



LEAD FREE CLT

LEAD REDUCTION PROGRAM

CLTW SCHOOLS AND CHILDCARES SAMPLING OUTLINE

WHERE AND HOW OFTEN IS SAMPLING FOR LEAD REQUIRED?

- The United States Environmental Protection Agency's (EPA) Lead and Copper Rule Revisions (LCRR) require that community water systems (such as Charlotte Water) conduct sampling at elementary schools (containing the grades K-8) and childcare facilities. Utilities may sample at 20 percent of elementary schools and 20 percent of childcare facilities per year for one 5-year testing cycle, or they may do all required sampling in one year. Charlotte Water will determine how sampling will be conducted prior to October 16, 2024, when compliance plans are due.
- Charlotte Water will also conduct sampling at secondary schools on request for one 5-year testing cycle and conduct sampling on request of all schools and childcare facilities thereafter. If there are an abundance of requests for sampling, Charlotte Water is not required to test more than 20 percent annually.
- The LCRR requirements exclude facilities that were either built after January 1, 2014 or replaced all plumbing after January 1, 2014. The year 2014 is set as a threshold because the maximum amount of lead that plumbing can contain and still be considered "lead-free" was changed in 2014. In 1986, the Safe Drinking Water Act went into effect which allowed plumbing to contain up to 8% lead and still be considered lead free. This regulation has since been updated so that after January 1st, 2014, all new plumbing should not contain more than 0.2 percent lead with respect to solder and flux, and 0.25 percent for any wetted surfaces (such as pipes and faucets).
- LCRR school and childcare sampling will begin after the compliance date of October 16, 2024.



LEAD FREE CLT LEAD REDUCTION PROGRAM

CLTW SCHOOLS AND CHILDCARES SAMPLING OUTLINE

HOW MANY SAMPLES ARE REQUIRED FROM EACH SCHOOL OR CHILDCARE FACILITY?

- Schools should collect samples from two drinking fountains, one kitchen faucet used for food or drink preparation, one classroom faucet or other outlet used for drinking, and one nurse's office faucet if available (total of 5 samples).
- Childcare facilities should sample from one drinking water fountain and one of either a kitchen faucet used for preparation of food or drink or one classroom faucet or other outlet used for drinking (total of two samples).
- Facilities that include both schools and licensed childcares, such as schools with after school or summer programs, should collect five samples from the school portion of the facility and two samples from the portion of the facility where childcare activities take place. This would count as two separate facilities being sampled.

WHAT IF A SCHOOL OR CHILDCARES REFUSES TO ALLOW SAMPLING OR CANNOT BE REACHED?

- The EPA has described how to document a non-response or refusals. Charlotte Water must make two separate good faith attempts to reach the facility before Charlotte Water can document a non-response and then is no longer required to sample at that facility. Both non-responses and refusals from elementary schools and childcare facilities may be accounted for in the annual 20 percent testing requirement during mandatory sampling.

HOW DOES ONE CORRECTLY TAKE A SAMPLE FROM A SCHOOL OR CHILDCARE FACILITY?

- The sample must be 250 mL (milliliter) in volume and shall be a first draw sample (i.e., no flushing prior to sample). The sample containers will be 250 mL bottles.
- The water must have remained stationary in the plumbing system of the sampling site (building) for at least 8 but no more than 18 hours and must from the cold-water tap. This means testing will be conducted first thing in the morning.



LEAD FREE CLT LEAD REDUCTION PROGRAM

CLTW SCHOOLS AND CHILDCARES SAMPLING OUTLINE

WHO CAN COLLECT THE WATER SAMPLES?

- The samples can be collected by Charlotte Water staff, school or childcare facility staff, or other appropriately trained individuals. Charlotte Water will decide on who will perform the sampling prior to October 16, 2024, when compliance plans are due.

COMMUNICATIONS TO EXPECT FROM CHARLOTTE WATER:

- During the first five years after the compliance date (Oct. 16, 2024), Charlotte Water will provide eligible elementary schools and childcare facilities with information about the health risks of lead in drinking water at least annually, schedule sampling, and provide the EPA's 3Ts (Training, Testing, and Taking Action) Toolkit (or subsequent EPA guidance).

Charlotte Water will also contact eligible secondary schools at least annually and provide them with health information and information on how to request sampling.

- Charlotte Water will contact at least 20 percent of elementary schools and at least 20 percent of licensed childcares per year so that all facilities will have been contacted to request sampling at least once within the 5-year testing cycle. Charlotte Water could also contact all schools and childcares within one year. Charlotte Water will have a decision about the sampling schedule prior to the compliance deadline of October 16, 2024, when compliance plans are due.
- Charlotte Water will contact schools and childcares at least 30 days prior to sampling to provide instructions on how to prepare for sampling. Charlotte Water will provide sample results and 3Ts remediation information within 30 days of receipt of sampling results.
- Charlotte Water will also include the following statement in all public education materials as required by the EPA:
"Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems."