



Frequently Asked Questions by Public Water Systems about Lead Testing of Drinking Water in California Schools

DISCLAIMER: This document is intended to provide answers to questions that may arise regarding lead testing of drinking water in California schools. Nothing in this document supersedes any statutory or regulatory requirements or permit provisions for public water systems.

Contents

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| Purpose and Requirements of Permit Amendment Requiring Public Water Systems to Assist Schools in Lead Testing of Drinking Water | 2 |
| Requests for Lead Sampling in Schools..... | 3 |
| Collecting Samples in Schools..... | 4 |
| Reporting Results | 6 |
| Sources of Additional Information about Lead Testing of Drinking Water in California Schools..... | 8 |
| Links to Resources Cited in this Document..... | 8 |

Purpose and Requirements of Permit Amendment Requiring Public Water Systems to Assist Schools in Lead Testing of Drinking Water

1. What are the new requirements for lead testing of drinking water in California schools? Why was this action taken?

As a result of a permit action by the State Water Resources Control Board Division of Drinking Water (DDW) on January 17, 2017, all community water systems are required to collect and analyze up to five water samples from drinking water fountains and regularly used drinking water faucets at a school, if the testing is requested by a superintendent or designee of a school, governing board or designee of a charter school, or administrator or designee of a private school.

Recent events in cities across the United States have shown that lead in drinking water remains an ongoing public health challenge and an important concern for children's health. DDW is taking action to allow schools (Kindergarten through 12th grade) to perform lead testing on water from regularly used drinking water faucets used for drinking or cooking, and requiring community water systems to assist schools in this effort.

2. Are schools currently required to test their drinking water for lead?

There are approximately 500 schools in California that are permitted as a public water system because they have their own water supply, such as a well. Those schools are already required to test their taps for lead (and copper), and have been performing this testing for many years. The DDW permit action does *not* apply to schools that are already regulated as public water systems.

However, most schools in California are served by community water systems which have not been required to test their water for lead under the current Lead and Copper Rule.

3. Why did our water system receive a permit amendment requiring lead testing of drinking water in schools when there are no schools in our distribution system?

DDW issued the permit action requiring lead testing of drinking water in California schools to all community water systems in California. If your water system does not serve potable water to at least one K-12 school listed in the [California School Directory](#), the permit amendment does not apply to your water system and no further action is necessary.

4. Our water system is regulated by a Local Primacy Agency (LPA), not DDW. How do the lead testing requirements apply to our system?

The permit provisions and testing requirements apply to all community water systems that serve water to a school, regardless of water system size. The LPA should be consulted as needed and required by the permit amendment. Sampling results should be reported to the DDW database.

5. Can we count any of these lead samples toward our Lead and Copper Rule sampling?

No.

6. Who pays for lead testing of drinking water in California schools?

The community water system that serves the school is responsible for all costs associated with collecting, analyzing, and reporting drinking water samples for lead testing at up to five locations at each school, and is required to meet with the authorized school representative to develop a sampling plan and review the sampling results. The community water system will *not* pay for any maintenance or corrections needed at the school if elevated lead levels are found in the drinking water, but is required to conduct repeat sampling at the school to confirm elevated lead levels and the effectiveness of any corrective action taken by the school.

Requests for Lead Sampling in Schools

7. When can lead testing be requested?

The superintendent or designee of a school, governing board or designee of a charter school, or administrator or designee of a private school can submit a written request for lead testing to their community water system any time before November 1, 2019.

8. Which schools can request lead testing of their drinking water?

The DDW permit action requires community water systems to assist any school in their service area that is listed in the [California School Directory](#). This directory includes schools for grades K-12, including private, charter, magnet and non-public schools. The directory does *not* include preschools, daycare centers, or postsecondary schools.

9. I haven't heard from any schools, do I need to do anything?

The public water system is not required to do any outreach to the schools. You may choose to do this; however, it is not required.

Collecting Samples in Schools

10. How will the lead testing be performed?

A water system representative will make an appointment to come to the school, develop a sampling plan, and collect up to five water samples. Samples may be collected from regularly used drinking fountains, cafeteria/food preparation areas, or reusable water bottle filling stations. Samples may be taken at sites where drinking water receives additional treatment, such as water softening. Sampling sites should be selected according to the [sampling guidance prepared by DDW](#).

The samples will be sent to a laboratory for analysis. Laboratories used for sample analysis must be certified for lead testing of drinking water by the state [Environmental Laboratory Accreditation Program \(ELAP\)](#).

11. Does DDW have to review the lead sample plan that the school representative and I put together?

No. You do not need to have the lead sample plan reviewed nor do you have to submit it to DDW.

12. When will the sampling be conducted?

Within 90 days of receiving the sampling request, the water system must meet with school officials, finalize a sampling plan, and collect water samples, or develop an alternate schedule that is approved by DDW.

The samples will be collected while school is in session in order to get the most representative results. Samples will be collected by a water system representative who is adequately trained to collect lead samples. The water system will receive the results of the sample analyses from the laboratory and meet with school officials to discuss the sampling results.

13. Can I collect any samples during the summer when school is not in session?

If repeat samples are needed, the samples will be collected while school is in session. It is acceptable to collect the samples after school starts up again after summer break.

14. What size sample bottle should be used? How should the sample be preserved? Should aerators be removed? Can samples be invalidated?

DDW has prepared a [sampling protocol](#) for lead testing of drinking water in California schools, which includes information on sample bottle size, preservation and chain of custody requirements, reporting requirements, and sample invalidation procedures. It should be noted that the DDW sampling protocol has different

requirements than the USEPA's [3Ts \(Training, Testing and Telling\) Program for Schools](#), including sample size and lead action level. Water systems should adhere to the DDW sampling protocol when conducting lead sampling in California schools.

15. Can a school take drinking water samples at more than five locations?

The DDW permit action requires that water systems assist schools in sampling up to five locations at each school. If the school district wishes to sample additional locations, the water system is not required to assist in the collection or analysis of those samples. Only five samples per school will be reported to the DDW database.

16. My lab gave me 250 mL sample containers, is this ok?

No, 1-liter sample containers are required. The lab doesn't know all of the requirements of this monitoring program; it is the public water system's responsibility to collect the samples according to the procedures described in the sample guidance document provided as attachment A to your permit amendment. (An updated sample guidance document is on our [Lead Sampling of Drinking Water in California Schools website](#).)

17. How does the lab know which analytical method to use?

As with any other drinking water sample, you need to provide instruction to the lab. You may use one of the following analytical methods for this monitoring program: test methods EPA 200.8, EPA 200.9, EPA 200.5 and/or SM3113B.

Any laboratory analyzing for lead must be ELAP-accredited and be able to achieve a Practical Quantitation Level of 5 ug/l (ppb).

18. Who figures out the sample site ID's so the results get submitted to the State electronically?

The lab will submit the school lead sample results using our existing laboratory data submittal methods. Water systems collecting lead samples for schools must first log into the Division's [School Lead Sampling and Reporting Tool](#) (<https://drinc.ca.gov/lisics/>) to add school sample sites to a sample site inventory. Using this tool, the water system will then be assigned the sample site ID's needed to properly label samples for each school sample site. Additional instructions are provided on the School Lead Sampling and Reporting tool. The sample site ID's should have this format: 3710010-AAB-A (for public water system #CA3710010).

19. What do I do if I turned in samples with sample ID's that don't look like "3710010-AAB-A"?

See above. Log on to the Division's [School Lead Sampling and Reporting Tool](#) (<https://drinc.ca.gov/lisics/>) to add school sample sites. Then give the sample site ID's to the lab (along w/the corresponding names that you had initially used) and ask

them to submit the results via EDT using the sample ID's generated by the School Lead Sampling and Reporting Tool. Additional instructions for the labs are on our [Lead Sampling of Drinking Water in California Schools website](#).

20. When taking the school samples, my water system would like to take a distribution system sample at the same time. How do I report this sample result?

A distribution system sample, such as from a routine Total Coliform Rule (TCR) monitoring location near the school, may be taken at the same time as the school sampling is performed to determine water quality before it enters the school's plumbing. This is a routine practice at some water systems; however, these distribution samples are not required by the DDW permit action and should not be reported to the DDW database, because the database is only designed to accept sample results from school tap locations.

21. The repeat sampling seems so complicated, is there a helpful diagram?

We have updated the sample guidance documents, and we continue to do so as we receive questions/comments. We added a new summary table to the [Sampling Guidance for Schools](#) document that helps describe the initial, repeat, and confirmation sampling requirements.

Reporting Results

22. Who will get the results of lead testing of drinking water performed at California schools?

The lab results from the sampling are reported directly to the community water system. The water system will then provide the results to the school and meet with the school staff to assist with interpretation of the sample results.

The Division will not be posting results on a webpage. Water systems are required to include a summary of the number of schools requesting lead sampling in their annual Consumer Confidence Report (CCR). An example of a summary statement is: "A total of 27 schools submitted requests to be sampled for lead. Up to 5 samples were collected at each school."

23. What do I do with the laboratory results after the lab gives them to me?

Per your permit amendment, you are required to provide the school(s) with their corresponding lab results. You do not need to provide the results to DDW since the laboratory results will be submitted electronically. If you have a result that is greater than the action level (15 ppb), we would appreciate an email or phone call, however this is not required. (See contact information below).

24. What is the action level for lead in drinking water at schools?

The DDW sampling protocol and permit action have established 15 parts per billion (ppb) as the action level for lead sampling in schools. This is the same concentration as the action level for residential tap sampling conducted by water systems for the Lead and Copper Rule. One part per billion is equivalent to about one drop in an Olympic-sized swimming pool.

The USEPA's [3Ts \(Training, Testing and Telling\) Program for Schools](#) currently uses 20 ppb in a 250 milliliter (mL) sample as the trigger level for follow-up testing; however, the California lead sampling of drinking water in schools sampling protocol was developed to align more closely with the tap sampling already performed by community water systems under the Lead and Copper Rule.

25. The Lead and Copper Rule uses a 90th percentile value to determine compliance with the action level. Does that apply to the lead sampling in schools program?

Each sample location at a school is compared individually to the 15 ppb action level. There is no 90th percentile calculation.

26. What happens if lead is detected in the drinking water at a school?

The USEPA's [3Ts \(Training, Testing and Telling\) Program for Schools](#) and the American Water Works Association's [Assisting Schools and Child Care Facilities in Addressing Lead in Drinking Water](#) contain detailed information on routine, interim, and long-term remedies if lead is detected in drinking water at a school.

In addition, the community water system will notify school officials within two school business days of receiving any sample results that exceed the lead action level of 15 parts per billion (ppb), and will then meet with the school staff to assist with interpretation of the sample results and provide information regarding potential corrective actions. The water system will conduct repeat sampling at any locations that exceed 15 ppb and obtain the results from the laboratory within 10 business days, as well as after any corrective action is taken. Repeat sampling will not be conducted at a sample site if the school chooses to remove the tap from service.

The community water system that serves the school is responsible for all costs associated with collecting, analyzing, and reporting drinking water samples for lead testing at California schools required by the January 17, 2017 permit action and the water system is also required to meet with the authorized school representative to develop a sampling plan and review the sampling results. The community water system will *not* pay for any maintenance or corrections needed at the school.

It should be noted that DDW has no regulatory authority over schools served by public water systems and cannot require any specific action be taken by the school or school district in the event of a lead action level exceedance at a school.

27.If elevated lead levels are found in a school’s drinking water, will other drinking water tap locations be sampled for lead?

If elevated lead levels are found in a school, the school district may choose to sample additional drinking water tap locations; however, the community water system that serves the school is not required to conduct sampling at any locations other than the five locations chosen for initial sampling.

28.If elevated lead levels are found in a school’s drinking water, will the community water system that serves the school receive a citation or fines?

Community water system compliance with the Lead and Copper Rule will continue to be determined by the results of residential sampling done according to the water system’s Lead and Copper Rule tap sampling plan. Elevated lead levels found during a special sampling event at a school will not cause a water system to be out of compliance with the Lead and Copper Rule.

Sources of Additional Information about Lead Testing of Drinking Water in California Schools

29.Whom can I contact for more information about lead testing of drinking water in California schools?

If you have additional questions about any aspect of lead testing of drinking water in California schools, send an email to DDW-PLU@waterboards.ca.gov, or call (916) 449-5646.

Links to Resources Cited in this Document

| Title | Author | Link |
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| DDW Lead Sampling in Schools Website | DDW | http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/leadsamplinginschools.shtml |
| 3Ts for Reducing Lead in Drinking Water in Child Care Facilities | USEPA | http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=20017JVA.txt |
| 3Ts for Reducing Lead in Drinking Water in Schools | USEPA | https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf |
| Assisting Schools and Child Care Facilities in Addressing Lead in Drinking Water | AWWA | http://www.awwa.org/portals/0/files/legreg/documents/assistingchoolslead2005.pdf |
| California School Directory | CDE | http://www.cde.ca.gov/re/sd/index.asp |
| Centers for Disease Control Healthy Schools | CDC | http://www.cdc.gov/healthyschools/nutrition/schoolnutrition.htm |
| Certified Environmental Laboratories | ELAP | http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/elap.html |

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| in California | | rtlic/labs/index.shtml |
| Consumer Confidence Report Search Tool | USEPA | https://ofmpub.epa.gov/apex/safewater/f?p=136:102 |
| DDW District Office Contact Information | DDW | http://www.waterboards.ca.gov/drinking_water/programs/documents/ddwem/DDWdistrictofficesmap.pdf |
| DDW Lead Sampling in Schools Sampling Protocol | DDW | http://www.waterboards.ca.gov/drinking_water/ce/rtlic/drinkingwater/leadsamplinginschools.shtml |
| DDW Supply Service Area Lookup Tool | DDW | http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/water_supplier.shtml |
| Home Water Testing | USEPA | https://www.epa.gov/sites/production/files/2015-11/documents/2005_09_14_faq_fs_homewatertesting.pdf |
| National Drinking Water Alliance | UC | http://www.drinkingwateralliance.org |
| School Water Quality Improvement Funding Program | DFA | http://www.waterboards.ca.gov/water_issues/programs/grants_loans/ |
| Water Quality Funding Sources for Schools | USEPA | https://www.epa.gov/dwreginfo/water-quality-funding-sources-schools-resource-k-12-schools-and-child-care-facilities |