



# **Memorandum of Understanding on Reducing Lead Levels in Drinking Water in Schools and Child Care Facilities**

## **June 2005**

EPA 816-F-05-015, June 2005

The Environmental Protection Agency (EPA) has signed a memorandum of understanding (MOU) with several federal agencies, state drinking water programs, and drinking water associations that represent water utilities to promote voluntary efforts to reduce children's lead exposure in schools and child care facilities. The MOU represents an unprecedented partnership between EPA, Department of Education, the Centers for Disease Control and Prevention, the American Water Works Association, the Association of Metropolitan Water Agencies, the National Association of Water Companies, the National Rural Water Association, and the Association of State Drinking Water Administrators to focus attention on testing for lead in drinking water for schools and child care facilities.

The signatories have agreed to encourage schools and child care facilities to take steps such as testing drinking water for lead; disseminating results to parents, students, staff and other interested stakeholders; and taking appropriate and necessary actions to correct problems. The signatories also agree to encourage drinking water utilities to assist schools and child care facilities in their efforts to understand and reduce lead exposure from drinking water.

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### **How does lead get into school and child care facility drinking water?**

Treated water that is provided by water utilities does not normally contain lead. However, if the water is corrosive, it can cause lead to leach from lead-bearing components in the utility's distribution system or in home or building plumbing fixtures. In the past, some water fountains in schools had lead-lined chiller tanks that could leach lead. The Lead Contamination Control Act of 1988 banned the use of such tanks and required that schools and day care centers replace or repair water fountains that had lead-lined chiller tanks. In the early 1990's, EPA provided information to assist states and schools in identifying the types of water coolers that contained lead, and schools worked to remove or

replace them. However, lead can still leach from bronze alloy fixtures and valves that make up internal building plumbing. The only way to be sure the tap water that comes from a school faucet or fountain does not have elevated lead levels is to have it tested.

#### **What are the current requirements for testing lead in schools and child care facilities?**

Schools and child care facilities that have their own water supply are considered to be non-community public water systems and are therefore subject to drinking water regulations, including the Lead and Copper Rule. There is no federal law requiring sampling of drinking water in schools that receive water from other public water systems. Although schools may be included as a sampling location (i.e., tap) for a public water system's lead and copper monitoring program, there are no federal requirements for more extensive testing. States and local jurisdictions may, however, establish programs for testing drinking water lead levels in schools and child care facilities. EPA has issued guidance documents designed to help schools and child care facilities develop and implement a sampling protocol to test for lead in their drinking water.

#### **Why is EPA participating in this MOU?**

EPA believes exposure to lead is a significant health concern, particularly for young children and infants. Adverse health effects from lead in children can include impaired mental development. Because children spend a significant part of the day in school and child care facilities, understanding and reducing lead exposures in those facilities is particularly important. We have made significant progress in reducing lead in the environment from all sources, including the nation's drinking water, but our work is not finished.

#### **Who are the signatories of the MOU?**

The signatories of the MOU are the Assistant Administrator for the Office of Water of the EPA, the Assistant Deputy Secretary for the Office of Safe and Drug Free Schools of the U.S. Department of Education (DoED), the Acting Director of the National Center for Environmental Health/Agency for Toxic Substances and Disease Registry of the Centers for Disease Control and Prevention (CDC), the Executive Director of the American Water Works Association (AWWA), the Executive Director of the Association of Metropolitan Water Agencies (AMWA), the Executive Director of the Association of State Drinking Water Administrators (ASDWA), the Executive Director of the National Association of Water Companies (NAWC), and the Executive Director of the National Rural Water Association (NRWA).

#### **What are the health effects from lead?**

The adverse health effects from lead include impaired mental development, IQ deficits, shorter attention spans, and lower birth weight. Exposure to lead is a significant health concern, particularly in young children and infants whose bodies tend to absorb more lead than the average adult.

**Why is it important to focus efforts on testing schools, even middle schools or high schools?**

Although the CDC has stated that the at-risk population for lead exposure is children under the age of six, this MOU is focused on both schools and child care facilities. EPA believes that it is a good idea to reduce lead levels even if the school includes children over the age of six. Teachers or older students could be pregnant and fetuses are very susceptible to environmental factors.

**How is the EPA reaching child care facilities?**

We believe that educating owners of child care facilities is an extremely important part of the MOU effort. The owners of many of these facilities may be unaware of potential drinking water issues. With the help of the CDC, EPA intends to reach the child care community through State Health Departments that license and register child care facilities. EPA also plans to reach the child care community by working with national child care organizations, such as the National Child Care Association (NCCA).

**What other actions does EPA plan to take to reduce lead in drinking water in schools and child care facilities?**

EPA intends to undertake a number of actions, including:

- An update to EPA's guidance on "Lead in Drinking Water in Schools and Non-Residential Buildings" (EPA 812-B-94-002, April 1994). This document will focus on schools and will be updated and revised to be less technical and more relevant for the use of school officials.
- An update to EPA's guidance on "Sampling for Lead in Drinking Water in Nursery Schools and Day Care Facilities" (EPA 812-B-94-003, April 1994). This document will focus on child care facilities and will be updated and revised to be less technical and more relevant for the use of child care facility officials.
- An effort to raise awareness and provide tools and guidance on the issue of lead in drinking water in schools and child care facilities. The effort will promote testing of drinking water, remediation, and sharing of the results of testing.
- Development of a new guidance on "Implementation Guidance for the Lead & Copper Rule for Schools & Child Care Centers." This document will focus on schools and child care facilities that are also public water systems to ensure that they have information on regulatory requirements