

## Sample Siting Plans



November 2015

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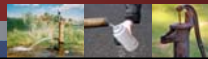
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## Sample Siting Plan Basics

- Systems must develop and adhere to a sample siting plan and a system-specific schedule by March 31, 2016
  - Sample siting plans are subject to state review & revision
  - 3 situations where plan must be submittal to State:
    - Alternative repeat locations
    - Seasonal systems on reduced monitoring\*
    - GWR dual purpose\*
- \*state approval of plan required

40 CFR 141.853(a)



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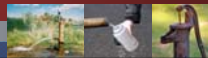
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## Sample Siting Plan Components

- Sampling locations
  - Must be representative of the water in the distribution system
  - Routine & repeat monitoring locations must be identified (may continue to use 5 up/downstream)
  - Must show all applicable GWR monitoring sites
- Sample collection schedule
  - Samples must be collected at regular time intervals throughout the month
  - Systems serving  $\leq 4,900$  may collect all samples (5) on a single day if taken from different sites

40 CFR 141.853(a)



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## Sampling Locations

- Sample siting plan must include locations for:
  - Routine samples
  - Repeat samples (SOP can be described)
  - GWR monitoring sites (sampling locations for dual-purpose samples must be noted & approved by state)
- Monitoring may take place at:
  - Customer's premises, OR
  - Dedicated sampling station, OR
  - Other designated compliance sampling location

40 CFR 141.853(a)(1) & (5)

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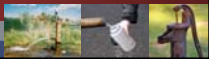
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## Special Purpose Samples

- Special purpose samples are operations-focused investigative samples that are not classified as routine or repeat compliance samples
  - Example: Samples used to determine if disinfection, flushing, storage tank cleaning, etc. is working properly
- The following **are not** special purpose samples & must be used to determine if a TT trigger exceedance or *E. coli* MCL violation occurred
  - Extra routine samples taken per the sample siting plan
  - Repeat samples

40 CFR 141.853(a)(4) & (b)

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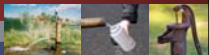
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## Special Considerations for State Drinking Water Agencies

- “Follow-up TC samples” not identified as repeat samples and the sample siting plan:
- Level 1 and Level 2 assessments
  - Corrective Actions
  - Sampling as part of public health protection when PWS believes that “no sanitary defect identified”

40 CFR 141.853(a)

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## Sampling Plan

TCR	RTCR
Systems must collect samples that are representative of water throughout the distribution system & the monitoring period according to a written sample siting plan	Systems must develop a written sample siting plan that identifies sampling sites & a sample collection schedule that are representative of water throughout the distribution system, no later than March 31, 2016 Sites may include a customer's premise, dedicated sampling station or other designated compliance sampling station Routine, repeat & GWR (if the system is subject to the rule) sampling sites must be reflected in the plan
Plans are subject to state review & revision	Plans are subject to state review & revision

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## Implementing Sample Siting Plan Provisions

- What process will the state use to review and revise sample siting plans?
  - Frequency
    - Change in PWS size/category
    - Sanitary survey intervals
    - Infrastructure changes
    - Treatment technology, disinfection changes
  - Other considerations
    - # routine/repeat monitoring sites, monitoring frequency
    - Representative of water throughout distribution system
    - GWR and dual purpose sites (if applicable)
    - Evaluation of most vulnerable period for seasonal systems (if applicable)

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