

TEMPORARY Total Coliform Sampling Contingency Plan During the Coronavirus Outbreak

EGLE recognizes that access to some sampling points may be restricted as a result of the COVID-19 mitigation strategies. However, it is important that bacteriological samples and chlorine residuals continue to be collected across the distribution system to ensure the safety of the water being supplied to the public. Please review the following guidance to remain in compliance.

Take Pro-active Steps

- Review your Bacteriological Sample Siting Plan (SSP).
- Contact sampling sites to determine if they are still accessible.
- Identify where special accommodations may be needed.
- Check back with sites as conditions change during this event.
- Identify temporary alternative sampling locations, if necessary.
- Ensure samplers exercise proper precautions (minimize contact with others, use proper handwashing techniques, disinfect surfaces, etc.).
- Check with your laboratory regarding availability and/or potential changes to drop-off/delivery practices. If you use the EGLE laboratory, visit Michigan.gov/EGLELab for updates.

Sampling Guidance

If a routine sampling location(s) is/are not accessible due to COVID-19 mitigation strategies, review the guidance below to remain in compliance.

- The minimum number of routine samples listed on your 2020 Monitoring Schedule are still required each month.
- Representative sampling is still necessary to ensure water quality throughout the distribution system.
- If routine sites are unavailable, first try using other sampling sites currently listed on your SSP. This could include established repeat sampling locations (upstream/downstream sites) and/or already-identified alternate sites.
- You may need to identify temporary alternate sites. Review guidance below.
- As a last option, you could sample fewer sites more often, but only if the remaining sites are representative of conditions throughout the distribution system. Finding additional sites is preferred.
- Contact EGLE if you need assistance evaluating your options.

Temporary Alternate Sites

- If you must use temporary alternate sites (sites not currently listed on your SSP), be sure to maintain representative sampling. See the [Guidance on Bacteriological Site Selection](#) document on our [webpage](#).
- If necessary, fire hydrants or outside spigots may be used. Take precautions to ensure that the sample tap is properly cleaned, disinfected, and flushed before the sample is collected. Positive results will require repeat sampling.
 - Hydrants: Sampling from hydrants will require the assistance of water supply personnel and may take more time to complete. See guidelines below and a link to information from EPA.
 - Outside Spigot: If used, take special care to thoroughly flush and clean the tap.

Alternate Site Approval and Reporting

- Prior approval to use alternate sites is not required during this emergency.
- When submitting results, explain the circumstances, identify if a result is from a temporary site, and provide the address of the temporary site. If the alternate site is a hydrant or sampling station, describe the location.
- Submit by the 10th of the month following the monitoring period in which the samples were collected.

Hydrants

Hydrants have been successfully used for bacteriological monitoring with EPA hydrant sampling assembly. Ideally, the location should be near the approved sample location. The hydrant sample should be made representative of the water quality in the water main. The following steps should be taken:

- Properly disinfect and flush the hydrant barrel prior to initial sampling.
- Use of a proper flushing and sampling apparatus with a sampling tap is preferred.
- Use EPA charts to calculate the amount of time needed to fully flush the hydrant lead and barrel.
- Collect samples after the proper amount of water has passed through the sampling assembly.
- Disinfecting the tap prior to sample collection is recommended, as with any bacteriological sample, and the sampling apparatus may need to be disinfected periodically.
- Leaving a flow control device on the hydrant that will allow continuous flow of 10 – 20 gpm is ideal for distribution monitoring points.

EPA has a guidance documents on how to sample from a hydrant and build your own flow sampling device to do it properly. There is also a video which goes over the procedure.

<https://www.epa.gov/dwstandardsregulations/hydrant-sampler-procedure-and-parts-lists>

Sampling Stations

Installation of sampling stations is another way to avoid many of the challenges presented by using customer properties for sampling. This may not be feasible for some communities at this time but may be an option worth exploring in the future. An example is shown below.

