# Module 3: Planning Your 3Ts Program



When planning your 3Ts Program, it is important to reach out to the public water system, state and local offices, parents, teaching staff, and other impacted stakeholders to establish partnerships. These partnerships will:

- Provide a better understanding of current lead control resources in the area.
- Offer partners who may be able to provide guidance to a new program.
- Create a platform for communicating any program updates to local and state offices and the community.

After you have a better understanding of how the program will operate in relation to current state and local efforts and what resources are available from internal and external stakeholders, it will be easier to identify individuals who can fill particular roles and make the program a success.

**Use the 3Ts Checklist to understand the recommended steps to implement a testing program for lead in school or child care drinking water.**

## Review Your Records

Identify and review records to determine if monitoring has previously been conducted at the school or child care facility. Some schools and child care facilities conducted voluntary monitoring in cooperation with state or local officials in response to the 1988 LCCA. Other schools and child care facilities may have sampled for lead in response to state requirements or local concerns. This information will be useful in filling out the plumbing profile questionnaire (provided in Appendix G), a tool that may be used to help determine whether lead is likely to be a problem in a school or child care facility. Records should also be reviewed to determine whether remediation actions have already been taken. For example, have water fountains with lead-lined coolers been replaced? See Appendix B for a listing of banned water coolers. While these records may not make additional testing or remediation unnecessary, they will help to prioritize efforts and make them more efficient.

If testing or remediation was conducted in response to the 1988 LCCA, it may have taken place 30 years ago or more. If current staff are not familiar with what activities may have taken place at the school or child care facility and records are incomplete or absent, consider contacting individuals who may have been involved in the past. Personnel that were involved may remember activities that were not well documented. They may also remember whether other agencies or the local public water system were involved, which may mean that additional records are available.

Throughout this manual, recommendations are provided on when and how to set up a robust recordkeeping process for current and future efforts.

**Communication Plan:** Include your partners in your communication with the parents, staff, and the school or child care community. Also remember to communicate to partners as new information becomes available.

## Establishing Partnerships

Entities like the public water system, local health offices, state drinking water programs, certified laboratories, and local community organizations may be able to provide assistance in testing the drinking water for lead. The information below can be used to:

- Initiate communications with potential partners
- Identify ways these organizations could help the program
- Develop the right questions to ask each type of partner

In addition to contacting the public water system, schools and child care facilities may consider exploring partnership opportunities with private foundations, private businesses, and corporations, who may be able to provide funding, and local construction professionals, who may be able to provide technical expertise.

### Assistance from Local Health Offices

Many local governments have established programs that are responsible for a wide variety of public health protection activities, such as Lead Poisoning Prevention Programs. Consider contacting the local health office to discuss particular needs or questions. Although resources may be limited, the health office may be able to provide assistance in a variety of ways. For example, a representative may be able to attend parent and teacher association (PTA) meetings to discuss potential health effects, as well as to act as a liaison with state programs to obtain information and assistance.

## Assistance from the State Drinking Water, Health and Education Programs

Contact state program managers to determine whether training and/or technical assistance is available and whether any other requirements may apply. The state drinking water program may be housed in the department of health or the department of the environment. When discussing issues with the state program, consider requesting assistance and referring to the Lead Contamination Control Act (LCCA) or this 3Ts toolkit to help to clarify the request. A representative may even be able to assist in working through the plumbing profile, conducting sampling, or taking follow-up action.

Many states have programs related to reducing lead in drinking water in schools and/or child care facilities. These programs may be in the state's environment, education and/or health departments. The state health and education departments may also be able to provide expertise and other information to support you in developing and maintaining their programs.

The Association of State Drinking Water Administrators website contains links to many state drinking water programs: https://www.asdwa.org/about-asdwa/.

### Why Contact State Drinking Water Programs?

- For more information about lead in drinking water and drinking water regulations pertaining to lead.
- To inquire about training or available technical assistance on lead sampling.
- For advice in identifying a qualified consultant to assist with developing the 3Ts Program.
- For a list of certified laboratories in the area where samples can be analyzed for lead.

## Assistance from Certified Laboratories

The state drinking water office should be able to provide a list of certified laboratories that you can use when testing for lead in drinking water. You should only use a laboratory that is certified by the state or EPA for testing lead in drinking water for public water systems.

Some laboratories will provide assistance in addressing the activities described in this manual. For example, some laboratories will collect samples for clients to ensure proper sampling technique and sample preservation. However, costs for services will vary and you may wish to contact several certified labs.

## Assistance from Local Community Organizations

There are a variety of local organizations within communities that can help; for example, community volunteer groups, senior citizens' groups, the PTAs, and local environmental groups. Another useful resource is the region's pediatric environmental health specialty unit (PEHSU). The region's PEHSU may be able to provide risk communication support to districts; for more information, please visit **http://www.pehsu.net/**.

Contacting these groups is another way for you to foster support. These groups might be willing to volunteer time to collect samples and train others to collect samples. Local nonprofit and community-based organizations may also have monetary or in-kind resources available to support testing and/or remediation.

## Working with Your Water System

A critical partner in any program to reduce lead in drinking water is the local water system. Before contacting community-based organizations and certified laboratories, EPA recommends contacting public water systems or local government offices for assistance. Water systems can help:

- Provide information that may be helpful
- Assist with determining if lead is present
- Support the you in developing your sampling plan
- Collect and analyze samples
- Help interpret results and determine potential lead sources
- Communicate with the school and child care facility, and the public

**View the 3Ts for Public Water Systems to see how they can help.**

Contact the public water system to determine whether assistance or information on previous efforts is available. Some public water systems have devoted resources to helping you conduct testing for lead. Although utilities may not be under a legal obligation to do so, assistance may be available through technical guidance, sampling or sharing in sampling or laboratory costs. Some utilities may be willing to help develop sampling plans and plumbing profiles (see Testing Section).

You can obtain the results of the water supplier's required monitoring under the Lead and Copper Rule to determine whether the supplier is in compliance with the requirements of the Rule. Public water systems should be able to tell you whether lead monitoring is current, whether the monitoring results are below the lead action level, and whether corrosion control treatment is provided. Your water supplier should also be able to tell you whether the supplier has conducted lead monitoring at the school or child care facility and may be able to provide some indication of whether lead could be a problem within your building(s).

In addition, EPA maintains a data warehouse of drinking water information. Also, many states make comprehensive drinking water system data available in online databases. Data can be searched by state (i.e., primacy agency), city, and/or county to find public water system information. Some public water systems are required to produce and distribute an annual report about the public water system including system-wide monitoring results. These reports are often called consumer confidence reports or annual water quality reports. Contact your public water system to obtain a copy of the latest consumer confidence reports or water quality report or visit EPA's Where You Live: Your Drinking Water Quality Reports Online website to check if it is available online.

## Questions to Ask Drinking Water Systems

It is important to know who supplies your drinking water, and how the water is treated. The following are some questions to consider asking the public water system providing your drinking water:

- What information can the water system provide regarding its compliance with federal and state standards for lead monitoring and treatment?
- What steps have been taken to maintain compliance with the Lead and Copper Rule and reduce lead levels?
- Has the water system had a lead action level exceedance in its most recent compliance period?
- Does the water system have sample results for the school or child care facility?
- Does (or could) the water system take any LCR samples at schools or child care centers?
- Is the water corrosive? If so, what is the system doing to minimize corrosion?
- Does the water system add a corrosion control chemical to the water?
- Is there construction or water main maintenance planned in the area?
- Does the water distribution system have any lead piping (for example, lead service lines or lead gooseneck at service connections), and does the system plan to remove these sources of lead?

### Don't forget to maintain a record!

Ensure that communications with partners are documented and kept in a centrally accessible repository, either online or at the facility. Documenting who you are working with and how partners are supporting the program will provide staff with additional points of contact if additional information is needed.

## Assigning Roles

You should assign responsibility to a key individual(s) to ensure that testing and follow-up actions are completed. Identify individuals who will likely implement and document the 3Ts Program and who will build a new program at the school or child care facility. A person should also be appointed to serve as the contact person for communication with interested parties (civic groups, the media, etc.). One person or more may be involved in these activities, but it is important to clearly define responsibilities and to support those people in their roles. An effective 3Ts Program will require a team effort. Identifying specific roles and responsibilities before initiating a program will give the program accountability.

Furthermore, by developing team dynamics that include internal communications, you can ensure that the program is successful and that staff turnover will not leave the program without direction or documentation. Whenever possible, get the school and child care administration involved. The superintendent, principal or school or child care facility director can give the 3Ts Program validity and support the individuals involved, improving the likelihood that their role in the 3Ts Program is integrated with their other job functions.

If you decide to use consultants or certified lab personnel, their roles should be defined and documented with respect to the responsible person(s) at your facility. Contact the state drinking water program or local health department if additional advice is needed on how to identify a qualified consultant.

## Identify Key Individuals

The most important people to involve in the planning process for the school's 3Ts Program are those who will be required to approve, support or fund aspects of the program and those who have current job roles and responsibilities that align with protecting the health of the school or child care facility population. Key stakeholders both within and outside of the school and child care facility system include:

- **Principal/Director.** Include the superintendent if this is a multifacility initiative.
- **Custodial and facilities staff**. These individuals will have in-depth knowledge about plumbing and history and assist in implementing the program (e.g., take water samples).
- **School board.** Those responsible for developing budgets and recommending district-wide initiatives.
- **School nurse.** This individual will have knowledge of overall student health, as well as an awareness of the dangers of lead poisoning and the importance of safe drinking water. This individual may already work with the local health department, be able to identify local laboratories for testing samples and can also advise parents on how to get their children's blood lead levels tested.
- **Cafeteria staff**. These individuals are aware of water use in food preparation. They can identify the faucets that are regularly used in food or drink preparation, as well as any unused faucets.
- **Athletics staff.** These individuals will know the sources of water used to fill water jugs or those used when teams are practicing or playing games.
- **Students.** Should feel informed and educated on drinking water and know who to go to if they notice an issue.
- **Teachers.** Those affected by lead in drinking water and able to assist with the program. Teachers also might be sources of information on water use (e.g., knowing which fountains are most used). Math and science faculty will have knowledge of volume equations and water quality and could provide assistance during the testing process.
- **Parents.** Advocates for the children in schools and child care facilities.

- **School district wellness committees.** Congressional legislation mandated that schools participating in the National School Lunch Program or other child nutrition programs create school wellness policies (USDA Team Nutrition).
- **Parent Teacher Associations (PTAs).** Student advocacy groups made up of parents and teachers.
- **Local plumbing and construction contractors/suppliers**. Those working on facilities; they should use "lead free" materials and plumbing products certified to be lead free.

## Programmatic Questions

### Who should create the sampling plan?

It is important to designate a person(s) to serve as a project lead of the sampling program and follow-up activities, even if someone else is hired to conduct testing. You may want to involve consultants, laboratories, or other knowledgeable partners to help develop the plan. You can contact the state, local health department or drinking water program, or water system, to get advice on how to identify a qualified consultant.

### Who should collect the samples?

Deciding who will collect samples may be based, in part, on whether the certified laboratory chosen to analyze samples also provides specialists to assist with sample collection. Choosing an individual who is adequately trained (e.g., a consultant or someone from the laboratory) to collect samples may help avoid sampling errors. Ask for references to confirm that individuals are qualified to test for lead in drinking water in schools and child care facilities. Some state drinking water programs or public water systems may provide both services, although there is no federal requirement that they do so.

### Will the laboratory take samples or will it provide training and sample containers for collectors designated by the school or child care facility?

If certified laboratory representatives or consultants are used to conduct testing, ensure that they have experience in conducting lead testing for drinking water at schools and child care facilities. You may wish to ask the laboratory or consultant for references for work they have completed at other schools and child care facilities. Regardless of who is collecting samples, you should ensure the sampler is familiar with the procedures outlined in the Testing Section. You should send the sampler a copy of this document, and any specific testing procedure documents, before sampling is

conducted. Testing activities can be misrepresentative if sample collectors do not follow proper sampling procedures. Also, make sure that laboratories or consultants do not confuse the sampling protocol with the lead testing protocol used by public water systems. The two protocols are different.

### Who should ensure proper remediation?

If testing results show elevated levels of lead in drinking water, then you should implement remediation measures. Some State programs have additional requirements, such as notification and remediation, if testing results show lead in drinking water above specified levels. If remediation is needed, you should assign a project manager to lead the development of a remediation plan by a qualified professional and to ensure that remediation is properly completed. The Taking Action Section, has more information on solutions that you can implement.

### Who is in charge of recordkeeping?

Selecting a team member to ensure methods and results are documented is key to building a sustainable program that is not impacted by staff resignation, retirement, or transfer. The person responsible for recordkeeping should work with all other team members to gather information and store it in a centrally accessible place.

### Don't forget to maintain a record!

Document your 3Ts Program contacts and the steps your team will take to accomplish the goals set out in your 3Ts Program.

Use the 3Ts Toolkit to identify and record contact information for partners from various organizations and groups described in this section.