

Module 4: Developing a Sampling Plan

Lead Water Coolers Banned in 1988

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The Lead Contamination Control Act (LCCA), which amended the Safe Drinking Water Act (SDWA), was signed into law on October 31, 1988 (P.L. 100-572). The potential of water coolers to contribute lead to drinking water in schools and child care facilities was a principal focus of this legislation. Specifically, the LCCA mandated that the Consumer Product Safety Commission (CPSC) order the repair, replacement, or recall and refund of drinking water coolers with lead-lined water tanks. In addition, the LCCA called for a ban on the manufacture or sale in interstate commerce of drinking water coolers that are not “lead-free.” Civil and criminal penalties were established under the law for violations of this ban. With respect to a water cooler that may come in contact with drinking water, the LCCA (Section 1461 of SDWA) defines the term “lead-free” to mean:

not more than 8 percent lead, except that no drinking water cooler which contains any solder, flux, or storage tank interior surface which may come in contact with drinking water shall be considered “lead-free” if the solder, flux, or storage tank interior surface contains more than 0.2 percent lead.

Another component of the LCCA was the requirement that EPA publish and make available to the states a list of drinking water coolers, by brand and model, that are not “lead-free.” In addition, EPA was to publish and make available to the states a separate list of the brand and model of water coolers with a lead-lined tank. EPA is required to revise and republish these lists as new information or analyses become available.

Based on responses to a Congressional survey in the winter of 1988, three major manufacturers (the Halsey Taylor Company, EBCO Manufacturing Corporation, and Sunroc Corporation) indicated that lead solder had been used in at least some models of their drinking water coolers. On April 10, 1988, EPA proposed in the Federal Register (54 FR 14320) lists of drinking water coolers with lead-lined tanks and coolers that are not “lead-free.” Public comments were received on the notice, and the list was revised and published on January 18, 1990 (Part III, 55 FR 1772). See the following page for a list of water coolers and lead components included on that list.

Important Note: The 1990 list is based on a definition of “lead free” in SDWA applicable to drinking water coolers only (SDWA Section 1461). At the time it was enacted, the 8% standard of the definition was the same as the definition of lead free in another section of SDWA applicable to pipes, pipe fittings, plumbing fittings, and fixtures, solder and flux (SDWA Section 1417). Since then, however, the definition of “lead free” for pipes, fittings, and fixtures in Section 1417 was changed as a result of the 2011, **THE REDUCTION OF LEAD IN DRINKING WATER ACT** to a weighted average of 0.25 percent of the wetted surface. **It is still important to test fixtures that are not on this list; especially if they were installed prior to 2014, the year THE REDUCTION OF LEAD IN DRINKING WATER ACT became effective.**

List of Water Coolers and Lead Components

EBCO Manufacturing

All pressure bubbler water coolers with shipping dated from 1962 through 1977 have a bubbler valve containing lead. The units contain a single 50-50 tin-lead solder joint on the bubbler valve. Model numbers for coolers in this category are not available.

The following models of pressure bubbler coolers produced from 1978 through 1981 contain one 50-50 tin lead solder joint each.

CP3	DP15W	DPM8	7P	13P	DPM8H	DP15M	DP3R	DP8A
DP16M	DP5S	C10E	PX-10	DP7S	DP13SM	DP7M	DP7MH	DP7WMD
WTC10	DP13M-60	DP14M	CP10-50	CP5	CP5M	DP15MW	DP3R	DP14S
DP20-50	DP7SM	DP10X	DP13A	DP13A-50	EP10F	DP5M	DP10F	CP3H
CP3-50	DP13M	DP3RH	DP5F	CP3M	EP5F	13PL	DP8AH	DP13S
CP10	DP20	DP12N	DP7WM	DP14A-50/60				

Halsey Taylor

Lead solder was used in these models of water coolers manufactured between 1978 and the last week of 1987:

WMA-1	SCWT/SCWT-a	SWA-1	DC/DHC-1
S3/5/10D	BFC-4F/7F/4FS/7FS	S300/500/100D	

The following coolers manufactured for Haws Drinking Faucet Company (Haws) by Halsey Taylor from November 1984 through December 18, 1987, are not lead-free because they contain 2 tin-lead solder joints. The model designation for these unites are as follows:

HC8WT	HC14F	HC6W	HWC7D	HC8WTH	HC14FH	HC8W	HC2F	HC14WT
HC14FL	HC14W	HC2FH	HC14WTH	HC8FL	HC4F	HC5F	HC14WL	HCBF7F
HC4FH	HC10F	HC16WT	HCBF7HO	HC8F	HC8FH	HC4W	HWCZ	

Lead Lined Tanks

Prior to publication of the January 1990 list, EPA determined that Halsey Taylor was the only manufacturer of water coolers with lead-lined tanks. Below provides a listing of model numbers of the Halsey Taylor drinking water coolers with lead-lined tanks that had been identified by EPA as of January 18, 1990.

Based upon an analysis of 22 water coolers at a U.S. Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.

Since the LCCA required the CPSC to order manufacturers of coolers with lead-lined tanks to repair, replace, or recall and provide a refund of such coolers, the CPSC negotiated such an agreement with Halsey Taylor through a consent order published on June 1, 1990 (at 55 FR 22387). The consent agreement calls on Halsey Taylor to provide a replacement or refund program that addresses all the water coolers listed below as well as “all tank-type models of drinking water coolers manufactured by Halsey Taylor, whether or not those models are included on the present or on a future EPA list.” Under the consent order, Halsey Taylor agreed to notify the public of the replacement and refund program for all tank type models.

Currently, a company formerly associated with Halsey Taylor, Scotsman Ice Systems, has assumed responsibility for replacement of lead-lined coolers previously marketed by Halsey Taylor. If a school or child care facility has one of the Halsey Taylor water coolers noted below, contact Scotsman Ice Systems to learn more about the requirements surrounding its replacement and rebate program.

Scotsman Ice Systems

775 Corporate Woods Parkway Vernon Hills, IL 60061

PH: (800) SCOTSMAN or 800-726-8762

PH: (847) 215-4500

Halsey Taylor Water Coolers with Lead-Lined Tanks

The following six model numbers have one or more units in the model series with lead-lined tanks:

WM8A	WT8A	GC10ACR	GC10A	GC5A	RWM13A
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The following models and serial numbers contain lead-lined tanks:

WM14A Serial No. 843034	WM14A Serial No. 843006	WT11A Serial No. 222650
WT21A Serial No. 64309550	WT21A Serial No. 64309642	LL14A Serial No. 64346908