



Testing for Lead in Drinking Water in Child Care Facilities and Correcting Problems

As of September 30, 2018, the Early Learning Division Office of Child Care requires all applicants for licensing to test the water supply for lead if the plumbing fixture is used for drinking, cooking, or preparing infant formula or food. All currently licensed child care homes and centers have until September 30, 2018 to complete testing.

Use this guidance to help you identify what plumbing fixtures to test, how to find a certified lab to perform the analysis, and what appropriate follow up action to take.

Sampling Procedures

Before you begin sampling

1. **Identify the fixtures you need to test:** You will have to collect a water sample from **each water fixture that is used for drinking, cooking, or preparing food or infant formula.** Make a list and give each fixture a unique name (for example, Kitchen tap, Infant Area Sink, etc.). Keep this list so you can match the results you get from the lab to the fixture you tested. If you have several fixtures and it is difficult to sample all of them at once, these samples can be taken on different days. Follow this sampling procedure each time you collect a sample.
2. **Contact an accredited drinking water laboratory to test your sample.** The Oregon Health Authority administers Oregon's Environmental Laboratory Accreditation Program (ORELAP). There is a list of all [labs accredited to analyze for lead in drinking water samples](#). Call the lab, tell them that you need to test for lead in water according to the 3Ts method and how many water fixtures you will be testing, and make a plan to get the bottles you will need (labs usually supply these). **Samples must be collected in a 250ml bottle.**

Collecting your samples

You'll collect a "first-draw" sample, which means the **water has to sit in the plumbing system for at least 8 hours, but not more than 18 hours.** It is easiest to collect these samples first thing in the morning. *If your facility is closed on weekends, do not sample on Mondays.*

- **Do not remove the aerator** from the fixture at any time during the initial sampling process.
- **Only sample cold water.**
- **Collect the first water from the faucet without overflowing the sample bottle.**

Helpful Hints

If you rent your facility, notify the building owner of your testing plans, ask for help, and provide them with a copy of the test results. Encourage your landlord to participate in this testing process and to take corrective actions if lead problems are found.

Where do I send the results I receive from the lab?

You can mail or email (ELD.lead@state.or.us) a copy of the results to:
Office of Child Care
700 Summer St NE
Salem, OR 97301

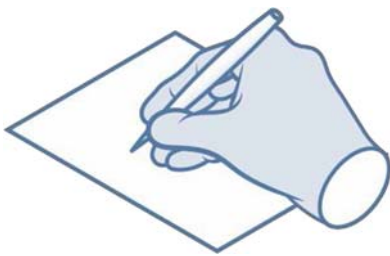
How to Take “First Draw” or “Initial” Samples



Place the sample bottle under the fixture and open the cold water tap to a normal flow.



Fill the sample bottle to the shoulder or the line marked “250 ml” leaving a little bit of room at the top of the bottle. Close the cap tightly.



Fill out the lab form and bottle label (if applicable) according to the lab instructions. Some important information to capture is:

- Name of your facility, contact and billing information
 - Collection date and time
 - Name of person collecting the sample
 - Type of sample (these are “first-draw” samples)
 - Fixture name (kitchen tap, infant area sink, etc.)
-



Repeat this process for each fixture used for drinking, cooking, or preparing infant formula and submit the samples to lab for analysis.

What to do if your results are greater than the action level for child care facilities

When you get your results from the lab, review them to see if any of the fixtures had a result at or above 15 parts per billion (ppb) (0.015 mg/L) for lead. If any of your fixtures exceed these levels you should take the following steps:

- **Immediately stop serving water from the fixtures that exceed the action level.** Start using bottled or packaged water, or lead filtered water for drinking, cooking, and preparing food or infant formula. You may also use water from a faucet that has recently tested below the action level. If you are not able to provide bottled or packaged water and meet the needs of your facility, you must close until you can meet the needs with bottled or packaged water. Water from these fixtures with results at or above 15 parts per billion can still be used for household uses (washing dishes, clothes, housekeeping, etc.).
- **Determine your corrective action plan and submit** to the Office of Child Care within 60 days. The corrective action plan should include follow-up sampling and remediation actions outlined in the EPA 3T's for Reducing Lead in Drinking Water in Schools. The Office of Child Care is currently working on developing resources to help providers create their corrective action plan. These resources will be available on the website and by request.
- **Notify all parents and guardians of the test results.** It is important that you communicate with your parents and staff regarding your test results and what actions you are taking. The rules require that you notify parents and guardians of the test result within one business day and post the results in a visible place. The EPA [3 T's for Reducing Lead in Drinking Water in Child Care Facilities](#) Section III has good information on communication and is a resource to help you determine how to communicate with your parents and staff.
- **Take "flushed" samples.** Flushed samples are designed to show whether there is lead in the first-draw sample in plumbing behind the wall leading to the fixture that may be contributing to the lead in the first-draw sample. Follow these steps to collect follow-up samples:
 - Make sure water sits in the plumbing for at **least 8 hours without use**, but not more than 18 hours.
 - **Do not remove the aerator** from the fixture at any time during the sampling process.
 - **Only sample cold water.** Make sure that cold water is the last water to go through the fixture before it sits overnight.
 - **Allow the water to run for 30 seconds, and then fill the 250 ml bottle.**

You must continue to provide packaged, filtered or bottled water until the fixtures are tested again and are below the EPA action levels for lead. You must resubmit test results after corrective action.

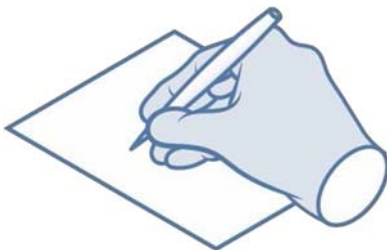
How to Take “Flushed” Samples



First thing in the morning, open the cold water tap to a normal flow and allow the water to run for 30 seconds.



After 30 seconds, while the water is flowing place the sample bottle under the fixture and fill the sample bottle to the shoulder or the line marked “250 mL”. Close the cap tightly.



Fill out the lab form and bottle label (if applicable). Make sure you capture the same information on the lab slip (name, sample date, etc.) you captured before, and **note that these are “flush samples.”**



Repeat this process for each fixture where the first draw sample exceeded the lead action level and submit the samples to lab for analysis.

Correcting Lead Problems

If your initial lead testing sample **results are equal to or greater than 15 parts per billion (ppb)**, you must stop using the faucet or fixture for drinking, cooking, or preparing infant formula immediately, and take one of the following actions.

Scenario 1:

Step	Action	Result	Action
1	Re-test with “flush test”	“Flushed sample” results show less than 15 ppb.	Replace the faucet
2	Re-test using “first draw” sample from new faucet	Result is less than 15 ppb	No further action is required.

If the results from Scenario 1 are equal to or greater than 15 ppb, you must use bottled water or use water from a faucet testing below 15 ppb.

OR:

Scenario 2:

Step	Action	Result	Action
1	Re-test with “flush test”	“Flushed sample” results show less than 15 ppb	Install approved lead filter
2	Keep a record of filter replacement.		No further action is required

If a provider replaces any faucets or fixtures at a later date, the provider must notify the Office of Child Care and sample the water from these faucets and fixtures and provide the test results to the Office of Child Care within ten days of receiving the results. The provider may not allow access to the replaced faucet or fixture until the Office of Child Care approves access.

For any assistance, contact the Office of Child Care Lead Line 503-947-5908 to discuss the results and options.

You can mail or email (ELD.lead@state.or.us) a copy of the results to:

Office of Child Care
700 Summer St NE
Salem, OR 97301