



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON DC 20350-2000

5090
Ser N45/19U132354

22 Mar 19

From: Director, Energy and Environmental Readiness Division (OPNAV N45)
To: Commander, Navy Installations Command
Commander, Naval Facilities Engineering Command
Chief, Bureau of Medicine and Surgery

Subj: UPDATE TO POLICY ON SAMPLING AND TESTING FOR LEAD IN
DRINKING WATER IN PRIORITY AREAS

Ref: (a) Energy and Environmental Readiness Division Memorandum Ser N45/14U132588 of
8 Feb 2014
(b) U.S. EPA 3Ts for Reducing Lead in Drinking Water in Schools and Child Care
Facilities Revised Manual, October 2018
(c) Title 40, Code of Federal Regulations Part 141, Subpart I
(d) OPNAV M-5090.1

1. This memorandum updates reference (a), which established Navy policy for sampling and testing drinking water for the presence of lead in priority areas, defined as primary and secondary schools, Child Development Centers (CDCs), School Age Care Programs (SACs), Navy operated 24/7 Group Homes, and youth centers. This policy does not extend to on or off-base residences (e.g., Child Development Homes or Family Child Care Homes) used for child care purposes under Navy's Child Development Home program, or schools that are not owned or managed by the Navy or Department of Defense (DOD). October 2006 guidance issued by the Environmental Protection Agency (EPA), reference (a), required specific actions in response to drinking water screening test results showing the presence of lead in excess of 20 parts per billion (ppb). **Effective immediately, required actions in reference (a) must be taken when lead is found in drinking water in concentrations greater than 15 ppb.**

2. Navy is taking this action in response to updated guidance from EPA. EPA's 3Ts – Training, Testing, and Taking Action – provides tools for schools and child care facilities to implement voluntary lead in drinking water testing programs. In reference (b), EPA revised its October 2006 3Ts for Reducing Lead in Drinking Water in Schools Technical Guidance to eliminate the previous 20 ppb recommended lead screening level. Currently, EPA provides no specific numeric level over which it recommends action when lead is detected in drinking water in schools or child care and youth program facilities. However, in the Lead and Copper Rule (LCR), reference (c), EPA has established a 15 ppb lead action level (AL) that triggers certain response requirements. Issuance of this policy requires using the LCR lead AL as the response requirement when sampling and testing for lead in drinking water in priority areas. The AL will be revisited in the event that EPA revises the LCR.

Subj: UPDATE TO POLICY ON SAMPLING AND TESTING FOR LEAD IN DRINKING WATER IN PRIORITY AREAS

3. Reference (a) required all Navy priority areas to accomplish initial baseline sampling and testing by 31 December 2014, and to conduct re-sampling and testing every 5 years thereafter. Navy facilities that have completed 2014 baseline testing but have not begun their 5-year re-sampling effort must use 15 ppb as the new threshold level for taking corrective action. Navy facilities that have completed the required 5-year re-sampling effort must review all test results and take required actions for any water outlet that previously tested at 15 ppb or greater. This action will ensure that sampling and testing for all Navy priority areas uses the new standard of 15 ppb in the second round of baseline sampling to be completed by 31 December 2019.

4. The updates to policy reflected in this letter will be included in the next revision of reference (d). The OPNAV N45 point of contact for this policy is Ms. Chaela Smith, N452, at (703) 695-5162, or chaela.smith@navy.mil.

S. T. GOODFELLOW

Copy to:
OPNAV (N4, N46)
DASN(E)