


DATE: April 26, 2006, Revised March 3, 2012, May 9, 2014

TO: Office of Drinking Water Staff

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Office of Drinking Water

SUBJECT: SAMPLE COLLECTION & ANALYSIS – Special Sampling Procedures

Related: WM 824 (R&R Program User's Guide)

Project Leader: Maya Whitaker 

  
Reviewed by: Mark Perry

Revision Highlights:

Clarification on the procedures to follow to obtain sample kits when DCLS is selected as the laboratory for special sampling.

Summary Statement

This Memo establishes the policy and procedures 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 – 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 Directors) 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 2 - Laboratory Selection/Sample Kit Obtainment

A. If a **private lab** is selected for chemical or bacteriological analysis:

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](http://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 Liaison;

(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

B. If the **DCLS** is selected for chemical or bacteriological analysis:

NOTE: Where feasible, Field Offices may stock DCLS 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. Field Office stockpile of DCLS labels and bottles used for repeat sampling may be used for microbiological sampling if DCLS performs the analysis. To order extra sample kits to be stockpiled, please contact the ODW Central Office Lab Liaison.

If the stockpile has been depleted, or the kit needed is not on hand at the field office, the subsequent procedures should be followed:

1. The Field Director (or Deputy Director) should contact the ODW Central Office Lab Liaison with the following information:
  - The nature of the event warranting the need for special/emergency sampling
  - The name and PWSID of the waterworks
  - The type of sample kits needed and quantity
  - When the samples will be collected (approximate date)
  - Advise whether this is an emergency situation where expedited analysis is needed (NOTE: expedited sample analysis will cost more and requires approval from the DCLS Director)
  - Who the kits should be shipped to in the field office
2. The ODW Central Office Lab Liaison will contact DCLS to order the sample kits, relay all pertinent information, and also make DCLS aware if there is an emergency situation to obtain approval for expedited sample analysis.
3. The ODW Central Office Lab Liaison will send confirmation back to the requestor when the kits have been ordered.

**For catastrophic events (i.e., hurricanes, floods, tornados, etc.) that could potentially affect a large area, the subsequent procedures should be followed for special sampling:**

1. The Field Director (or Deputy Director) should contact the ODW Central Office Lab Liaison to obtain a DCLS authorization code.
2. The ODW Central Office Lab Liaison will enter the code into the R&R Ad Hoc Order Definition table and notify the requestor of the code and its availability for selection in the R&R Ad Hoc module.
3. Staff should use the R&R Ad Hoc Order module to generate sampling input forms that should be used with the field office's repeat bottle stock.
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.

**Step 3 – Field Office Special Sample Documentation**

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 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