

DATE: April 26, 2006, Revised March 3, 2012
TO: Office of Drinking Water Staff
FROM: J. Wesley Kleene, PhD, PE, Director 
Office of Drinking Water
SUBJECT: SAMPLE COLLECTION & ANALYSIS – Special Sampling Procedures

Delete: WM866 (Emergency Sampling Using DCLS)
Related: WM 824 (R&R Program User's Guide)

Project Leader: Christine Harrison 

Reviewed by: Susan Douglas 

Revision Highlights:

Tracking database for special samples has been relocated on 'odwsrv1\odwshare'.
Attachments have been deleted.
Reference Internet links and electronic file locations have been updated or deleted.
Technical Services Division no longer establishes a budget or tracks expenditures for special samples.
Procedures for utilizing DCLS for special sampling have been incorporated from WM866.

Summary Statement

This Memo establishes the policy and procedure for conducting Special Sampling. The Special Sampling Program allows ODW staff to react quickly to accidents, emergency, or other non-routine conditions. *It is not the intention of this memo to cover known, suspected or threatened intentional contamination events (i.e. acts of terrorism).*

1. BACKGROUND

There occasionally exists a need for the collection of water samples for chemical and bacteriological analysis outside the routine compliance samples taken by a waterworks. The need for these special samples often is generated by public health concerns that cannot be addressed through routine sampling schedule requirements. In most instances there is a need for quick, concise, and deliberate action in the collection and analysis of these special samples.

2. SAMPLE TYPES

Listed below are instances where special sampling may be appropriate:

- A. Investigative Tool – Special sampling may be employed to evaluate a possible contamination event, public complaint, special request, or other perceived or real threats to public health when routine monitoring (or the lack thereof) may not yield sufficient or timely information. This may also include the investigation and verification of suspicious or problematic analysis results, or the investigation of newly discovered waterworks.

- B. Requested Samples – Special sampling includes requests from the Central Office, EPA, or local Health Director. This may include assistance in epidemiological investigations and public health issues. Pre-rule implementation and post-rule investigations are also included in this category.
- C. Enforcement Action Support – Special sampling may be used for information gathering to support enforcement actions.

Samples that are explicitly prohibited under this guidance are:

- Compliance samples,
- Any samples that the owner of a waterworks can be required to collect at the waterworks expense,
- Source development samples, or
- Samples for non-public water supplies.

Note: The Special Sampling Program allows ODW staff to react quickly to accidents or emergency conditions such as natural disasters, roadway accidents or suspected water supply contamination events. Contaminations declared as HAZMAT, terrorist or FEMA events may have an outside source of funding available for reimbursement. This reimbursement is to be sought when applicable but need not be a requirement for a decision on whether or not sampling should take place.

3. IMPLEMENTATION

The Field Office will implement the Special Sampling Program in the following manner:

Step 1 - Laboratory Selection

Field Directors are responsible for establishing in advance laboratories which will be used for special sampling. The laboratory selected may include the DCLS as well as any certified laboratories on the DCLS approved listing for the appropriate analytical method. Private laboratories on the State Contract list (eVA) should be used and may be found at www.eva.virginia.gov. Use of private laboratories not on eVA may result in additional costs to the agency.

Each Field Director will contact selected private laboratories directly to establish procedures for:

- (a) Obtaining the needed sample container/forms;
- (b) Delivery of samples to the private laboratory;
- (c) Submission of analysis results directly to the Field Office and/or Central Office Lab Administrator;
- (d) Submission of private laboratory invoices directly to the Field Office.

Field Directors should use the following criteria when selecting private laboratories:

- Cost of the analysis
- Cost of shipping
- Availability of obtaining/storing sample containers
- Business hours and how this would relate to dropping off sample containers
- Weekend sampling availability
- Timeliness of getting sample results

Step 2 - Sample Kit Storage

Where feasible, Field Offices may stock sample kits that would be considered appropriate to have on hand in cases of time sensitive events. Inventory should be managed such that the shelf-life for sample kits is not exceeded. An acceptable alternative to storing kits at the Field Office would be to make special arrangements with the lab for as-needed kit pick up.

Field Office stockpile of DCLS labels and bottles used for repeat sampling may be used for microbiological sampling under the following conditions:

- DCLS performs the analysis
- Authorization code is obtained from DCLS through the ODW Central Office Lab Liaison

Step 3 – Authorization to Collect Special Samples

Field Office staff must obtain permission from the Field Director to collect the special samples. Field Directors are free to delegate this authority or establish standing orders to allow the staff to easily collect special samples during routine or non-routine field activities. Field Directors (or Deputy Director) should use the following criteria when considering whether to authorize special sampling:

- Potential for impacting public health
- Additional risks incurred by delaying sampling
- Need for VDH pro-activity in high profile incidents
- Cost of the analysis/shipping
- Existing expenditures and time until end of year

Step 4 – Field Office Special Sample Documentation

To utilize the Field Office stockpile of DCLS labels and bottles for emergency microbiological sampling:

1. Field Director (or Deputy Director) requests a DCLS authorization code through the ODW Central Office Lab Liaison
2. ODW Central Office Lab Liaison enters the code into the R&R Ad Hoc Order Definition table and notifies requestor of the code and its availability for selection in the R&R Ad Hoc module.
3. Staff use the R&R Ad Hoc Order module to generate sampling input forms.
4. When special sampling for the event is no longer required, the ODW Central Office Lab Liaison will disable the authorization code from the R&R Ad Hoc Order Definition table.

For all other special sampling:

Field Offices are to maintain a listing of all samples collected and expenses incurred under this special sampling program. This list should include the waterworks PWSID, waterworks name, date and time sample collected, collectors name, date analysis results received, the cost of the analysis, and justification. The Field Office will enter this information in the spreadsheet located on

odwsrv1\odwshare\05-Incidents\501-Status Reports\Field Office Special Sampling Log.xls

The information must be updated immediately following receipt of the laboratory's invoice.

All private laboratories shall submit invoices directly to the field offices. The field offices will complete the appropriate voucher for each laboratory invoice and submit the voucher with an attached copy of the laboratory invoice to the ODW Business Manager for payment.

END OF MEMO