



UNITED STATES MARINE CORPS  
MARINE CORPS INSTALLATIONS COMMAND  
3000 MARINE CORPS PENTAGON  
WASHINGTON, DC 20350-3000

IN REPLY REFER TO:  
5090  
G-F

**FEB 24 2014**

MARINE CORPS INSTALLATIONS COMMAND POLICY LETTER 2-14

From: Commander, Marine Corps Installations Command (MCICOM)  
To: Distribution List

Subj: SAMPLING AND TESTING FOR LEAD IN DRINKING WATER IN PRIORITY AREAS

Ref: (a) Safe Drinking Water Act, 42 USC 300f-300j  
(b) SECNAVINST M-5210.1, Records Management Manual  
(c) Navy Medicine Enterprise Nursing Procedures Manual, June 2013  
(d) BUMED INFO Paper "Recommendation to Remove Naval Hospitals from 'Priority Areas' for Lead Testing in Drinking Water", October 2013  
(e) MCO P5090.2A  
(f) 3Ts for Reducing Lead in Drinking Water in Schools Revised Technical Guidance, October 2006  
(g) 3Ts for Reducing Lead in Drinking Water in Child Care Facilities: Revised Technical Guidance, December 2005

Encl: (1) Lead in Drinking Water at Priority Areas Generic Notification Letter Template  
(2) Lead in Drinking Water at Priority Areas Direct Notification Letter Template  
(3) Lead in Drinking Water Fact Sheet Template

1. Situation. Per the references, Marine Corps installations are required to follow U.S. Environmental Protection Agency (EPA) guidelines when testing and sampling drinking water for lead from water fountains, faucets, and other outlets used primarily by children. These "priority areas" are defined as outlets in primary and secondary schools, Child Development Centers (CDCs), School Age Centers, and Youth and Teen Centers. Priority areas do not include on-base or off-base residences (e.g., Family Child Care Homes) used for child care purposes, out-patient medical centers, or schools that are not owned or managed by the Department of Defense. Since reference (c) mandates the use of sterile water to reconstitute powdered formula and as recommended by Bureau of Medicine and Surgery in reference (d), hospital pediatric and maternity wards have been removed from the priority area definition.

2. Mission. To provide policy and procedures regarding sampling and testing of drinking water in priority areas at Marine Corps installations in order to ensure a uniform, consistent, and effective program.

3. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. The leading cause of lead in drinking water is through leaching from plumbing materials and fixtures as water moves through the distribution infrastructure. Even though drinking water from the water treatment plant may meet federal, state, local, and overseas standards, a facility may still encounter elevated lead at the outlet or spigot due to lead in plumbing materials.

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(2) Concept of Operations. The EPA is required to publish guidance and testing protocols to assist schools in determining the source and degree of lead contamination in drinking water supplies and, if applicable, in remedying such contamination. EPA has published guidance for both schools and day care centers in references (f) and (g). These references include recommendations regarding developing a sampling plan, interpreting results in order to pinpoint specific outlets that may require corrective action (e.g., water cooler replacement), short and long term remedies, and communicating sampling results.

b. Coordinating Instructions

(1) Tasks. Effective immediately, all installations are directed to implement a three-step program for sampling and testing drinking water in priority areas pursuant to references (f) and (g). Sampling and testing under this program is to be conducted in addition to, not in place of, sampling to determine whether a water supply system meets system-wide regulations under the Lead and Copper Rule covered by reference (a).

(a) Step 1, Baseline. Installations shall perform baseline sampling and testing of water outlets in priority areas that are known to be used regularly for drinking and cooking. Examples include: drinking fountains (bubbler and water cooler style), sinks (especially those known or visibly used for water consumption, e.g., coffee maker or cups are nearby), bathroom faucets, hose attachments that may be used to fill water jugs (e.g., for sports team practice), hot water outlets, ice makers, and bottled water dispensers. Outdoor water outlets should be evaluated for likelihood of use. If initial screening results exceed EPA's recommended lead screening level of 20 parts per billion (ppb), installations shall immediately take the outlet out of service or mark with appropriate signs (e.g., non-potable). Installations shall implement the second step of the EPA's Two-Step Sampling Process identified in reference (g)). If sampling continues to exceed 20 ppb, installations shall institute permanent corrective actions in accordance with references (f) and (g). Step 1 shall be completed for all priority areas by 31 December 2014.

(b) Step 2, New or Modified Facilities. Installations shall sample and test all water outlets in priority areas that are known to be used regularly for drinking and cooking when Marine Corps owned water treatment processes are added or modified in any way that has the potential to increase lead concentrations (e.g., system includes older plumbing lines and plumbing/solder is disturbed, replaced, or removed). As part of the installations' annual internal environmental compliance audit, the environmental office shall query each priority area to determine if any plumbing modifications have been made and if sampling needs to be completed. This step shall also include initial baseline testing of all outlets that are expected to be used regularly for drinking and cooking in newly-constructed priority areas prior to building occupancy; however, after January 2014 if the contractor can adequately demonstrate that all materials used in plumbing conform to section 1417 of reference (a) requiring less than 0.25% lead, then the requirement to test new construction is waived.

(c) Step 3, Retesting. Installations shall re-test priority areas every five years from the established baseline, or more frequently if required by regulatory agencies.

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4. Administration and Logistics

a. A copy of all test results shall be made available at locations where testing was conducted and provided to the supporting Occupational Health Clinic and Environmental Health/Preventive Medicine Department. At a minimum, a notice of availability of the testing results shall be provided to the parents or legal guardians of children attending schools and/or Child Development Centers (CDCs), School Age Centers, and Youth and Teen Centers. Direct notification of results shall be conducted for any lead detection greater than 20 ppb during a sampling event. Notification requirements and procedures shall be coordinated in advance of any testing with Public Affairs staff, local Public Health commands, and any other appropriate installation, regional or command staff. Templates are provided as enclosures (1), (2), and (3) to facilitate notification of test results to families. In accordance with reference (b), all records of sampling and testing of drinking water in priority areas shall be maintained for 12 years.

b. Funding requests for sampling and testing for lead in drinking water in priority areas should be entered into the Status Tool for the Environmental Program (STEP).

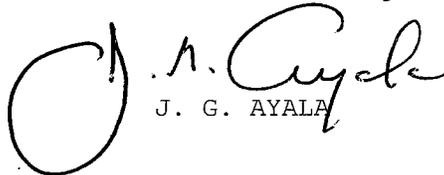
c. Compliance with this policy shall be verified during annual internal Environmental Compliance Evaluations (ECEs) and triennial external ECEs.

d. The requirements reflected in this letter will be included in the next revision of reference (e). The point of contact for this policy is Ms. Misha Turner at (571) 256-2807, or misha.turner@usmc.mil.

5. Command and Signal

a. Command. This policy is applicable to all personnel within MCICOM, its various commands and subcommands.

b. Signal. This policy is effective the date signed.

  
J. G. AYALA

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