



## 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

Purpose and Requirements of Permit Amendments Requiring Some 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 .....	7
Sources of Additional Information about Lead Testing of Drinking Water in California Schools .....	8
Links to Resources Cited in this Document.....	9

## **Purpose and Requirements of Permit Amendments Requiring Some Public Water Systems to Assist Schools in Lead Testing of Drinking Water**

### **1. What are the new permit requirements for some public water systems to conduct lead testing of drinking water in California schools? Why were these permit amendments issued?**

In early 2017 the State Water Resources Control Board Division of Drinking Water (DDW) and the Local Primacy Agencies who have delegated enforcement authority over public water systems issued amendments to the domestic water supply permits of approximately 1,200 community water systems. The permit amendments were issued to community water systems that DDW or the LPAs, respectively, had reason to believe serve a school. The permit amendments require the water systems to which they are issued 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. For your convenience, copies of four of the permit amendments issued to public water systems are posted on the DDW website.

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 and the LPAs issued the permit amendments to allow schools (Kindergarten through 12<sup>th</sup> 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. No permit amendments were issued 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 and the LPAs issued the permit amendments requiring lead testing of drinking water in California schools to those community water systems in California that they believed serve a school. 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 LPAs issued permit amendments to those community water systems they regulate that they believe serve a K-12 school. The LPA should be consulted as needed and required by the permit amendment. As stated in the permit amendment, sampling results should be reported to the DDW database, rather than to the LPAs.

**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 was issued the permit amendment and 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 permit amendments do *not* require the community water system to pay for any maintenance or corrections needed at the school if elevated lead levels are found in the drinking water, but the water system 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 that is served by a public water system to whom a permit amendment was issued can submit a written request for lead testing to the community water system any time before November 1, 2019.

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

The DDW-issued permit amendments require 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?**

As stated in the permit amendments and documents referenced in the amendments, 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, which is referenced in the permit amendments](#).

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?**

The permit amendments require that 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 permit amendments require 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 the permit amendment; 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 DDW's 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/) (<https://drinc.ca.gov/lisics/>), the link to which is in the Guidance for Electronic Submittal of School Lead Sample Results, 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/) (<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-issued permit amendment 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 permit amendments require that the lab results from the sampling be 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, as described in the permit amendments.

The Division will not be posting results on a webpage. The permit amendments require those water systems receiving an amendment 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-issued permit amendments and the sampling protocol referenced in the amendments 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 90<sup>th</sup> 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 90<sup>th</sup> 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.

As required by the permit amendments, 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 permit amendments 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](mailto:DDW-PLU@waterboards.ca.gov), or call (916) 322-9602 or (916) 322-9601.

### Links to Resources Cited in this Document

Title	Author	Link
DDW Lead Sampling in Schools Website	DDW	<a href="http://www.waterboards.ca.gov/drinking_water/centralic/drinkingwater/leadsamplinginschools.shtml">http://www.waterboards.ca.gov/drinking_water/centralic/drinkingwater/leadsamplinginschools.shtml</a>
3Ts for Reducing Lead in Drinking Water in Child Care Facilities	USEPA	<a href="http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=20017JVA.txt">http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=20017JVA.txt</a>
3Ts for Reducing Lead in Drinking Water in Schools	USEPA	<a href="https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf">https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf</a>
Assisting Schools and Child Care Facilities in Addressing Lead in Drinking Water	AWWA	<a href="http://www.awwa.org/portals/0/files/legreg/documents/assistingschoolslead2005.pdf">http://www.awwa.org/portals/0/files/legreg/documents/assistingschoolslead2005.pdf</a>
California School Directory	CDE	<a href="http://www.cde.ca.gov/re/sd/index.asp">http://www.cde.ca.gov/re/sd/index.asp</a>
Centers for Disease Control Healthy Schools	CDC	<a href="http://www.cdc.gov/healthyschools/nutrition/schoolnutrition.htm">http://www.cdc.gov/healthyschools/nutrition/schoolnutrition.htm</a>
Certified Environmental Laboratories in California	ELAP	<a href="http://www.waterboards.ca.gov/drinking_water/centralic/labs/index.shtml">http://www.waterboards.ca.gov/drinking_water/centralic/labs/index.shtml</a>
Consumer Confidence Report Search Tool	USEPA	<a href="https://ofmpub.epa.gov/apex/safewater/f?p=136:102">https://ofmpub.epa.gov/apex/safewater/f?p=136:102</a>
DDW District Office Contact Information	DDW	<a href="http://www.waterboards.ca.gov/drinking_water/programs/documents/ddwem/DDWdistrictofficesmap.pdf">http://www.waterboards.ca.gov/drinking_water/programs/documents/ddwem/DDWdistrictofficesmap.pdf</a>
DDW Lead Sampling in Schools Sampling Protocol	DDW	<a href="http://www.waterboards.ca.gov/drinking_water/centralic/drinkingwater/leadsamplinginschools.shtml">http://www.waterboards.ca.gov/drinking_water/centralic/drinkingwater/leadsamplinginschools.shtml</a>
DDW Supply Service Area Lookup Tool	DDW	<a href="http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/water_supplier.shtml">http://www.waterboards.ca.gov/waterrights/water_issues/programs/drought/water_supplier.shtml</a>
Home Water Testing	USEPA	<a href="https://www.epa.gov/sites/production/files/2015-11/documents/2005_09_14_faq_fs_homewatertesting.pdf">https://www.epa.gov/sites/production/files/2015-11/documents/2005_09_14_faq_fs_homewatertesting.pdf</a>
National Drinking Water Alliance	UC	<a href="http://www.drinkingwateralliance.org">http://www.drinkingwateralliance.org</a>
School Water Quality Improvement Funding Program	DFA	<a href="http://www.waterboards.ca.gov/water_issues/programs/grants_loans/">http://www.waterboards.ca.gov/water_issues/programs/grants_loans/</a>
Water Quality Funding Sources for Schools	USEPA	<a href="https://www.epa.gov/dwreginfo/water-quality-funding-sources-schools-resource-k-12-schools-and-child-care-facilities">https://www.epa.gov/dwreginfo/water-quality-funding-sources-schools-resource-k-12-schools-and-child-care-facilities</a>