<b>Plumbing Profile Question</b>	What Answers to the Plumbing Profile Questions Mean
3. When were the most recent plumbing repairs made? Note the locations.	If the building (or an addition, new plumbing, or repair) is less than 5 years old and lead solder or other leaded materials were used (e.g., brass fixtures containing lead alloys, especially those purchased or installed prior to 2014 when the Reduction of Lead in Drinking Water Act took effect), elevated lead levels may occur. If water supplied to the building is corrosive, lead can remain a problem regardless of the plumbing's age.
4. Of what materials is the service connection (the pipe that carries water to the school or child care facility from the public water system's main in the street) made?	Lead piping was often used for the service connections that join buildings to public water systems. In larger schools, the service line is probably not lead because lead is impractical for the larger service lines typically used in these facilities; however, many child care facilities reside in small buildings and are at a higher likelihood of being served by lead lines.
Note the locations where the service line enters the building and connects to the interior plumbing.	Some localities required the use of lead service connections up until the "lead-free" requirements of the 1986 Safe Drinking Water Act Amendments took effect. Although a protective layering of minerals may have formed on these pipes, vibrations can cause flaking of any protective build-up and, thus, allow lead contamination to occur.
5. What are the potable water pipes made of in the facility? Examples include: Lead, plastic, galvanized metal,	Survey the building for exposed pipes, preferably accompanied by an experienced plumber who should be able to readily identify the composition of pipes on site. Most buildings have a combination of different plumbing materials.
cast iron, copper, other.	Lead pipes are dull gray in color and may be easily scratched by an object such as a knife or key. Also, a magnet will not stick to lead.
types of pipe, if applicable, and the	Galvanized metal pipes are gray or silver-gray in color and are usually fitted together
	compounds containing lead have been used to seal the threads joining the pipes.
	Debris from this material, which has fallen inside the pipes, may be a source of

Plumbing Profile Question	What Answers to the Plumbing Profile Questions Mean
Note the areas of the building that receive water first, and which areas	Copper pipes are red-brown in color. Corroded portions may show green deposits.
receive water last.	Copper pipe joints were typically joined together with lead solders until the "lead-free" requirements of the 1986 Safe Drinking Water Act Amendments took effect.
	Plastic pipes, especially those manufactured abroad, may contain lead. If plastic pipes
	are used, be sure they meet NSF International standards, <a href="http://info.nsf.org/Certified/pwscomponents/">http://info.nsf.org/Certified/pwscomponents/</a> .
6. Are there tanks in the plumbing	Some older tanks may contain coatings that are high in lead content.
system (e.g., pressure tanks or	
gravity storage tanks)?	Tanks may accumulate sediment that could be flushed back into the plumbing system
	under certain circumstances. You may wish to contact the supplier or manufacturer to
Note the locations of any tanks,	obtain information about coatings. They may also wish to hire a plumber or tank
and any available information	service contractor to inspect the tanks, especially gravity storage tanks that are
about the tank (e.g., manufacturer	located outside of the building.
or date of installation).	
	Although EPA encourages routine maintenance of hot water heaters, this guidance
	does not include sampling hot water outlets or hot water heaters, because hot water
	is not recommended for consumption (drinking/cooking). See Temperature Control
	Establishing Routine Practices in the Taking Action Section.
7. Was lead solder used in the	The 1986 Safe Drinking Water Act Amendments banned plumbing components that
plumbing system?	contained high levels of lead. It is likely that high-lead solder and fluxes continued to
	be used until 1988 and even later in some areas of the country. The local plumbing
Note the locations with lead solder.	code authority or building inspector may be able to provide guidance regarding when
	high-lead solder was last used on a regular basis in the area. It is important to note
	that the Reduction of Lead in Drinking Water Act did not revise the "lead-free"
	definition for solder and flux.

9. How many of the following	In addition to lead components in the plumbing system, lead solders or lead in the
outlets provide water for	brass fittings and valves used in some faucets, fountains, and refrigerated water
consumption?	coolers may be sources of lead. It is important to identify the locations of all such
	drinking water outlets. Faucets in bathrooms should not be used to obtain water for
Water coolers, water fountains	drinking. Although they may be adequate for washing hands, they may not be
with central chillers, cold water	appropriate for drinking purposes. However, if bathroom faucets, locker room
taps, ice makers, kitchen taps, or	showerheads, and non-traditional drinking water outlets are known to be used for
drinking fountains. Note the	drinking or cooking (e.g., fill water jugs), sampling should be conducted. You may
locations.	consider posting "Do Not Drink or Cook" signs.
10. Have you checked the brands	Older water coolers (purchased or installed prior to 1988) may be a major source of
and models of water coolers and	lead contamination. See Appendix B of this manual for a summary of EPA's list of
compared them to the listing of	water coolers found to contain lead. Use the list to help prioritize sampling. If a water
banned water coolers in Appendix	cooler is listed as having a lead-lined tank, its water should not be used for drinking,
B of this document?	and the cooler should be removed immediately, as these coolers pose the highest risk
	of contamination.
Note the locations of any banned	
coolers.	
11. Do outlets that provide drinking	Lead-containing sediments that are trapped on screens can be a significant source of
water have accessible screens or	lead contamination. Facilities should create a routine maintenance program to clean
aerators? (Standard faucets usually	the screens regularly. See Cleaning in Establishing Routine Practices of the Taking
have aerator or screens. Many	Action Section. If sediment has been a recurring problem, regular cleaning of the
coolers and fountains also have	screens and additional investigation of the reasons for the debris accumulation is
inlet strainer screens.) If so, have	appropriate. However, the manufacturer or water service provider should be
the screens been cleaned?	contacted to obtain instructions for cleaning screens.
Note the locations.	

	water, or stained dishes or laundry?	corrosion; brown stains result from the corrosion of iron. Where such symptoms occur, high levels of lead, copper, and iron may be present in the water.
	Note the locations.	
	13. Is any electrical equipment	If electrical equipment has been installed using water pipes as a ground, the electric
	grounded to water pipes?	current traveling through the ground wire will accelerate the corrosion of any interior plumbing containing lead. This practice should be avoided, if possible. However, if
	Note the locations.	existing wires are already grounded to water pipes, the wires should not be removed from the pipes unless a qualified electrician installs an alternative grounding system.
		Check with the local building inspector on this matter. State or local building codes may require grounding of the wires to the water pipes. Improper grounding of electrical equipment may cause severe shock.
	14. Have there been any	Although lead dissolved in water cannot be seen, tasted or smelled, the presence of a
	taste?	contamination.
	Note the locations.	
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such as frequent leaks, rust-colored signs of corrosive water. Blue-green deposits on pipes and sinks indicate copper

Frequent leaks, rust-colored water, and stains on fixtures, dishes, and laundry are

What Answers to the Plumbing Profile Questions Mean

12. Are there signs of corrosion,

**Plumbing Profile Question** 

Plumbing Profile Question	What Answers to the Plumbing Profile Questions Mean
15. Check building files and ask the public water system to determine	As discussed in the <u>Training Section</u> , lead testing may have previously been done voluntarily under the Lead Contamination Control Act. Results of analyses of general
whether any water samples have	water quality, such as measures of pH, calcium hardness, and carbonate alkalinity, can
been taken from the building for	provide important clues about the corrosiveness of the water. If there is no data from
any contaminants.	the school or child care facility, the public water system should at least be able to provide information about the general water quality.
Name of contaminant(s)?	
What concentrations of the	
contaminant(s) were found?	
What was the pH?	
Is testing done regularly at the	
facility?	
16. Other plumbing questions:	You should incorporate this information into decisions regarding sample locations and
	sampling protocol. They may wish to note the direction of water flow and the location
Are blueprints of the building	of fixtures, valves, tanks, areas of sediment accumulation, areas of corrosion, etc., on
available?	a sketch or blueprint of the plumbing.
Are there known plumbing "dead-	
ends," low use areas, existing leaks	
or other "problem areas?"	
Are renovations being planned for	
part or all of the plumbing system?	



### **APPENDIX F**

Highlights of the 3T's for Reducing Lead in Drinking Water



The 3Ts toolkit includes modules to assist facilities in developing a drinking water testing program.

Module 1

Communicating the 3Ts Module 2

Learning About Lead in Drinking Water

Planning Your 3Ts Program Module 3

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Module 4

Developing a Sampling Plan



Remediation & Establishing Routine Practices

Conducting Sampling & Interpreting Results

Module 5



Module 7

important areas of communication throughout. includes steps needed to take a holistic approach, including The 3Ts Establishing a Lead Testing Program Checklist

For this and the full toolkit, visit: https://www.epa.gov/safewater/3Ts

## Immediate Actions to Start Improving Water Quality

Immediately remove drinking water coolers listed in EPA's 3Ts as containing lead lined coolers. These were built before the 1986 Lead Free Act.

# Clean drinking water fountains and aerators (screens)

recorded. regularly. Consider creating a cleaning time card that can be posted by the water fountains to allow the cleaning times to be

**Use only cold water** for food and beverage preparation. Hot water will dissolve lead more quickly than cold water and is likely to contain increased lead levels.

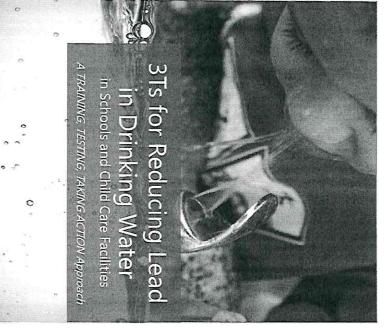
contaminants of concern). Make sure filters are maintained if being used. Ensure that the selected filter is certified to remove lead (or any other

notices if the water should not be consumed. Use pictures if there are small children using bathrooms Create and post placards near bathroom or utility sinks with

when water may have been sitting for a long period of time. preparation, particularly after weekends and long vacations Regularly flush all water outlets used for drinking or food



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# What are the 3Ts?

The 3Ts toolkit was developed for schools and child care facilities to help them implement a voluntary program for reducing lead in drinking water. The 3Ts consist of the following:

- TRAINING officials to raise awareness of the 3Ts program and summarize the potential causes and health effects of lead in drinking water.
- TESTING drinking water in schools and child care facilities to identify potential lead problems.
- TAKING ACTION to reduce lead in drinking water.

# Worldle 1: Communicating the 3T

# **Develop a Communication Plan**

Communicating early and often about your testing plans, results, and next steps will build confidence in your community.

Templates are available to help you:

- Get your team together
- Create a contact list
- Identify your target area
- Know your methods of communication
- Identify timing for communication
- Start communicating!

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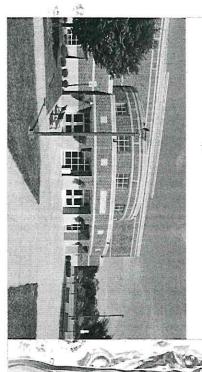


View the 3Ts Toolkit for helpful resources:

Link: https://www.epa.gov/safewater/3Ts

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# Reducing Lead Exposure

Lead is a toxic metal that is harmful to human health. We can be exposed to lead through a variety of sources (e.g. paint, dust, soil, air, and drinking water).

There is no known safe blood lead level for children. EPA suggests that schools and child care facilities implement programs for reducing lead in drinking water as part of their overall plans for reducing environmental threats. Safe and healthy school and child care environments foster healthy children and may improve student performance.

There are no federal laws requiring testing of drinking water in schools and child care facilities, except for those facilities that own and/or operate their own public water supply and are thus regulated under the Safe Drinking Water Act (SDWA)

Some states, tribes and local jurisdictions have established their own programs for testing drinking water lead levels in

schools and child care facilities, and some have developed

regulations or guidance. Facilities should reach out to their



Even when water entering a facility meets all federal and state public health standards for lead, older plumbing materials in schools and child care facilities may contribute to elevated lead in their drinking water.

Utilizing the 3Ts Toolkit can help ensure a successful lead in drinking water reduction program.

### Assigning Roles

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It is important to clearly define responsibilities and to support those people in their roles. An effective program will require a team effort. Identifying specific roles and program accountability. responsibilities before initiating a program will give the

Role	Responsibilities
3Ts Program Contact	Act as the point of contact for the Program. Communicate with the other teams, external resources, and program partners.
Public Communications Contact	Communicate testing plans, results and remediation efforts to the public (e.g., to the school and child care facility community, media outlets, civic groups)
Partner Liaison Contact	Work with certified laboratories, interest groups, the school board and other partners supporting the 3Ts Program. Schedule activities and maintain

Sampling Activities—Contact Lead the effort to develop and implement a sampling plan. Engage with other program points of contact and external resources and partners as appropriate.

communication.

Remediation Activities Contact Lead the remediation efforts, if necessary. Engage with other program points of contact and external partners as appropriate, acting as the Program point of contact for

Recordkeeping Program documents. Lead effort to create, maintain, and update documentation with the team annually. Ensure a central repository is created to house all 3Ts

Contact

# Identifying Funding Sources

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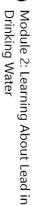
the program's budget. Funding issues should be discussed with decision-makers and with partners early on in the the success of the program. Items such as the cost of planning process. any predictable remediation costs can be incorporated into collecting water samples, having the samples analyzed and Ensuring a 3Ts Program has adequate funding is necessary for





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provide the framework for an effective program Learn and develop plans that



Health Effects of Lead

be absorbed into the bones, where it can collect for a lifetime. mineral that strengthens the bones. Because of this, lead can tell the difference between lead and calcium, which is a There is no known safe level of lead. The human body cannot

Pregnant and nursing staff should also be aware of the developing fetuses of pregnant women. harmful risks of lead exposure to nursing infants and the Young children are especially susceptible to lead exposure.

Even low blood levels of lead have been associated with:

- reduced IQ and attention span
- learning disabilities
- poor classroom performance
- hyperactivity
- behavioral problems
- impaired growth and hearing loss

## Sources of Lead

the air, lead in soil, and lead in consumer products and food based paint (e.g., paint chips or dust), lead in water, lead in Sources of lead exposure include the lead industry, lead-







In the air



In the soi

In consumer products

Lead Industry

plumbing materials containing lead. Interior lead pipe and in schools and child care facilities faucets) are the primary contributors of lead in drinking water and various drinking water outlets (e.g., water fountains and lead solder (commonly used until 1988), brass fittings, valves Lead gets into drinking water as it comes into contact with

# How Lead in Drinking Water is Regulated

materials be used in new plumbing and in plumbing repairs. The Lead Ban (1986): A requirement that only "lead-free"

drinking water coolers with lead lined tanks. water at schools and child care facilities, including the recall of aimed at the identification and reduction of lead in drinking The Lead Contamination Control Act (LCCA) (1988): The LCCA

control the amount of lead and copper in water supplied by public water systems. The Lead and Copper Rule (1991): A regulation by EPA to

Drinking Water Act (SDWA). further reduces lead and redefines "lead-free" under the Safe The Reduction Of Lead In Drinking Water Act (2011): This act

established regulations for schools and child care facilities. State Laws: Some states, tribes and local jurisdictions have



Module 3: Planning a 3Ts Program

### Review Records

more efficient. conducted, and to determine whether remediation actions have been taken. This will help to prioritize efforts and be Review records to determine if monitoring has been

## Establishing Partnerships

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in testing the drinking water for lead. community organizations may be able to provide assistance drinking water programs, certified laboratories, and local Entities like the public water system, local health offices, state

- Assistance from Public Water Systems: Assistance may be sharing in sampling costs. Some systems may be willing to available through technical guidance, sampling and/or help develop sampling plans and plumbing profiles
- Assistance from Local Health Offices: Many local activities, such as Lead Poisoning Prevention Programs. responsible for a wide variety of public health protection governments have established programs that are
- Education Programs: Contact your state programs to whether training and/or technical assistance is available. determine whether any other requirements apply, or Assistance from the State Drinking Water, Heath and
- laboratories that you can use for testing. water office should be able to provide a list of certified Assistance from Certified Laboratories: The state drinking
- citizens' groups, the PTAs, and local environmental groups. can help; for example, community volunteer groups, senior are a variety of local organizations within communities that Assistance from Local Community Organizations: There

## Sampling Dos and Don'ts

### Do:

- Follow the instructions provided by the laboratory for handling sample containers to ensure accurate results.
- don't forget to label. Assign a unique sample identification number to each sample collected. Use a coding scheme to help differentiate samples, and
- Collect all water samples before the facility opens and before any water is used. Ideally, the water should sit in the pipes unused for at least 8 hours but not more than 18 hours before a sample is taken.
- Learn how water flows in your facility. If there are multiple floors, it is typically recommended to sample from the bottom floor and continue up. Start sampling closest to the main and work away.

- Remove aerators prior to sampling. Potential lead contributors may be missed if aerators are removed since debris could be contributing to the lead in drinking water if particles containing lead are trapped behind aerator screens.
- Flush water prior to sampling, unless instructed to do so. Flushing can be a tool to improve water quality, especially after long holidays or weekends. However, flushing prior to sampling may cause samples to not be representative of daily consumption.
- Close the shut-off valves to prevent their use prior to sample collection. Minute amounts of scrapings from the valves could produce inaccurate results showing higher-than-actual lead levels in

### Communicate Results

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results, and next steps will build confidence in your community. Communicating early and often about your testing plans, commitment to protecting children and staff health. Telling parents and staff about your lead monitoring program will demonstrate your





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potential problems Test drinking water to identify



Module 4:

Developing a Sampling Plan

Conduct a Walkthrough

walkthrough. Conduct a walkthrough of the facility and create an inventory. may be helpful to take pictures when conducting this Take note of all sinks and fountains used for consumption. It

through building(s), and to prioritize sample sites. This will enable you to understand how water enters and flows

be removed immediately. storage tanks or lead parts listed in EPA's 3Ts. These should Make sure to identify any outlet noted as having lead-lined

Determine Sample Locations

consumption. teachers' lounge, and other sites used for and classroom sinks, home economics sinks, Sample sites include drinking fountains, kitchen



sampled; prioritizing outlets: EPA recommends all outlets used for consumption be

- That are used by children under the age of 6 years or sinks, classrooms used for early childhood education) pregnant women (e.g., drinking fountains, nurses' office
- That are frequently used by students and staff
- Are older and/or have never been tested

that it is not for drinking. sampled and clear signage should be used to notify people sinks in janitor's closets or outdoor hoses, do not need to be Faucets that are not used for human consumption, such as

Selecting a Laboratory for Sample Analysis

Certified Laboratories for Drinking Water for a list of program or the public water system, or visit EPA's website: a certified laboratory approved by the state or EPA for testing Regardless of who collects the samples, schools should employ certified laboratories in the area. Contact Information for Certification Programs and lead in drinking water. Contact the state drinking water

# Determine Your Sampling Frequency

plumbing, water quality, lead results, budget, and competing drinking water is dependent on a variety of factors (e.g. How frequently your facility can and should test for lead in

and the effectiveness of remediation or treatment efforts. monitoring provides information on changes in the lead levels water a part of their regular building operations. Annual Schools and child care facilities should make testing drinking

### Check your service line

some locations. Other materials used for service lines include copper, galvanized steel, plastic and iron. Lead is less practical and are at a higher likelihood of being served by lead lines for the larger service lines typically used in larger buildings; however, many child care facilities reside in small buildings Lead pipes are used for service connections, or service lines, in

Step 1

service line for the school. whether there is a lead service line or can help identify the The water utility may be able to provide information about Regardless of building size, make sure to check the service line.

visible and are generally a dull gray color and very soft. Lead service lines may be





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### Conducting Sampling

outlet (e.g. faucet, fixture, or water fountain) or behind the wall a 2-step sampling procedure to identify if there is lead in the (e.g. in the interior plumbing). EPA recommends that schools and child care facilities conduct

before a sample is taken. opens and before any water is used. Ideally, least 8 hours but not more than 18 hours the water should sit in the pipes unused for at Collect all water samples before the facility



sample at all taps used for consumption to identify Take a 250-mL first draw 250-mL First Draw Sample potential lead in the fixture take a 30-second flush sample to identify lead in the plumbing behind the fixture. Step 2 250-mL Flush Sample If the result of Step 1 is high

Prioritize remediation efforts based on sample results and use reduce their lead levels to the lowest possible concentrations. the steps in the 3Ts to pinpoint potential lead sources to

# Establishing Routine Practices

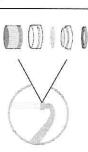
Establish routine practices to reduce exposure to lead and other environmental hazards (e.g., bacteria). These activities should not be conducted immediately prior to collecting a water sample but should be planned as part of the school's or child care facility's water management program to improve overall drinking water quality.

### Some of these include:

- Clean water fountains, aerators and screens
- Use only cold water for food and beverages
- If filters are used, make sure they are maintained
- Create and post placards near sinks where water should not be consumed
- Regularly flush all water outlets, particularly after weekends and vacations

### Clean Faucet Aerators

- O Unscrew the end-piece of your faucet where the water comes out. This is the aerotor, (Make note of how the pieces come off, to put back together. Paris vary.)
- Remove the screen and rinse out any dirt that has collected.
- Screw it back on.



### Communicate Results

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Reach out to your community, parents and staff to let them know what remediation is being conducted. Include any lead protection efforts

the that have been conducted and that the school or child care facility is already implementing (e.g., routine practices)



### Module 7: Recordkeeping

### Keep a record

Keep a record of sampling and remediation efforts that have been conducted and schedules that have been created to continue to maintain water quality. It is important to keep an ongoing record of public outreach and communication activities. Keep copies of past communication materials and the dates they were sent out. Strong recordkeeping can prove to be helpful in ensuring the longevity of the program. The 3Ts includes recordkeeping templates.



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### ACTION

Take action to reduce lead in drinking water and communicate to parents, staff, and the larger school community

Routine Practices

Module 6: Remediation & Establishing

Decide When to Take Action

There is no known safe level of lead for children. EPA encourages schools to prioritize remediation efforts based on lead sample results and to use the steps in the toolkit to pinpoint potential lead sources to reduce their lead levels to the lowest possible concentrations.

Before sampling, facilities should establish a plan on how they will respond to their sample results to protect the school and child care facility population from lead in drinking water. This may be dependent on a variety of factors (e.g., age of plumbing, population, water corrosivity, available resources, and other school and child care program priorities). EPA recommends that you prioritize remediation of drinking water outlets with the highest lead levels.

Make sure to also check with your state and local health department. They may have guidance or even requirements that include a lead remediation trigger.



Solutions typically should be addressed on both on a shortterm and on a long-term basis.

### Immediate Response

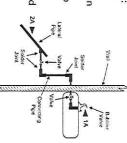
- Shut off problem outlets: If initial sample results from an outlet exceed the remediation level, the outlet can be shut off or disconnected until the problem is resolved.
- Share Test Results: Notify staff, parents, and students of test results and actions the school is taking.
- Increase Awareness and Public Education: If the remediation trigger is exceeded, take the initiative by providing information to your school community.

# Short-Term Control Measures

- Provide Filters at Problem Taps: Point of use (POU), or filter, units are commercially available and can be effective in removing lead.
- Flush Taps Prior to Use: Flushing individual problem outlets or all outlets may also represent a short-term solution. Learn how to use flushing as a tool appropriately in the <u>3Ts</u> <u>Flushing Best Practices.</u>
- Provide Bottled Water: This can be an expensive alternative but might be warranted if schools expect or are aware of widespread contamination and other remediation is not an exist.

# Permanent Control Measures

- Replacement of Outlets: If the sources of lead contamination are localized and limited to a few outlets, replacing these outlets or upstream components may be the most practical solution.
- Pipe Replacement: Lead pipes within the school and those portions of the lead service lines under the public water system's jurisdiction can be replaced.
- Provide Filters at Problem Taps: Some facilities may chose to use filters or Point of use (POU) units as a long-term or permanent control measure. It is important to follow manufacturer instructions for maintaining filters (e.g., change the cartridge).
- Reconfigure Plumbing:
  Ongoing renovation of school or childcare buildings may provide an opportunity to modify the plumbing system to redirect water supplied for drinking or cooking to bypass sources of lead contamination.



### Follow-Up Procedures

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Once a remediation option has been selected and implemented there are additional follow-up procedures that should be taken.

Work with plumbers and maintenance staff to ensure that additional samples are taken from any outlets that were impacted by replacement of fixtures, reconfiguration of plumbing, or other remediation actions to ensure that lead levels are reduced.

Schools and child care facilities should continue to test for lead regularly and make testing drinking water a part of their regular building operations.

