

GUIDANCE: ON-REQUEST LEAD SAMPLING

When Sampling Must Be Offered

Starting November 1, 2027, under 40 CFR §141.85(c), a water system is required to offer lead tap water sampling upon customer request if the customer is served by any of the following:

- **Known lead service line**
- **Galvanized service line requiring replacement (GRR)**
- **Service line with unknown lead status**
- **Any service line in the system following an exceedance of the lead action level**

Sample Requirements at Service Line (SL) Sites: For sites serviced by a lead, GRR, or unknown service line, samples must capture water that has been in contact with both the service line and the premise plumbing. This means collect first-liter and fifth-liter samples.

Regulatory Sample Triggers

1. **Customer Request at Lead, GRR, or Unknown Service Line Site:** Must offer sampling in accordance with §141.85(c)(2) whenever a customer requests it at a lead, GRR, or unknown service line location (starting November 1, 2027).
2. **Exceedance of Lead Action Level:** If the system exceeds the lead action level, it must offer lead sampling to any customer who requests it, under §141.85(c)(1).
3. **Service Line Disturbance:** Special notification and sampling requirements apply following any disturbance of a lead service line, as outlined in §141.85(f)
4. **Supplemental monitoring, following up, or site assessments:** Samples collected in response to consumer requests may be used for compliance if they meet established sampling protocols. Note: contact Division of Water first, for instructions on assigning sample site codes to those locations.

Payment for Consumer Requested Lead Sampling

Common Utility Practice Models:

- Utility Covers All Cost:** The utility covers all costs associated with sample collection and laboratory analysis. This is the most customer-friendly approach and may enhance public trust and participation.
- Customer Collects, Pays All Costs:** The utility provides a sample kit, but the customer arranges and pays for laboratory analysis independently.
- Third-Party Partnership:** The utility partners with a third-party organization to coordinate sampling and analysis. Payment responsibilities may vary based on the partnership agreement.

Consumer-Requested Lead Sampling Policy

- Eligibility and Availability:** The utility will offer consumer-requested lead sampling in accordance with the requirements of [40 CFR §141.85\(c\)](#), which includes situations where a consumer requests lead testing in drinking water.
- Sample Protocol:** Samples collected at sites with lead, GRR, or unknown service line materials must capture potential lead contributions from both the premise plumbing and service line.
- Cost Responsibility:** The utility will adopt one of the following cost sharing approaches for sample collection and analysis (select one):
 - Utility funded: The utility will cover the full cost of sample collection and analysis.
 - Shared cost: The utility will provide a sampling kit at no charge to the customer. The customer is responsible for collecting the sample and arranging laboratory analysis.
 - Third-party partnership: The utility partners with a third-party organization. Payment responsibilities may vary based on the partnership agreement
- Results Notification:** The utility will provide test results directly to the occupant/property owner within 3 business days of receiving the results. There are specific content and delivery requirements, which are listed in [40 CFR §141.85\(d\)](#).

Recommended Operating Procedure: Consumer-Requested Lead Sampling

1. Record Request Details

- Document the following information at time of request:
 - Date of request
 - Service address
 - Customer name and contact information
 - Service Line (SL) material status (lead, GRR, unknown)

2. Confirm Eligibility

- Verify that the site qualifies for sampling under one or more of the following
 - Lead, GRR, or unknown service line
 - Site is subject to sampling on request due to action level exceedance

3. Communicate Cost Policy

- Inform the customer of the applicable cost-sharing policy
 - Obtain and document customer acknowledgment (e.g., signed form, email confirmation)

4. Schedule and Coordinate Sampling

- Arrange for sample collection in accordance with approved protocol, ensuring:
 - Sample captures both premise plumbing and service line
 - Sampling is performed by trained staff or qualified contractors (if sample is not collected by customer)

5. Laboratory Analysis

- Ensure that all samples are submitted to a [lead-certified laboratory](#) for analysis in compliance with regulatory requirements.

6. Results Reporting and Follow-Up

- Provide test results and other information to both occupant and property owner, consistent with 40 CFR §141.85(d)
- Water system must provide the lab results as soon as practicable but no later than three business days after the water system learns of tap monitoring results.

Proposed Customer Communication: Tap Sampling Offer

If your property has a lead service line, galvanized requiring replacement (GRR), or an unknown service line material, you may be eligible for tap sampling.

We will provide you with the sample collection kit and instructions for collecting a tap water sample from your home. The utility will cover the cost of the analysis by a certified laboratory, and the results will be provided to you.

This offer is provided in accordance with the requirements under 40 CFR §141.85(c)

Next Steps

Adopt or Update Local Policy

- Ensure local policies reflect the current procedures for lead sampling, cost responsibilities and customer communication

Develop Customer Materials

- Create and publish a clear handout and/or webpage explaining eligibility, procedures, and expectations.

Establish Recordkeeping System

- Maintain a detailed log of all sampling requests, lab results, and customer notifications.

Train Staff

- Provide training on sampling procedures, cost policy, and regulatory notification requirements.