

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

November 16, 2016

RI Department of Administration, 1 Capitol Hill, Providence, RI, Executive Dining Room

Attendees:

1. June Swallow, Chief, DOH Drinking Water Quality
2. Clay Commons, DOH Drinking Water Quality
3. Andy Andrade, RI Department of Education (RIDE)
4. Alyson McCann, URI Cooperative Extension
5. Elizabeth Herron, URI Cooperative Extension
6. Lorraine Joubert, URI Cooperative Extension
7. Chris Smith, Dr Daycare Centers
8. Melissa Orpen-Tuz, Department of Health
9. Amy Parmenter, DOH Drinking Water Quality
10. Cindy Giroux, RI Association of School Principals

Purpose of the Meeting: to reach consensus on the revised scope of work, the sampling plan and the outreach plan to schools, begin discussing recommendations, continue compiling relevant data, and begin developing a project schedule.

Lorraine reviewed the progress to date (progress report and other materials posted on the website <http://web.uri.edu/nemo/lead-in-water/>). There was some discussion to ensure that the sampling strategy and procedures reflect the EPA 3Ts guidance. Those materials will be reviewed and revised as needed to ensure that sampling collection procedures comply with that document.

The list of prohibited water coolers (appendix in the 3Ts) should be included with correspondence sent regarding the project so that schools can review it to be sure they don't have those. Also there was a question about sampling from units with filters (many new coolers or bottle fillers have filters designed to remove lead and other impurities). It was agreed that given the limited number of samples that will be possible under the current funding that fixtures with filters that are properly maintained not be sampled. In addition, unless kitchens are used for food or beverage preparation, faucets in them will not be tested.

Lorraine sought confirmation about public water supply (PWS) schools (those with their own wells); do they test water at the taps? Clay confirmed that they do, thus those schools needed be sampled under this project.

Andy suggested that we investigate extending the timeline via the legislature as well as consider asking for funding to cover at least some data acquisition from daycares. He also recommended that we make

an effort to cultivate a new champion in the legislature since Eileen Naughton (legislation author) is no longer in the General Assembly. Arthur Handy, a co-sponsor, has apparently expressed an interest in the project progress and looked forward to the report, and thus might be a good option.

Chris brought a list of questions regarding the project from the RI Business Owners in Child Care Association (BOCA). Those focused largely on how testing would be done in daycares. [During the course of the meeting most of those questions were addressed.] He wondered if there were a daycare within a school building (there are many schools with pre- and post-school programs licensed via the DCYF as daycares) would be responsible for testing? Elizabeth said that we should ensure that at least 1 of the minimum of 3 samples per school building be taken from a drinking water source used by daycare facilities. Since daycares typically use water pitchers and paper cups, it will be important to focus on kitchens or whichever faucet is used for filling those in the daycare area. June asked about progress in mobilizing Watershed Watch volunteers to collect samples at daycares. There was discussion and support for reaching out to watershed organizations in urban areas who also have experience sampling and would likely be interested in assisting.

Alyson mentioned that the contract labs should send schools not only the sample bottles, but also the sampling procedures and chain of custody forms (as developed by this project). That means that we need to get those materials completed with Sue Stableford (our plain language specialist) as soon as possible.

Once sampling has begun, URI will receive results from the lab, maintaining a database. Schools and the superintendents' offices will be sent their results as quickly as possible. The results reports will need to be clear, easily understood, and provide information on next steps in the event of elevated values. The recommendations should address both short and long term corrective actions. URI and DOH will work with Sue to create the reporting template. Responses will be based on the 3Ts guidance.

June inquired as to whether we would also be posting the results on the project website, stating that we should. Elizabeth responded that we could, but would have to post them as pdfs. Developing a clear reporting tool that lends itself to those online pdfs becomes even more important. Also, how will we acknowledge the PWS schools? It was decided that the results from those schools would be included on the website and that Clay would provide those data. This will be important since some districts have schools that are supplied by other PWS with other schools managing their own PWS. We'll have to provide information for both. In addition, a letter should be sent to self-supplied schools to let them know where they fit in. Also, June confirmed that lead is the primary concern, that testing for lead was the legislature's intent, and we should sample for lead only, not copper, to maximize the number of samples.

There was discussion on whether schools would want to participate, especially with information being so public. But Cindy largely alleviated that concern when she mentioned that there was a great deal of

interest in her community and she had heard from others all. The public is interested in this information and the school committees will want to be able to provide it. This low-cost option would be appealing.

Cindy emphasized that we had to be sure to let the districts know what the options were for addressing problems in the event of elevated lead values. She also suggested that initial communication be via the school superintendents and work through them. We should also communicate with the RI Association of School Superintendents (RIASS -Tim Ryan, executive director, tprtgo@cox.net), as well as RI Association of School Committees (RIASC -Tim Duffy, executive director, info@ri-asc.org) and the RI Association of School Principals (RIASP -Donald Rebello, Executive Director, drebello@riasp.org). Cindy planned to share information with the executive committee of RIASP.

Cindy and Andy both suggested that having a point of contact appointed at the district level to coordinate with the schools within that district and with project staff/lab would be the most efficient way to progress. They would be the one to determine if school staff or another district employee (or themselves) would be responsible for identifying fixtures and/or collecting samples, and help to coordinate sample pick-up.

Alyson asked that we discuss the letter review process – we need to get the outreach to superintendents going and want to be clear on what the DOH review requirements are. Andy also suggested that we have Tim Ryan review the letter for tone and expectations before finalizing it.

Recommendations:

Clay stated that we should use the 3Ts as the recommendation to districts for responding to results.

Andy advised that we investigate what other states have done regarding schools testing for lead. We should consider making the recommendation that a regular checklist to be signed off on by the superintendent be developed (similar to the school safety plans that are reviewed every three years).

We need to clarify again what the DCYF regulations are in practice. The regulations state that water sampling is conducted at licensure, but apparently they may not actually be happening.

Amy expressed concern regarding quality assurance for bottle labeling and change of custody forms. Elizabeth agreed that we'll have to emphasize the need to ensure that whoever picks up the samples (project staff or lab couriers) will have to carefully review the sample bottle labels to make sure they match the sample datasheet / chain of custody forms. If there are any differences those will have to be corrected prior to leaving.