OCFS Lead Testing in Drinking Water Program Requirements and Instructions

Requirements prior to sample collection:

- ✓ Applicant and/or sample collector (if different from applicant) must read and understand the EPA's 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities guidance manual.
- ✓ Sample collector must watch videos listed prior to collection: Video 1 (NYS DOH) and Video 2 (NYS DOH). *There are some differences in this video, for example, OCFS has already contracted with a laboratory for all providers. Additionally, preservatives are not needed for your sample. Preservatives will be added by the lab after they receive your collection.*

1.) Fixture Manifest

A fixture manifest is a list of all the water outlets which will be tested. Fixture manifests are used to help identify which water outlets have lead levels and if the water outlets are at action level. If a water outlet has tested for positive for lead and is at or above 15 ug/L then the water outlet is considered at or above the 'action level'.

1a. Prior to completing your fixture manifest/requesting your samples, make sure your program is ready.

- Has your program been open for at least two weeks?
- Has your program been using a 'normal' amount of water supply?
    - If you said yes to both those questions, complete the Fixture Manifest.
    - If you said no, please wait until you have been open for two weeks and have been using a normal amount of water for your program before moving on to the next step.

1b. Once you have received your fixture manifest, and have determined your facility is ready to collect, you should conduct a walkthrough to determine sampling locations.

1c. Complete the fixture manifest. Make sure that every water outlet you are testing is identified on the manifest**.** This way, if there is an elevated lead level you know exactly which water outlet it came from. If you have a combo fixture, please make sure that each water outlet is tested individually. Example: A water dispenser with a water bottle filling station and a drinking fountain.

1d. Once you have completed the fixture manifest, email the fixture manifest and any photographs to OCFS at ocfs.sm.watertest@ocfs.ny.gov. Make sure that photographs are labeled with your OCFS license or registration number for identification purposes either on the photo or in the email body. Note: This fixture manifest will be used to determine the number of sampling containers needed for your facilities as well as help to identify the sources of lead.

2.) Communicate

Child care facilities must inform all program staff and families that they will be testing for lead in drinking water prior to sample collection. There are premade letter templates and communication documents available in the EPA's 3Ts guidance manual; Module 1. Templates are also available on the New York State's Department of Health website (letter template).

2a. If you are not using the template your communication must include: the date you are testing, the health effects of lead on children, how you will inform parents of the testing results, and information on how families can test their own water at home.

2b. It is best practice to offer opportunities for training for staff on the dangers of lead in drinking water. Training opportunities for staff are available on the OCFS website.

3.) Collection

The certified laboratory New York Environmental (NYE) will mail your child care facility two prelabeled sample containers for ***each*** water outlet. The label will state the water outlet location, which 'draw' the container is for and your OCFS program number for identifying factors.

3a. Once you receive your sample containers, make sure to read all directions provided by the lab before you begin your water sample collection. An instruction sheet will come with the sampling containers.

3b. The sample kit will include one bottle labeled "**FRB**." This is the **F**ield **R**eagent **B**lank and is for the laboratory to determine whether sampling activities or transit conditions impacted lead measurements. The FRB is filled with laboratory grade water without detectable levels of lead.

- ✓ Prior to starting collection, uncap the FRB sample and allow it to stand on a level surface in the facility so that it can be exposed to the immediate environment.
- ✓ Once sampling has been completed, re-cap the FRB sample firmly and return it to the laboratory with the other containers.

DO NOT remove the water inside the FRB or add any water. Simply open the FRB, collect your samples in the correctly labeled containers, then come back and close the FRB.

3c. One sample container will be for a 1st draw sample and one sample container will be for a 2nd draw (flush) sample.

FAQ: What is 1st draw?

A first draw is a sample collection of water that has been sitting motionless, inside the interior plumbing with a stagnation period of at least 8 hours, but not over 18. This represents the first use of consumption that would occur if you weren't collecting the water in a sample bottle.

FAQ: What is 2nd draw (flush)?

A flush sample is a collection of water that is being testing after a "flush" to the system. The collection of water is taken after a 30-second flush of the water pipes has occurred. This can identify lead in the plumbing behind the fixture.

3d. **You must collect your water samples within one week of receiving your sampling kits.** The night before you take your samples make sure that no one uses the water before you collect. You can do this by informing staff who might come into work before you, and/or posting signs around the outlets and program which read, also please note that the 3Ts suggest that you turn off your lawn sprinklers but do not turn off actual water valves.

Tip: Make sure to have materials ready before sampling. Start the with the water outlet closest to where the main water supply enters your program. You will need a pen for completing the

Chain of Custody form;this will be sent to you from the lab with your sampling containers. The Chain of Custody form is required documentation of who took the samples and when.

3e. After you have collected your water samples, you must send those out to the laboratory **within 36 hours of collection**. Be sure to check when you can mail these out as to not overlap a weekend or a day when mailing service is not available.

Note: Email any photographs taken of water outlets to OCFS at ocfs.sm.watertest@ocfs.ny.gov. Make sure that every photograph is labeled with the fixture name (this can be in the email body) and include your OCFS license number.

4.) Results

The test results will be emailed unless a specific request is submitted to the laboratory to mail. You can submit this request via email to the NYE laboratory at: requests@nyenvironmental.com with a written request. You must include your OCFS license or registration number.

4a. Inform the staff and families of the results within two days receipt of results from the laboratory.

4b**. If there are any water outlets that have a lead level at or above 15µg/L, you must remove those water outlets from service.** You can do this by physically removing the fixture and/or posting signage with "Do Not Drink" signs. Reminder: The OCFS Lead Testing in Drinking Water Program at Child Care Facilities program utilizes an action level of 15µg/L based on the federal regulation from the Lead in Copper Rule however, please note that there are no known safe levels of lead.

4c. If your facilities results have any water outlets over the action level, OCFS will email guidance documents on how to create a plan for remediation. The EPA has also created a guidance document on Remediation Options for support as well.

FAQs are available on the OCFS Lead Testing in Drinking Water Program webpage

Contact Information:
ocfs.sm.watertest@ocfs.ny.gov