



COMMONWEALTH of VIRGINIA

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OFFICE OF DRINKING WATER

UPDATED: April 6, 2020, 1:00 pm.

To: Waterworks Owners in Virginia

From: Dwayne Roadcap, Director of Office of Drinking Water

Re: Compliance monitoring during the COVID-19 pandemic

This message is to remind you of the importance of continuing compliance monitoring and reporting as required under both the federal and Virginia's Waterworks Regulations. As you are aware, waterworks have a heightened responsibility to protect public health because unsafe drinking water can lead to serious illnesses and access to clean water for drinking and handwashing is critical during this crisis. Waterworks need to continue to manage and operate their facilities in a manner that is safe and that protects the public. This includes maintaining treatment and ensuring sample collection and analyses are conducted as required.

The Virginia Department of Health, Office of Drinking Water (ODW) has received questions regarding whether alternate monitoring locations would be allowed in sampling locations or whether any exceptions would be granted from required monitoring. At this time, there are no exceptions for required monitoring; however, there are some instances where water systems may identify alternate monitoring locations.

Alternate monitoring locations allowed:

- Coliform and distribution system disinfectant residuals:** Community waterworks must continue to collect the minimum number of samples required (as specified in their bacteriological sample siting plans), but alternate locations are allowed if a site is unavailable due to business closures/restricted access.
 - An alternative location may include an outside tap or other location that is lower risk for the sampler. Outside taps that are frost-free or have an atmospheric vacuum breaker may cause problems and waterworks staff should consider if these should not be used. Waterworks staff should take extra care and caution for tap cleaning and flushing prior to sampling for any alternative locations.
 - The alternate location should be either the designated upstream or downstream site if available and the site that was used should be noted on the sample report, i.e., 01U, 01D. Otherwise, if the alternate location is within 5 service connections of the unavailable routine location, the sample should be reported using the location ID# of the routine location.
 - If the alternate location is NOT within 5 service connections of the routine sampling site, the waterworks should contact their field office for instructions.

- Remember, if the waterworks practices disinfection, a disinfectant residual measurement is required for each routine and repeat sample.
 - Waterworks may sample at existing locations more than once per month as long as the sampling is distributed evenly across the month and there continues to be sufficient representation of sampling sites throughout the distribution system.
 - Three (3) repeat samples are required for all coliform-positive results. To the extent possible, repeat samples are to be taken in accordance with RTCR requirements.
2. **TTHM and HAA5:** Alternate sampling locations are allowed if routine sites are unavailable due to business closures/restricted access.
- If the alternate location is representative of the same water as the unavailable location, use the same location ID as the routine sample site identified in the monitoring plan.
 - If there are no alternate locations available that are representative of the same water, the waterworks should contact their field office for instructions.

Within 48 hours after having to collect coliform, disinfectant residual or DBP samples from an alternate location, the waterworks must notify its local ODW Field Office staff in writing (via email) to explain the circumstances that required use of an alternate location.

Continue to monitor as required:

EPA and VDH have not changed monitoring requirements for the following:

1. **Nitrate/Nitrite**
2. **Lead and Copper (LCR):** maintain social-distancing guidelines while dropping off and picking up LCR tap sample bottles.
3. **Inorganics, metals, volatile organic compounds, synthetic organic compounds, and radionuclides**
4. **Water production**
5. **Water treatment plant process control and performance monitoring (to ensure treatment efficacy):** Continue to monitor as required (i.e. the required number of samples from each specified location (plant tap and/or entry point) at the appropriate monitoring frequency).

Finally, ODW understands this evolving situation has the potential to affect water system operations and the availability of key staff.

If you begin to experience any circumstances that may adversely affect water quality or quantity, please contact the Office of Drinking Water (ODW, [ODW Contact Information](#)) as soon as possible.

ODW will continue to assess the situation on a regular basis and will update you if modifications to this guidance are necessary.