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8 Feb 2014

From: Director, Energy and Environmental Readiness Division  
(OPNAV N45)

To: Distribution

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

Ref: (a) OPNAV M-5090.1  
(b) Safe Drinking Water Act, 42 USC 300f-300j  
(c) 3Ts for Reducing Lead in Drinking Water in Schools:  
Revised Technical Guidance, October 2006  
(d) 3Ts for Reducing Lead in Drinking Water in Child Care  
Facilities: Revised Technical Guidance, December 2005  
(e) BUMED Info Paper "Recommendation to Remove Naval  
Hospitals from 'Priority Areas' for Lead Testing in  
Drinking Water", October 2013 (NOTAL)  
(f) DoDI 4715.05 Environmental Compliance at Installations  
Outside the United States, November 2013  
(g) DoD 4715.05-G Overseas Environmental Baseline Guidance  
Document, May 2007

1. This memorandum updates policy in reference (a) on sampling and testing of lead in drinking water in priority areas at Navy installations worldwide. There is no federal law or DoD policy requiring schools or child care facility to test drinking water for lead unless the school/facility is a public water system. However, the health and safety of all of our Navy family is a top priority of Navy's uniformed and civilian leadership. Because children are most susceptible to the effects of lead, it is Navy policy to meet U.S. Environmental Protection Agency (EPA) guidelines for testing and sampling of water from drinking water fountains, faucets, and other outlets from which children may drink, including schools and child care facilities. Recent events have prompted an examination of current policy on sampling and testing drinking water in these facilities to ensure that we have a uniform, consistent, and effective Navy worldwide program.

2. Lead most frequently gets into drinking water by leaching from plumbing materials and fixtures as water moves through the facility's distribution system. Even though drinking water

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received from the water supplier may meet federal, state, local and/or overseas standards for lead, the facility may have elevated lead due to plumbing materials, water chemistry, and water use patterns. The best way to determine if a facility might have elevated lead levels in its drinking water is by testing the water at the tap.

3. The Lead Contamination and Control Act of 1988 amended reference (b) to require EPA to publish a guidance document and testing protocol to assist schools in the U.S. in determining the source and degree of lead contamination in school drinking water supplies and in remedying such contamination. EPA has published guidance for both schools and day care centers in references (c) and (d), that includes recommendations in developing a sampling plan, interpreting results to pinpoint specific outlets that require corrective action (e.g. water cooler replacement), short and long term remedies, and communicating sampling results.

4. For the purposes of this policy "priority areas" are identified as primary and secondary schools, Child Development Centers (CDCs), 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 (CDHs) or Family Child Care Homes (FCCs)) used for child care purposes under Navy's Child Development Home program, or schools that are not owned or managed by the Navy or DoD. While pediatric and maternity wards are included in the definition of priority areas under reference (a), this updated policy removes them from the definition per reference (e).

5. Effective immediately, all Navy installations are directed to implement a three-step program for sampling and testing drinking water in priority areas following the guidance provided in references (c) and (d) and any policy or guidance issued by the Commander, Navy Installations Command, the Navy Executive Agent for drinking water. Sampling and testing under this program is to be implemented in addition to, not in place of, sampling conducted to determine whether a water supply system meets system-wide regulations under the Lead and Copper Rule under reference (b), reference (f), or reference (g). These are two related but separate requirements.

6. In Step 1, installations shall perform sampling and testing at all of the following water outlets in priority areas to establish a baseline.

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- a. Drinking fountains, both bubbler and water cooler style, indoor and outdoor (e.g. playgrounds, sports fields, etc.)
- b. Kitchen sinks
- c. Home economic rooms sinks
- d. Teacher's lounge sinks
- e. Nurse's office sinks
- f. Classroom sinks
- g. Bathroom faucets
- h. Utility sinks, hose attachments, and outdoor outlets if used to fill water jugs (e.g. for sports team practice)
- i. Any sink known to be or visibly used for consumption (e.g. coffee maker or cups are nearby)

Installations that have conducted sampling and testing of all required water outlets meeting the guidelines of references (c) and (d) within the last five years and have maintained relevant records are exempt from Step 1 requirements for those water outlets. Any outlets for which appropriate documentation has not been retained must be included within the Step 1 sampling and testing baseline. Step 1 shall be complete for all priority areas by 31 December 2014.

If initial screening results exceed EPA's recommended lead screening level of 20ppb, installations shall (1) immediately take the outlet temporarily out of service or select an interim remedy as outlined in reference (d); and (2) use full protocol sampling on affected outlets (EPA's Two-Step Sampling Process identified in reference (d)). If full protocol sampling continues to exceed 20ppb, installations shall institute permanent corrective actions in accordance with references (c) and (d).

7. Step 2 of the sampling and testing program consists of sampling and testing water outlets in newly constructed or modified priority areas. Installations shall sample and test all water outlets identified in Step 1 when Navy owned water treatment processes or plumbing are added or modified in any way

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that has the potential to increase lead concentrations (e.g. system includes older plumbing lines and plumbing/solder is disturbed, replaced, or removed). The environmental office shall query each priority area annually to determine if any plumbing or treatment modifications have been made and if sampling needs to be completed. This step also includes initial baseline testing of all outlets identified in Step 1 in newly constructed or modified priority areas prior to occupancy; however, if the installation can document that all plumbing materials conform to section 1417 of reference (c), then the requirement to test new construction is waived.

8. Step 3 of the sampling and testing program consists of periodic re-testing and sampling of all outlets in Step 1. Periodic testing shall be accomplished every five years from the established baseline or in accordance with state requirements if more frequent.

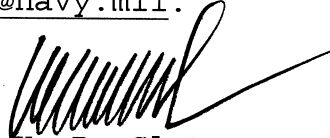
9. A copy of all test results shall be made available to the Local Preventative Medicine Service/Medical Treatment Facility, all schools, CDCs, Navy operated 24/7 Group Homes, youth centers, where testing was conducted. At a minimum, availability of testing results shall be provided to the parents or legal guardians of children attending the schools, CDCs, Navy operated 24/7 Group Homes, and youth centers. Direct notification of results shall be conducted for any lead detection greater than 20ppb during a sampling event. Notification requirements and procedures shall be coordinated with Public Affairs staff, local Navy Preventive Medicine Service/Medical Treatment Facility, legal department, and shall be conducted in accordance with any other installation, regional or command guidance if applicable. All records of sampling and testing of drinking water in priority areas shall be retained for 12 years.

10. Funding for sampling and testing to establish a baseline (and re-testing where necessary) and for periodic recurring out-year sampling and testing every five years from the established baseline should be programmed in Navy's Environmental Portal, Environmental Program Requirements Web (EPR Web) using Environmental Readiness Level 4 to ensure projects receive the highest priority for funding. Funding for sampling and testing of newly constructed or modified priority areas should be included in the project scope, and funded with project dollars. Funding for implementation of corrective actions is the responsibility of the installation Public Works Officer.

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11. Compliance with this policy shall be verified during annual internal Environmental Compliance Audits, and triennial external Environmental Compliance Audits.

12. The updates to policy reflected in this letter will be included in the next revision of reference (a). The OPNAV N45 point of contact for this policy is Ms. Lindsay Nehm, N452E, at (703) 695-5179, or [lindsay.nehm@navy.mil](mailto:lindsay.nehm@navy.mil).



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