

To: All Public Water Systems

From: Division of Water Supply & Geoscience

Re: **Distribution Sampling Guidance During COVID-19 Pandemic-01**

Date: March 21, 2020

The New Jersey Department of Environmental Protection (DEP) understands that the unprecedented circumstances of the COVID-19 outbreak, including the need to restrict unnecessary travel and adopt social distancing practices as described in [Executive Order 107](#), has created limitations for many regulated entities, including water and wastewater systems. DEP has been and will continue working to ensure that we are responsive to these circumstances by providing the needed regulatory flexibility while protecting public health and safety, including our responsibility to ensure the provision of safe drinking water to New Jersey residents. DEP is currently evaluating drinking water requirements and establishing guidelines that will allow water systems to focus their attention on the highest priorities, while continuing to conduct the necessary monitoring that helps ensure public health and safety.

At this time, DEP is giving you preliminary guidance to ensure water systems' continued compliance with acute parameters, such as total coliform (as described below). The remainder of the distribution sampling, chronic parameters lead and copper, water quality and disinfectant by-products, are also discussed below. DEP will continue to provide you with guidance as the situation evolves. We recommend that you frequently check the DEP's Division of Water Supply and Geoscience's website available at <https://www.state.nj.us/dep/watersupply/index.html> for further updates. In an effort to continue to work together during this unprecedented time, the DEP strongly encourages you to contact us via email at [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov) with questions, concerns and difficulties you may encounter regarding your regulatory requirements.

### **Revised Total Coliform Rule (RTCR)**

#### *Alternate Sampling Locations*

In accordance with 40 CFR 141.853, public water systems must develop a written sample siting plan that identifies sampling sites and a sample collection schedule that are representative of water throughout the distribution system.

Please be advised, that RTCR allows water systems to revise sampling locations as needed, without prior State approval. This means that public water systems may take samples from alternate locations as needed due to access issues provided the samples are representative of the distribution system. A sampling location may be at:

- a customer's premise
- dedicated sampling station
- nearby business, or
- other designated compliance sampling location.

Additionally, as a last resort, water systems may also collect samples from hydrants, hose bibs, or outside spigots if no alternate locations are accessible.

Due to the COVID-19 outbreak, water systems that make adjustments to their sampling plan, must capture changes in a supplemental addendum to their RTCR sampling plan labeled COVID 19. **Do not submit these changes to DEP at this time**, however, these changes must be kept on file at the water system and available for NJDEP review.

#### *Number & Frequency of Samples*

Please note, that RTCR does not allow reductions in the number of samples collected per monitoring period. The rule also requires systems with a population greater than 4,900 to collect samples throughout the monitoring period. However, due to the COVID-19 crisis, guidance is forthcoming for systems that have exhausted the above options and are unable to collect the required number of samples.

#### **Disinfectant By-Products (DBP) Rule**

If a water system cannot gain access to a site located in the sampling plan, the system is permitted to select an alternate site in close proximity. This alternate site must represent similar water quality to the original site. These samples can be reported through E2 under existing sample IDs, but must include a comment stating that the sample location is located in close proximity or sampled at an outside tap. **No approval from DEP is needed to proceed with this method.**

#### **Lead and Copper Rule (LCR)**

##### 1) Lead and Copper Tap Sampling:

Water systems on standard monitoring have until June 30, 2020 to collect the required number of samples. At this time, DEP is recommending that water systems focus their limited resources on acute parameters other than LCR compliance. DEP is continuing to evaluate the changing conditions as a result of COVID-19 and will provide additional direction closer to the end of the current monitoring period.

##### 2) Sequential Sampling:

The DEP is granting a 60-day extension to all water systems that are currently required to collect sequential sampling. This is a blanket extension; **systems do not need to submit a request for an extension to DEP.** This timeframe will be reevaluated in 60 days and may be extended further if necessary.

##### 3) Water Quality Parameter (WQP) Monitoring:

Water systems are encouraged to continue sampling for WQPs where possible. If a water system cannot gain access to a site located in the sampling plan, the system is permitted to select an alternate site in close proximity. Any changes to the WQP sampling plan must be captured in a supplemental addendum labeled COVID 19. **Do not submit these changes to DEP at this time**, however, these changes must be kept on file at the water system and available for DEP review.

If you have any questions regarding the information outline above, you may contact the Division of Water Supply & Geoscience at [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov).