

Testing for Lead and Copper in Child Care Facilities

On May 27, 2017, changes to WAC 170-300 added the requirement for all licensing applicants and all licensed center and home early learning providers to test their program water supply used for drinking, cooking or preparing infant formula or food for lead and copper.

This guidance should help identify fixtures to be tested, find a certified drinking water lab to perform the analysis and take appropriate follow-up action if high levels of lead and/or copper are detected. The Environmental Protection Agency (EPA) developed the **3Ts for Reducing the Lead in Drinking Water in Child Care Facilities** which has good information about the health effects of lead, how it gets into drinking water, ways to help reduce exposure to lead in drinking water and how to communicate with parents and staff. While it can be a good source of information, *please use the following guidelines to collect required lead and copper samples.*

Sampling Procedures

1. Before you begin sampling:

- a. Pick the fixtures you need to test: you will have to collect a sample from each water fixture that is used for drinking, cooking or preparing infant formula.
 - i. Make a list of each fixture and give it a unique name (e.g., Kitchen Tap, Infant Area Sink). Keep this list to match the lab results with the proper fixture.
- b. Contact a certified drinking water lab to test your sample. The Department of Ecology Lab Accreditation Unit accredits all drinking water labs in Washington State. They have developed a report, organized by county, of all labs accredited to test drinking water samples. Find a lab nearby with lead and copper on their list of analytes. Call the lab, tell them what testing you are doing and make a plan to get the bottles you will need (labs usually supply these). Samples should be collected in a 250mL bottle:
https://apps.ecology.wa.gov/laboratorysearch/appfiles/DWLLabs_WABByCounty.pdf

2. Preparing to collect your samples:

The sample you collect must be a “first-draw” sample which means the water has to sit in the plumbing system for at least 8 hours, but not more than 18 hours. It is easiest to collect these samples first thing in the morning. If you are running an in-home facility, try not to use the water in the home or flush toilets during the night until the samples have been collected. If your facility is closed on weekends, DO NOT sample on Mondays.

- a. Do not remove the aerator from the fixture at any time during the sampling process.
- b. Only sample cold water. Make sure that cold water is the last water to go through the fixture before it sits overnight.
- c. First thing in the morning, place the sample bottle under the fixture and open the cold water tap to a normal flow. Fill the sample bottle to the shoulder or the line marked “250 ml.” Close the cap tightly.
- d. Fill out the lab form and bottle label (if applicable). Important information to capture:
 - i. Name of your facility
 - ii. Collection date and time
 - iii. Name of the person collecting the sample
 - iv. Type of sample (these will be “first-draw” samples)
 - v. Fixture name (kitchen tap, infant area sink, etc.)
 - vi. Contact and billing information



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- e. Repeat this process for each fixture you have to test and submit the samples to lab for analysis.

What to Do If Results Are Greater Than EPA Action Level for Child Care Facilities

When you get the results from the lab, review them to see if any of the fixtures had a result that was greater than 20 parts per billion (ppb) for lead (0.020 mg/L) or 1300 ppb (1.30 mg/L) for copper. If any of your fixtures exceed these levels you should take the following actions:

1. **Immediately stop serving water from the fixtures that exceed the action level.** Start using bottled or packaged water for drinking, cooking and preparing infant formula. If you are not able to provide bottled or packaged water and meet the needs of your facility, you must close until you can meet the needs with bottled or packaged water.
2. **Immediately contact your DCYF Licensing Officer.** Advise them of the lab results and the actions you are taking to protect the children at your facility.
3. **Notify all parents and guardians of the test results.**
4. **Take “follow-up” samples.** Follow-up samples (often called flush samples) are designed to show whether the lead and/or copper in the first-draw sample is coming from the fixture or the plumbing behind the wall leading to the fixture. The key difference between first-draw and follow-up sampling is allowing the water to run for 30 seconds before taking the sample. Follow these steps to collect follow-up samples:
 - a. Do not remove the aerator from the fixture at any time during the sampling process.
 - b. Only sample cold water. Make sure that cold water is the last water to go through the fixture before it sits overnight.
 - c. First thing in the morning, open the cold water tap to a normal flow and allow the water to run for 30 seconds. While the water is flowing, place the sample bottle under the fixture and fill the sample bottle to the shoulder or the line marked “250 ml.” Close the cap tightly.
 - d. Fill out the lab form and bottle label (if applicable). Important information to capture:
 - i. Name of your facility
 - ii. Collection date and time
 - iii. Name of the person collecting the sample
 - iv. Type of sample (these will be “follow-up” samples)
 - v. Fixture name (kitchen tap, infant area sink, etc.)
 - vi. Contact and billing information
 - e. Repeat this process for each fixture where the first draw sample exceeded the lead and/or copper action level and submit the samples to lab for analysis.
5. **Contact DCYF when you get your results.** When you get your results from the follow-up samples, contact your DCYF Licensing Officer to discuss the results of your follow-up sampling and next steps.
6. **Continue to provide bottled or packaged water.** Your DCYF Licensing Officer will work with you on a plan to address the lead and copper levels in your facility and find a solution to allow you to use the tap water again. You must continue to provide packaged or bottled water until the fixtures are tested again and are below EPA action levels for lead and/or copper.

