag	centile, use this format if your lab does not prov not need to submit this to DNR but it is helpful t	ride a 90 th percentile o have it for your red	cords.)
PWSID	#:	Public Water Supply Name:		
Мо	onitoring Frequen	cy (circle): Routine 6-month Reduced Ann	ual Reduced Trien	nial
Results	of lead monitoring:			
Rank	Date Collected	Sample Location	Lead Result	Tier ID
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
	rcentile for lead:			
Rank	Date Collected	Sample Location	Copper Result	Tier ID
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
90 th pe	rcentile for copper:			

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Keep this form for your records.

Section 3: Changes to Sample Site Locations, Frequencies

Making Changes to Sample Site Locations

Make an assessment of your ability to sample a sufficient number of appropriate sites from your lead and copper plan well in advance of the monitoring period. Making contact with the resident early and determining whether their home still meets the selection criteria as a sample location will eliminate this variable. Furthermore, lead and copper samples should be collected early in the monitoring period to ensure samples arrive at the lab in a timely fashion and are analyzed well before the end of the monitoring period. This will also allow time to conduct the mandatory water quality parameter testing if either the lead or copper action level IS EXCEEDED at the 90th percentile during any monitoring period.

Changes to sample sites are allowed when water systems can no longer gain access to the site, if after conducting a Materials Inventory it is determined that a more applicable location is available, or if the original site location no longer meets the Tier selection criteria. For example, if a home is vacant or demolished, if a softener is added or plumbing upgrades have been made then the structure no longer meets the Tier selection criteria.

It is advisable to submit a site change request before you take your routine lead and copper samples. This change in location must be submitted to the department no later than the 10th of the month following the end of the sampling period, using the Sample Site Identification and Certification/Change of Sample Site form provided on the next page.

Your written lead and copper sample siting plan must be updated whenever there is an addition or deletion of a site and you are also encouraged to update the plan to identify sites that meet the requirements of the Tier site selection criteria that can be readily substituted if needed during future monitoring events.

Contact your DNR Water Supply Operations Section permit writer or DNR field office representative for a comprehensive list of sample locations that were used in the past.

Lead & Copper Rule: Change of Sample Site Form

PWSID #:	PWS NAME:	
Month & Year Sample	s were collected:	Today's Date:

Original Site Address:		
New Site Address:		
Distance between site	es (approximately):	
Selection Criteria:		Tier
	01.5	Tier
Reason for Change (a	ttach additional pages if necessar	y):
* * * *	* * * * * * * * * * * * * * * *	* * * * * * * * * * * * * * * *
Original Site Address:		
New Site Address:		
Distance between site	es (approximately):	
Selection Criteria:	NEW:	
	01.5	Tier
Reason for Change (a	ttach additional pages if necessar	y):
Signature (Name & Ti	tle):	
		DNR FO #:

KEEP A COPY OF THIS FORM FOR YOUR RECORDS!

Send to: DNR WS Operation Section

502 E 9th St

Des Moines, IA 50319-0034

Fax: 515-725-8202

Lead & Copper Rule Reduced Monitoring Site Selection

Reduced sample sites shall be selected using the following procedure:

- 1. From the two most recent six-month rounds of testing, select the round of testing that had the OVERALL HIGHEST lead result.
- 2. Using the selected round, arrange the sample sites in order, based on the lead test result, from highest to lowest.
- 3. Beginning with and including the site with the highest lead result, select and include every other site for reduced monitoring (i.e., highest result, 3rd highest, 5th highest, 7th highest, etc.).
- 4. After selecting every other site (see #3 above), if it is determined that a specific selected site can no longer be included in the sample pool, replace the site with the next site on the original list (i.e., replace the 7th highest site with the 6th highest site).
- 5. This reduced sample plan must be kept in your file for future reference. You must return to these same sites for each reduced sampling period.

If either the lead or copper action level IS EXCEEDED at the 90th percentile during any reduced monitoring period, you are required to:

- Conduct water quality parameter monitoring in accordance with subparagraphs 567 IAC 41.4(1)"d"(2), (3), or (4) during the monitoring period in which the action level was exceeded, and
- Resume standard or base monitoring for at least two consecutive six-month monitoring periods.

Section 4: Lead Consumer Notice

The Consumer Notice must be distributed to each resident that sampled (provided to the person living where the sample was collected). The notice must include:

- 1. The lead results for their specific location.
- 2. An explanation of the health effect of lead.
- 3. A list of steps the consumer can take to reduce exposure to lead in drinking water.
- 4. Contact information for the water utility.
- 5. The lead maximum contaminant level goal of 0 mg/L and the 90th percentile lead action level of 0.015 mg/L and the definition for these terms.

The water system must provide the consumer notice no later than 30 days of learning of the results. The consumer notice requirement only applies to the lead result, however the Iowa DNR encourages the system to also provide the copper results with the notice.

If any individual lead sample result exceeds 0.015 mg/L, the water system will be contacted by Iowa DNR and requested to provide the consumer notice within 48 hours.

After providing the consumer notice, the water system must submit one copy of the notice and the certification form to the Iowa DNR.

The templates for the consumer notice and certification form are on the next four pages. The templates are also available on this webpage: www.iowadnr.gov/ws-forms.

Lead and Copper Consumer Notice and Certification Form

PWS Name:	PWSID#:	Date:
	EAD & COPPER CONSUMER NOT	
lead and copper levels in our sys	s required to periodically collect tap tem. Your residence was selected for e is provided to you with the analyti	or this monitoring as part of our
Sample address:	Samp	le collection date:
Analytical Lead result, in mg/L (r	milligrams per liter):	
Analytical Copper result, in mg/L	(milligrams per liter):	
	el is a concentration of a contamina which a public water supply system level is 1.3 mg/L.	
contaminant in drinking water be	al (MCLG): The maximum contaminelow which there is no known or expeled MCLG is zero. The copper MC	pected risk to health. The MCLG
If present, elevated levels of lead and young children. Lead in drink service lines and home plumbing	of lead and how can I reduce my d can cause serious health problems king water is primarily from materia . [NAME OF SYSTEM] is responsible lards, but cannot control the variety	s, especially for pregnant women ls and components associated with for providing drinking water that
by flushing your tap for 30 secondrinking or cooking. Information is available from the Safe Drinkin information-about-lead-drinking-	g for several hours, you can miniminds to 2 minutes before using the word on lead in drinking water and stepsing Water Hotline or at http://www.ewater . When replacing your bathroom F/ANSI Standard 61 Annex G (Californ)	ater and using only cold water for you can take to minimize exposure epa.gov/your-drinking-water/basic- om or kitchen faucet, consider a
Copper is an essential nutrient, be action level over a relatively shown people who drink water containing liver or kidney damage. People was a second or containing the co	of copper and how can I reduce out some people who drink water controlled the period of time could experience going copper in excess of the action levith Wilson's Disease should consult as previously described will also red	ontaining copper in excess of the astrointestinal distress. Some yel over many years could suffer their personal doctor. Flushing
Who can I contact at my wat	er system for more information	?
Phone number at our public water		
F-mail address at our public water	er supply system:	

Consumer Notice Instructions: Community PWS

Per the Lead & Copper Rule consumer notice requirements, you must complete the lead consumer notice, distribute the notice to each home or building that was tested with its specific lead result, and submit a certification of your activities and a copy of the notice to Iowa Department of Natural Resources (DNR) at the address listed below.

Consumer Notice Content

Data completed

You are required to provide the consumer notice to consumers who occupy homes or buildings that are part of your system's lead & copper monitoring program with the analytical results when their drinking water is tested for lead, including those who do not receive water bills. The Consumer Notice must include the mandatory language in the example provided with these instructions. It must be multilingual, where appropriate.

Distribution of the Consumer Notice

Within 30 days of receiving the analytical results from the laboratory, you must provide the required notice to the people served at each residence or building that was a part of the sample plan. The DNR recommends you provide the required notice as soon as available, especially if the result is elevated to allow the customer to take corrective actions in a more timely manner. This can be accomplished through direct mail, including it with the water utility bill, or by hand delivery.

Multi-family dwellings: Where testing occurs in buildings with many units, such as an apartment building, the notice must be provided to each individual unit that was tested. The notice does not have to extend to the entire building.

If you wish to use an alternate method that would still meet the requirements, contact the DNR-Water Supply Operations Section to discuss the method, prior to conducting the notice. (See your current Operation Permit for the contact information.)

(analogo a conv. of notice)

Date completed.	(enclose a copy of notice)
Delivery Certification	
, , , ,	law that I am familiar with the information submitted in this rue, accurate, and complete.
Name (print or type)	Title
Signature	Date

You must send a signed copy of this certification form to the DNR no later than 3 months following the end of the monitoring period. You must include with this certification a representative copy of the consumer notice distributed. Send your consumer notice and certification form to the following address:

Water Supply Operations Section Iowa Department of Natural Resources 502 E 9th St Des Moines, IA 50319-0034

NTNC: Lead and Copper Consumer Notice and Certification Form PWS Name: PWSID#: Date: **LEAD & COPPER CONSUMER NOTICE ANALYTICAL RESULTS FOR LEAD & COPPER TAP WATER MONITORING** Our public water supply system is required to periodically collect tap water samples to determine the lead and copper levels in our system. This notice is provided to you with the analytical results of the tap water samples collected at our system. Sample collection date: _____ _____ Lead*: _____ Copper*: _____ Sample location: _____ Lead*: _____ Copper*: ____ Sample location: _____ Lead*: _____ Copper*: _____ Sample location: _____ Lead*: _____ Copper*: _____ Sample location: Lead*: Copper*: Sample location: *The results are reported in milligrams per liter (mg/L), or parts per million. **Definitions** Action Level (AL): The action level is a concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a public water supply system must follow. The lead action level is 0.015 mg/L. The copper action level is 1.3 mg/L. Maximum Contaminant Level Goal (MCLG): The maximum contaminant level goal is the level of a contaminant in drinking water below which there is no known or expected risk to health. The MCLG allows for a margin of safety. The lead MCLG is zero. The copper MCLG is 1.3 mg/L. What are the health effects of lead and how can I reduce my exposure? If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and building plumbing. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using the water and using only cold water for drinking or cooking. If you are concerned about lead in your water, steps you can take to minimize exposure are available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/lead. What are the health effects of copper and how can I reduce my exposure? Copper is an essential nutrient, but some people who drink water containing copper in excess of the action level over a relatively short period of time could experience gastrointestinal distress. Some people who drink water containing copper in excess of the action level over many years could suffer liver or kidney damage. People with Wilson's Disease should consult their personal doctor. Flushing your tap before using the water as previously described will also reduce copper levels. Who can I contact at my water system for more information? Phone number at our public water supply system:

E-mail address at our public water supply system:

Consumer Notice Instructions: NTNC PWS

You must complete the lead consumer notice, post or distribute the notice to your employees and customers with the specific lead results for each building in the system from which samples were collected, and submit a certification of your activities and a copy of the notice to Iowa Department of Natural Resources (DNR) at the address listed below.

Consumer Notice Content

The Consumer Notice must include the mandatory language in the example provided with these instructions. The notice must include the lead analytical results. It must be multilingual, where appropriate.

Distribution of the Consumer Notice

You are required to provide the consumer notice to consumers who could drink the water in buildings that are part of your system's lead & copper monitoring program. Within 30 days of receiving the analytical results from the laboratory, you must provide the required notice to the people served at each building that was a part of the sample plan. This can be accomplished through posting, direct mail, or by hand delivery. If you wish to use an alternate method that would still meet the requirements, contact the DNR-Water Supply Operations Section to discuss the method, prior to conducting the notice. (See your current Operation Permit for the contact information.)

Date completed:	(enclose a copy of notice)	
Delivery Certific	ation	
	der penalty of law that I am familiar with the information submitted in this and that it is true, accurate, and complete.	
Name (print or ty	e) Title	
Signature	Date	

Within 3 months of completion of the consumer notification, you must send a signed copy of this certification form to the DNR. You must include with this certification a representative copy of the consumer notice distributed. Send your consumer notice and certification form to the following address:

Water Supply Operations Section Iowa Department of Natural Resources 502 E 9th St Des Moines, IA 50319-0034

Section 5: Lead & Copper Rule Overview

Lead & Copper Rule Overview

- Conduct a system-wide Materials Inventory of the plumbing. If the system has lead service lines, keep track of where those lines are located. If the line has been removed, update the Materials Inventory. If more lead service lines are discovered, update the Materials Inventory.
- Communicate with homeowner and confirm they are willing and able to conduct sampling properly. Verify that no plumbing changes have been made at the site since the last sampling period.
- Update the sampling plan and submit any change of sample site forms to DNR.
- Deliver sample bottles and ensure homeowner is still familiar with proper procedures, leave a copy of sampling instructions and request that they fill out the form properly.
- Retrieve sample bottles from homeowners and ensure they signed and dated the instruction form. The person actually collecting the sample should sign the form.
- Submit samples to certified lab along with the chain of custody.
- If any individual lead sample result exceeds 0.015 mg/L, provide the consumer notice to the homeowner within 48 hours of receiving lab results or notification by DNR.
- Provide the consumer notice to each site no later than 30 days of receiving the lab results.
- Submit one copy of the consumer notice and the completed certification form to the DNR no later than 3 months following the end of the monitoring period.