



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

IN REPLY REFER TO:

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**JUL 01 2021**

MARINE CORPS INSTALLATIONS COMMAND POLICY LETTER 3-21

From: Commander, Marine Corps Installations Command  
To: Distribution List

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

Ref: (a) MCO 5090.2, Volume 16, Paragraph 0317, 11 June 2018  
(b) Title 40, Code of Federal Regulations Part 141, Subpart I  
(c) U.S. EPA 3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities Revised Manual and Toolkit, October 2018  
(d) SECNAV M-5210.1, "Department of the Navy Records Management Manual," January 2012

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

1. Situation. Per reference (a), Marine Corps installations are required to follow United States Environmental Protection Agency (EPA) guidelines when sampling and testing 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 childcare purposes, out-patient medical centers, or schools that are not owned or managed by the Department of Defense. This policy letter updates previous guidance in Marine Corps Installations Command (MCICOM) Policy Letter 6-19 by providing more specific information on requirements for coordination and notification of testing results for lead in drinking water in priority areas and by providing updated fact sheets and templates.

2. Cancellation. MCICOM Policy Letter 6-19.

3. Mission. To provide policy regarding sampling, testing, and screening levels relating to lead in drinking water in priority areas at Marine Corps installations in order to ensure a uniform, consistent, and effective program.

4. Execution

a. Commander's Intent and Concept of Operations

(1) Commander's Intent. Children are the most susceptible population to lead exposure. The leading cause of lead in drinking water is leaching from plumbing materials and fixtures as water moves through the distribution

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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. In order to prevent potential childhood exposures to lead in drinking water, Marine Corps installations shall identify and mitigate elevated lead levels in drinking water in priority areas.

(2) Concept of Operations. In accordance with reference (b), 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 updated guidance for both schools and day care centers in reference (c). EPA combined previously separate technical guidance documents into one document and eliminated a previously recommended lead screening level of 20 parts per billion (ppb). Reference (c) does not provide a numeric threshold for lead detections in drinking water that, when exceeded, triggers recommended action(s). However, in the Lead and Copper Rule (LCR), reference (b), EPA established a 15 ppb lead action level (AL) in drinking water that prompts certain response requirements. All installations are to use a 15 ppb lead screening level when sampling and testing drinking water for lead in priority areas.

b. Coordinating Instructions

(1) All installations are directed to implement a three-step program for sampling and testing drinking water in priority areas as specified in reference (a). 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 LCR covered by reference (b).

(2) Marine Corps installations are required to re-sample all priority areas every five years and 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). All test results must be reviewed and appropriate actions taken for any water outlet tested at 15 ppb or greater.

(3) As part of the installation annual internal Environmental Compliance Evaluation, all priority areas shall be evaluated to determine if any plumbing modifications have been made and if sampling needs to be completed.

(4) Coordination with the Preventive Medicine Authority (PMA) and a representative from the facility being sampled is required during the planning process for sampling.

(5) A copy of all test results shall be made available at locations where testing was conducted and retained for 12 years as required in reference (d). At a minimum, a notice of availability of the testing results should be provided to the facility staff and parents or legal guardians of children attending schools or child development centers, school age centers, and youth and teen centers.

(6) Direct notification of results shall be conducted for any lead detection greater than the 15 ppb screening level during a sampling event. Notifications shall be coordinated with Communication Strategy (COMMSTRAT)

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staff, installation PMA, and any other appropriate installation, regional, or command staff.

(7) Templates are provided as enclosures (1), (2), and (3) to facilitate notification of test results. All notification letters shall be reviewed by the Navy Marine Corps Public Health Center (NMCPHC) prior to issuance. With concurrence from the installation PMA, the letter shall be signed by the installation commanding officer and distributed to the parents, staff, and the installation and region public affairs officers (PAO).

5. Administration and Logistics

a. Funding requests for sampling and testing for lead in drinking water in priority areas should be entered into the USMC environmental budget database tool.

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

c. The requirements reflected in this policy letter will be included in the next revision of reference (a).

d. Reference (c) can be found using the following link:  
[https://www.epa.gov/sites/production/files/2018-09/documents/final\\_revised\\_3ts\\_manual\\_508.pdf](https://www.epa.gov/sites/production/files/2018-09/documents/final_revised_3ts_manual_508.pdf).

e. The point of contact for this policy is Ms. Misha Turner at (571) 256-2807 or misha.turner@usmc.mil.

6. 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.



E. D. BANTA

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