

Frequently Asked Questions (FAQ) for Lead/Copper Site Plan Template

12/02/24

Where do we find the Site Plan Template and more information regarding the Site Plan Template for lead/copper?

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

1. The Site Plan Template.
2. An instructional guideline factsheet on how to use the Site Plan Template.
3. The record of participation form to record the resident/owner doesn't want to participate in the sample collection.
4. Information on how to submit the completed Site Plan Template.
5. Video webinar on how to use the Site Plan Template.

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

Yes, you may be able to use some of your previous sample sites for sampling as long as these sites are your highest priority sites. You would still need to confirm all the information about the sites in the Site Plan Template 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 move to the next tier (lower priority) when there are not enough higher priority (lower number) 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 some of the 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 Site Plan Template to identify the highest priority sites that should be used for sampling, then locate those sites in your system for site approval. Obtain MDH approval and then proceed to sampling.

LCR Tier flow chart

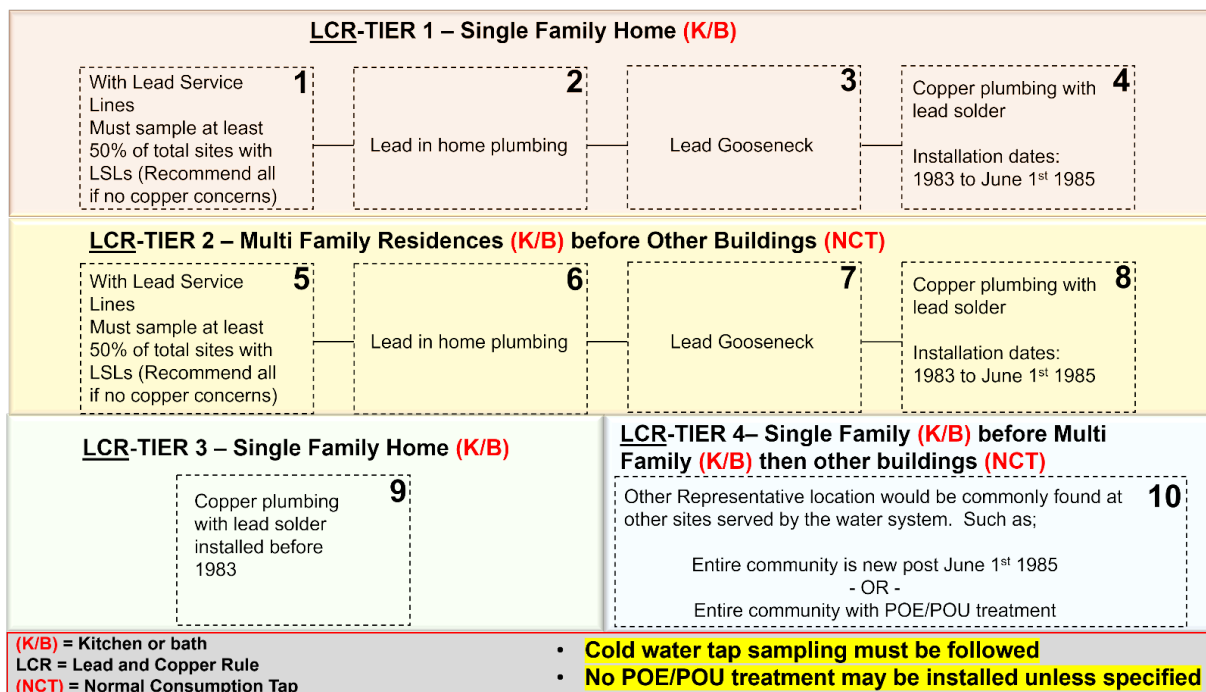


Figure 1 | Tier priority flowsheet. The diagram illustrates the hierarchy of site selection, organized into four priority tiers, with "Tier 1" being the highest and "Tier 4" the lowest. Within each tier, sites are further prioritized numerically as 1, 2, 3, and so forth. Selection should commence from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

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

Response: You may only collect from sites with POU/POE if all sites in your distribution are softened/filtered or if you have exhausted all non-softened/filtered sites. Additionally, if non-softened sites become available, you must attempt to sample these sites. 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.

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.

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. See Figure 1 above. 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 service line, lead gooseneck, pigtail or connector).

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

Response: No, these two templates are not the same. This template is used for the lead/copper sampling related to your lead and copper sampling schedule. This template only needs to provide information to determine a tier number for each site, and only needs to include sites for the number of samples you must collect. 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. Below is the table that demonstrates how many samples must be collected based on population:

System size and number of sites needed

| 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 |

Figure 2 | Chart showing the system sizes. Systems serving more than 100,000 people need 100 sites in standard monitoring, and 50 for reduced monitoring. Systems serving between 10,000-100,000 people need 60 sites for standard monitoring, and 30 for reduced monitoring. Systems serving between 3300-10,000 people need 40 sites for standard monitoring and 20 for reduced monitoring. Systems serving between 500-3300 people need 20 sites for standard and 10 for reduced monitoring. Systems serving between 100-500 people need 10 sites for standard and 5 for reduced monitoring. Systems serving fewer than 100 people need 5 sites for standard and 5 for reduced monitoring.

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

Yes. If the system would like to change the selected sites on their chain of custody (COC) form, they can contact MDH at Health.community.leadandcopper@state.mn.us for an Site Plan Update Template to add their new sites. 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 [Record of Participation Form](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-out Site Plan Update Template and relevant Record of Participation forms would need to be sent to MDH for a site change approval.

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)?

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 saved for the systems records for 12 years and sent to MDH to move to another site and request approval of another site if necessary. Under the LCRI, a site is not able to be sampled after one customer refusal or two outreach attempts that result in non-responses.

How is the community water system supposed to know internal plumbing material? Same with point-of-use/point-of-entry?

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. Determining internal plumbing may involve calling the homeowner before providing bottles, performing a site visit, or other methods. Internal plumbing or POU/POE 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, a new site must be approved to maintain compliance. Water systems must work with the sites identified for sampling to identify the required information prior to sampling.

Is lead solder considered lead internal plumbing?

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 or just copper plumbing 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 in use.

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

Systems only need to obtain enough sites to fulfill their required monitoring as identified on your system's annual monitoring schedule (AMS) or on Sheet 1 in the upper right corner of the Site Plan Template. The water system's Lead Service Line Materials Inventory may be used to determine which sites to start with via the process flow on SHEET-2 of the Site Plan Template. This process is to ensure the highest priority sites are sampled for your system.

Are any water systems exempt from this process?

No, 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 for each and every monitoring round water system must ensure previously approved sites remain their highest priority using SHEET-2 of the lead and copper site plan template and your most up-to-date lead service line inventory information.

Our first site plan template was completed prior to our lead service line inventory, and we did not know we had any LSLs during this time. Do we have to update our site plan template to include these sites?

Yes, when you discover that higher priority (lower tier) sites exist in your system. These sites must be added to your site plan template and sent to MDH for review and approval. Please email health.community.leadandcopper@state.mn.us

Do we have to submit a new site plan template before every monitoring period?

Likely, yes. Water systems are required to verify the information on their previous lead and copper site plan is still accurate and representative of the highest priority sites that exist in their system based on their most up-to-date lead service line inventory information. If you need to make changes to your Site Plan Template, please email health.community.leadandcopper@state.mn.us for a Site Plan Update Template.

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01/13/2025

To obtain this information in a different format, call: 651-201-4700.