

# U.S. EPA 3Ts Program

## Training, Testing & Taking Action Plan Builder

Plan eBuilder – Interactive Tool to Build an Implementation Plan for Testing and Reducing Lead in Drinking Water in Child Care Facilities





## *Disclaimer*

This guide is a product of the voluntary program of the U.S. Environmental Protection Agency (EPA) 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities - Training, Testing, and Taking Action Approach.

EPA's 3Ts program is not a federal requirement under the National Primary Drinking Water Regulations. Therefore, this guide is not intended for use by public water systems that are subject to compliance under the Lead and Copper Rule Revisions or other National Primary Drinking Water Regulations under the Safe Drinking Water Act (SDWA).

The 3Ts program approach is voluntary and provides tools and informational materials for schools, child care facilities, states, territories, and Native American Tribes to implement lead testing programs in drinking water, at their discretion.

This document does contain overviews of federal regulatory requirements concerning lead in drinking water that apply to public water systems. EPA has made every effort to ensure the accuracy of the discussion in this guidance. In the event of a conflict between the discussion in this document and any statute or regulation, this document would not be controlling.

The general description in this document does not substitute for any law or regulation. Many states (or tribes) and localities have different, more stringent requirements than EPA's, some of which may apply to schools and child care facilities even if they are not a public water system. Therefore, schools and child care facilities should not rely solely on this guidance for that compliance information.

This document does not impose legally binding requirements on EPA, states, or the regulated community.

This document does not confer legal rights or impose legal obligations upon any member of the public.

# INTRODUCTION



Hi, I'm **Thirstin!**

I am your assistant and will help you create a 3Ts Program Plan to reduce lead for your child care's drinking water.

## First: Download the Plan Builder!

Before beginning, to ensure inputs are saved, download the Plan Builder as a PDF file and save it to your computer or shared network location. The Plan Builder is designed to be used with a desktop PDF viewer such as Adobe Acrobat or Adobe Reader.

INTRODUCTION

GETTING STARTED

COMMUNICATE

TRAINING

TESTING

TAKING ACTION

TAKE ACTION:  
TAKE IT WITH YOU!

**Important:** If you are a small child care facility, school, tribe, or another facility with 10 or fewer water outlets performing lead testing and/or remediation for drinking water, this 3Ts Plan Builder is for you. Use the [3Ts Program Plan Builder for Schools](#) if your facility has more than 10 water outlets.

EPA's 3Ts Program approach for reducing lead in drinking water follows three key steps:

- [Training](#) child care staff to raise awareness of the 3Ts Program, the potential causes and health effects of lead in drinking water, and how to sample and test for lead.
- [Testing](#) for lead in drinking water in child care facilities to identify potential lead problems.
- [Taking Action](#) to reduce lead in drinking water through short-term and/or long-term measures.

## How to Use the Plan Builder

This Plan Builder will walk you through five sections to create your 3Ts Program plan:

1. [GETTING STARTED](#)
2. [COMMUNICATE](#)
3. [TRAINING](#)
4. [TESTING](#)
5. [TAKING ACTION](#)

The Plan Builder was adapted from EPA's [3Ts for Reducing Lead in Drinking Water Manual](#), [Toolkit](#), and associated documents (e.g., [3Ts Checklist](#)). For full details on the 3Ts Program, including definitions of terminology ([3Ts Manual Appendix A](#)), refer to the 3Ts Toolkit at the following URL: <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit>. Additional documents are hyperlinked throughout the Plan Builder for your reference as you work through the document.

## Important Notes

- Users do not have to complete the Plan Builder in a single session as progress can be saved in the downloaded PDF.
- Users are encouraged to walk through the steps in order, as each provides important context for future steps.
- You can use the checklist below to track progress through the document noting which sections have already been completed.

### FIRST: Download the Plan Builder!

Before beginning, to ensure inputs are saved, download the Plan Builder as a PDF file and save it to your computer or shared network location. The Plan Builder is designed to be used with a desktop PDF viewer such as Adobe Acrobat or Adobe Reader.

## Elements of the Plan Builder

### Tables and Text Entry Boxes

Each section provides prompting questions and step-by-step guidance to help users make decisions to build a 3Ts plan. Tables and text boxes containing default suggested text can be overwritten or deleted.

When working through this document, several of the form fields will have “tooltips” that will appear when you hover over them. These tooltips will provide additional information to help build your plan. Tooltips are denoted by this symbol: .

## Completion Checklist

*TO-DO: To help you keep track of your progress, check the box after you complete each section of the Plan Builder.*

|   |    |
|---|----|
| <input type="checkbox"/> Introduction.....            | 1  |
| <input type="checkbox"/> My Getting Started Plan..... | 4  |
| <input type="checkbox"/> My Communications Plan.....  | 10 |
| <input type="checkbox"/> My Training Plan.....        | 12 |
| <input type="checkbox"/> My Testing Plan.....         | 18 |
| <input type="checkbox"/> My Taking Action Plan.....   | 26 |

## Instructions for Printing the Plan Builder

This entire document is intended to be printed for easy reference to your lead reduction implementation plan. Complete the following steps to print all plans, including the summary pages at the end of the Builder titled “**Take Action: Take It With You**”.

- In your toolbar -- click [File].
- Click [Print] and ensure under [Pages to Print] that “**All**” is selected.
- Click [Print]. The entire document will print to your selected printing device.



## TAKE ACTION: TAKE IT WITH YOU!

At the end of this Builder, your responses from the **Taking Action** chapter will be auto populated into summary pages titled “**Take Action: Take It With You**”. Print and use for a quick reference of your planned actions when lead is detected in your school’s drinking water.

**Note:** If changes are needed, make them in the **Taking Action** chapter to re populate the summary pages of **Take It With You!**

## Build a 3Ts Program

Get started by assembling your team, establishing recordkeeping practices, and coordinating with your state drinking water program regarding local regulations.

Let's get started!



1 Assemble Your Team



2 Establish Recordkeeping Practices



3 Identify State, Tribal, and Local Regulations



4 Create an Overall Schedule

- INTRODUCTION
- GETTING STARTED
- COMMUNICATE
- TRAINING
- TESTING
- TAKING ACTION
- TAKE ACTION: TAKE IT WITH YOU!

### STEP 1: Assemble Your Team ([3Ts Module 1](#))

Depending on your facility's size and resources, you may have one person responsible for several program activities.

#### *STEP 1A: Identify Program Leads*

Designate your 3Ts Program and Deputy Program Leads. The Program Leads coordinate the design, implementation, and execution of your 3Ts Program.

*Getting Started Table 1: Identify your 3Ts Program Lead(s).*

| 3Ts Program Administration Lead Contact Information |                         |
|---|-------------------------|
| 3Ts Program Lead                                    | 3Ts Deputy Program Lead |
| Name:   | Name:                   |
| Phone Number:                                       | Phone Number:           |
| Email:  | Email:                  |

#### *STEP 1B: Identify Internal and External Stakeholders*

- Internal stakeholders include individuals and groups who may approve, support, or fund aspects of your 3Ts Program as well as those who have current job roles that align with protecting the health of your facility community. Internal stakeholders may include:
  - Principal/Director/Owner
  - Custodial/Facilities Staff
  - Cafeteria Staff
  - Teachers
  - Parents
  - Local Plumbing and Construction Contractors/Supplier
- External stakeholders can help operate and communicate about your 3Ts Program. Update [Table 2](#) regularly and make it available to all team members for when a quick response is necessary.

*Getting Started Table 2: Create a contact list of your external stakeholders.*

| External Stakeholder Contact Information |   |
|--|---|
| State Drinking Water Program             | Local Public Health Officials                                   |
| Name:                                    | Name:   |
| Phone Number:                            | Phone Number:   |
| Email:                                   | Email:  |
| State Department of Education            | Local Public Water System (PWS)/Water Supplier (if applicable*) |
| Name:                                    | Name:   |
| Phone Number:                            | Phone Number:   |
| Email:                                   | Email:  |
| State Department of Health               | Media   |
| Name:                                    | Name:   |
| Phone Number:                            | Phone Number:   |
| Email:                                   | Email:  |

*\*Note - if you are served by a groundwater well and not a local PWS, contact your state drinking water program for assistance instead.*

### *STEP 1C: Assign Communication Roles*

- Identify individuals to communicate to the public about your 3Ts Program activities. Individuals could include members of your child care community, local professionals, and public leaders.

*Getting Started Table 3: Fill in the table below to identify your Communications Team.*

| Communications Team Roles and Responsibilities  |                                  |
|---|----------------------------------|
| <b>Communications Team Lead:</b> acts as the main point of contact to ensure the accuracy and consistency of public information. The lead coordinates communications activities, make announcements, and keeps the 3Ts Team up to date as the program progresses. | Name:<br>Phone Number:<br>Email: |
| <b>Public Relations Contact:</b> monitors and responds to questions via email or phone. Helps utilize existing resources, such as a website, newsletter, or larger announcements.   | Name:<br>Phone Number:<br>Email: |
| <b>Communication of Health Risks Contact:</b> works with your health department to communicate lead health risks and information about blood lead testing for children to stakeholders.   | Name:<br>Phone Number:<br>Email: |

### *STEP 1D: Assign Training Roles*

- You will need to train your team members and stakeholders about the health effects of lead, its effect on children, and aspects of your 3Ts Program. It may be necessary to train your staff on how to take drinking water samples.

*Getting Started Table 4: Fill in the table to identify key Training Team members.*

| Training Team Roles and Responsibilities   |                                  |
|--|----------------------------------|
| <b>Training Team Lead:</b> acts as the main person in charge of your trainings including logistic activities (e.g., location, schedule).                                     | Name:<br>Phone Number:<br>Email: |
| <b>Other team members:</b> could lead trainings. Consider using internal staff, consultants, state and local agency contacts, or laboratory staff for the various trainings. |                                  |
| Trainer 1  | Trainer 2                        |
| Name:<br>Phone Number:<br>Email:   | Name:<br>Phone Number:<br>Email: |

### *STEP 1E: Assign Testing Roles*

- Involve knowledgeable and experienced individuals (such as consultants, laboratories, or other partners) to help design a comprehensive testing plan and conduct testing.
- Who conducts testing may depend on whether the certified laboratory also provides specialists to assist with sample collection. If certified laboratory representatives or consultants are used, ensure that they have experience in conducting lead testing for drinking water.
- Consider designating a person to serve as the Testing Team Lead for testing and follow-up activities.

*Getting Started Table 5: Fill in the table below to identify key team members for developing and executing the testing portion of your plan.*

| Testing Team Roles and Responsibilities   |                                  |
|---|----------------------------------|
| <b>Testing Team Lead:</b> designs your sampling methodology, serves as the point-of-contact for your testing efforts, coordinates sampling and testing activities, and informs the 3Ts Program Lead of the testing result activities. | Name:<br>Phone Number:<br>Email: |
| <b>Sample Collector:</b> collects samples and coordinates the sampling schedule. This may be an employee of the certified laboratory you work with.   | Name:<br>Phone Number:<br>Email: |
| <b>Sample Shipper:</b> ensures that samples are labeled, stored properly, and shipped to the testing laboratory correctly.  | Name:<br>Phone Number:<br>Email: |

### *STEP 1F: Assign Taking Action Roles*

- Work closely with maintenance staff and plumbers who make repairs to your facility's water infrastructure to identify and evaluate remediation options for your facility, ensure that chosen remediation options will reduce lead in water, understand the benefits and considerations associated with each remediation option, and select a remediation provider.

*Getting Started Table 6: Fill in the table below to assign key team members for developing and implementing remediation plans.*

| Taking Action Team Roles and Responsibilities   |                                  |
|---|----------------------------------|
| <b>Taking Action Team Lead:</b> acts as the main person in charge of the Taking Action portion of your 3Ts Program and coordinates the Taking Action Team’s efforts.  | Name:<br>Phone Number:<br>Email: |
| <b>Head of Building Maintenance/Custodial Services:</b> is important to include on the Taking Action Team as they are familiar with the facility’s needs and maintenance for any remediation actions that take place.   | Name:<br>Phone Number:<br>Email: |
| <b>Plumbers:</b> are important to include for replacing pipes or making other plumbing changes to remediate elevated lead levels.   | Name:<br>Phone Number:<br>Email: |
| <b>Local PWS/Water Supplier:</b> can help determine your possible lead remediation options and may be responsible for your facility’s water service line replacement effort.  | Name:<br>Phone Number:<br>Email: |
| <b>Electrician:</b> may be necessary to include on your 3Ts Taking Action Team if you pursue pipe replacement. Electrical wires may be grounded to the water pipes and in some cases can be removed by a qualified electrician and replaced by an alternative grounding system. | Name:<br>Phone Number:<br>Email: |
| <b>Point-of-Use (POU) Filter Maintenance Contact:</b> is necessary if your facility installs POU filters to remediate lead problems.  | Name:<br>Phone Number:<br>Email: |

## STEP 2: Establish Recordkeeping Practices ([3Ts Module 7](#))

Recordkeeping is critical to building an effective 3Ts Program. Keep and regularly update an ongoing record of partners, team contacts, testing efforts, remediation efforts, public outreach, and communication activities as you implement your 3Ts Program.

### *STEP 2A: Identify a Recordkeeping Lead*

- Appoint someone to ensure methods and results are documented to reduce the impact of staff turnover on your 3Ts Program. This recordkeeper will work with all team members to gather and store information in a centrally accessible place.

*Getting Started Table 7: Identify your Recordkeeping Lead.*

| 3Ts Program Recordkeeping Lead Contact Information |
|--|
| Name:<br>Phone Number:<br>Email:                   |

## *STEP 2B: Keep Key Records*

Keep records of the following key items to help improve your program and prevent the loss of important programmatic knowledge.

- **Annual Water Quality Reports:** Your local PWS may be required to produce and distribute an annual water quality report that includes system-wide lead monitoring results. Contact your PWS to obtain a copy of the latest water quality report or visit the website [Find Your Local Customer Confidence Report \(CCR\)](#) to check if it is available online.
- **Contact Lists:** Keep contact information for partners as part of program records. Use the [3Ts Toolkit Partners Contact Template](#) to identify and record contact information.
- **Completed Plan:** Post your completed 3Ts plan in a central location where your team members can access it.
- **Communications Materials:** Keep an ongoing record of communication activities, including dated copies of past communication materials and **questions received from the community that could be addressed in the future**. The [Communicate](#) section covers these materials further.
- **Training Attendance, Schedule, and Materials:** Keeping attendance and schedule records helps you track training progress and better plan your future training needs. The [Training](#) section covers these topics further.
- **Testing Plan and Results:** Throughout the testing process, document the sampling methodology, sampling locations, any implemented procedures or protocols, and testing results. The [Testing](#) section covers these topics further.
- **Record Remediation Actions:** Record remediation actions, schedules for upkeep and maintenance, and lists of partners and contacts that assisted in your efforts. Keeping records of remediation actions will help maintain and actively monitor remediation measures for effectiveness. The [Taking Action](#) section covers these remediation actions further.
- **Schedules of Routine Practices:** Keep records of scheduled routine practices to maintain a high level of water quality and set calendar reminders to help you stay on schedule. The [Taking Action](#) section covers routine practices further.

### Recordkeeping Templates

- [Partners Contact Form](#)
- [Roles and Responsibilities Form](#)
- [School and Child Care Facility Data eTrackers](#)

## STEP 3: Identify State, Tribal, and Local Regulations ([3Ts Introduction](#))

Reach out to your state drinking water program to find out what rules or regulations may apply to your facility and your program, then tailor your plan to meet any local or state requirements. Some states, tribes, and local jurisdictions have established their own laws, regulations, or guidance for testing drinking water lead levels in child care facilities.

*TO-DO: Input relevant local laws or regulations about testing for lead in your child care facility's drinking water and/or include relevant website links.*

## STEP 4: Create an Overall Schedule

Use the table below to keep track of all the important information you may need along the way to test for lead in your child care facility's drinking water. Activities may have a corresponding table as you continue through the Plan Builder. Font colors correspond with the appropriate sections if more information is needed. Some of the items below have already been auto-populated based on your answers to previous questions in the Getting Started section (e.g., invitees for the communication group). **Fill out the rest of the Plan Builder to populate your schedule!** Once you have filled-in all the sections of the Plan Builder, your answers will appear here, and you can view and make adjustments to your 3Ts Program Plan Schedule.

*Getting Started Table & Below is a schedule for your 3Ts Program. You can refer back to this table and edit your dates, activities, and responsible leads as your program evolves and you child care facility's needs change.*

| Dates | Activities  | Activity Lead | Notes |
|-------|---|---------------|-------|
|       | 1. Communicate with stakeholders about launching a 3Ts Program                          |               |       |
|       | 2. Develop training materials for the Administration Training Group                     |               |       |
|       | 3. Schedule and invite attendees to the trainings for the Administration Training Group |               |       |
|       | 4. Conduct trainings for the Administration Training Group                              |               |       |

| Dates | Activities   | Activity Lead | Notes |
|-------|--|---------------|-------|
|       | 5. Develop training materials for the Communication Training Group                         |               |       |
|       | 6. Schedule and invite attendees to the trainings for the Communication Training Group     |               |       |
|       | 7. Conduct trainings for the Communication Training Group                                  |               |       |
|       | 8. Develop training materials for the Testing Training Group                               |               |       |
|       | 9. Schedule and invite attendees to the trainings for the Testing Training Group           |               |       |
|       | 10. Conduct trainings for the Testing Training Group                                       |               |       |
|       | 11. Develop training materials for the Taking Action Training Group                        |               |       |
|       | 12. Schedule and invite attendees to the trainings for Taking Action Training Group        |               |       |
|       | 13. Conduct trainings for the Taking Action Training Group                                 |               |       |
|       | 14. Create an outlet inventory   |               |       |
|       | 15. Create your plumbing profile   |               |       |
|       | 16. Decide your sampling outlets   |               |       |
|       | 17. Establish sampling procedures  |               |       |
|       | 18. Select your certified laboratory and backup laboratory                                 |               |       |
|       | 19. Define your laboratory's role  |               |       |
|       | 20. Communicate with stakeholders about testing schedule and when water must remain unused |               |       |

| Dates | Activities   | Activity Lead | Notes |
|-------|--|---------------|-------|
|       | 21. Conduct sampling (include all dates and times)   |               |       |
|       | 22. Receive and interpret results  |               |       |
|       | 23. Communicate with stakeholders after receiving lead results   |               |       |
|       | 24. Conduct follow-up sampling if necessary (includes another round of receiving, interpreting, and communicating results) |               |       |
|       | 25. Identify if you receive any elevated lead results  |               |       |
|       | 26. If you receive elevated lead results, identify the source of lead  |               |       |
|       | 27. Communicate with stakeholders about plans for taking action if you received elevated lead results                      |               |       |
|       | 28. Take immediate actions<br>(See <a href="#">Taking Action Table 3</a> )   |               |       |
|       | 29. Take short-term actions<br>(See <a href="#">Taking Action Table 4</a> )  |               |       |
|       | 30. Develop and implement long-term solutions (See <a href="#">Taking Action Table 5</a> )                                 |               |       |
|       | 31. Incorporate routine practices into your water management plan<br>(See <a href="#">Taking Action Table 6</a> )          |               |       |
|       | 32. Implement routine practices  |               |       |

## Summary:

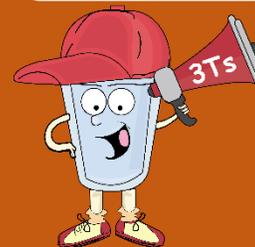
In this section, you identified your program's stakeholders, assembled your 3Ts Team, established your recordkeeping procedures, reviewed a schedule, and noted any relevant state or local regulations. Return to this section to create and review your plan schedule.



## Build Your Communications Plan

This section builds your 3Ts Program communications plan for your team, members of the community, and other stakeholders. Communicating early and often about your testing plans, results, and next steps will build stakeholder confidence in your ability to provide a safe learning environment.

Communication is **key!**



1

Identify Your Target Audience and Communication Methods

2

Incorporate Communications Best Practices

3

Schedule Communications Activities

- INTRODUCTION
- GETTING STARTED
- COMMUNICATE
- TRAINING
- TESTING
- TAKING ACTION
- TAKE ACTION: TAKE IT WITH YOU!

### STEP 1: Identify Your Target Audiences and Communication Methods ([3Ts Module 1](#))

- Your Target Audiences are the groups that you plan on regularly informing about your 3Ts Program. Communications should always be directed at these audiences. Descriptions of target audiences can be found in [3Ts Module 1](#).
- Communication methods will depend on the level of importance of the message, audience preferences, and the number of people in the Target Audience.

*TO-DO: Answer the following questions to work through things to consider when selecting communication methods.*

- What communication methods have you used in the past? What made those methods successful? Examples of communication methods include press releases, letters/fliers, social media, mailbox stuffers, websites, staff newsletters, and presentations. Detailed descriptions of communication methods can be found in [3Ts Module 1](#).

- Will you change your communication methods based on the message? Indicate the factors that will influence changing your communication methods, such as the importance of the message, level of concern, timeliness of the message, and risk being communicated.

- What languages do you anticipate using? If you will need to use multiple languages, how will you accommodate language needs (e.g., provide language-based contacts, translated information)?

- What stakeholder groups do you anticipate communicating to (e.g., parents, staff)? What methods will you use to communicate with each of these groups?

## STEP 2: Incorporate Communications Best Practices ([3Ts Module 1](#))

When carrying out communications activities, keep the following best practices in mind:

- ✓ Take the initiative to communicate with your community.
- ✓ Make sure your information is honest, accurate, and comprehensive.
- ✓ Speak with one consistent voice.
- ✓ Anticipate questions and concerns and address them proactively.
- ✓ Be positive and forthcoming.
- ✓ Keep your audience up to date with the newest information.
- ✓ Have a plan created for communicating the results of your sampling effort to your audience before testing begins.
- ✓ Share results regardless of the lead level detected.
- ✓ Share plans about remediation activities, including what actions will be taken and when.
- ✓ Regularly update your community on water quality improvement efforts and routine practices.
- ✓ Being transparent about improvement efforts will ensure your stakeholders and community members have agency.

### Communication Templates

- Customizable Poster
- Parent Letter
- Newsletter
- Postcard

## STEP 3: Schedule Communications Activities ([3Ts Module 1](#))

- You will create schedules for completing program activities in the [Training](#), [Testing](#), and [Taking Action](#) sections. These schedules will also include communications activities that align with activities in these other sections. Communications activities are indicated by **orange font**.
- Time your communications to coincide with other activities so that your stakeholders remain informed throughout the process.



### Summary:

In this section, you finalized methods of communication to use and learned best practices for communicating about your 3Ts Program activities. Return to this section to identify methods to reach out to the community and internal stakeholders.

## Build Your Training Plan

Let's use this section to build your internal training and educational outreach process. This section helps you select relevant topics, communicate background information on health effects and drinking water regulations, group team members and stakeholders with similar roles into targeted trainings, incorporate best practices for conducting trainings into your trainings, and utilize existing materials for training sessions.



**1** *Group Team Members and Select Topics for Targeted Training*

**2** *Determine Materials for Use in Training Program*

**3** *Incorporate Best Practices into Training Development*

**4** *Schedule Trainings*



### STEP 1: Group Team Members and Select Topics for Targeted Training ([3Ts Module 3](#))

- Use the following table to identify your Training Groups. You may find it efficient to train groups of people with similar roles. You may have personnel in more than one Training Group; if this is the case, be sure to avoid scheduling conflicts.
- Use the following table to guide your selection of the appropriate training topics.
  - Some topics are broadly applicable to all trainings, as they provide helpful context and generate buy-in. There is no one way to conduct trainings but referring to these topics at the beginning of each training may serve as a useful starting point. These topics include:
    - Background of your facilities and buildings
    - Your relationship to your PWS
    - Common terminology used
    - Health effects of lead
    - Vulnerability of children to lead poisoning
    - Sources of lead
    - How lead gets into drinking water
    - Regulatory background (state and/or federal requirements) of lead in drinking water
- Refer to [3Ts Module 2](#) for more information about the above topics. For additional training resources, see EPA's [Lead webpage](#).
- Refer to the "Best Practices" listed in [Step 3](#) later in this section for suggestions on activities your trainings can incorporate and the best format for each group. For example, breakout groups may be useful for larger Training Groups with clusters of similar roles.
- Physical walkthroughs may be beneficial for those involved with facility infrastructure. Varying the format of your trainings can help engage different types of learners; some attendees may be visual, auditory, or kinesthetic learners.

## STEP 2: Determine Materials for Use in Your Training Program ([3Ts Module 2](#))

- There are multiple training materials available for your use when conducting the various trainings, including the training materials from EPA’s 3Ts Program, your state or municipal offices, and non-profits and professional associations.
- Your partners may have other materials that may be useful for your trainings. Check with:
  - Your district’s public relations team, who may have existing training materials.
  - Other local or regional schools/child care facilities.
  - Professional water organizations like the Water Research Foundation or local chapters of the American Water Works Association and National Rural Water Association.
- You may find it useful to develop your own training materials based on guidance from EPA, your state, and partners, or to include supplemental materials attached to the plan. If you decide to develop your own training materials, refer to [Step 3](#) later in this section.

*TO-DO: Select the training materials your program will use.*

- EPA 3Ts Materials such as the [3Ts Manual](#) and [Toolkit](#)
- State Training Materials
- Municipal Training Materials
- Partner Training Materials
- Child Care Facility Training Materials
- Develop your own
- List the specific training materials you will use for the categories checked above:

*Training Table 1: Fill in the table to organize trainings for your groups. You may use the recommended topics and activities in italics or adjust to what will best work for your team members. Refer to the Getting Started section to identify who should be grouped together for trainings.*

| Training Group Names           | Topics | Materials | Activities | Location/Platform | Additional Notes |
|--------------------------------|--------|-----------|------------|-------------------|------------------|
| Group:<br>Trainer:<br>Members: |        |           |            |                   |                  |

## STEP 3: Incorporate Best Practices into Your Training Development ([3Ts Module 3](#))

The following steps guide you through the process of developing trainings to prepare your team members and stakeholders for their roles in the program.

### *Best Practices for Training Development*

Incorporate supportive and inclusive best practices to sustain buy-in and investment in your program. Keep these best practices in mind when developing and conducting your trainings.

#### Outreach

- ✓ Employ your Communications Team to announce trainings and provide materials that may be beneficial to the larger community. This may include information on the EPA’s 3Ts Program and state and local resources on lead in drinking water.
- ✓ Be transparent in communications with stakeholders. Include stakeholders across your whole community, including underserved populations so that everyone is made aware of your trainings.
- ✓ Begin training early in your 3Ts Program to ensure your team is informed of their responsibilities.

#### Training Materials

- ✓ Provide discussion materials and topics before trainings so your team is prepared in advance.
- ✓ Vary training tools and presentation formats to keep trainings fresh and attendees engaged. Some training tools work better with different audiences.
- ✓ Enhance your training materials with graphics, examples, and pictures.

#### Training Procedures

- ✓ Create an open, honest, and inclusive learning environment, as this may be new information for many attendees.
- ✓ Allot ample time for questions. Encourage attendees to ask questions, and repeat questions asked back to them to ensure that you can properly answer their questions.
- ✓ Incorporate interactive activities to engage attendees. Some examples of interactive activities are knowledge checks and quizzes, tours of testing sites, group discussions, case studies, and hands-on exercises.

### *Developing Your Trainings*

While the content of each training session may vary based on the training audience and timing, there are some structural features that are applicable to all your trainings.

*TO-DO: Brainstorm answers to the questions below to get a sense of your training protocols.*

- How will you ensure that your trainings are accessible for all attendees? For example, if you will be holding remote trainings, will you use video, audio, and phone line? Will they be recorded for future reference?

- Will training materials be made available in languages other than English (including ASL)?

- Will these trainings be incorporated with other training programs that your facility is involved in? If so, how will you integrate materials related to your 3Ts Program? 

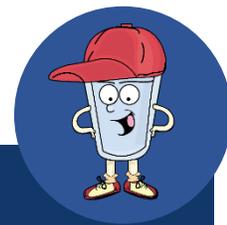
## STEP 4: Schedule Trainings ([3Ts Module 3](#))

- Plan out your training dates so that all team members have the necessary information before beginning their assigned roles.

*Training Table 2: Enter the dates by which you will complete training activities, the activity leads, and any relevant notes in the table below. If applicable, revise activities to match the Training Groups you have created above.*

| Dates | Activities  | Activity Lead | Notes |
|-------|---|---------------|-------|
|       | 1. Communicate with stakeholders about launching a 3Ts Training Program                 |               |       |
|       | 2. Develop training materials for the Administration Training Group                     |               |       |
|       | 3. Schedule and invite attendees to the trainings for the Administration Training Group |               |       |
|       | 4. Conduct trainings for the Administration Training Group                              |               |       |
|       | 5. Develop training materials for the Communication Training Group                      |               |       |
|       | 6. Schedule and invite attendees to the trainings for the Communication Training Group  |               |       |
|       | 7. Conduct trainings for the Communication Training Group                               |               |       |
|       | 8. Develop training materials for the Testing Training Group                            |               |       |
|       | 9. Schedule and invite attendees to the trainings for the Testing Training Group        |               |       |

| Dates | Activities  | Activity Lead | Notes |
|-------|---|---------------|-------|
|       | 10. Conduct trainings for the Testing Training Group                                |               |       |
|       | 11. Develop training materials for the Taking Action Training Group                 |               |       |
|       | 12. Schedule and invite attendees to the trainings for Taking Action Training Group |               |       |
|       | 13. Conduct trainings for the Taking Action Training Group                          |               |       |



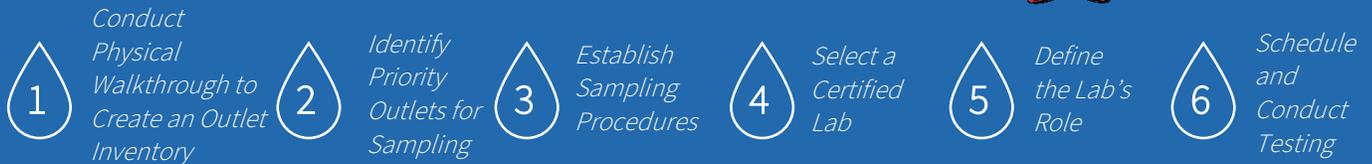
## Summary:

In this section, you identified useful training materials, organized, and identified content for Training Groups, learned some training best practices, and developed features of your training program. Review this section to determine how and when you will implement training for your 3Ts Program.

## Build Your Sampling and Testing Plan

Use this section to help build your Lead Testing Plan. Testing includes the process of sample collection, which is usually conducted by your team members, and sample analysis, which is conducted by a certified laboratory. This section will cover how to plan, prioritize, and determine sampling locations, develop sampling collection procedures, and begin to analyze and interpret your results. This plan will depend on the physical infrastructure of your building and your facility's schedule and needs.

Create a thorough **sampling plan!**



- INTRODUCTION
- GETTING STARTED
- COMMUNICATE
- TRAINING
- TESTING
- TAKING ACTION
- TAKE ACTION: TAKE IT WITH YOU!

### STEP 1: Conduct Physical Walkthrough to Create an Outlets Inventory ([3Ts Module 4](#))

- Create an inventory to help you choose which outlets to sample. Begin by conducting a physical walkthrough to create an inventory of your outlets used for human consumption in all buildings.
- Identify how your water enters and flows through the building(s)' plumbing, priority outlets, and additional sites that staff or students use for drinking water.

When conducting the walkthrough of the facility, make sure to:

- ✓ Take note of all outlets and visible plumbing used for human consumption. i
- ✓ Take pictures to refer to at a later time.
- ✓ Pay close attention to the following indicators when prioritizing outlets as they may be more likely to have elevated lead results. These indicators include:
  - Rust around the outlet or discolored water coming from the outlet
  - Colored stains on fixtures and/or around the plumbing
    - Blue-green deposits on pipes and sinks indicate copper corrosion; brown stains result from the corrosion of iron
  - For more information on these indicators, refer to [3Ts Appendix G](#).



## STEP 2: Identify Priority Outlets for Sampling ([3Ts Module 4](#))

- Use outlets from [Testing Table 1](#) in [Step 1](#) to prioritize and identify the outlets you will test. You may need to prioritize some locations due to time or resource constraints. The following are factors that increase outlet priority:
  - Use by children under the age of six years old
  - Use by pregnant or nursing women
  - High frequency of use
  - Old fixtures (especially those constructed before 1988)
  - Presence of brass fittings, faucets, or valves
  - Outlet with accessible screens or aerators
  - Visible signs of corrosion, such as rust (See [Step 1](#))
  - Outlets with complaints of unusual (metallic) taste or strong odor
- When determining which outlets to test, include a variety of fixtures used for human consumption.
  - Test multiple types of fixtures to characterize potential lead exposure from various outlets.
  - Do not include faucets that are not used for human consumption, such as sinks in janitor’s closets or outdoor hoses.

*Testing Table 2: In the table below, indicate the outlets you will test. See details in [3Ts Module 4](#).*

| Sample Outlet | Outlet Location | Types of Outlets | Is a filter attached to this outlet? | Priority Level |
|---------------|-----------------|------------------|--------------------------------------|----------------|
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |
|               |                 |                  |                                      |                |

## STEP 3: Establish Sampling Procedures ([3Ts Module 4](#), [3Ts Module 5](#))

Determine sampling procedures and protocols to ensure that lead sampling is implemented properly and consistently in your facility.

### *STEP 3A: Outlet Sampling Sequence ([3Ts Module 4](#))*

- First, consider the order in which you will sample outlets. Sampling typically follows the flow of water through a building, start on the bottom floor (where the water main is located) then continue up.
- Using your inventory ([Step 1](#)), [Exhibits 2 and 3 in 3Ts Module 4](#), and the questions below, decide on the order of taking samples. You also may want to refer to useful documents such as floor plans.

*TO-DO: List the order of floors and/or parts of the building where you will test.*

- How does water flow through your building? Include the point of entry, where the water goes from floor to floor, and the order in which fixtures receive water on the same floor. Identify the order in which priority outlets are serviced. *See information you entered in [Step 1](#) and [Step 2](#).*

- List the order of floors and/or parts of the building where you will test.

### *STEP 3B: Testing Frequency ([3Ts Module 4](#))*

- How frequently your facility can and should test for lead in drinking water depends on a variety of factors (e.g., plumbing, water quality, lead results, budget, and competing priorities).
- Annual monitoring provides information on changes in the lead levels and the effectiveness of remediation or treatment efforts, as well as timely notice of faulty or damaged outlets, and other problems that may need to be addressed.

*TO-DO: Answer the following questions to determine how often you will test for lead.*

- What is your budget for lead testing? ⓘ

- Have you had lead-positive sample results in the past?

- Given your answers from the previous two questions, how often will you test for lead in your facility's drinking water? ⓘ

### STEP 3C: Sampling Protocols ([3Ts Module 4](#), [3Ts Module 5](#))

- It is recommended for child care facilities to collect 250 mL samples after a minimum of 8 hours not using the water. A 250-mL sample volume can help identify the sources of lead at an outlet, as it is representative of the amount of water consumed per serving. 
- For each outlet to be sampled, determine which type of sample is appropriate: first-draw samples and/or flush samples. For more information about types of sample and sampling protocols, including the recommended 2-Step sampling procedure, see [3Ts Module 5](#) including the Sampling Field Guide and Sampling Guide Video.

*TO-DO: Answer the questions below about sample types.*

- From which outlets and fixtures will you collect first-draw samples? 

- From which outlets and fixtures will you collect flush samples/second-draw samples? 

- Will you collect second-draw samples at the same time that initial samples are taken? 

### STEP 3D: Shipping Your Samples ([3Ts Appendix E](#))

- Establish an organized labeling and shipping process prior to collection to help ensure that samples are properly handled.
- In your shipping procedures, keep samples properly labeled and sealed between collection and preparation by the laboratory.
- Most laboratories will provide the necessary shipping containers. To prevent sample degradation, ship the samples to the testing laboratory as soon as possible.

*TO-DO: Describe your comprehensive storage and shipping procedure from storing samples to packaging and sending out the containers.*

### STEP 4: Select a Certified Laboratory ([3Ts Module 4](#))

Select a certified laboratory approved by the state or EPA for analyzing your samples. It is best practice to have a backup laboratory in case your primary laboratory cannot analyze samples within your desired timeframe. See [3Ts Module 4](#) for more information about selecting a certified laboratory.

*Testing Table 3: Enter the laboratory and backup laboratory that will analyze your samples.*

| Laboratory Name | Position | Contact Information     | Shipping Address | Cost |
|-----------------|----------|-------------------------|------------------|------|
|                 | Primary  | Phone Number:<br>Email: |                  |      |
|                 | Backup   | Phone Number:<br>Email: |                  |      |

## STEP 5: Define the Laboratory’s Role ([3Ts Module 4](#))

Define the laboratory’s role in your testing procedures (i.e., collecting samples vs. conducting analysis). Communicate with the laboratory to confirm testing details, such as when they will send out the sample kit, their timeline for conducting sample analysis, and providing the results.

*TO-DO: Identify the services your selected laboratory will provide.*

- What sampling containers will the laboratory provide? 

- What applicable services will the laboratory provide? 

- What is the laboratory’s timeframe for returning sample results?

## STEP 6: Schedule and Conduct Testing ([3Ts Module 4](#), [3Ts Module 5](#))

- Now that you have chosen sampling locations and established procedures, create a schedule for completing testing activities.
- When identifying dates and times for sampling, schedule sample collection *before* the facility opens and *before* any water is used. Ideally, the water should sit in the pipes unused for 8 to 18 hours before a sample is taken.
- When identifying dates for multiple rounds of sampling, make sure to look at the calendar to ensure you are not sampling on holidays. If so, confirm with the chosen laboratory that they will receive your samples.
- When your facility conducts testing, use the 3Ts [eTracker](#) to record your sampling and results.

*TO-DO: Answer the questions below to help determine when to conduct your testing.*

- On what holidays and vacations is your facility closed? Avoid testing after a building was closed for 18 hours or more. 

- Identify the best time periods to take samples below. What are your facility's normal hours of operation?

*Testing Table 4: Enter the dates you will complete certain activities, the activity leads, and any relevant notes in the table below.*

| Dates | Activities   | Activity Lead | Notes |
|-------|--|---------------|-------|
|       | 1. Create an outlet inventory  |               |       |
|       | 2. Decide your sampling outlets  |               |       |
|       | 3. Establish sampling procedures   |               |       |
|       | 4. Select your primary and backup certified laboratory   |               |       |
|       | 5. Define your laboratory's role   |               |       |
|       | 6. Communicate with stakeholders about testing schedule and when water must remain unused                                  |               |       |
|       | 7. Sampling schedule (include all dates and times)   |               |       |
|       | 8. Receive and interpret results   |               |       |
|       | 9. Communicate with stakeholders after receiving lead results  |               |       |
|       | 10. Conduct follow-up sampling if necessary (includes another round of receiving, interpreting, and communicating results) |               |       |

## Summary:

In this section, you captured information about outlets and plumbing in your facility, established sampling procedures, determined how your samples will be analyzed, and identified times to sample for lead in drinking water. Return to this section to identify your laboratory, sample locations, and the frequency of your samples.

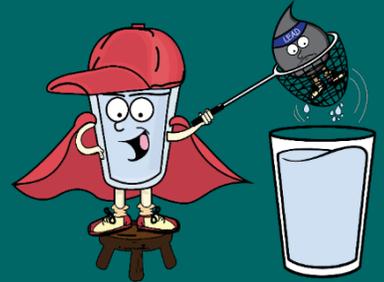


## Build Your Remediation Plan

Use this section to build your plan for taking action after receiving lead testing results. You will consider immediate, short term, and long term actions to remediate lead in your drinking water and determine which actions could be best for your facility and community. Solutions to lead problems need to be implemented on both a short term and a long term basis.

**Remember, there is no level of exposure to lead that is without risk to children;** taking actions on all outlets that show a detected lead level can reduce exposure. These remediation actions could be as easy as shutting off the outlet as an interim measure, putting up signage noting that lead was detected at a very low level, and/or providing instructions to let the water run for a set amount of time to flush the lead out.

Let's take **action** to reduce lead in drinking water!



1

Identify Program Remediation Trigger

2

Identify Remediation Contractors

3

Determine Immediate Actions

4

Determine Short term Actions

5

Determine Long term Solutions

6

Establish Routine Practices



### STEP 1: Identify Program Remediation Trigger and Interpret Results ([3Ts Module 5](#))

- At a minimum, establish your **Program Remediation Trigger (PRT)**. This is the level of lead or concentration detected (e.g., in parts per billion or ppb, micrograms per liter or  $\mu\text{g/L}$ , parts per million or ppm, or lastly, milligrams per liter or  $\text{mg/L}$ ) in your drinking water sample at which you will prioritize to take immediate remediation action(s) to reduce or eliminate the exposure that exceeds the PRT.
- The level may be set by the facility and/or state, depending on existing state regulations and funding support. If your facility is receiving funding from the Water Infrastructure Improvements for the Nation Act (WIIN) grant through the state, then the state is required to set this level for your facility. Contacts for EPA and state agencies administrating the WIIN grant program can be found at: <https://www.epa.gov/dwcapacity/wiin-2107-lead-testing-school-and-child-care-program-drinking-water-state-grant-program>. For more guidance on this level, ask your state or refer to the [3Ts Manual](#).
- Check with your state and local agencies to see if they have additional guidance or requirements (e.g., state-specific lead remediation trigger).

It is especially important to ensure drinking water is safe for vulnerable infant populations when reconstituting infant formula.

- EPA regulates public water systems (PWSs) and does not have a health-based standard for lead. To keep lead from entering the water, EPA’s Lead and Copper rule (LCR) requires PWSs to treat water using certain chemicals that keep the lead from leaching into the water by reducing corrosion of pipes and plumbing. This treatment is called corrosion control. To check if corrosion control is working, EPA requires PWSs to test for lead at the tap in certain homes. PWSs compare sample results from these homes to EPA’s action level of 15 ppb. If 10 percent of the samples from these homes have lead levels that are greater than 15 ppb, then the PWSs must perform actions such as public education and lead service line replacement. For more details on LCR refer to [Lead and Copper Rule 101 factsheet](#).
- To assist child care facilities in a state without a state-specific lead remediation trigger level, the facility determines the PRT. Contact your appropriate local agency (e.g., public health department) for guidance. Recognizing there is no level of exposure to lead that is without risk to children, the following illustrates baseline action levels recommended by other federal agencies, state WIIN programs and public health organizations:
  - National data from the state WIIN grant program show PRT levels range from 4 ppb to 15 ppb.
  - World Health Organization baseline level is 10 ppb.
  - American Pediatric Association baseline level is 1 ppb.

Small child care facilities are more likely to have lead service lines that may need to be replaced.

*TO-DO: Indicate your Program Remediation Trigger (e.g., in ppb or ppm) to take action below.*

- If your results are above the PRT, you will need to take immediate, short-term, and long-term actions to reduce lead in your drinking water. Action may include posting a sign at the fixture to inform that lead was found, installing filters, implementing routine flushing, removing the fixtures from service.
- If your sample results are below the PRT, EPA recommends taking action to further minimize potential exposure. Action may include routine maintenance and flushing procedures. For more details, see [3Ts Module 6](#) to reduce level lead exposure.

## STEP 2: Identify Remediation Contractors ([3Ts Module 6](#))

- Identify potential external contractors for remediation. Prior to agreeing to work with any specific organization, ask contractors for schedule information, health precautions that must be taken during and following remediation, upfront costs, and operations and maintenance costs.
- When selecting a contractor, confer with your local health department, PWS, and other internal or external stakeholders to ensure the organization performing remediation is qualified and reputable.

*Taking Action Table 1: List potential remediation contractors and the services they can offer.* <sup>1</sup>

| Contractor Contact Information | Services Offered | Reference Name and Contact Information | Notes |
|--------------------------------|------------------|--|-------|
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |

### STEP 3: Determine Immediate Actions ([3Ts Module 6](#))

- Determine which actions you will take first if you receive elevated lead results. For these actions to be effective, you may take all or a combination of several actions.
- As you evaluate the feasibility of each option and choose the actions that you will integrate into your plan, consider the questions that appear when you hover over each box. Work with your remediation provider, or your local health department, to help answer these questions and determine which remediation options may be right for you.

*Taking Action Table 2: Fill in the table to determine which immediate action(s) to take following elevated lead results. The text in italics provides information to consider as you determine which actions to take. Additional information about these actions can be found in [3Ts Module 6](#).*

| Immediate Remediation Actions   | Likelihood of Success <span style="float: right;">i</span> | Cost <span style="float: right;">i</span> | Availability of Water <span style="float: right;">i</span> | Staffing Requirements <span style="float: right;">i</span> | Additional Notes |
|---|--|---|--|--|------------------|
| <input type="checkbox"/> <b>Immediate shutoff:</b> Shut off or disconnect the problem outlet until the problem is resolved.                                   |  |   |  |  |                  |
| <input type="checkbox"/> <b>Do not drink (or cook) orders:</b> Post clear signage to notify people that the outlet is not to be used for drinking or cooking. |  |   |  |  |                  |
| <input type="checkbox"/> <b>Share test results:</b> Let stakeholders know about your test results.  |  |   |  |  |                  |

## STEP 4: Determine Short-term Actions ([3Ts Module 6](#))

- Determine which short-term actions you will take following elevated lead results. Additional information about these actions can be found in [3Ts Module 6](#).

*Taking Action Table 3: Fill in the table with your short-term actions. The text in italics provides information for you to consider as you determine which actions you will take.*

| Short term Remediation Actions  | Likelihood of Success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|---|-----------------------|------|-----------------------|-----------------------|------------------|
| <input type="checkbox"/> <b>POU Filters:</b> Install POU filters at each problem outlet. Ensure that the selected POU device is certified to remove lead by checking with the manufacturer or a third-party website (such as nsf.org or wqa.org) to verify the product was tested and certified against NSF/ANSI Standard 53 and for particulate lead, certified against NSF/ANSI Standard 42. For details refer to A Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead [EPA/600/F-18/335   December 2018] |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Flushing:</b> Flush individual problem water outlets or all outlets within the facility. Unless you can ensure lead levels remain low throughout the day, flushing is recommended multiple times per day.   |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Providing bottled water:</b> Provide students and staff with bottled water to minimize use of tap water. This may be warranted if you are aware of widespread contamination and other remediation is not a near-term option.  |                       |      |                       |                       |                  |

## STEP 5: Determine Long-term Solutions ([3Ts Module 6](#))

- Determine long-term solutions you will implement if you receive elevated lead results. Long-term solutions may involve replacement or repairs. When making any repairs or conducting work to replace plumbing or fixtures, ensure that “lead-free” solders and other materials are used. Additional information about these actions can be found in [3Ts Module 6](#).

*Taking Action Table 4: Fill in the table with long-term actions. The text in italics provides information for you to consider as you determine which actions you will take.*

| Long term Remediation Actions   | Likelihood of Success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|---|-----------------------|------|-----------------------|-----------------------|------------------|
| <input type="checkbox"/> <b>Replacement of Problem Outlets:</b> Replace identified problem outlets and any identified upstream plumbing components (e.g., valves, leaded solder) permanently. |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Pipe Replacement:</b> Replace lead pipes and portions of lead service lines. Lead service lines may fall under your or your PWS’s jurisdiction.                   |                       |      |                       |                       |                  |

| Long term Remediation  | Likelihood of Success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|--|-----------------------|------|-----------------------|-----------------------|------------------|
| <p><input type="checkbox"/> <b>POU Filters:</b> Install and maintain POU filters. Create maintenance schedules and identify a point of contact to ensure POU filters are properly maintained. For details refer to <a href="#">A Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead</a>.</p> |                       |      |                       |                       |                  |
| <p><input type="checkbox"/> <b>Reconfigure Plumbing:</b> Modify plumbing system to bypass sources of lead contamination. Ongoing renovation of school or child care buildings may provide an opportunity. You may need to conduct additional testing to be certain you have properly identified all sources of lead contamination.</p>     |                       |      |                       |                       |                  |

## STEP 6: Establish Routine Practices ([3Ts Module 6](#))

- Establish routine practices to reduce exposure to elevated lead levels and other environmental hazards in the future.
- Below are examples of routine activities that can be conducted to prevent exposure to drinking water contaminants. Determine which practices your facility will implement.
- The frequency with which you implement these practices will depend on your facility, type of fixtures, and amount of lead found in your facility.

*Taking Action Table 5: Check which routine practices to include in your facility’s overall water management program.*

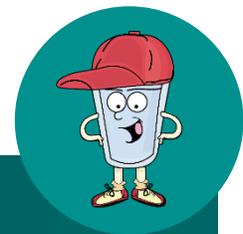
| Routine Practices   |
|---|
| <b>Cleaning</b>   |
| <input type="checkbox"/> Clean fountains, aerators, and water fountain strainers regularly and post a cleaning time tracking card by the water fountains/outlets for maintenance staff to complete. Set a reminder on the calendar to notify maintenance staff when cleaning is required. |
| <b>POU Maintenance</b>  |
| <input type="checkbox"/> Create a schedule for filter replacement to notify maintenance staff when it is time to change the filter.   |
| <b>Temperature Control</b>  |
| <input type="checkbox"/> Use only cold water for food and beverage preparation as hot water will dissolve lead more quickly. Communicate this to cafeteria staff and post notices.  |
| <input type="checkbox"/> If hot water is necessary, take it from the cold-water faucet and heat on a stove or in a microwave oven.  |
| <b>Cross-Connections Control</b>  |
| <input type="checkbox"/> Evaluate the facility for the presence of cross-connections (e.g., connections of non-potable water to potable sources) and address any sources of potential contamination.  |
| <b>Communication</b>  |
| <input type="checkbox"/> Create and postcards near bathroom handwashing sinks with notices that water should not be consumed.   |
| <input type="checkbox"/> Organize events for the community to explain how everyone can help.  |
| <input type="checkbox"/> Use pictures if there are small children using bathrooms and ask teachers to remind students.  |
| <b>Routine Flushing Practices</b>   |
| <input type="checkbox"/> Flushing as a routine practice can help prevent elevated lead results proactively as opposed to flushing as a remediation action. For guidance on flushing, refer to <a href="#">3Ts Module 6</a> .  |

## STEP 7: Schedule Remediation Actions ([3Ts Module 5](#), [3Ts Module 6](#))

Now that you have determined your action steps following lead testing and chosen routine practices you will implement into your water quality management plan, make a schedule to execute this action plan.

*Taking Action Table 6: Enter the dates you will complete certain activities, the activity leads, and any relevant notes in the table below.*

| Dates | Activities  | Activity Lead | Notes |
|-------|---|---------------|-------|
|       | 1. Identify if you receive any elevated lead results  |               |       |
|       | 2. If you receive elevated lead results, identify the source of lead  |               |       |
|       | 3. Communicate with stakeholders about plans for taking action if you received elevated lead results          |               |       |
|       | 4. Take immediate actions (See <a href="#">Taking Action Table 3</a> )  |               |       |
|       | 5. Take short-term actions (See <a href="#">Taking Action Table 4</a> )                                       |               |       |
|       | 6. Develop and implement long-term solutions (See <a href="#">Taking Action Table 5</a> )                     |               |       |
|       | 7. Incorporate routine practices into your water management plan (See <a href="#">Taking Action Table 6</a> ) |               |       |
|       | 8. Implement routine practices  |               |       |



## Summary:

In this section, you determined what immediate, short term, and long term actions you will take in the event of elevated lead levels. You also decided on routine practices that you will establish as part of your facility's water management plan to reduce your community's exposure to not only lead but other drinking water contaminants. Refer to this section to confirm your remediation trigger and next steps for when you receive your lead results.

## Take Action: Your Summary Input

This section auto-summarizes your input from the Taking Action chapter of the Plan Builder. Print and use for a quick reference of your planned actions when lead is detected in your school’s drinking water. To print this summary only, complete the following steps:

1. In the toolbar – click [File]
2. Click [Print] and select [Pages], then enter all the page numbers of Take It With You! (e.g., 36-41).
3. Click [Print] and you will have a quick reference of your planned actions when lead is detected in your school’s drinking water.

Note: If changes are needed, make them in the **Taking Action** chapter to re-populate the summary pages of **Take It With You!**

*TO-DO: Indicate your Program Remediation Trigger (e.g., in ppb or ppm) to take action below.*

*Taking Action Table 1: List potential remediation contractors and the services they can offer.*

| Contractor Contact Information | Services Offered | Reference Name and Contact Information | Notes |
|--------------------------------|------------------|--|-------|
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |
|                                |                  |  |       |

*Taking Action Table 2* Fill in the table to determine which immediate action(s) to take following elevated lead results. The text in italics provides information to consider as you determine which actions to take. Additional information about these actions can be found in [3Ts Module 6](#).

| Immediate Remediation Actions   | Likelihood of Success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|---|-----------------------|------|-----------------------|-----------------------|------------------|
| <input type="checkbox"/> <b>Immediate shutoff:</b> Shut off or disconnect the problem outlet until the problem is resolved.                                   |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Do not drink (or cook) orders:</b> Post clear signage to notify people that the outlet is not to be used for drinking or cooking. |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Share test results:</b> Let stakeholders know about your test results.  |                       |      |                       |                       |                  |

*Taking Action Table 3: Fill in the table with your short-term actions. The text in italics provides information for you to consider as you determine which actions you will take.*

| Short-term Remediation Actions   | Likelihood of Success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|--|-----------------------|------|-----------------------|-----------------------|------------------|
| <p><input type="checkbox"/> <b>POU Filters:</b> Install POU filters at each problem outlet. Ensure that the selected POU device is certified to remove lead by checking with the manufacturer or a third-party website (such as nsf.org or wqa.org) to verify the product was tested and certified against NSF/ANSI Standard 53 and for particulate lead, certified against NSF/ANSI Standard 42. For details refer to A Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead [EPA/600/F-18/335   December 2018]</p> |                       |      |                       |                       |                  |
| <p><input type="checkbox"/> <b>Flushing:</b> Flush individual problem water outlets or all outlets within the facility. Unless you can ensure lead levels remain low throughout the day, flushing is recommended multiple times per day.</p>   |                       |      |                       |                       |                  |
| <p><input type="checkbox"/> <b>Providing bottled water:</b> Provide students and staff with bottled water to minimize use of tap water. This may be warranted if you are aware of widespread contamination and other remediation is not a near-term option.</p>  |                       |      |                       |                       |                  |

*Taking Action Table 4: Fill in the table with long-term actions. The text in italics provides information for you to consider as you determine which actions you will take.*

| Long-term Remediation Actions  | Likelihood of success | Cost | Availability of Water | Staffing Requirements | Additional Notes |
|--|-----------------------|------|-----------------------|-----------------------|------------------|
| <input type="checkbox"/> <b>Replacement of Problem Outlets:</b> Replace identified problem outlets and any identified upstream plumbing components (e.g., valves, leaded solder) permanently.  |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Pipe Replacement:</b> Replace lead pipes and portions of lead service lines. Lead service lines may fall under your or your PWS's jurisdiction.  |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>POU Filters:</b> Install and maintain POU filters. Create maintenance schedules and identify a point of contact to ensure POU filters are properly maintained. For details refer to <a href="#">A Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead</a> . |                       |      |                       |                       |                  |
| <input type="checkbox"/> <b>Reconfigure Plumbing:</b> Modify plumbing system to bypass sources of lead contamination. Ongoing renovation of school or child care buildings may provide an opportunity. You may need to conduct additional testing to be certain you have properly identified all sources of lead contamination.      |                       |      |                       |                       |                  |

# TAKE ACTION: TAKE IT WITH YOU

*Taking Action Table 5: Check which routine practices to include in your facility's overall water management program.*

| Routine Practices   |
|---|
| <b>Cleaning</b>   |
| <input type="checkbox"/> Clean fountains, aerators, and water fountain strainers regularly and post a cleaning time tracking card by the water fountains/outlets for maintenance staff to complete. Set a reminder on the calendar to notify maintenance staff when cleaning is required.   |
| <b>POU Maintenance</b>  |
| <input type="checkbox"/> Create a schedule for filter replacement to notify maintenance staff when it is time to change the filter.   |
| <b>Temperature Control</b>  |
| <input type="checkbox"/> Use only cold water for food and beverage preparation as hot water will dissolve lead more quickly. Communicate this to cafeteria staff and post notices.<br><input type="checkbox"/> If hot water is necessary, take it from the cold-water faucet and heat on a stove or in a microwave oven.                                |
| <b>Cross-Connections Control</b>  |
| <input type="checkbox"/> Evaluate the facility for the presence of cross-connections (e.g., connections of non-potable water to potable sources) and address any sources of potential contamination.  |
| <b>Communication</b>  |
| <input type="checkbox"/> Create and postcards near bathroom handwashing sinks with notices that water should not be consumed.<br><input type="checkbox"/> Organize events for the community to explain how everyone can help.<br><input type="checkbox"/> Use pictures if there are small children using bathrooms and ask teachers to remind students. |
| <b>Routine Flushing Practices</b>   |
| <input type="checkbox"/> Flushing as a routine practice can help prevent elevated lead results proactively as opposed to flushing as a remediation action. For guidance on flushing, refer to <a href="#">3Ts Module 6</a> .  |

# TAKE ACTION: TAKE IT WITH YOU

*Taking Action Table 6:* Enter the dates you will complete certain activities, the activity leads, and any relevant notes in the table below.

| Dates | Activities  | Activity Lead | Notes |
|-------|---|---------------|-------|
|       | 1. Identify if you receive any elevated lead results  |               |       |
|       | 2. If you receive elevated lead results, identify the source of lead  |               |       |
|       | 3. Communicate with stakeholders about plans for taking action if you received elevated lead results          |               |       |
|       | 4. Take immediate actions (See <a href="#">Taking Action Table 3</a> )  |               |       |
|       | 5. Take short-term actions (See <a href="#">Taking Action Table 4</a> )                                       |               |       |
|       | 6. Develop and implement long-term solutions (See <a href="#">Taking Action Table 5</a> )                     |               |       |
|       | 7. Incorporate routine practices into your water management plan (See <a href="#">Taking Action Table 6</a> ) |               |       |
|       | 8. Implement routine practices  |               |       |