



Massachusetts Department of Environmental Protection (MassDEP)

Drinking Water Program (DWP)

## How to Handle Customer-Requested Lead Water Samples

*Updated January 2025*

With the service line inventory consumer notices being distributed, public water systems (PWS) may see an increase in requests from customers for lead drinking water testing. If a PWS receives a customer request for a lead water sample, and if the PWS is taking these samples, there are several important steps to follow to ensure that the consumer requested sample collection does not trigger additional requirements under the Lead and Copper Rule (LCR)<sup>i</sup>. **The goal is to develop and implement a clear, written, properly managed Customer-requested Lead Sampling Standard Operations Procedure (SOP) to ensure compliance with the LCR.** Here are the recommended steps for an SOP:

1. **Determine if the sampling would occur during your PWS normal LCR sampling period.**
  - **If yes**, take steps to differentiate this customer sampling from LCR compliance sampling as described below and in your written Customer-requested Lead Sampling SOP.
  - **If no** – you can either take a normal sample (labeling special sample (SS)) or use the protocol below and as described in your customer-requested Lead Sampling SOP.
2. **Verify the Request**
  - **Confirm the request is from a customer:** Ensure that the lead sampling request is from a customer (resident or business).
  - **Clarify the purpose for the sample request:** Inform the customer that the sample is for informational purposes and will not be counted toward the PWS's compliance sampling requirements under the LCR.
3. **Inform the Customer of Requirements for the Sampling**
  - Determine (ask) why the customer want to sample and explain your customer-requested Lead Sampling SOP.
  - If the sample is requested due to exposure concerns, suggest they collect a sample when they would normally be making juice, filling water glasses or making formula.
  - If the sample is requested to understand more about their lead service line – (or unknown service line material) suggest taking a stagnant 5<sup>th</sup> liter or sample after the water changes temperature, or after a set time based on internal plumbing.
4. **Select an Appropriate Sampling Size\***
  - **Provide the customer with or use non-standard volumes (such as 250 mL or 500 mL) bottles for customer requested sampling.**

*\*Please note that if your PWS takes 1 Liter samples during the systems monitoring period and the sampling site meets the LCR tier criteria, the samples must and will be included as PWS LCR compliance samples.*

## 5. Proper Labeling

- Label the bottles clearly and fill out the **chain of custody** appropriately. **These samples must be reported as special samples (SS).**
- **If you follow the instructions above, do not include these samples as your LCR compliance samples. However, please remember that noncompliance samples must still be reported to MassDEP by your lab using the eDEP Bulk Upload.**

## 6. After Sampling Collection -Review Results with the Customer

- Provide results: After analysis, provide the customer with the lead test results as soon as they are available. If the test shows elevated levels of lead, advise the customer on potential actions, such as replacing lead-containing plumbing or fixtures, using filters, or flushing the faucet regularly to reduce lead exposure.
- Remember to educate the customer: If the lead concentration exceeds the action level (15 µg/L), educate the customer about the health risks of lead exposure and recommend steps for reducing exposure, including obtaining a certified water filter or contacting a plumber to remove lead-containing plumbing.

**By following the above steps above, developing and implementing a written SOP, PWS can effectively manage customer-requested lead samples, ensuring they are handled appropriately while ensuring PWS regulatory compliance samples under the Lead and Copper Rule.**

If you need MassDEP/DWP assistance with your Customer-Requested Lead Sampling SOP, please contact the Drinking Water Program at [program.director-dwp@mass.gov](mailto:program.director-dwp@mass.gov) , subject: LCR.

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<sup>i</sup> If a PWS is not offering or taking customer samples, the PWS must refer the customer to a Massachusetts Certified laboratory. For a list of Massachusetts Certified laboratories see <https://www.mass.gov/how-to/find-a-certified-laboratory-for-water-testing>. You can search for a laboratory in the list of laboratories offering drinking water analytical services for **private well owners and residential customers**, at the top of the webpage.

For more information on how lead gets into drinking water, visit the [MassDEP Is There Lead in my Tap Water](#) webpage.