Follow-up Steps for Schools with Lead and/or Copper Sampling Results above the Action Level

Office of Water Quality

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Introduction:
It is imperative for schools to take corrective action if there is a lead and/or copper exceedance. The purpose of this fact sheet is to explain the steps a school needs to take if the drinking water sample results are above the lead Action Level (AL) of 15 parts per billion (also known as 15 ug/L) and/or copper AL of 1.3 parts per million (also known as 1.3 mg/L). The information provided in this Fact Sheet is based on EPA’s guidance document, “3T’s for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance.”

Follow-up Steps after a Lead and/or Copper Exceedance:
1. Shut Off Problem Fixtures
   Immediately shut off or disconnect any tap with sample results exceeding the applicable Action Level. Place a placard on the tap indicating that it has been shut off due to high lead or copper levels and will remain out of service until the problem has been corrected. Other interim measures may include:
   - Flush the piping system in your building every morning and especially after vacations.
   - Provide bottled water if necessary.
   - Use only cold water for food and beverage preparation.

2. Contact your Local Public Water System (PWS) and the Indiana Department of Environmental Management (IDEM). If your school is classified as a PWS, you will need to contact IDEM about following the EPA Lead and Copper Rule.
   If the sampling was conducted by you or on your behalf, make your public water supplier aware of any results that exceed the applicable Action Level(s). You should also notify IDEM of any sampling result(s) that exceeds the applicable Action Level(s). Notification should be sent to IDEM’s Drinking Water Branch at 317-234-7435 or DWBMGR@idem.in.gov.

3. Conduct Outreach to Staff and Parents
   Provide staff, students, and parents with a letter informing them of the lab results and describing your plans to address any results over an Action Level. Sample letters are attached.

4. Follow-up Sampling
   Conduct follow-up sampling to determine if the source of the contamination is the fixture or the connecting plumbing.
5. **Permanent Measures**
   Permanently reduce or eliminate the sources of lead or copper that originate in your building's plumbing. All measures must be conducted by a licensed plumber. Permanent measures to address long-term health concerns may include:
   - Shut off and remove or replace problem taps or components.
   - Check ground wires and eliminate any that may accelerate corrosion.
   - Check and replace all Lead Service lines. Contact local PWS to check status of lead service lines.
   - Replace lead pipes within the school or reconfigure plumbing to bypass sources of lead contamination.
   - Replace brass faucets and fittings that contain lead.
   - Replace drinking fountains that contain lead components.
   - Remove copper lines with lead solder.
   - Install time-operated solenoid valves to automatically flush problem outlets.
   - Use certified lead-free materials to repair or replace the facility's plumbing system.
   - Use only cold water for food and beverage preparation.
   - Clean aerators in accordance with regular maintenance schedule.

6. **Report Actions Taken**
   Review the results for all schools and report any remedial actions taken to IDEM.

   **It is important that you share your results and follow-up remedial actions with your school community and other interested stakeholders.**

7. **Seek Assistance from Others**
   Schools, school districts and early education facilities should research opportunities for assistance from local officials including the public water supplier, county health department, Plumbing Inspector, and elected officials; as well as from certified water testing laboratories.

**Additional Information:**
- For more information on lead and copper in drinking water, please visit IDEM’s website at [www.idem.IN.gov](http://www.idem.IN.gov).
- For questions and concerns, please contact IDEM’s Office of Water Quality, Drinking Water Branch at (317) 234-7435 or (800) 451-6027.
Template for Lead Results over the Action Level

*(NOTE: This is a sample letter to students, families, and staff from a school or early education or child care facility with laboratory results that exceed the Action Level for lead in drinking water. Delete or replace all items in red including this paragraph and add your school letterhead here.)*

*(Insert date)*

To the Students, Families, and Staff of *(insert school)*:

Our school system is committed to protecting student, teacher and staff health. To be proactive and protect our community, *(insert school)* tested our schools’ drinking water for lead.

**Why Test School Drinking Water for Lead?**

High levels of lead in drinking water can cause health problems. Lead is most dangerous for pregnant women, infants and children under six years of age. Exposure to high levels of lead during pregnancy contributes to low birth weight and developmental delays in infants. In young children, lead exposure can lower IQ levels, affect hearing, reduce attention span, and hurt school performance. At very high levels, lead can even cause brain damage.

To protect public health, the U.S. Environmental Protection Agency (EPA) suggests that schools and daycare facilities test their drinking water for lead. If lead is found at any water outlet at levels above 15 parts per billion (ppb), EPA recommends taking action to reduce the lead.

**Is the Drinking Water Safe in Our Schools?**

Due to recent nationwide events in regards to lead, we decided to ensure the safety of our children by testing the schools’ drinking water for lead. During recent sampling for lead and copper, some water taps at our school had lead levels that exceed the Action Level for lead in drinking water. The Action Level for lead in drinking water is 15 micrograms per liter (also known as 15 parts per billion (ppb)). Below is a list of the sample locations that exceeded the lead Action Level.

<table>
<thead>
<tr>
<th>Sampling Results</th>
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<tbody>
<tr>
<td>Date Sample Collected</td>
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We would like to inform you about our plans to reduce potential exposure to lead in drinking water at our school. Lead is not believed to be in our water source but plumbing and fixtures in our buildings may contain lead, resulting in an increase in the lead content in tap water. Exposure to lead is a concern because lead is a toxic metal that has a range of adverse health effects.

The administration takes these results very seriously and is moving immediately to safeguard the health of the students, faculty and staff. The following information describes steps we are taking to address the issue of lead in the water.

To safeguard our students and other sensitive individuals (including woman who are pregnant or nursing), our school is taking actions as follows:

Only include applicable items

What we are doing:
1. While exceeding the Action Level does not require provision of alternative drinking water sources, beginning XXXX we will be providing bottled water and will be shutting down all water fountains.
2. We have removed from service all taps with lead levels over the Action Level.
3. We are implementing a public information process that will include distribution of outreach material to all students, parents, teachers, staff and local officials.
4. We have developed a sampling plan to conduct testing at outlets (faucets, water fountains, etc.) where students and staff get water for drinking, beverage preparation and cooking.
5. We are implementing a flushing and water usage plan to safeguard against lead exposure from drinking water in the school at outlets that are found to be above the Action Level for lead. This includes the daily flushing of water fountains and/or faucets at sinks and the limitation of water consumption to cold-water faucets for food and beverage preparation.
6. We will undertake efforts to determine the cause of this lead Action Level exceedance and investigate if there is a corrosion issue. We will develop and put into place a corrective action plan as quickly as possible following additional testing and consultation.
7. Through periodic reports, we will keep you informed as to the progress of our efforts. These reports will serve to let you know what has been done and what is being done to safeguard against lead exposure from drinking water at our school(s).
8. We will replace the faucets and drinking water fountains that exceeded the lead Action Level.
9. Optional information can be included that announces an information display at the school on Lead in Drinking Water at Schools and/or an announcement about a workshop that will provide further information and will provide an opportunity for Q&A.

How Can I Learn More?
You may see a copy of all of our water testing results at the school district’s central office, which is open Monday through Friday from 7:30 AM – 4:30 PM and on our website under the “Public Info” tab at (insert school website). For more information about water quality in our schools, please contact (insert name and phone number). For information about water quality
and sampling for lead at home, contact your local water supplier or state drinking water agency.

Sincerely,

(Insert signature and title)

Modified from EPA’s “3T's for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance.”