

Frequent Asked Questions (FAQ) with Responses for Lead/Copper Site Plan Template

MAY 14, 2024

1. Where do we find the site plan template and more information regarding the site plan template for lead/copper?

Response: The site plan template can be found on the MDH webpage [Lead and Copper Site Plan Updates](https://www.health.state.mn.us/communities/environment/water/lcsiteplan.html) (<https://www.health.state.mn.us/communities/environment/water/lcsiteplan.html>). This webpage includes:

- The excel workbook which includes the template.
- A factsheet guideline on how to use the excel workbook.
- The record of participation form to note the resident/owner doesn't want to participate in the sample collection.
- Information on how to submit the completed excel workbook.
- Video webinar on how to use the excel workbook.

2. Can we use sites that were used in previous sampling periods to complete the site plan template?

Response: Yes, you may be able to use some of your previous sample sites for sampling. You would still need to confirm all the information about the site in the spreadsheet to determine the tier number. Your system must attempt to get samples collected from the highest priority sites available in the distribution for compliance sampling. You are only allowed to go to a higher tier number when there are not enough lower tier sites to get all the required samples collected (Figure 1). For example, you can only look to Tier 2 sample sites when you have used all the available Tier 1 sample sites. It is important to note there even is a priority within each some of tiers, see image below that may assist in identifying appropriate site priority. Your historical sites may not be the highest priority sites available to your system for sample collection. Follow the flow chart on SHEET-2 of the excel workbook to identify the highest priority sites that should be used for sampling, then locate those sites in your system for the site approval spreadsheet. Obtain MDH approval and then proceed to sampling.

FREQUENT QUESTIONS AND ANSWERS (FAQ) FOR LEAD/COPPER SITE PLAN TEMPLATE

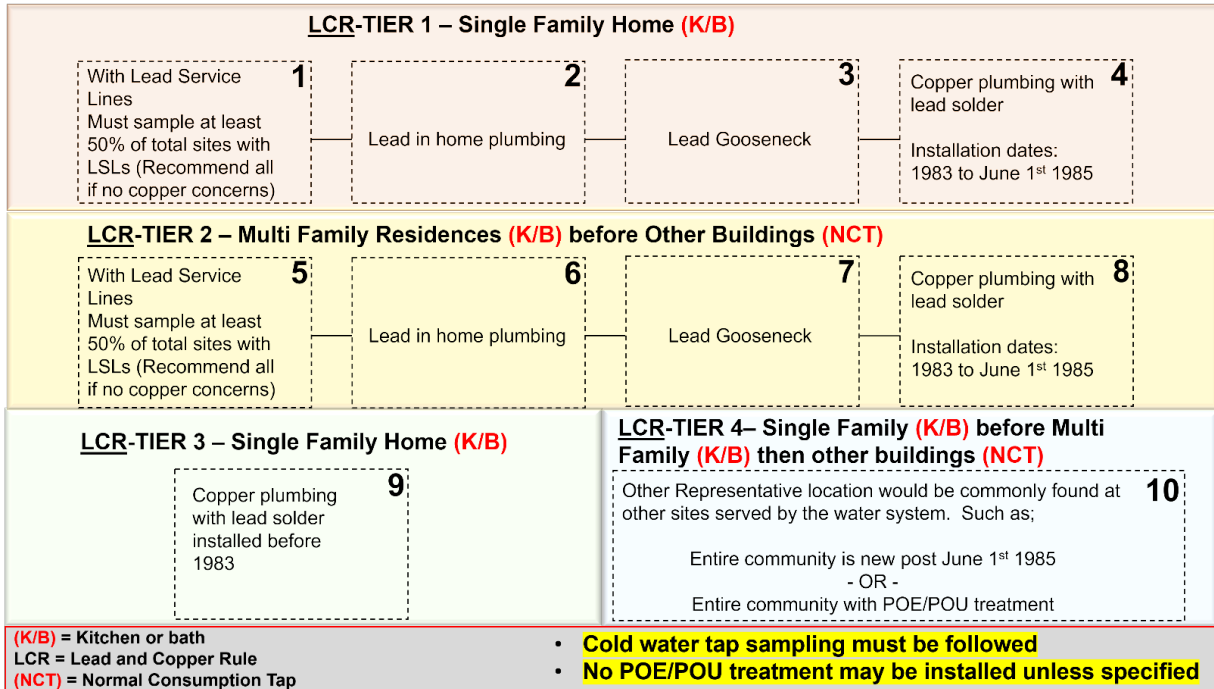


Figure 1 | Tier priority flowsheet. The diagram illustrates the hierarchy of site selection, organized into four priority tiers, with "Tier 1" being the highest and "Tier 4" the lowest. Within each tier, sites are further prioritized numerically as 1, 2, 3, and so forth. Selection should commence from the highest priority site in Tier 1 and proceed sequentially to the lower priority sites in subsequent tiers.

3. The instructions state that sites with POU/POE devices (such as softeners) are not allowed. What if majority of our sites have those devices installed?

Response: You can collect from sites with POU/POE, but if there is a single home in the distribution without a softener or treatment device that is a site your system must attempt to use for sample collection. If all the sites you’ve used previously have softeners, we recommend investigating other sites in the distribution to see if there are any homes that would be without treatment and a higher priority for sample collection. Ultimately, your system needs to document that there aren’t any untreated homes available or willing to participate in sample collection for samples from treated homes to be valid.

4. If we know that all sites have lead service lines (LSL), do we still need to complete inspections or have conversations with the resident home to confirm the site information?

Response: Yes, it must be confirmed if the site has a POU/POE installed to determine the Tier. At this time the internal plumbing can be determined as well. When LSLs are present, the internal plumbing could be listed as “Other” as it wouldn’t affect the tier. However, if or when the LSL is replaced the internal plumbing will be needed to confirm the tier number. Thus, this should be obtained and confirmed at the same time as the POU/POE is confirmed. You will need to fill in the site material information in the excel workbook.

5. How do we identify the presence of lead goosenecks? Do we abandon lower priority sites in favor of sites with lead goosenecks? What about galvanized service lines?

Response: This information can be assessed to the best of the operator or engineer’s knowledge on previous building installation records, or general physical inspections. Yes, if you have sites that have confirmed known lead goosenecks present, those sites take priority within Tier 1 after lead service lines (LSLs) and after lead interior plumbing because the lead from a gooseneck has less risk than LSL and lead internal plumbing pipes. Under the current rule, you would want to prioritize homes with lead goosenecks over the homes built in 1983-1985 with copper pipe/lead solder but after LSL or lead internal plumbing pipe. You don't need to incorporate galvanized service lines under the current rule, but those would become a priority in the future under LCRI unless those locations are proved to never be downstream of lead (lead gooseneck, pigtail, or connector).

6. Is this site plan template the same thing as the service line inventory template?

Response: No, these two templates are different and not the same. This template is used for the lead/copper sampling related to your lead and copper scheduled sampling. This template only needs to provide information as it relates to the highest priority sites your system must sample. The number of sites your water system must sample is shown on your lead/copper COC along with the Annual Monitoring schedule for your system.

Additional table describing this is below based on population:

System size (number of people served)	Number of sites (standard monitoring)	Number of sites (reduced monitoring)
>100,000	100	50
10,001 to 100,000	60	30
3,301 to 10,000	40	20
501 to 3,300	20	10
101 to 500	10	5
≤100	5	5

7. Can I update the site plan template in future if site information changes?

Response: Yes. If the system would like to change the selected sites on their chain of custody (COC) form, they can resubmit the excel workbook template with the new sites they want to add. The replaced site must be of the same tier priority or higher (if they are available) before selecting lower tier priority sites. Additionally, the record of participation form (present on the MDH webpage [Lead and Copper Site Plan Updates \(https://www.health.state.mn.us/communities/environment/water/lcsiteplan.html\)](https://www.health.state.mn.us/communities/environment/water/lcsiteplan.html)) needs to be filled for each site replaced unless there is a materials/construction change made at the site location that changes the tier for the prior approved sites. The filled our form or spreadsheets would need to be sent to MDH for a site change approval.

8. What if the owner/resident of the site does not want to participate or refuses to take part in lead/copper sampling, even though their tier is a higher priority (i.e., Tier 1)?

Response: In this case, a record of participation form (in the MDH webpage) would need to be completed to note that the site was inaccessible. The filled form would need to be sent to MDH and documented by the system to move to another site and request approval of another site if necessary.

9. How is the PWS supposed to know internal plumbing material? Same with POE POU?

Response: This is the responsibility of the water system to determine prior to sampling. This is required to ensure the site is an acceptable sample site for your water system. This may involve calling the homeowner before providing bottles, performing a site visit, or other. This can change over time also based on remodeling or new treatment installed, thus it should be re-confirmed at time of sampling or prior to sending bottles to lab. If this changes and a site is no longer valid, approval and a new site would be necessary to maintain compliance. Water systems must work with the sites identified for sampling to identify this required information prior to sampling. This could be conversations with the homeowner prior to selecting a site, a site visit prior to sampling such as looking under the kitchen or bath sink prior to sampling, or other.

10. Is lead solder considered lead internal plumbing?

Response: Lead Internal plumbing would be a full lead pipe. Please note these are rare but do exist in some older homes. Copper plumbing with lead solder is not considered lead internal plumbing. Note: When selecting the copper for internal plumbing drop down it is important to consider if it is Copper with Lead Solder (CUP-LS) or just copper plumbing (Copper) free of solder. Typically, if a water system does not know you can base this off your experiences in the water system as a whole or use the general conclusion that homes pre 1985 are likely to have Copper with Lead Solder (CUP-LS) in use.

11. Are any water systems exempt from this process?

Response: This applies to all community water systems, regardless of their size (population size). Systems must perform this prior to next set of lead and copper sampling and then ensure each and every future sampling pool and sites used are appropriate and approved.

12. Does every resident home need to be inspected/tested for?

Response: Systems only need to obtain enough sites to fulfill their required monitoring as identified on your system annual monitoring schedule (AMS) or on Sheet 1 in the upper right corner of the Site Plan Template Excel workbook. The water system inventory should be used to determine which sites to start with via the process flow on Sheet 2 of the Site Plan Template Excel workbook. This process is to ensure the highest priority sites are sampled for your system.