



# FAQs: Water Quality Parameter (WQP) Sampling Plans

(Version 1, December 2020)

## Introduction

This guidance is intended to assist public water systems with frequently asked questions (FAQs) associated with administrative and technical aspects of their water quality parameter (WQP) sampling plans.

- For questions related to reporting results, refer to the [E2 Guide](#) and the [WQP Monitoring Report Form](#).
- For questions related to forms, refer to the [Forms Guide](#).
- Additional Technical Fact Sheets, Guidance Documents, and Templates are available at <http://www.nj.gov/dep/watersupply/dwc-lead-public.html>.

### Acronym Key

*ALE – action level exceedance*

*EPTDS – entry point to the distribution system*

*NOV – notice of violation*

*CCT – corrosion control treatment*

*LCR – Lead and Copper Rule (Federal)*

*SOW – source water*

*DS – distribution system*

*NONC – notice of non-compliance*

*WQP – water quality parameter*

## General

### What do I need to submit?

The NJDEP WQP Sampling Plan (Plan) [template](#) available on our website must be used and must include a map of the distribution system. Refer to NJDEP's [Plan guidance](#) for instructions.

### Where do I send my submission?

All Plans must be submitted electronically to [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov) with the subject line, 'WQP Sampling Plan.'

### I have a Lead and Copper Sampling Plan. Do I need a separate WQP Sampling Plan?

Yes, if your water system operates corrosion control for the purposes of lead and/or copper or purchases water that is treated for lead and/or copper corrosion, commonly referred to as corrosion control treatment (CCT), then you must submit a separate WQP Sampling Plan.

### How do I know if my pH adjustment unit is considered CCT for the purposes of controlling lead and/or copper corrosion?

NJDEP updated its policy (as of February 2018) on how it is determining if a pH adjustment unit is used for the purposes of controlling lead and/or copper corrosion. Water systems are encouraged to coordinate with the Bureau of Water System Engineering, Engineering Section ("Permitting") to clarify the primary purpose of the treatment processes. Permitting may be reached at (609) 292-2957.

Your water system is considered to have "post pH adjustment" that is CCT for the purposes of controlling lead and copper if you have pH adjustment that is used to treat the water prior to it entering the distribution system to meet the secondary standard (commonly referred to as "post pH adjustment") and one or more of the following criteria are met: an action level exceedance occurred recently or in the past, an inhibitor for lead and/or copper corrosion control is used and/or received by another water system, or lead service lines are confirmed or the presence of what is unknown in the distribution system. If you receive pH adjusted water from a system that meets one or more of the previous three criteria outlined, then you are also considered to have post pH adjustment that is CCT for the purposes of controlling lead and copper.

### How do I complete the table in the inventory section?

As explained and illustrated in NJDEP's [Plan guidance](#), all active sources and treatment facilities must be included. This includes both permanent and emergency interconnections.

## General Continued

### What are WQPs?

Water quality parameters (WQPs) are used to identify appropriate CCT and whether CCT is being properly maintained. WQPs include: pH, alkalinity, calcium, conductivity, temperature, orthophosphate, silica, iron, manganese, chloride, sulfate, hardness, aluminum, and ammonia.

### What WQP monitoring schedule am I “on,” i.e., what set of WQP requirements do I follow?

Monitoring is conducted at the EPTDS and at taps within the distribution system (DS), as discussed on pages 3-4.

**Note**, NJ implements additional requirements that go beyond the federal regulations. For more details, refer to the following fact sheets available at <https://www.state.nj.us/dep/watersupply/dws-sampreg.html>:

- [Initial WQP Monitoring](#)
- [Follow-up WQP Monitoring\\*](#)
- [Optimal WQP Monitoring\\*](#)

\*Note that all large water systems (serving  $\geq 50,000$ ) will be on either follow-up or optimal WQP monitoring, regardless of the presence of CCT.

### If I sample for a WQP daily, do I have to submit those daily values?

If an EPA approved method is used it is considered a compliance sample under the LCR, so the daily results must be submitted (40 CFR 141.87(f), 90). A non-EPA method is considered operational data and does not need to be submitted for compliance purposes.

### How do I report WQP samples if my system collects more than one value per day at the same site for compliance?

The average of the results for the 24-hour period is to be reported to the Department.

### What is the difference between WQP monitoring and source water (SOW) monitoring?

WQP monitoring is used to evaluate how corrosive the water is, what appropriate treatment options apply at the EPTDS and within the DS, and/or whether the installed CCT is operating effectively.

The purpose of SOW monitoring is to determine if the source of supply is contributing to elevated lead and copper levels. SOW monitoring is conducted at the EPTDS and samples for lead and copper must be taken. This monitoring is required after a lead or copper ALE, after SOW treatment is installed, and after maximum permissible levels are set by NJDEP or a determination is made that SOW treatment is not required.

### When should my Plan be updated?

The Plan must be updated within 30 days of any significant changes in, but not limited to, system size class (as defined at 40 CFR 141.86), a permanent change in sampling site, change in source, change in treatment, or significant alteration of the distribution system, interconnections, or other infrastructure. The water system is required to keep a copy of the approved Plan on site and made available for review upon request.

### Who do I call with questions?

Water systems can contact the Permitting, Distribution Water Quality Parameters Unit, with any questions regarding the Plan. Systems can contact Permitting via phone, (609) 292-2957, or email, [watersupply@dep.nj.gov](mailto:watersupply@dep.nj.gov).

## **Due Dates/Violations/Enforcement**

**Does a response due date, e.g., a sampling plan submission, mean business days or calendar days?**

Calendar days.

**Is there a grace period for the initial Plan submission?**

There are no grace periods. If the system does not submit a Plan initially requested from the NJDEP, then the system will be referred to the administrative authority and the system is subject to return to standard (six-month, semi-annual) lead and copper monitoring.

**Why was I sent a notice of violation (NOV)?**

NOVs are issued by the administrative authority if a water system fails to submit a Plan initially requested from the NJDEP or the system was referred to the administrative authority.

**What happens after I miss the NOV due date for a Plan?**

Additional violations may be issued to the system, including a penalty assessment. For more information, contact the administrative authority at <https://www.nj.gov/dep/enforcement/dwlue.html> or <https://www.state.nj.us/health/lh/community/>.

**What is the protocol after a deficiency letter for a Plan?**

If a Plan is deficient, then a water system is required to have either a conference call or meeting at NJDEP.

**If I receive a Notice of Non-Compliance (NONC) for missing a deficiency response due date will I be put back on standard?**

No. The NONC will give the system 14 calendar days to submit the deficiency response or else the system will be referred to the administrative authority.

**What happens if a NONC is not addressed?**

The system will be referred to the administrative authority and an NOV may be issued, as described above, including the system being returned to standard (six-month, semi-annual) lead and copper monitoring.

## **Entry Point to the Distribution System (EPTDS) Sampling**

**Only some of my treatment plants have CCT. What is the correct protocol?**

In the Plan, indicate that EPTDS with no CCT will conduct initial WQP monitoring in the case of an ALE. Note that all large water systems (serving  $\geq 50,000$ ) will be on either follow-up or optimal WQP monitoring, regardless of the presence of CCT. For the treatment plants with CCT, they will be required to conduct follow-up or optimal WQP monitoring.

**Where can I find bi-weekly monitoring periods?**

Bi-weekly monitoring periods are available at <https://www.state.nj.us/dep/watersupply/dwc-lead-wgpm.html>.

**Can I sample the first week and third week of the month to meet the bi-weekly monitoring requirement?**

EPTDS samples must be collected at least every 14 days within bi-weekly compliance periods. WQP monitoring schedules will always have an initial start date of either January 1st or July 1st and the bi-weekly compliance periods will follow that initial begin date. Therefore, the sampling is bi-weekly and not bi-monthly, so collecting samples only on the 1<sup>st</sup> and 15<sup>th</sup> day of each month would not be in compliance with the LCR.

## WQP Distribution System (DS) Sampling

### How many samples in the DS do I need to take for WQPs?

The number of sample sites used to sample throughout the DS is based upon the water system's residential and non-transient population served (refer to 40 CFR 141.87(a)(2) and NJDEP's [Plan guidance](#) for details).

Water system size (Population Served)	Standard Distribution Sites	Reduced Distribution Sites	Alternate Distribution Sites
> 100,000	25	10	10
10,001-100,000	10	7	7
3,301 to 10,000	3	3	3
501 to 3,300	2	2	2
≤ 500	1	1	1

### Is a Plan required to contain alternate WQP distribution sites? If so, how many?

Yes, based on the population served by the water system. Refer to the table above and NJDEP's [Plan guidance](#) for details.

### What are acceptable sites for WQP distribution sites?

Refer to NJDEP's [Plan guidance](#). More than minimum number of sites required by the federal LCR may be required depending on varying water quality, pressure zones, etc. throughout the system.

### Do I have to use my lead and copper sites?

No. See above; lead and copper sites are based on vulnerable locations and may not be evenly distributed throughout the distribution system and reflective of your system's water quality.

### Can I use my sites under the Revised Total Coliform Rule (RTCR) for distribution sites?

Refer to NJDEP's [Plan guidance](#) for instructions. Yes, but if the only justification is that the site is sampled under the RTCR, then that justification is not acceptable. NJDEP based its guidance on EPA's [Revised LCR Monitoring and Reporting Guidance](#) for criteria when selecting WQP tap sites.

### Why am I sampling for alkalinity within the DS during follow up monitoring?

To determine if alkalinity needs to be adjusted as part of the treatment process. For further details, refer to EPA's guidance document, [Optimal Corrosion Control Treatment Evaluation Technical Recommendations](#).

## WQP Monitoring Periods

### How long will we be on follow-up WQP monitoring?

Water systems under the LCR are required to conduct follow-up WQP monitoring immediately following the installation of CCT or approval of the WQP Plan by NJDEP and must remain on follow-up WQP monitoring until the State designates Optimal WQP values. Within 30 days after completing two consecutive, six-month periods (12 months) of follow-up WQP monitoring, a water system is required to submit an Optimal WQP Recommendation to NJDEP using *Optimal Water Quality Control Parameter Recommendation form* ([BWSE-LC03](#)).

### How long will I be on OWQP monitoring?

OWQP monitoring will be a continuous monitoring schedule once the optimal values have been set by the NJDEP.

### Where can I find my WQP Monitoring Schedule?

All public water system monitoring schedules, as well as other important system information, are available on NJDEP's Drinking Water Watch at <https://www.nj.gov/dep/watersupply/waterwatch>.