

COVID-19 –Information for Public Water Systems Lead and Copper Rule Water Quality Monitoring and Precautions Guidance

This document gives guidance to public water systems (PWS) on water quality monitoring requirements of the Lead and Copper Rule (LCR) and precautions during the COVID-19 pandemic to protect PWS staff and their customers from the spread of the COVID-19 disease virus.

Lead and Copper

- PWSs are required to continue to collect lead and copper samples as required.
- Samples are required to be collected from approved sites, which meet the Tier Level criteria established in the Lead and Copper Rule (LCR).
- LCR sampling is a customer-based sampling program. There does not need to be in-person contact between the person collecting LCR samples and those dropping off sample bottles/picking up samples. The DPH Drinking Water Section (DWS) recommends that PWS staff wear appropriate facemasks and disposable gloves while maintaining social-distancing guidelines of at least six feet distance from customers when dropping off and picking up sample bottles.
- PWSs that sample for lead and copper on a frequency of every six months are required to collect these samples between January and June and between July and December. Systems have until June 30 to complete the current six-month monitoring period sampling; however, sample collection should not be delayed to the very end of the monitoring period in order to allow additional time to identify new sampling locations, if need be.
- PWSs that are on annual or triennial monitoring are required to collect samples for lead and copper from June 1 through September 30. Sample collection should not be delayed to the end of the monitoring period in order to allow additional time to identify new sampling locations, if need be.
- PWSs should only sample at occupied locations that have seen recent, normal use.
- If a sample site is unavailable, PWSs may collect a sample at another site in their sampling pool (that meets the Tier Level criteria in the LCR).
- DWS recommends that PWSs contact customers that are in their primary and alternate lead and copper sampling plans to see if the customers are willing to continue to participate. PWSs should tell them that the PWSs are taking safety measures to prevent the spread of COVID-19, such as:
 - Making sure staff wash their hands often
 - Cleaning the sample bottles before dropping them off
 - Leaving sample bottles outside customers' residences on a specific day so that the customers can collect samples the next morning.
 - Picking up samples outside the customers' residences the same morning after they sampled.
 - Providing customers with a phone number where they can reach the PWS's staff should they have questions. Then, asking if the customers would be willing to provide the same to the PWS to reduce the need for any face-to-face contact.

- PWSs may need to find more sample locations, if participation is low. Make sure to find homes that meet the sampling location Tier Level criteria in the LCR. If the PWS is not sure of the sample location Tier Level selection criteria, please contact the DWS.
- If a PWS needs to add more sampling locations, the PWS is required to complete a revised lead and copper sampling site plan and submitted it to the DWS prior to sample collection, to ensure they meet the sampling location Tier Level criteria. The following is the sampling site plan link:
https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/excel/SSP_Sampling_Point_Inventory.xlsx
- The following are some things that PWSs can do to help customers participate safely in the sampling program and to reassure them that precautions are being taken to prevent exposure to the COVID-19 disease virus through contact with PWS staff or with sampling bottles.

Clean the outside of the sample bottles and plastic ziplock bags:

Clean the outside of the sample bottles and plastic ziplock bags before drop-off and after pick-up. This will not diminish the integrity of the sample. DPH recommends that PWS staff wear appropriate facemasks and disposable gloves when in contact with sample bottles during the drop off and pick up process.

For sample bottle drop-off:

DPH recommends that PWS staff wear appropriate facemasks and disposable gloves when in contact with sample bottles during the sample bottle preparation process to prevent contaminating cleaned bottles.

- Before leaving bottles with the customer: Wipe down the outside of the sample bottles using soapy water or 3% hydrogen peroxide (found in drug stores & supermarkets) using a cotton ball or paper towel; or use an alcohol wipe. Bleach is not necessary or recommended. The mechanical action of wiping is more important than the product used, because this is what will remove any microbes on the surface. Allow bottles to air-dry (should dry in seconds to a minute or two), or dry bottles with a clean paper towel or similar.
 - Label the bottles after they have been cleaned.
- Change gloves frequently to prevent carryover of any contamination from bottle to bottle.
- Place the clean, dry sample bottle in an individual clean plastic ziplock bag with a note saying that the sample bottle has been cleaned.
- Leave the plastic bag containing the sample bottle outside the customer's residence, along with the sample collection instructions, applicable data collection form and standing time attestation, and a phone number for the customer to call if they have questions and to call after they have collected the sample(s).

For sample bottle pick-up:

Always wear appropriate facemasks and disposable gloves while coming in contact with sample bottles throughout the pickup process.

- Retrieve the sample bottle from outside the customer's residence, along with any paperwork needed to process the sample. DPH recommends that PWS staff wear gloves.
- PWS can clean the sample bottles after each sample location pick-up or clean all the sample bottles in the office by putting all collected and properly labelled sample bottles in a large plastic bag stored in a cooler.
- Wipe down the outside of the sample bottle and ziplock bag using soapy water or 3% hydrogen peroxide (found in drug stores & supermarkets) with a cotton ball or paper towel; or use an alcohol wipe. Bleach is not necessary or recommended. The mechanical action of wiping is more important than the product used, because this is what will remove any microbes on the surface. Allow bottle to air-dry (should dry in seconds to a minute or two), or dry bottles with a clean paper towel or similar.
 - Take care to not effect the sample bottle label or the information entered onto it.
- Place the clean, dry sample bottle in an individual clean plastic bag with a note saying that the outer surface has been cleaned.
- If in the field and not wearing gloves, use a hand sanitizer containing at least 60% alcohol, rubbing hands well with the product. Follow this with hand washing with soap and running water as soon as possible after handling samples.
- Send the sample bottles and accompanying paperwork to the lab. The lab can now process the samples as they normally would. The lab does not need to take any further special precautions outside of their regular protocols.

Please be aware that the DWS is not waiving any drinking water regulatory requirements to ensure that public health is protected. PWSs are required to comply with all monitoring and reporting requirements and any violations will continue to be issued. If your PWS has closed temporarily, please contact the DWS with the closing date and when you plan to resume operations. It will be taken into consideration if a PWS is closed and not open to the public throughout the end of the monitoring period. Please see the Non-Community Water System section below for more information on closed PWS.

Water Quality Parameters

- PWSs must continue to collect water quality parameters (WQP) samples as required.
- DWS is allowing flexibility on WQP compliance if complying with the social distancing requirements during sampling is difficult . WQP samples do not need to be collected from homes. PWS can utilize alternative sampling locations, such as sampling at locations close to the usual sample locations that are accessible, at pump stations, tanks, or alternative sample locations for bacteria or disinfection by-products sampling.

Non-Community Water Systems

- As noted above in the Non-Community Water System Section of the Water Quality Monitoring Information, any Non-Community PWS that is closed and not serving water to the public should notify the DWS of the date on which the PWS closed and also when it reopens (once applicable). Notifications of PWS closure should be emailed to DWDcompliance@ct.gov.
- Stagnant water can increase lead and copper concentrations in the water causing a false action level exceedance due to improper sampling. Additionally, stagnant water can reduce the effectiveness of

any existing corrosion control treatment in place. It is recommended that lead and copper samples not be collected from Non-Community PWSs that are fully closed for the entire monitoring period. If such samples are not collected, the Non-Community PWS will accrue a monitoring and reporting violation and require distribution of public notification. Therefore, the Non-Community PWS should document that the failure to monitor and report is due to COVID-19 required closure.

- Non-Community PWSs that are on annual and triennial monitoring have until September 30 to sample. If the Non-Community PWS remains closed through September 30 and can't collect proper lead and copper samples, the PWS will be reverted to standard monitoring (every six months) for lead and copper.
- When Non-Community PWSs are re-opening after a closure related to COVID-19, a return to service protocol including thorough flushing and cleaning out of end point devices such as faucets and aerators should be conducted. It is recommended that collection of lead and copper samples from the facility only occur after two weeks of normal water system operations.

The following are links to DWS guidance regarding cleaning aerators and returning to service:

- Be Lead Free – Clean Your Aerator procedures: https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/pdf/Be-Lead-Safe-Clean-your-aerators.pdf
- Return to Service Protocol: https://portal.ct.gov/-/media/Departments-and-Agencies/DPH/dph/drinking_water/pdf/COVID-19-Return-to-Service-Guidance.pdf