

Summary of Sampling and Procedures for Lead Testing in Schools

To ensure that exposure to lead by students and staff is below the Action Level of 15 ppb at the drinking water locations sampled at the school, and that the water system and school complete all required steps before students and staff are notified of the lead testing results, corrective actions, and educational materials, the Sampling Instructions and Sampling Guidance should be followed completely. The steps necessary to be completed by the water system and/or school and to properly and fully complete the lead testing process are summarized below.

1. Water system and school should read the Initial, Repeat and Confirmation, and Corrective Action Check Sampling Instructions, and the Sampling Guidance Documents.
2. School selects up to five of the busiest drinking water outlets for sampling and testing. DDW database can accept up to 26 locations (25 sample sites and 1 distribution source site) to be sampled for testing.
3. Each location selected for testing should be assigned a Sample ID. Each Sample ID should use the following format: <Water System No.>-<School ID>-<Sample ID> i.e. 1710001-AAC-A. All repeat, confirmation, and corrective actions samples collected at a location are to be assigned the same Sample ID.
4. Water system and school complete the Lead Sampling Plan, Chain of Custody, and sample bottle labels to include the Sample IDs.
5. Water system trained sampler performs initial sampling. Water system may train school personal to conduct the sampling if necessary.
6. Water system and school coordinate in reviewing initial sample test results within 10 days of receipt of results from laboratory, determine any Action Level exceedances or plan any repeat sampling.
7. AB 746 requires after an Action Level is exceeded, the school “shall take immediate steps to make inoperable and shut down from use all fountains and faucets where the excess lead levels may exist.” If a school wishes to resample the initial sample location, the school should complete the sampling as soon as possible, post the fountain or faucet “do not use for drinking”, and continue to use the fountain or faucet for non-drinking purposes until the repeat sample is collected, maintain regular usage.
8. Water system trained sampler performs repeat sampling.
9. Water system and school coordinate in reviewing repeat sample test results within 10 days of receipt of results from laboratory, determine any Action Level exceedances, plan confirmation sampling (if needed), and select corrective actions.
10. If no corrective actions will be implemented the school needs to remove from service the drinking water outlets with repeat lead sampling results confirming greater than 15 ppb.
11. Investigate whether other drinking water locations that were not tested but can be reasonably expected to have similar (greater than 15 ppb) lead levels based on the age, material, location, and/or plumbing configuration and should be removed from service permanently or until addressed using the EPA 3Ts recommendations for corrective actions.
12. A drinking water location with an Action Level exceedance requires that a sample be collected at the service connection to the school to determine the lead level of water

entering the school from the distribution system. The service connection sample location should be flushed before sampling (this is not a first draw sample) to ensure that the sample is representative of distribution system water quality.

13. In preparation for corrective actions school removes from service all drinking water outlets with a confirmed (from repeat sampling) Action Level exceedance.
14. Water system trained sampler performs confirmation sampling (if needed).
15. Water system and school coordinate in reviewing confirmation sample test results within 10 days of receipt of results from laboratory, determine any Action Level exceedance, and select corrective actions.
16. If no corrective actions will be implemented the school needs to remove from service the drinking water outlets with confirmation lead sampling results greater than 15 ppb.
17. In preparation for corrective actions school removes from service all drinking water outlets with a confirmed (from confirmation sampling) Action Level exceedance.
18. It is recommended that the school complete a Corrective Action Plan describing the selected corrective actions to be implemented at each drinking water locations with lead levels above 15 ppb.
19. Water system and school may coordinate in the release of lead testing results, educational information, and planned corrective actions to students, staff, and water system customers. The water system shall not release school lead sampling results to the public until at least 60 days after receipt of the results of the initial round of lead sampling and only after the water system has first discussed the results with the school.
20. School implements corrective actions.
21. Water system trained sampler performs corrective action check sampling.
22. Drinking water locations with check sample results less than or equal to 15 ppb have lead levels less than the Action Level, are suitable for consumption, and need no further testing.
23. The water system may discontinue lead sampling at the sample site if the lead sample collected after completing some corrective action is at or below 15 ppb.
24. Drinking water locations with check sample results greater than 15 ppb have lead levels that exceed the Action Level and require additional corrective actions and check sampling and need to be removed from service.
25. If necessary the school may select problem drinking water outlets to be permanently removed from service.
26. Water system and school maintain all test results, guidance documents, corrective action information, and lead testing correspondence in permanent file for future reference.

Summary of Repeat Monitoring At Each Sample Site

DDW AND CDE PRESS RELEASE CORRECTION: 2 DAY REPORTING OF RESULTS IS FOR ACTION LEVEL EXCEEDANCES ONLY (SEE BELOW)

Route	Initial Sample Collected within 90 days of request or per alternative sampling plan.	First Repeat Collected within 10 business days of receipt of Initial sample results	Second (Confirmation) Repeat Collected within 10 business days of receipt of First Repeat sample results	Corrective Action Sample Collect Corrective Action sample after any corrective action
1	Lead is less than or equal to 15 ppb. Monitoring is complete.	No action	No action	No action
2A	Lead is greater than 15 ppb AND the sample site remains in service. Proceed to first repeat.	First Repeat lead sample is greater than 15 ppb. Repeat monitoring is complete. Remove sample site from service.	No action	Corrective action lead sample is greater than 15 ppb. Continue with corrective actions. (School is responsible for additional samples.)
2B1	Lead is greater than 15 ppb AND the sample site remains in service. Proceed to first repeat.	First Repeat lead sample is less than or equal to 15 ppb. Collect second repeat sample	Second Repeat lead sample is greater than 15 ppb. Repeat monitoring is complete. Remove sample site from service.	OR Corrective action lead sample is less than or equal to 15 ppb. Monitoring is complete.
2B2	Lead is greater than 15 ppb AND the sample site remains in service. Proceed to first repeat.	First Repeat lead sample is less than or equal to 15 ppb. Collect second repeat sample	Second Repeat lead sample is less than or equal to 15 ppb. Repeat monitoring is complete.	No action
3	Lead is greater than 15 ppb AND the school removes the sample site from service within 10 business days of the receipt of the sample analysis.	No action	No action	No action

Time Requirements for Reporting Results

- Within 90 days following receipt of a written request for sampling from a school, the water system must either 1) finalize a sampling plan with the school and complete initial sampling, or 2) develop an alternative schedule with the school for preparation of the sampling plan and completing sample collection. An alternative plan must be submitted to DDW for approval within 90 days of receipt of the written request.
- The water system must provide and discuss the sample results (initial, first repeat, second repeat, and corrective action) with the school within 10 days of receipt of the sample results from the testing laboratory, and within 2 business days of receipt when the sample results include an Action Level exceedance.
- First repeat samples must be collected within 10 business days of receipt of the initial sample results; second repeat samples must be collected within 10 business days of receipt of the first repeat results. At least one Corrective Action sample should be collected immediately following installation of the corrective action.
- The water system should request to the laboratory that testing and reporting for all repeat samples be completed in 10 days.
- The water system must not release the sampling results to the public for 60 days following the receipt of the initial sample results unless the water system releases the data in compliance with a Public Records Act (PRA) request for the specific results.
- All lead sample results should be reported electronically by EDT to DDW using the School Lead Sampling and Reporting Tool at <https://drinc.ca.gov/lscs/>. It is recommended but not required that a public water system notify DDW of an action level exceedance at the same time they notify the school. (via email to DDW-PLU@waterboards.ca.gov)