

Module 3: Planning Your 3Ts Program

Establishing Partnerships and Working with Your Water System



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 you in developing your sampling plan.
- Collect and analyze samples.
- Help interpret results and determine potential lead sources.
- Communicate with the school or child care facility and the public.

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

Lead and Copper Rule (LCR)	3Ts for Reducing Lead in Drinking Water
Required For: all community and non-transient non-community water systems.	Voluntary Program: to assist schools with training, testing, and taking action.
Sampling Protocol: The LCR takes a system-wide approach. If the 90th percentile lead level concentration of ten samples exceeds the 15 ppb action level, water systems must take additional action. The sampling protocol under the LCR involves a 3x1 first draw sample after a stagnation period of 6 hours.	Sampling Protocol: Only in schools and child-care facilities that own and/or operate a public water system must meet the requirements of the LCR. Under the 3Ts, EPA recommends sampling and follow-up actions be taken at each individual outlet. The 3Ts consists of a 2-stop sampling protocol, which includes two 30-min samples: (1) first draw after an 8 to 18-hour stagnation, and (2) a flush sample after 30 seconds.
Follow-Up Actions: Water systems are required to undertake treatment actions, depending upon system size and corrosion control treatment status. These include corrosion control, public education, water quality monitoring, and lead service line replacement.	Follow-Up Actions: The initial sample and the follow-up flush sample will help determine the source of the lead (e.g., the fixture or behind the wall). This remediation measures can be implemented as appropriate to address that outlet. This includes removing fixtures and repairing/replacing water fixtures, to minimize exposure.

Note: EPA recommends a smaller sample in the 3Ts because it is more effective at identifying the sources of lead at an outlet because it represents a smaller section of plumbing. A 30-min sample from a faucet would be less likely to collect portions of the plumbing behind the wall than the faucet's requirement. There is no known safe level of lead for children. EPA encourages schools to prioritize remediation efforts based on lead sample results and to use the steps in the 3Ts to pinpoint potential lead sources to reduce their lead levels to the lowest possible concentrations.

Office of Water
EPA 815-F-18-002
October 2018

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.

