

Lead and Copper Rule Sampling: From Planning through Documentation

July 9th, 2020 at 8:45 a.m.
3 TCHs*

Agenda

8:45 Call open and registration
9:00 Introduction/Overview
9:15 LCR Sampling Plan and
Materials Survey
10:30 Break
10:45 LCR sampling
requirements and forms
12:00 Q&A and Evaluation
12:15 Adjourn



Zoom Instructions

In order to get the TCHs participant must:

- Participate in any live polls or pop-quizzes during the webinar. To do so, answer the question(s) by clicking on the answer(s) once it pop-ups in the screen.
- Participation by using the chat/question area to ask or answer questions
- Participating in the post-webinar survey evaluation.

If you encounter any problems during this training, please contact our TAs through the chat.

Remarks

COVID-19: Building flushing

Key updates of the LCR revisions are:

- PWSs will be required to submit a complete inventory of LSLs.
- A new 10 ppb trigger for lead will require PWSs to plan for potentially exceeding the AL by taking the following proactive steps:
 - LSL outreach to affected homes
 - Prepare a corrosion control study
 - No longer eligible for reduced monitoring
- Systems over the lead trigger must submit to MassDEP a LSLR plan including a goal of replacing all publicly owned LSL for approval.
- Systems over the AL will be required to replace 3% of all LSLs via a full replacement and to provide pitcher filters and replacement cartridges for 3 months after replacement.
- A new 24-hour Public Notice requirement for all AL exceedances.



Lead and Copper Sampling Plan and Materials Survey Worksheet

Cathy Wanat

MassDEP Drinking Water Program, WERO

Acronyms

- **LCR** = Lead and Copper Rule
- **PWS** = Public Water Supply
- **COM** = Community Water System
- **NTNCs** = Non-Transient Non-Community Water System
- **MSWS** = Material Survey Worksheets
- **LCR-SP-A, B, C** = Lead and Copper Rule Sampling Plan Forms
- **LSL** = Lead Service Line
- **SFR** = Single Family Residence
- **MFR** = Multifamily Residence
- **LCCA** = Lead Contamination Control Act
- **EECF** = Early Education and Care Facility

Learning Objectives

- Understand the forms that are required when submitting a LCR sampling plan to MassDEP for review and approval
- Identify when a LCR Sampling Plan requires revision
- Understand the purpose and importance of a Materials Survey
- Identify when to conduct a Materials Survey
- Understand what Tier and Tier Classifications are and how they differ for COM and NTNC systems
- Understand the steps that are required prior, during and after submitting a LCR Sampling Plan to MassDEP for review and approval
- Be able to properly fill out a LCR Sampling Plan and Materials Survey Worksheet

Before You Begin!

- **All PWSs** must have an approved sampling plan on file **prior to** sampling
- Are you using the most current version of all forms?
 - [https://www.mass.gov/lists/lead-copper-forms-templates#lead-&-copper-rule-\(lcr\)-](https://www.mass.gov/lists/lead-copper-forms-templates#lead-&-copper-rule-(lcr)-)
- Have you completed the Materials Survey Worksheet?
- Have there been any changes in your water system since the last sampling round?
- Use MassDEP guidance
 - <https://www.mass.gov/doc/instructions-for-lead-and-copper-sampling-plan-forms-lcr-sp-a-lcr-sp-b-lcr-sp-c/download>
- Does your sampling pool target the highest risk sites?
- Have you made contact with all participants?



Sources of Lead



310 CMR 22.06B(7)(c)

<u>System Size (No. People Served)</u>	<u>Number of sites (Standard Monitoring)</u>	<u>Number of sites (Reduced Monitoring)</u>
>100,000	100	50
10,001-100,000	60	30
3,301 to 10,000	40	20
501 to 3,300	20	10
101 to 500	10	5
≤100	5	5

***MassDEP uses the greater population (winter or summer) reported on the Annual Statistical Report (ASR) to determine number of samples required.
Notify MassDEP if your population crosses a threshold for change in the number of sites required.***

What are Tiers and Tier Classifications?

Tiering is used to **prioritize** sampling locations based **on risk**

Every sampling location **must** have a Tier assigned

EPA has identified three Tiers: 1, 2 and 3

For sites that do not meet Tier criteria = 3H (COMs)

Tiers are further characterized by assigning classifications, i.e. Tier 1B, Tier 2D, etc. *(Only for COM water systems)*

Tiers differ for COMs and NTNCs

Tier Hierarchy = Tier 1 > Tier 2 > Tier 3

Tiers and Tier Classifications: COM

Classification information for COM Systems Within each tier, use higher classification locations before lower classification locations (ex. Tier 1A before Tier 1B).

<u>Tier 1 Class:</u>	<u>Tier 2 Class:</u>	<u>Tier 3 Class:</u>
<p>A: Single Family Residence (SFR) with Lead Service lines (LSL) (partial or full) or lead-lined</p> <p>A2: Multifamily Residence (MFR) w/ LSL if ≥ 20% connections served by PWS are MFRs</p> <p>A3: SFR with lead goosenecks/pigtails</p> <p>B: SFR with lead pipes or copper pipes with lead/tin solder–Built in 1983, 1984, or 1985</p> <p>B2: SFR with verified Lead/Tin Solder built in 1986 or later</p>	<p>C: MFR with LSL and/or lead goosenecks/pigtails</p> <p>D: MFR with lead pipes or copper pipes with lead/tin solder built 1983, 1984 or 1985</p> <p>E: Private building with LSL and/or with lead goosenecks/pigtails</p> <p>F: Private building with lead pipe or copper pipe with lead/tin solder installed in 1983, 1984, or 1985</p>	<p>G:SFRs built prior to 1983</p> <p>H: Other/exceptional cases Note: (Please explain on LCR-SP-A page 2 Other/exceptional Cases Comments)</p>

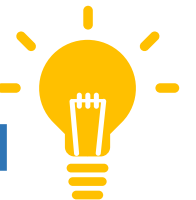
COM sample site selection hierarchy = Tier 1>Tier 2>Tier 3

Tiers: NTNC

Information for NTNC Systems		
<u>Tier 1:</u> Buildings that contain copper pipes with lead solder installed after 1982 or contain lead pipes; and/or are served by a lead service line (LSL)	<u>*Tier 2:</u> Buildings that contain copper pipes with lead solder installed before 1983	<u>Tier 3:</u> Other

- If additional sites are needed to complete the sampling pool, the NTNC system shall use Tier 3 representative sites throughout the distribution system.
- A representative site is a site in which the plumbing materials used at that site would be commonly found at other sites served by the water system
- **No Classifications!!**

Poll Question 1



Materials Survey Worksheet (MSWS)

- ☑ All public water suppliers must complete a MSWS of their system to identify their pool of sample sites
- ☑ MSWS must be completed before sampling for lead and copper- start early!
- ☑ Every PWS must fill out a MSWS, but only need to submit it with the Sampling Plan when the sampling plan has sites other than Tier 1 sites
- ☑ With the proposed LCR revisions, all Water Suppliers will be required to submit a MSWS
- ☑ MSWS should be constantly updated (every sampling round) to ensure that the highest tier sites are included in the sampling plan
- ☑ Keep track of MSWS changes over time; assign someone to this task
 - <https://www.mass.gov/doc/identifying-sites-for-lead-and-copper-sampling-and-preparing-a-sampling-plan-and-materials>

MassDEP-DRINKING WATER PROGRAM

LEAD AND COPPER MATERIAL SURVEY
INVESTIGATION WORK SHEET 1 of 3*Please type or print clearly using black ink*

PWS ID #: _____ PWS Name: _____ City/Town: _____ Date: _____

PWS Address: _____

Contact person name: _____ Telephone #: (____) _____ Population: _____ Samples required: _____

Type of structure	Location	Contact Person		Lead Service Line (LSL)	Type of Home Plumbing Material	Material Verified?	Did Owner Volunteer?	Selected		Received Training Material?
		Name	Phone # /email					Routine	Alternate	

Note: If you cannot identify and secure all Tier 1 sites in your minimum lead and copper sampling plan you must return the material survey worksheets 1-3 with your lead and copper sampling plan to the MassDEP for review and approval.

If you are required to submit this form to MassDEP please complete the certification block below:

My signature below indicates that I have provided MassDEP with a "materials survey". I certify under penalty of law that I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Signature of authorized public water system party: _____ **Date:** ____/____/____

Name of authorized party (PRINT): _____ **Title:** _____

Telephone #: _____ Mobile/cell #: _____ Fax #: _____ Email Address: _____ Page ____ of ____

MassDEP-DRINKING WATER PROGRAM

LEAD AND COPPER MATERIAL SURVEY
INVESTIGATION WORK SHEET 2 of 3*Please type or print clearly using black ink*

PWS ID #: _____ PWS Name: _____ City/Town: _____ Date: _____

PWS Address: _____

Contact person name: _____ Telephone #: (____) _____ Population: _____ Samples required: _____

Type of Structure	Type of Plumbing Material					Distribution System Lead Service Connections	
	Interior Plumbing						
	# of Residences/ Buildings with Lead Pipes	# of Residences/ Buildings with Copper Pipes and Lead Solder Built Before 1983	# of Residences/ Buildings with Copper Pipes and Lead Solder Built in 1983-1985	# of Residences/ Buildings with Copper Pipes and <u>Verified</u> Lead Solder Built After 1985.	# of Lead Service Lines Connections Total		
					Entire Line-100% Lead	Partial Lead Line	
SFRs ¹							
MFR ²							
BLDGs ³							
TOTAL							

1. SFR-Single family residence

2. MFR-Multi-family residence

3. BLDG-Public /Commercial Building

Note: If you cannot identify and secure all Tier 1 sites in your minimum lead and copper sampling plan you must return the material survey worksheets 1-3 with your lead and copper sampling plan to the MassDEP for review and approval.

If you are required to submit this form to MassDEP please complete the certification block below:

My signature below indicates that I have provided MassDEP with a "materials survey". I certify under penalty of law that I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Signature of authorized public water system party: _____ **Date:** ____/____/____**Name of authorized party (PRINT):** _____ **Title:** _____

Telephone #: _____ Mobile/cell #: _____ Fax #: _____ Email Address: _____ Page ____ of ____

MassDEP-DRINKING WATER PROGRAM**LEAD AND COPPER MATERIAL SURVEY
INVESTIGATION WORK SHEET 3 of 3***Please type or print clearly using black ink*

PWS ID #: _____ PWS Name: _____ City/Town: _____ Date: _____

PWS Address: _____

Contact person name: _____ Telephone #: (____) _____ Population: _____ Samples required: _____

PLUMBING MATERIAL	TYPE OF STRUCTURE		
	# of service connections that are Single Family Residences (SRF)	# of service connections that are Multiple family Residences (MFR)	# of service connections that are public or commercial buildings (BLDG)
Interior Plumbing			
Lead Pipe			
Copper pipe with lead solder installed before 1983			
Copper pipe with lead solder installed in 1983 -1985			
Copper pipe with verified lead solder installed after 1985			
Service Lines			
LSLs			
Entire Line			
Partial Line			
Total Available Sites			

Note: If you cannot identify and secure all Tier 1 sites in your minimum lead and copper sampling plan you must return the material survey worksheets 1-3 with your lead and copper sampling plan to the MassDEP for review and approval.

If you are required to submit this form to MassDEP please complete the certification block below:

My signature below indicates that I have provided MassDEP with a “materials survey”. I certify under penalty of law that I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Signature of authorized public water system party: _____ **Date:** ____/____/____

Name of authorized party (PRINT): _____ **Title:** _____

Telephone #: _____ **Mobile/cell #:** _____ **Fax #:** _____ **Email Address:** _____ **Page** ____ **of** ____

Gathering Information for MSWS

PWSs should survey all records documenting the materials used to construct and repair the distribution system and buildings connected to the distribution system



Service Line Tie-cards



Building Permits



Plumbing Codes and Permits



Distribution Maps and Drawings



Inspection and Maintenance Records



Meter Installation Records



Permit Files



Interviews with Senior Personnel, Building Inspectors, and Retirees

Filling Out the MSWS



Worksheet 1: Materials Survey Investigation Results for primary & alternative sampling locations



Worksheet 2: Materials Survey Results by Number of Service Connections for each Plumbing Materials Type



Worksheet 3: Summary of Materials Survey Results



All 3 sheets must be filled out



Can submit supplemental information to Worksheets 2 and 3 to identify number of service connections that do not fit these groups so that you can arrive at total number of service connections.

Filling Out the MSWS Continuation



Adding the numbers in each column/row of Worksheet 2 and 3



How can you tell that you are on the right track?



Where can you find a number to support your final total from the worksheets?



The Material Survey gives a total number of each Tier Class



The sampling pool must target high risk sites based on sample site selection hierarchy.

MSWS 2 for COM

MassDEP-DRINKING WATER PROGRAM

LEAD AND COPPER MATERIAL SURVEY INVESTIGATION WORK SHEET 2 of 3

Please type or print clearly using black ink

PWS ID #: 1234567 PWS Name: _NO TOWN WATER_ City/Town: _NO TOWN_ Date: 1/1/2020

PWS Address: _10 MAIN STREET_

Contact person name: JOE ANY Telephone #: (978) 789-6321 Population: 600 Samples required: 20

Type of Structure	Type of Plumbing Material				Distribution System Lead Service Connections	
	Interior Plumbing				# of Lead Service Lines Connections Total	
	# of Residences/ Buildings with Lead Pipes	# of Residences/ Buildings with Copper Pipes and Lead Solder Built Before 1983	# of Residences/ Buildings with Copper Pipes and Lead Solder Built in 1983-1985	# of Residences/ Buildings with Copper Pipes and <u>Verified</u> Lead Solder Built After 1985.	Entire Line-100% Lead	Partial Lead Line
SFRs ¹	Tier 1	Tier 3	Tier 1	Tier 1	Tier 1	Tier 1
MFR ²	Tier 2	No Tier	Tier 2	Tier 2	Tier 2	Tier 2
BLDGs ³	Tier 2	No Tier	Tier 2	Tier 2	Tier 2	Tier 2
TOTAL	Total	Total Total	Total	Total	Total	Total

1. SFR-Single family residence

2. MFR-Multi-family residence

Note: 1. ANY SERVICE CONNECTION after 1985, not verified lead solder are not listed in table per EPA

Therefore # of service connections PWS is not represented in in table

2. Pigtailed/goosenecks do not have a spot on the form; indicate the number somewhere, ex. in parentheses

3. BLDG-Public /Commercial Building

Note: If you cannot identify and secure all Tier 1 sites in your minimum lead and copper sampling plan you must return the material survey worksheets 1-3 with your lead and copper sampling plan to the MassDEP for review and approval.

If you are required to submit this form to MassDEP please complete the certification block below:

My signature below indicates that sufficient Tier 1 sites were not available and that I have provided MassDEP with a “materials survey”. I certify under penalty of law that I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Signature of authorized public water system party: _____ **Date:** ____/____/____

Name of authorized party (PRINT): _____ **Title:** _____

Telephone #: _____ Mobile/cell #: _____ Fax #: _____ Email Address: _____

Page ____ of ____

MSWS 2 for NTNC

MassDEP-DRINKING WATER PROGRAM

LEAD AND COPPER MATERIAL SURVEY INVESTIGATION WORK SHEET 2 of 3

Please type or print clearly using black ink

PWS ID #: 1234567 PWS Name: _NO TOWN WATER_ City/Town: _NO TOWN_ Date: 1/1/2020

PWS Address: _10 MAIN STREET_

Contact person name: JOE ANY Telephone #: (978) 789-6321 Population: 600 Samples required: 20

Type of Structure	Type of Plumbing Material				Distribution System Lead Service Connections	
	Interior Plumbing				# of Lead Service Lines Connections Total	
	# of Residences/ Buildings with Lead Pipes	# of Residences/ Buildings with Copper Pipes and Lead Solder Built Before 1983	# of Residences/ Buildings with Copper Pipes and Lead Solder Built in 1983-1985	# of Residences/ Buildings with Copper Pipes and <u>Verified</u> Lead Solder Built After 1985.	Entire Line-100% Lead	Partial Lead Line
SFRs ¹	X	X	X	X	X	X
MFR ²	X	X	X	X	X	X
BLDGs ³	Tier 1	Tier 2	Tier 1	Tier 1	Tier 1	Tier 1
TOTAL	Total	Total	Total	Total	Total	Total

1. SFR-Single family residence

2. MFR-Multi-family residence

3. BLDG-Public /Commercial Building

Note: If you cannot identify and secure all Tier 1 sites in your minimum lead and copper sampling plan you must return the material survey worksheets 1-3 with your lead and copper sampling plan to the MassDEP for review and approval.

If you are required to submit this form to MassDEP please complete the certification block below:

My signature below indicates that sufficient Tier 1 sites were not available and that I have provided MassDEP with a “materials survey”. I certify under penalty of law that I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Signature of authorized public water system party: _____ **Date:** ____/____/____

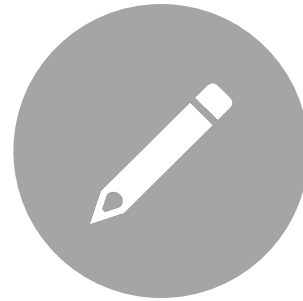
Name of authorized party (PRINT): _____ **Title:** _____

Telephone #: _____ Mobile/cell #: _____ Fax #: _____ Email Address: _____ Page ____ of ____

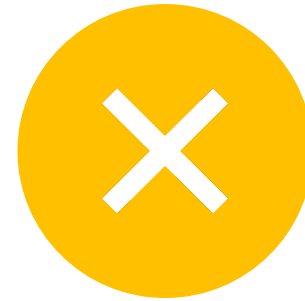
Common Mistakes Made on MSWS



TOTAL NUMBER OF SITES
EQUAL TO THE NUMBER
OF SAMPLES REQUIRED,
RATHER THAN THE
NUMBER OF SERVICE
CONNECTIONS IN THE
PWS DISTRIBUTION



PUTTING ALL SERVICE
CONNECTIONS ON
WORKSHEET 1



NO SIGNATURE

What Do the Numbers Reveal and Where Do We Go From Here?

- MSWS identifies the number of high risk sites that should be included or evaluated as part of the **LCR Sampling Plan**
- Do you have a sufficient number of Tier 1 sites to complete your LCR plan?
 - If yes, a copy of the MSWS does not need to accompany the LCR Sampling Plan.
 - If no, a copy of the MSWS must be included with the LCR Sampling Plan.
- MSWS should be updated when there has been changes to the PWS distribution, i.e. when lead service lines have been fully replaced, changes in building/homeowner plumbing, etc.
- MSWS is a constantly evolving document

Poll Question 2



LCR Sampling Plan Forms - LCR-SP-A/B/C

- All PWSs must have an approved sampling plan on file
- Water Suppliers with a LCR Sampling Plan without a LSL certification block (pre-7/2018 rev.) on LCR-SP-A will need to submit a new Sampling Plan prior to sampling
- Additional reasons why a new sampling is required include - change in treatment, population, change in source and a change in sampling frequency (increase or decrease), updates to the MSWS
- <https://www.mass.gov/doc/lead-and-copper-sampling-plan-lcr-sp-a-lcr-sp-b-lcr-sp-c/download>
- <https://www.mass.gov/doc/instructions-for-lead-and-copper-sampling-plan-forms-lcr-sp-a-lcr-sp-b-lcr-sp-c/download>

Sample Site Selection

- Sample locations must be the highest Tier available.
 - Highest tier is defined as a site where the potential for exposure to excessive levels of lead and copper exists. These sites are sites that have LSLs (full or partial), lead goosenecks and/or pigtails, and 50/50 solder.
- The sampling pool must target high risk sites using the following process sequential order:
 - At least 50% Tier 1 sites served by LSL: **MassDEP recommends 100%**
 - Other Tier 1 sites
 - Tier 2 sites
 - Tier 3 sites

COM sample site selection hierarchy: Tier 1>Tier 2>Tier 3

Tier 1 Sites: COM



1 A –SFR with LSL (full or partial)



1A2-MFR with LSL, IF more than 20 % of service connections are MFR



1A3-SFR with lead gooseneck (pigtail)



1B-SFR with lead pipes or copper pipes with lead/tin solder built in 1983, 1984 or 1985



1B2-SFR with verified lead/tin Solder built in 1986 or later

Note: EPA is not requiring PWS to search out illegally installed lead/tin solder

Tier 2 sites: COM



Tier 2C-MFR with LSL and/or lead goosenecks/pigtails (if less than 20% service connections are MFR)



Tier 2D-MFR with lead or copper pipes with lead/tin solder built 1983-1985



Tier 2E-Private building with LSL and/or with lead gooseneck/pigtails

Example: Non residential building with LSL would override a residential building (SFR) built in 1990



Tier 2F-Private building with lead or copper pipe with lead/tin solder installed in 1983, 1984 or 1985

Tier 3 Site: COM



Tier 3G-SFR built before 1983



Tier 3H-Other/exceptional cases:

- Residences built after 1985 are preferable to non-residential buildings
- PWS only has plastic plumbing , cannot demonstrate “lead free” conditions due to presence of brass faucets

Note: If you select Tier 3H you must provide documentation on LCR-SP-A form (page 2)

Tier 1 Building: NTNCs

Tier 1 site consists
of buildings that:

- Contain copper pipes w/ lead solder installed after 1982 or contain lead pipes; and/or
- are served by LSL

Tier 2 site consists
of buildings that

- Contain copper pipes with lead solder installed before 1983

Tier 3

- Any other buildings that are not Tier 1 or Tier 2 but are representative sites.

NTNC sample site selection hierarchy:- Tier 1>
Tier 2> Tier 3



Filling In Forms LCR-SP-A/B/C

I. System Information

- Population: use greater number (winter or summer) from your most recent ASR

II. Reporting

- Use Form LCR-SP-A for primary sample sites

III. Certification Block

LCR-SP-B: for alternative sites (if possible list one to one and a half times the required number of primary sites)

LCR-SP-C: Column “Date of recent sample”-for general information only. If you don’t know leave it blank

- List all schools (public and private) and EECFs
- Provide name and street address for each school/EECF

Schools



All schools and EECFs should be listed on form lcr-sp-c



To locate all EECF in your distribution see:
<http://www.eec.state.ma.us/childcaresearch/earlyedumap.aspx>.



When selecting an EECF, PWS should focus on school age child care programs



PWS shall rotate through their list, targeting the most vulnerable population



At least two schools/EECFs within distribution must be tested during each sampling round
(2 taps at each of 2 schools)

Sampling Plan Certification

- PWS must submit a completed LCR Sampling Plan to MassDEP for review and approval
- Certifying that : Tier 1 sites were not available; MassDEP has been provided a Materials Survey; Complied with 310 CMR 22.06B(7); and if there are higher Tier sites in distribution system a LCR Highest Tier Form (LCR-Samp-HTS) is also submitted.
 - <https://www.mass.gov/doc/lcr-highest-tier-site/download>
- If there are subsequent changes to the sampling plan because of changes in plumbing, etc., the PWS must submit a revised sampling plan for approval. Sampling Plan must be reviewed and signed by the Supplier of water or PWS Certified representative

Highest Tier Sites (LCR-Samp-HTS) Form

- Used when you have higher Tier sites available that are **not willing** to participate in the sampling program
- Certification form to document efforts made to solicit participation:
 - Letters
 - Phone calls
- These higher tier sites must be contacted again with each future round of sampling!!
- <https://www.mass.gov/doc/lcr-highest-tier-site/download>

Lead & Copper Sampling Plan Change in Sampling Site Form

- <https://www.mass.gov/doc/lead-copper-sampling-plan-change-in-sampling-site>).
- When to use
 - the original site no longer meets criteria (plumbing has been replaced)
 - no longer available, occupant is no longer interested
- How to submit? Email? Needs approval?
- This form is for a permanent change
- PWS must attempt to get participation AT LEAST TWICE and submit documentation

Submitted Packet Must Contain What Forms?

- **Signed** Forms LCR-SP-A/B/C
- **Signed** MSWS if other than Tier 1 Sites on LCR-SP-A/B
- **Signed** Highest Tier Site Form if highest tier sites not on LCR-SP-A/B
- Copy of your Sampling Instructions:
 - <https://www.mass.gov/doc/ntnc-sampling-instructions-and-chain-of-custody-form/download>
 - <https://www.mass.gov/doc/home-sampling-instructions-and-chain-of-custody-form/download>

Common Mistakes on LCR Sampling Plan

Form LCR-SP-A and B:

- ✗
 - Incorrect spelling
 - Using out of date form
 - Using Avenue/Street/ Road interchangeably for site address
 - Listing sample sites that are not used for routine consumption (i.e. janitors closet, mechanical room, slop sink, etc.)
- ✗ Forms not signed by Authorized Party (i.e. owner, certified operator, etc.)
- ✗ Not enclosing **every form** that is required



Convincing Residents to Get on the LCR Plan

- LCR requires PWSs try to get occupants at the most susceptible sites to participate for long periods of time
- Find creative ways:
 - Educate consumer on the importance of the program
 - Utilize social media
 - It is **FREE**, all you need to do is collect the samples
 - Offer gift card to a local eatery
 - Offer water bill rebate

Use Chat to share the ideas you have used for encouraging/rewarding LCR Sampling participation.

Questions?

Call or email anytime:

CERO	Josephine Yemoh-Ndi	Josephine.yemoh-ndi@mass.gov
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