

Lead Testing in Schools 3Ts Training “Introduction”



What is TCEQ?



- Environmental agency for the state
 - Goal: Clean air, clean water, and the safe management of waste
 - <https://www.tceq.texas.gov/>
- Central Office located in Austin
 - 16 Regional Offices across Texas
- TCEQ Office of Water
 - Helps administer the regulatory program for ~7,000 state **Public Water Systems (PWS)**

Governing Regulations for Public Water Systems (PWS)



- *Federal*
 - Regulations developed by U.S. Environmental Protection Agency (USEPA) under the Safe Drinking Water Act of 1974
- *State*
 - Regulations overseen and enforced by the Texas Commission on Environmental Quality (TCEQ)
 - Texas Administrative Code

Lead and Copper Rule (LCR) for PWSs



- Since 1991, the LCR focuses on controlling corrosion within the distribution system that delivers water to customers.
- LCR sets *action levels* for lead and copper
 - Screening tool for determining when certain treatment technique actions are needed.
 - Based on practical feasibility of reducing lead though controlling corrosion.

Action levels: Lead - 0.015 mg/L | Copper - 1.3 mg/L

Lead and Copper Rule (LCR)



- Under the LCR, PWSs have a tap sample monitoring schedule.
 - Sample sites represent locations that may be susceptible to high lead/copper amounts and are categorized using a “tiered” system.
 - Primary sample locations are individual residences.
 - Sample results determine if an action level has been exceeded or not.
 - If >10% results are above an action level, then PWSs have additional requirements.

What about Schools?



- There is currently no federal or state law or regulation that requires *all* schools be tested for lead.
 - For *most* schools, testing is voluntary.
- The LCR sampling is focused primarily on individual residential locations.

Some Schools Regulated by TCEQ Under the LCR



- Some Texas schools have their own source of drinking water and are regulated under the LCR as a PWS.
- The LCR requires these systems to sample from buildings that contain lead pipes/service lines or copper pipe with lead solder.
- The TCEQ schedules and determines compliance for these systems in the same manner as any other PWS.

Majority of Schools Not Regulated by TCEQ



- The majority of schools in Texas receive water from a community PWS.
- The LCR requires these systems to collect samples primarily from single family homes with lead pipes/service lines or copper pipe with lead solder.
- TCEQ encourages PWSs to have schools as sample sites when possible, but this is not mandatory under the LCR.

THE EPA “3Ts” Guidance



- **Training** school and childcare officials to raise awareness of the 3Ts program and summarize the potential causes and health effects of lead in drinking water.
- **Testing** drinking water in schools and childcare facilities to identify potential lead problems.
- **Taking Action** to reduce lead in drinking water.

EPA 3Ts Toolkit – Training



- Breaks down the 3Ts into seven modules:
 - **Training**
 - Module 1 – Communicating the 3Ts
 - Module 2 – Learning about Lead in Drinking Water
 - Module 3- Planning your 3Ts Program

EPA 3Ts Toolkit – Testing



- Testing
 - Module 4 – Developing a Sampling Plan
 - Module 5 – Conducting Sampling and Interpreting Results

EPA 3Ts Toolkit – Taking Action



- Taking Action
 - Module 6 – Remediation and Establishing Routine Practice
 - Module 7 - Recordkeeping

Recordkeeping



- Maintaining accurate and thorough records of the “hows” and “whys” of your school lead testing program are *essential* throughout your decision making process and for completing remedial activities.

Best Practices to Improve Drinking Water Quality



- Immediately remove water fountains containing lead lined coolers.
- Clean drinking water fountains and aerators regularly.
- Use cold water taps for food and beverage preparation.
- If you have water filters – make sure filters are maintained/changed out regularly.
- Regularly flush all water outlets used for drinking or food preparation.

Overview



- Provide information and guidance to school officials based on EPA's 3Ts so that schools may:
 - Make decisions about identification of lead levels in the drinking water at their facilities.
 - Take appropriate actions to address any identified concerns.

Overview (continued)



- TCEQ is committed to the health of children in Texas and safe drinking water in schools.
- The only way to confirm if there is lead in drinking water is to test for lead.
- Awareness of best practices to reduce exposure to lead in drinking water.
- Engage your public water system early in the process.

Resources and Funding as of 10/2018



- TCEQ:
 - https://www.tceq.texas.gov/drinkingwater/chemicals/lead_copper/lead-testing-in-schools-outreach-project
- USEPA:
 - Lead in Drinking Water in Schools :
 - <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit>
 - Water Quality Funding Sources for Schools: <https://www.epa.gov/dwreginfo/water-quality-funding-sources-schools-resource-k-12-schools-and-child-care-facilities>

USEPA Guidance



- All references in today's workshop are found in the USEPA's 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities.
- [USEPA 3Ts Guidance Webpage](#)
- <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit>