

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



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Drinking Water Section

DWS Circular Letter #2018-12

TO: Non-Transient, Non Community School & Child Care Public Water Systems
FROM: Lori Mathieu, Public Health Section Chief, Drinking Water Section *L. Mathieu*
DATE: May 29, 2018
RE: School & Child Care Public Water Systems Lead & Copper Compliance

Schools and child care facilities that have their own water supply and are classified as Non-transient Non-community public water systems (NTNCs) are subject to the Lead and Copper Rule (LCR) requirements at this time. The Department of Public Health (DPH) is here to work with you to assure that the locations selected and the sampling procedures performed are correct. The DPH is strongly suggesting that school and child care NTNCs review their sampling site plan and revise their sampling procedures to maintain compliance with the LCR requirements.

Revise Sampling Site Plan

The Sampling Site Plan inventory form should be updated with the proper lead and copper sampling sites, if it has not been updated after the DPH had added the LCR Tier Type column to the form in 2016, or after plumbing modifications have been made to the water system. The Sampling Site Plan inventory form should be submitted to the DPH at DWDCCompliance@ct.gov for review and acceptance. The materials inventory of the system should be re-evaluated to locate as many Tier 1 sites as possible. For NTNCs with insufficient Tier 1 sites, Tier 2 sites can be selected. For NTNCs with insufficient Tier 1 and Tier 2 sites, Non-Tier sites can be selected. The form and instructions for LCR sample site selection are located in the Drinking Water Section (DWS) website with the link below:

http://www.portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/excel/SSP_Sampling_Point_Inventory.xlsx

Sample sites should be from locations that have separate interior cold water taps used for drinking water (i.e. kitchen, cafeteria, water fountains, and classrooms) that do not have a point of use filter in place. An effective sampling site plan should contain at least the same number of



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sample sites for standard monitoring based on the population of the system as listed in the table below.

System Size (# of People Served)	# of Sites (Standard Monitoring)	# of Sites (Reduced Monitoring)
Greater than 100,000	100	50
10,001 – 100,000	60	30
3,301 – 10,000	40	20
501 – 3,300	20	10
101 – 500	10	5
≤ to 100	5	5

For more information on sampling site selection and the LCR, please refer to the following links:

- DPH Lead and Copper Rule Website:
<http://www.portal.ct.gov/DPH/Drinking-Water/DWS/Lead-and-Copper-Rule>
- LCR Quick Reference Guide:
<https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=60001N8P.txt>

Review Sample Procedures

Proper sampling procedures should be followed to ensure that lead and/or copper is accurately measured within the system's drinking water. It is important to review these procedures with the person(s) responsible for collecting the samples. Proper sampling procedures include:

- Sample collection should be from interior cold water taps, prioritizing sampling from kitchen/cafeteria and other drinking water taps meeting the sample site selection requirements,
- Do not use taps with an automatic mix of cold and hot water,
- Do not collect the sample immediately after the weekends, holidays, or school vacations,
- Sample must be 1 liter in volume,
- Use wide-mouth sample bottle,
- No pre-flushing prior to sample collection,
- No removal of aerator prior to or during sample collection,
- Samples must be first draw and collected after the water has been sitting in the pipes motionless for at least 6 hours (recommended maximum stagnation time of no more than 24 hours), multiple days of sampling may be needed to have representative first draw samples for all locations,

For more information on sample collection, please refer to EPA's 3Ts for Reducing Lead in Drinking Water: Testing with the link below:

<https://www.epa.gov/dwreginfo/3ts-reducing-lead-drinking-water-testing>

Also, note the EPA Clarification of Recommended Tap Sampling Procedures for Purposes of the Lead and Copper Rule with link below:

https://www.epa.gov/sites/production/files/2016-02/documents/epa_lcr_sampling_memorandum_dated_february_29_2016_508.pdf

If you have any additional questions regarding the LCR, please contact Carissa Madonna at (860) 509-7333.

cc: Debra Johnson
Local Health Directors
Certified Operators