

## Testing Drinking Water for Lead at Public Schools and State Licensed Day Care Facilities: Advisory September Meeting

January 25, 2017

RI Department of Health, Beck Conference Room, RIDOH Lower Level

### Attendees:

1. Andy Andrade, RI Department of Education (RIDE)
2. Leeanne Black, Department of Health (DOH)
3. Bonnie Cassani Brandt, Department of Health
4. Clay Commons, DOH Drinking Water Quality
5. Cindy Giroux, RI Association of School Principals
6. Elizabeth Herron, URI Cooperative Extension
7. Sally Johnson, Department of Health
8. Lorraine Joubert, URI Cooperative Extension
9. Alyson McCann, URI Cooperative Extension
10. Patricia Nolan, Brown University
11. Amy Parmenter, DOH Drinking Water Quality
12. Danielle Phillips, DOH Intern
13. Josephine Saltzman, Ocean State Analytical Service, LLC
14. Chris Smith, Dr Daycare Centers
15. June Swallow, Chief, DOH Drinking Water Quality

**Purpose of the Meeting** update on the current status of the project, review draft database, develop format and mechanism for posting data online and begin discussion about report to the General Assembly

Lorraine reviewed the progress to date (progress report and other materials posted on the website <http://web.uri.edu/nemo/lead-in-water/>). Overall, progress is good. In general schools are responding positively and we are getting quite a few samples as well as data from the schools districts that have been proactively testing for lead.

There was some discussion regarding those districts from which we had not heard. Jo Saltzman explained that she had heard from several districts that they were confused over exactly what their responsibilities were regarding the testing. In particular Portsmouth had investigated having her collect samples from each of their water fixtures, until they discovered the cost. June Swallow suggested that we should contact the water department to see if they might be able to help collect samples from the Portsmouth schools. [Note – immediately after the meeting she contacted the water department and they were willing to help out. By the next morning the Portsmouth School Facilities Manager, Matt Murphy, had reached out to Clay and Elizabeth and arrangements have been made to work with him to collect samples in the Portsmouth schools.]

### 300 Public Schools on Municipal Water:

- Completed lead testing on their own (that we know about) – 82 (Waiting on East Providence data)
- Contractor hired to complete lead testing – 17 (Pawtucket – said they would share the data once it is available)
- Samples at the lab (as of 1/20/17) - 5
- Data received from samples collected via this project (as of 1/20/17) - 31
- Received bottles to sample (as of 1/20/17) - 40
- Bottles ready to go - 9
- Waiting to receive bottles - 43
- Waiting for confirmation from – 9 (Woonsocket)
- Not responded regarding their participation yet – 54 (Portsmouth, Providence primarily)
- Not planning to participate - 10 (North Providence – building new schools, use of bottled water only, or no reason given)

Results from samples collected for this project so far have been generally below detection levels. Kitchen(nette) faucets and sprayers have been the fixtures more likely to have measureable lead levels than fountains or coolers. One kitchenette faucet in a Met School building was found to have a value above the action level. The school was immediately notified and they took corrective action. A re-test found measure levels, but well below the action level. Immediate notification of values above the action level and support to correct and re-test is the model being used for all elevated values. Sample results will be sent out to schools once the results letter and template for sharing data with parents is approved by DOH public information staff. The use of a separate form for Actions to reduce lead was approved to be attached to the results letters. The Actions would also be setup as a webpage on the DOH and project sites that prints well.

June Swallow mentioned that she would be presenting information about the project at the RI Water Works Association's Legislative Breakfast on 1/30/17. She would also be providing information to the DOH Director for an oversight committee hearing on 2/1/17.

Patricia Nolan suggested that school superintendents should know about those events in advance if possible. She also expressed concern about the results letters not giving school superintendents adequate notice before posting results online. The results letter should be re-worked to assure schools that results will not be posted immediately so that there is time to respond to any elevated values. [Note – the revised letter provides additional time before results are posted online.]

An extended discussion about how to handle results from schools that did on their own testing ensued. Elizabeth Herron assumed that the contractors or other parties responsible for the testing would have done the necessary follow-up. Clay Commons was not sure that we could make that assumption and that we needed to contact those school districts. Discussion focused on one particular district which has been assessing its schools for a number of years, which had

a number of elevated values. The testing protocol used in that district is quite different than that being used for this project, which is more similar to the 3Ts protocol. They test late in the summer, when pipes have been stagnant for months, and include bathroom faucets, which are not required to be lead-free. Those results confirm that providing guidelines for school testing programs is an important recommendation for the report to the General Assembly. It was determined that another results letter should be developed to send to schools that did their own testing, which would include the actions to reduce lead levels in water. [Note: Follow-up with the school district found that the fixtures with elevated values had been re-tested and were found to be below the action level. Those data are now included in the dataset.]

Andy Andrade expressed concern that school districts not be “blind-sided” by discovering that elevated values were posted or that they were listed as having not tested. He said he would follow-up with Tim Ryan to be sure the districts in question were away of the issue. [Note: Data was sent to Tim so he was aware of current results.] Andy also agreed to work with Tim to contact school districts that have not yet responded to URI on participating in the sampling program.

Sally Johnson explained how project data might be handled on the DOH website. Some discussion occurred and it was decided that it would be most effective for Elizabeth to send her the data file to see how best to progress. Sally, Clay and Elizabeth would continue to work on how best to present the data online and try to have something ready to go by March 1<sup>st</sup>.

There was discussion about testing at daycares. Bonnie Cassani Brandt confirmed that water testing is part of the initial licensure process. But since it is usually done by a licensed-lead inspector daycare providers may not be aware that it was part of that inspection process. Actual sample values are typically not easily available. Paper reports are submitted and usually only archived for several years. In addition the reports often only check-off that values were lead-safe rather than report the concentration.

Project funds should be sufficient to support testing at select daycares. A list was created prioritizing daycare centers within a 3 mile radius of schools reporting 10 students or more with elevated blood lead levels. Larger centers (capacity of greater than 100 children) with those buffers were also targeted. Pat Nolan suggested that Kids Count might be helpful for formatting the sharing of information and perhaps at finding volunteers to collect samples from the daycares. Sally Johnson mentioned that DOH funds community programs that might be able to fund volunteers as well (need to determine the contact for that).

Leeanne Black, a new hire at DOH introduced herself. Phone calls regarding school sampling results will be directed to her, so she asked to be included in all results emails and other pertinent communications.

A revised outline for the report to the General Assembly was developed with responsible parties identified.

## Report Outline:

### Executive Summary (2 pages) (URI)

1. Overview of the project (URI)
2. Overview of lead regulations (Danielle, DOH)
  - Existing lead regulations
    - Federal
    - State - legislation, regulations, and policies
  - Current practice and enforcement mechanisms
    - Safe Drinking Water Act (SDWA)
    - Lead Poisoning Prevention Program (LPPP)
    - Lead Contamination Control Act (LCCA)
    - DOH, Healthy Homes, Public Water Supplies
    - DCYF
    - RIDE
  - Summary of findings
3. Public Water Supplies (Leeanne, DOH)
  - Lead and Copper Rule – history and compliance
    - Municipal Systems
    - Smaller community systems
    - Non Transient Non Community systems (schools)
    - Transient Non Community systems?
    - Self-supplied schools and day cares
  - Enforcement and compliance ongoing
  - Summary of findings
4. Schools and Daycares on Municipal Water (URI)
  - Sampling project overview
  - Sampling plan review
  - Participation
  - Results summary
  - Summary of findings
5. Findings and Recommendations (URI with input from DOH and Advisory Committee)
  - Legislative, Regulatory and Policies
  - Operational (i.e. how can schools/daycare can implement recommendations)
6. Appendices
  - Sample results
  - Proposed legislative language, regulations or enforceable procedures
  - Resources (links to project information and educational materials)