

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

September 27, 2016, RI Department of Health, 3 Capitol Hill, Providence, RI, Room 209

Attendees:

1. June Swallow, Chief, DOH Drinking Water Quality
2. Clay Commons, DOH Drinking Water Quality
3. Darlene Price, RI Housing Resources Commission
4. Eugenia Marks
5. Pat Nolan, Brown University
6. Laura Brion, Childhood Lead Action Project
7. Jason Blais, Atlantic States Rural Water and Wastewater Association
8. Henry Leibovitz, DOH Laboratories
9. Bonnie Cassani Brandt, DOH Healthy Homes & Environment
10. Tim Ryan, RI School Superintendents' Association
11. Veronica Davis, RI Department of Children, Youth and Families (DCYF)
12. Stephanie Renzi, RI Department of Children, Youth and Families (DCYF)
13. Josephine Saltzman, Ocean State Analytical Services, LLC
14. Alyson McCann, URI Cooperative Extension
15. Elizabeth Herron, URI Cooperative Extension
16. Lorraine Joubert, URI Cooperative Extension

Purpose of the Meeting: to review and agree on the scope of work for the project and begin collecting project data

The **scope of work was affirmed** (with minor edits as submitted by Clay Commons). Remainder of the meeting focused on details related to next steps to implement it.

June Swallow emphasized that it would be important to ensure that a mechanism to deliver sample results to the school be incorporated into the project. Schools should be informed about:

- Individual sample values for the taps/sources assessed,
- What those results mean,
- Links to the 3Ts guidance materials

Schools will need these resources to address any elevated levels and/or to communicate with the public regarding those results.

USEPA's 3 Ts (<https://www.epa.gov/dwreginfo/reducing-lead-drinking-water-schools-revised-technical-guidance>) is being updated, but may not bridge the gap between the Safe Drinking Water Act (SDWA) and the Lead Contamination Control Act (LCCA) as had been hoped.

Josephine Saltzman questioned why this legislation failed to include private schools as all previous school safety regulations had?

Clay reminded the committee that the purpose of this legislation was to identify lead levels at the tap, as opposed to public water supplies which need to confirm that the corrosion control/treatment systems are functioning and that lead levels in the supply water meet criteria. Water suppliers already conduct the necessary testing of the water supplied, but plumbing within structures could result in elevated levels that are not identified. Agreed that focus of this sampling is to identify taps and collect samples, not plumbing assessment. If lead is found, recommendation should be to conduct full 3T assessment. Group charge is also to make recommendations to address gaps and assure compliance

Lead monitoring in RI school/daycare drinking water is happening, but may be following various protocols and not be occurring on an annual basis, or using the same standard.

Bonnie Cassani Brandt: For daycares, which require a lead safe certification of water for licensing, DCYF uses random daytime sampling of all of the sources of drinking and cooking water (i.e. not wash sinks, but all taps that children might be drinking from). A 1-liter, 1 minute flushed sample is taken, with 15 ppb the action criterion.

Since 2012 inspectors have been entering the lead safe certificates into the DOH database themselves, and are required to keep their own records for only 3 years, so the DOH database may not have all the certifications in that database, but all licensed daycares have been tested and certified lead safe.

Veronica Davis - Drinking water sampling for lead is done for the initial licensing only – not the biennial renewals. The larger daycare centers (as opposed to home-based providers) have just completed their renewals, so we missed an opportunity for those to have additional lead samples collected. Home-based provider renewals are on a rolling basis (~ 40 -50 home providers per month), so it may be 12 – 18 months before all of those renewals are up.

Adding a requirement to sample lead in drinking water as part of the renewal process should be considered as part of any revisions to the licensing requirements to ensure that providers are providing lead safe water. Due to the potential financial impact of an elevated lead test, having certified inspectors collect those samples in daycares would be preferable to self-sampling.

Because there are many daycares that were licensed prior to 2003 (when DOHs database begins), those certifications will be very difficult to find, and may only indicate whether a certificate exists or not (rather than a numeric value). DCYF will provide a table of all providers including the year that they received their initial license, so we can identify providers that haven't tested in years or even decades.

Since licensed daycare providers have been certified as having lead levels of less than 15 ppb, the committee agreed that those records constituted a baseline of information as required by the legislation, and that we should focus the limited resources (time and funds) of this project on the schools.

Pat Nolan – Can we use building dates and locations to prioritize efforts? Also speaking with the plumbing community may help us to determine how much we need to worry and which systems might pose the most concern.

Other criteria include focusing on neighborhoods with children with documented high blood lead levels. Barbara Morin (DOH) will be sending data to help identify those neighborhoods. Elementary schools should also be a priority since they serve children at an age when lead is most likely to create harm. Also schools that are likely to have lead service lines should be assessed (Providence Water has those data posted online).

June Swallow – Based on RIDE materials survey, may be able to ID schools that need more samples.

The sampling protocol should be flexible enough to permit additional samples for schools likely to have higher lead levels or varying levels within a structure (i.e. an old wing and a new wing).

Elizabeth Herron – A school facilities assessment has just been completed, which we are waiting for from Department of Education (RIDE) the results of which may be helpful in prioritizing schools. (Note: a follow-up call with Tim Ryan indicated that Joseph Da Silva will be sending annual health checklists that the schools complete prior to the start of school which may be more useful than the report, which may take a while to complete.)

How to collect those school samples? We need to balance the time and availability of school staff and / or samplers with the need to get useful information. What is typical use (of water taps/faucets) and potential exposure? that is the goal.

Can we plan to do training for school personnel both to develop their knowledge of how lead gets into drinking water taps, and what is required under the legislation, as well as how the capability to collect samples properly.

June Swallow – Twenty plus years of experience with training homeowners to collect and submit water samples suggest that school staff could be trained to collect samples. The plumbing assessment portion of the 3Ts guidance is the bigger challenge. We should investigate MA and NY standards and assessment/sampling methods for schools.

Jo Saltzman mentioned that it may be difficult for school facilities staff to collect first flush samples according to the anticipated protocol – although the ability and willingness to may vary widely across schools and districts. The RI School Facilities Director’s meeting just occurred which included a speaker promoting the installation of filtration systems to reduce lead in water systems, but there were many questions about maintenance of those systems. However that group would be a great place to get the word out about this project and to get guidance on how best to work with schools to implement it. (Note: Lorraine Joubert contacted them and we are on the agenda for their Friday, October 28th meeting.)

Tim Ryan advised that superintendents and facilities directors need a lot more data and that school staff would be reluctant to collect samples. He suggested that we develop an RFP to do the inspections and sample collection with contract staff as opposed to school staff. Further he recommended that we

work with RIDE (via Joseph DaSilva and Andy Andrade) to make contact with schools in order to avoid confusion or misinterpretations.

It was also suggested that we with contact mayors to help get the school committees on board. Water suppliers should also be approached to see if they can help do inspections and / or sample collection. They may also have data available that they would be willing to share.

Next steps:

- Begin communications with the schools, including getting access to the facilities assessment reports. (As noted Tim Ryan initiated that and we are currently awaiting school health assessment). We need to reinforce that the point of this project is to ensure compliance with existing regulations.
- Develop a draft sampling plan (based on the 3Ts, but project appropriate).
- Begin developing a GIS assessment to help prioritize neighborhoods and schools.
- Continue gathering currently available data.

List of data currently received and being assessed:

- Excel file with current licensed daycare providers (as of 9/22/19) - DCYF
- Excel file with properties having Lead Safe water certificates (as 9/21/16) – RIDOH
- Excel file with schools and daycares that have their own water supplies (as of 4/28/16) – RIDOH
- Link to Providence Water’s lead supply/service line GIS

Data needed:

- School facilities assessment report/data
- Lead and copper results from schools

Tentative next meeting (dependent upon what gets done):

Thursday, October 27th, 1-2:30 pm or Tuesday, November 15th, 1-2:30 pm