

# Lead and Copper Monitoring: Sample Site Selection Guide

For non-transient non-community (NTNC) water systems

Non-transient non-community water systems (NTNC) must routinely monitor for lead and copper on a sixmonth, annual, or triennial basis. Your monitoring frequency and population determine the number of required samples. You are required to follow the Environmental Protection Agency's (EPA) tier designations to identify appropriate sample sites. It is up to your system to determine the locations for sample collection.

## 1. Selecting the sampling sites - choose the lowest tier sites first

Use the diagram below to choose a sampling pool that only contains sites where the risk of lead exposure is the highest. All available Tier 1 sites must be sampled. Tier 2 sites can only be used when all available Tier 1 sites have been sampled. If all available Tier 1 and Tier 2 sites have been exhausted, then Tier 3 sites may be used to fulfill sampling requirements.



## 2. Choosing the taps

- Locate taps in building(s) where the risk of lead exposure is the highest.
- Collect samples from taps where water consumption is most likely to occur. For example, a kitchen faucet should be selected as a sample site over an art room sink.
- Avoid empty or vacant buildings where the water has not been used for long periods of time. These sites will likely have higher levels of lead and/or copper than would be consumed under normal conditions.
- If you don't have enough taps to sample from, you can apply for a tap waiver from the Drinking Water Program.
- Fixtures and faucets installed after 2014 are required to have less than 0.2% lead. However, the plumbing leading to these fixtures may still contain lead. If the plumbing contains lead, then it may be an appropriate sampling site. If the plumbing does not contain lead, then it is not a high-risk site and will take lower priority.

### 3. Documentation

Designated operators should keep detailed and accurate records. All records must be kept for no less than 12 years.

When collecting lead and copper samples, include the following information on the 141-A form:

- Sample ID
- Date and time of last water use
- Date and time of collection
- Location of the sampling site. Remember, be consistent with how you identify sampling sites.

Although sampling locations are chosen based on their tier designation, NTNC systems do not need to report the tier designation on their 141-A form.

### 3. Changing a sampling site

Over time, certain taps may become unavailable for sampling or their tier designation may change. It is acceptable to switch sites if your system is replacing it with the highest priority site available. All changes and the reason(s) for the changes must be recorded on your 141-A form and submitted to your lab along with your water samples.

Acceptable reasons for changing sampling sites include:

- The plumbing has been removed or replaced.
- The fixture has been removed or replaced.

For more information about sampling for lead and copper, visit the Drinking Water Program website, www.medwp.com/pws/sampling.shtml, or contact your public water system inspector.

