

# Lead Testing in Schools 3Ts Training “Taking Action”



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY  
WATER SUPPLY DIVISION

# 3Ts Toolkit

The 3Ts toolkit includes modules to assist facilities in developing a drinking water testing program.



## Module 1

Communicating the 3Ts



## Module 2

Learning About Lead in Drinking Water



## Module 3

Planning Your 3Ts Program



## Module 4

Developing a Sampling Plan



## Module 5

Conducting Sampling & Interpreting Results



## Module 6

Remediation & Establishing Routine Practices



## Module 7

Recordkeeping

# Taking Action



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# Module 6: Remediation & Establishing

# Overview of Remediation & Establishing Routine Practices



- Immediate Response
- Short-Term Control Measures
- Permanent Control Measures
- Follow-Up Sampling
- Consideration for Replacement Activities
- Establishing Routine Practices



# Immediate Response



- Shut off problem outlets.
  - If initial sample results exceed the school's designated action level, the outlet can be shut off or disconnected.
- Share test results.
  - Provide test results to stakeholders.



# Continued Immediate Response



- Post “Not for Drinking/Cooking” signs.
  - If initial sample results exceed the remediation level but the outlet is not routinely used for human consumption.
- Increase awareness and public education.
  - Take the initiative to provide information to your community.
  - Be positive, proactive and forthcoming.



# Short-Term Control Measures

## Flushing



- Flush the piping system in your building.
  - Open “suspect” taps every morning before facility opens and let water run to remove stagnant water.
  - Unless you can ensure lead levels remain low throughout the day, flushing once a day or once a week is not recommended.
  - See EPA’s “3Ts Flushing Best Practices” document for more information.



# Short-Term Control Measures



- Provide bottled water.
  - The Food and Drug Administration (FDA) regulates bottled water.
- Provide filters at problem taps.
  - Point-of-use units are commercially available and can be effective in removing lead.
    - These filters require maintenance and regular replacement.
  - Verify filter is lead reducing.
    - NSF/ANSI Standard 53 (for lead removal).





# Permanent Control Measures Replacement



- Replacement of problem outlets.
  - Replace outlets and any identified upstream plumbing components that may have caused the lead level increase.
- Pipe replacement.
  - Replace lead pipes on school property and any lead service lines under the school's jurisdiction.



# Permanent Control Measures



- Provide filters at problem taps.
  - These filters require maintenance and regular replacement.
- Reconfigure plumbing.
  - Ongoing renovation of facility may provide opportunity to modify plumbing.
  - Water can be redirected for cooking and drinking to bypass identified sources of lead contamination.



# Considerations for Replacement Activities



- When making repairs, ensure that certified “lead-free” materials are utilized.
- Consider checking grounding wires.
  - Existing wires may already be grounded to the water pipes so please consult with an electrician.





# Follow-Up Sampling

- Once remediation is complete, collect follow-up samples to confirm the remediation was successful and the identified sources of lead were addressed.
- Follow the sampling protocol developed in Module 4.
  - See 3Ts Testing presentation.



# Establish Routine Practices Cleaning



- Cleaning
  - Clean drinking fountains regularly.
  - Create an aerator / faucet screen maintenance schedule.
    - Set reminders to ensure actions are completed.
  - Establish a recordkeeping procedure to record when the aerators are cleaned.



# Establish Routine Practices Temperature and POU



- Temperature control
  - Use only cold water for food or beverage preparation
  - If hot water is needed – heat cold water on stove or microwave.
- If point-of-use (POU) units are utilized, these filters will require monitoring and replacement.



# Establish Routine Practices Flushing



- Routine flushing practices
  - Regularly flush all outlets.
    - Particularly after weekends or holidays.
  - Open valves and faucets and let water run to remove water that has been standing in interior pipes
  - Do not flush too many outlets at once.
    - This could create pressure drops in the building.





# Establish Routine Practices

- Cross-connection control
  - Evaluate the facility for the presence of cross-connections and address any issues.
    - Cross connections are connections of non-potable water to potable sources.
- Communication
  - Create signs for water outlets that are not to be used for human consumption.
    - Use pictures for children's bathrooms.
  - Consider organizing an event for the community.





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## Module 7: Record- keeping



# Recordkeeping

- Recordkeeping is very important *before, during, and following* any testing that is conducted.
- Keep ongoing records of partners, team contacts, testing and remediation efforts, and communications.
  - Keep copies of past communication materials and the dates they were sent out.
  - Document all outreach efforts and activities.
  - Ensure records are kept in a single repository.



# Recordkeeping Suggestions



- Some suggestions for you to consider include:
  - Documenting the methodologies and procedures that were used to plan for testing.
  - Maintaining information about the laboratories and/or professionals and their procedures used.
  - Document any plans instituted in the process (i.e., flushing plans, maintenance plans, sampling schedules, best practices used, etc.).
  - Keep a running log of questions received from the community.



# Questions

