




NEW YORK STATE

OFFICE OF CHILDREN AND FAMILY SERVICES

LEAD TESTING IN DRINKING WATER PROGRAM

A large, stylized blue water drop graphic with a double-line border, centered on the page. Inside the drop, the following text is written in bold black font:

**Resource
Information to
Address
Elevated
Lead Levels In
Drinking Water**

OCFS Lead Testing in Drinking Water Program
Remediation Support Plan

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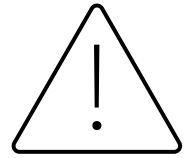
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Your water outlet(s) tested positive for lead, now what?

Your child care facility water outlet(s) is over the acceptable action level. You **must immediately stop use of the water outlet for consumption** (drinking and cooking). Stopping use of the outlet can include shutting off the outlet, disconnecting pipes or physically putting barriers up, such as tape, around the outlet to make it unusable.



Providers are allowed to limit the use of elevated water outlets to handwashing only; if the fixture is **ONLY** used for handwashing, one option for temporary remediation is to place a 'DO NOT DRINK' sign as close as possible to the outlet and ensure the outlet is not used for drinking and or cooking. If child care facilities chose this option they must inform all staff, families, and children that water outlets with this sign may not be used for drinking/cooking.

If you are not limiting the use of the elevated water outlet, you must ensure that children, staff, and families do not consume water from that outlet. Remember, if a child can fit their hand and/or mouth under that fixture and turn it on, then they can drink from it.

OCFS **regulations** require that all licensed and registered child care facilities must provide safe drinking water. If needed, implement immediate strategies (ex. purchasing bottled water) to stay in compliance in addition to stopping use of the water outlet.



Once you have implemented your immediate strategies to provide safe drinking water to the children in your care, **create a remediation plan** working towards a permanent long-term fix. In addition to the remediation plan, your OCFS regulator will work with you to develop a safety plan as well. The safety plan will reiterate that you must create and implement a remediation plan for all elevated water outlets.

How do I create a remediation plan?

Step 1: Identify the source of the lead. To do this, look at the results for each water outlet and decide which answer from Table 1 fits best for each. It's important to understand how lead gets into drinking water so you can choose a remediation strategy that works for each specific outlet.

First Draw	Over	Under	Over	Under
Second Draw	Under	Over	Over	Under
Possible Remediation	Fixture	Plumbing	Both	N/A

Table 1



Plumbing: Lead can enter drinking water from a contaminated water supply and/or due to corrosion in the pipes (inside the home and or outside). Corrosion is when the pipes break down creating a chemical reaction that occurs inside the plumbing. This allows lead to leach into the water supply.

Fixtures: Faucets inside your home may contain lead.

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Step 2: Remember the possible source of lead for each outlet and consider writing it down next to your identifier on the fixture manifest and or results.

Example: Fixture Manifest

First Draw/ 2 nd Draw (Flush) Samples (Complete these columns)			
Functional Space	Outlet Type	In Use?	Are there any leaks
<i>fixture</i> Kitchen	Sink Faucet	Y	N
Kitchen	Sink Sprayer	Y	N
<i>plumbing</i> Bathroom in Classroom 1	Left Sink Faucet	Y	Y
Bathroom in Classroom 1	Right Sink	Y	Y

Example: Results

Sample Location/Description	LOQ	Result	Units	Flag
Kitchen Faucet; 1st Draw	1.0	1.52	µg/L	
Kitchen Faucet; 2nd Draw	1.0	<1.00	µg/L	
Kitchen Sprayer; 1st Draw	1.0	2.45	µg/L	
Kitchen Sprayer; 2nd Draw	1.0	<1.00	µg/L	
Bathroom Hands Free Faucet; 1st Draw <i>fixture</i>	1.0	23.1	µg/L	H
Bathroom Hands Free Faucet; 2nd Draw	1.0	2.52	µg/L	
Field Blank	1.0	<1.00	µg/L	

Step 3: Chose a remediation option that works best for your outlet(s). Read the 'Remediation Options' section of this document for a deeper dive into the specifics around the remediation options.



Fixture



Plumbing

- Limit the use with 'do not drink' signs
- Replace the fixture
- Point of Use Filter
- Replace plumbing components
- Clean aerator (screen)
- Remove fixture from use

- Flush water (temporary)
- Point of Use Filter
- Point of Entry
- Replace lead plumbing lines
- Replace lead service lines
- Plumbing Bypass

Some other options include using water filtering pitchers and or purchasing water. The remediation options listed here are not all options available and is not meant to be all encompassing.

Step 4: Implement your chosen remediation action. After this step you can request your follow-up testing.

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How do I request follow-up testing?

Step 1: Record detailed steps taken for each elevated water outlet and then complete a follow-up request on your original fixture manifest. To do this place a check mark in the column “Follow-Up” as displayed below.

- a. Exception: If you have chosen the remediation action of limiting the use to handwashing only and have posted ‘DO NOT DRINK’ sign(s), you are allowed to put those specific outlets back into use once the sign is posted and you have informed all staff, children, and families they may not drink from those specific outlets. You do not need to request follow-up test for those outlets however you must email your detailed steps of your remediation to OCFS and ensure completion of your safety plan with your regulator.
- b. If not under exception: do ***not*** put the water outlet back into use until it has been retested AND the lead level is no longer above action level.



First Draw/ 2 nd Draw (Flush) Samples (Complete these columns for the first request)									Follow-Up
Functional Space	Outlet Type	In Use?	Are there any leaks?	Is there an aerator (screen)?	Is there a water filter?	Hot/Cold? (H/C) With single handle or two? (S/T)	Photograph Taken? (optional)	Comments:	Follow-Up Requested (Check)
Kitchen	Sink Faucet	Y	N	Y	N	H/C-S	N		✓
Kitchen	Sink Sprayer	Y	N	Y	N	C-S	N		
Bathroom in Classroom 1	Left Sink Faucet	Y	Y	N	N	C-T	Y	Sink drips when shut off	
Bathroom in Classroom 1	Right Sink Faucet	Y	Y	N	N	C-T	Y		✓
Classroom 1	Sink Faucet	Y	N	N	N	H/C-S	N		
Basement Bathroom	Sink Faucet	Y	Y	Y	N	H/C-S	N		

Step 2: Email the remediation actions taken for each elevated water outlet and your follow up request (fixture manifest) to OCFS at ocfs.sm.watertest@ocfs.ny.gov.

Ensure that your email includes very detailed steps about what actions you have chose for each elevated outlet. Please be sure to include your OCFS license number in the subject line.

Exception: If you have chosen the remediation action of limiting the use to handwashing only, you do not need to request follow-up test for this outlet. However, you must still inform OCFS of your detailed steps taken for each elevated water outlet via email.

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OCFS will review the request. If approved, OCFS will request your sampling containers from NYE. While your request is under review, OCFS could ask for further details regarding the remediation steps you have taken. OCFS will inform you via email that we have approved your request for follow-up testing.

Once approved, facilities must inform the staff and families of the retesting. Communications must include specific details on which outlets will be retested, the steps the facility has taken for remediation, and the date the retest will occur.

Facilities must test within one week of receipt of sampling containers.

You will collect the samples in the same fashion as the first round of testing. The EPA has created a [Follow-Up Sampling](#) guidance document in the 3Ts (Module 6) which could be helpful for facilities.

Facilities must return the samples to the lab within 36 hours of collection along with the Chain of Custody form.

Remediation Options

Fixtures:

Limit the use:

- If the fixture is ONLY used for handwashing, one option for temporary remediation is to place a 'DO NOT DRINK' sign as close as possible to the outlet and ensure the outlet is not used for drinking and or cooking. If child care facilities chose this option they must inform all staff, families, and children that water outlets with this sign may not be used for drinking/cooking. Examples of these signs are attached in this email. *Please check these signs daily to ensure they have not deteriorated due to water damage and consider laminating for longevity.

Replace the fixture

- To determine if your faucet is considered lead-free the Public Health and Safety Organization has created a website, [Lead Content Certified Products](#) where consumers can search products for lead content. Plumbing Manufacturers International has published an article, "[How to Purchase a Low-Lead Faucet or Drinking Water Device](#)" intended to help customers identify symbols when searching for a faucet as well.

Replace the plumbing components

- Fixtures will have plumbing components such as valves and solder which might require replacement as well. The EPA has created a document to help consumers identify lead free certification marks for drinking water systems and plumbing products entitled, "[How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products](#)" (attached). Home Depot has created diagrams, information, and explanations on [part of a sink and plumbing components](#) for consumer education.

Clean your aerator

- Clean the faucet's screen (also known as an aerator) on a regular basis as lead can collect there. This is one way that lead will get into your water.

Plumbing:

Determining which plumbing lines have lead can be helpful to keep the cost down. The EPA has created a tool to help determine if the pipes have lead: [Lead Protect your Tap Checklist](#). Here are some options for remediation if the source of lead could be the plumbing:

Flush your water

- This is a temporary solution while working on a permanent remediation plan. If the water has been stagnant for several hours lead can leech into the water from the pipes. Flushing means that you will run the water at a high volume prior to drinking or cooking which will 'flush' the stagnant water out and pull new water in. The amount of time that you will need to flush your water will depend on many things, including if your home has a lead service line and how long that line is but it could be several minutes. It is best to contact your [water](#)

[utility](#) for the recommended flushing time for your community. The EPA has created a document to support [flushing best practices](#) (attached). NYSDOH has created guidance specifically for public water users regarding [flushing indoor plumbing](#).

Use Point of Use (POU) Device

- POU devices are used to remove the lead from the water at the point in time that the water is being used. This means that the water isn't getting filtered until you go to use it. These are typically located at single water outlets.
 - There are different types of POU devices. Some examples are filter pitchers plumbed-in under the sink or attached to the faucet. To learn more about the different types of water filters, along with their pros and cons CDC issued guidance, "[Choosing Home Water Filters & Other Water Treatment Systems](#)".
 - All POU devices are not created equal. Make sure to get a certified device for removing lead. The EPA has created a document entitled, "[A Consumer Tool for Identifying Point of Use \(POU\) Drinking Water Filters Certified to Reduce Lead](#)" (attached).
 - Use the filter properly. Ensure the installation is correct for both the filter and the cartridge. Create a reminder to replace the cartridge when required. If you use the cartridge after it has expired, it could be less effective at removing the lead. You should not run hot water through the filter.
 - It is important to check your filter devices often to ensure they are working properly. POU filters can be impacted by the water quality at your site.
 - If you opt to use a plumbed-in unit with a separate filtered faucet, which allows for the use of untreated water for washing and cleaning, you must post a sign and inform staff, families, and children that the untreated water is not to be used for drinking and or cooking. Any water for drinking or cooking should ONLY come from the filter water. These types of units are usually installed under the sink and helps to reduce operating costs of the filter.

Use a Point of Entry (POE) Device

- A Point of Entry device treats all the water entering the house, and not just water at a single point used for drinking as the Point of Use filter does.

Learn if you have a lead service line

- To establish if the pipe that connects your home to the water main (called a service line) is made from lead contact your water utility or a licensed plumber. Or you can find out if you have a lead service line is by using the EPA's [Lead Protect you Tap Checklist](#) or by doing a "scratch test."

Funding Support Options

There may be funding options available to help cover the cost of remediation. The EPA has created a document (attached entitled: EPA Funding Sources) to help support providers for funding options.

You can also visit the PDF here: https://www.epa.gov/sites/default/files/2019-10/documents/3ts_funding_document_2019.pdf

Additionally, many cities and towns have been awarded funding to help homeowners pay for lead service line replacements. For more information on what the Lead Service Line Replacement Plan is visit: <https://www.health.ny.gov/environmental/water/drinking/lslrp/> Please reach out to your public water supplier to see if they have options available.

To see if your community was awarded, please visit NYSDOH Lead Service Line Replacement Awards at: <https://health.ny.gov/environmental/water/drinking/lslrp/awards.htm>

You can also visit the EPA's website which provides a detailed overview of funding options for lead service line replacement at: <https://www.epa.gov/ground-water-and-drinking-water/funding-lead-service-line-replacement>

Tips and Reminders

- Human skin does not absorb lead.
- Lead pipes are more likely to be found in homes built before 1986
- **Boiling water does not remove or reduce the amount of lead in your water.** Water that comes out of the outlet warm or hot can have higher levels of lead. Ensure that you use only **cold** water when making a bottle for babies as lead dissolves more easily into warm/hot water. Remember that testing is the only way to know if lead is present.
- **Pay attention to construction in your neighborhood.** If you have a lead service line and it is disturbed, construction may cause more lead to be released from a lead service line. This is also true if you complete only a partial lead line replacement.
- **Who owns the lead service line?**
 - **From the water main to the shut off valve** the water utility company owns and from the shut off valve to the home meter is owned by the property owner. Replacing the lead service line is a share responsibility between the water company and the homeowner.
- **What is a partial line replacement?**
 - A partial lead service line (PLSL) is when there is a replacement of only a portion of a service line- which could be either the water company portion from water main to shut off valve, or the homeowner portion from the shut of valve to the meter. This is done if only a section of the line is lead, which is the part that gets replaced, but the non-lead portion stays. PLSL's can potentially increase the lead levels in drinking water.
- Contact [your local health department](#) with questions about lead testing drinking water or for advice about lowering lead levels in your drinking water. Email [the NYS DOH Bureau of Water Supply Protection](#) or call 518-402-7600 for information about what public water suppliers must do to address lead in drinking water.
- **What if I have a well?**
 - Private well water should also be tested for lead in drinking water. There are no safe levels of lead. Private wells have additional components which differ from a public water line and could contain parts contaminated with lead with a higher chance if it is more than 20 years old. It is best to find a certified water treatment professional to help support you in determining what would work best to make your well less corrosive. To help support well owners in finding a certified profession the Water Quality Association has created an interactive map located at <https://www.wqa.org/find-providers>. To learn more about private wells please visit the EPA website: <https://www.epa.gov/privatewells/learn-about-private-water-wells>.