

Addressing Lead in Drinking Water at Vermont's Schools

A Statewide Testing Program

**Department of Environmental Conservation
Department of Health
Agency of Education**

Lead is a highly toxic metal that can cause serious and permanent health problems. The effects of lead poisoning are irreversible yet preventable. While the largest source of lead contamination in the body is from lead paint, drinking water can also be a source. Lead normally enters drinking water from contact with lead pipes, plumbing fixtures, and solder, which all could contain various levels of lead. Lead can dissolve into water, especially if the water is corrosive.

Unless every tap is tested, there is no way to know if lead is present in drinking water. Findings published in the July 2018 report following a pilot program in 16 Vermont schools found elevated lead levels (greater than or equal to the action level of 15 ppb) in at least one tap at five of the participating 16 schools.

This document outlines critical requirements of a Vermont lead in school drinking water testing program, which include: working with all Vermont schools test each tap used for consumption; notifying the school community of results; and, taking action to mitigate if lead is found at or above the 15 ppb action level.

Applicability, Prioritization, and Frequency

The program will apply to all Vermont Schools including independent schools. Testing described in this document is in addition to any testing already required by law.

The program will be initiated January 2019, and with a goal of completing initial sampling at all schools serving students in Kindergarten by June 1, 2021; initial sampling of all Vermont Schools will be completed by June 1, 2022. These deadlines are for collection and submission only, not for receiving analysis results from the Vermont Department of Health Laboratory. Testing conducted at buildings after July 1, 2017 in a manner consistent with the program will fulfill the initial sampling requirements.

All schools will be retested every 5 years thereafter until three consecutive samples are below the action level.

Sampling Procedures

Testing will follow the Environmental Protection Agency's 3Ts for Reducing Lead in Drinking Water Toolkit, except where there are Vermont specific requirements. All potable water outlets that are currently or potentially used for drinking and cooking will be sampled. All testing will be conducted while school is in session to reflect normal operating conditions within the school. Samples will be analyzed by the Vermont Department of Health Laboratory.

Schools will be responsible for identifying the total number of outlets requiring sampling, identifying these locations on a sampling plan, and for sample collection. The Health Department will assist schools in developing and implementing sampling plans.

Action Level and Remediation

The action level for lead is 15 ppb. If lead levels are detected at or above 15 ppb in any sample from any potable water outlet the school must discontinue use of that outlet until remediation has occurred and test results indicate lead concentrations are below the action level. The school must ensure building occupants have an adequate supply of potable water for drinking and cooking until the outlets have been remediated and confirmatory test results demonstrate lead concentrations are below the action level.

The schools will be responsible for remediating or permanently removing all outlets that test at or above the action level. The Department of Environmental Conservation will offer technical assistance during the remediation phase of the program.

Data Management

A publicly accessible data management system will be created by the State for this program.

The Department of Environmental Conservation will be the lead agency developing the data management system and will work in close collaboration with the Health Department and the Agency of Education.

Notification

Schools will be responsible for notifying the school community of initial sampling results as soon as practical, but no more than 30 days after the school receives the results. The schools should notify the school community that all testing and remediation is complete as soon as practical but not more than two weeks following submittal of the compliance certification statement to the State.

The Department of Health will assist schools with notification.

Compliance and Reporting

Upon program completion, the school will submit a compliance certification statement to the State attesting to implementation of the program, including that the necessary mitigating actions have taken place, within six weeks of sampling. Compliance certification statements will be posted by the State to the public facing website.

The Department of Health will be the lead agency to determine compliance with the sampling requirements under this program. The Department of Environmental Conservation will be the lead agency to determine completion of remediation efforts.

The Department of Health in coordination with the Agency of Education and Department of Environmental Conservation will publish a report summarizing the program at the end of the three-year period.

Schedule

	2019									
Critical path steps	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
Database development and testing										
Staff recruitment/training										
Website Content and Guidance for Building Managers										
Outreach and notification to schools										
Go-Live for buildings under normal usage conditions										
Finalize laboratory and shipping logistics										
Availability of funding through legislative or Federal action										
Go-live for all Pre-K/K schools										
On-going testing all schools										----->