CM REGENT INSURANCE COMPANY

Risk Manager

Answers, resources and information to help assess and reduce risk

Risk Management Recommendations Regarding Potential Lead Exposure in Schools
By Sharon Orr

Lead contamination in water sources in Michigan has resulted in increased national awareness of potential contaminants in drinking water. Several events lead to the issue with drinking water in Flint, Michigan: the water source was changed from Lake Huron to the Flint River, the new water source was not treated with an anti-corrosive, service lines leading into buildings contained lead and, as a result, the untreated water precipitated leaching of lead from pipes into the water.

Lead is a potent neurotoxin with no safe level in children. Facilities built prior to 1978 may contain multiple sources of lead. In light of recent events, Risk Management recommends following Environmental Protection Agency (EPA) guidelines, outlined below, as they relate to checking several areas, not just water lines/sources, for potential lead exposure:

- Interior painted areas – Examine walls and interior surfaces to see if the paint is cracking, chipping, or peeling, and check areas on doors or windows where painted surfaces may rub together.
- Exterior painted areas – Check exterior paint as well; it can flake off and contaminate nearby soil where children may play.
- Surrounding areas – Be sure there are no large structures nearby with peeling or flaking paint that could contaminate the soil around play areas.
- Playground equipment – Older equipment can contain lead-based paint.
- Consider testing drinking water outlets in the facility and on the playground, especially those that provide water for drinking or cooking.
- Understanding that school entities are faced with limited funds, the recommendation is to prioritize sampling sites based on potential use and risk. Also, consider that actual use can change over time.

The EPA recommends the following sites as priority sites:

High Priority:

- Drinking fountains, both bubbler and water cooler style
- Kitchen sinks
- Classroom combination sinks and drinking fountains
- Home economics room sinks
- Teacher's lounge sink, nurse's office sink
- Classroom sinks in special education classrooms
- Any sink known to be or visibly used for consumption (for example, coffeemaker or cups are nearby)

Never use hot water for drinking or cooking. Lead leaches more easily into hot water than into cold water. The water may also sit in contact with lead components in a hot water tank.

Medium Priority:

- Classroom sinks (potential for cups used for drinking, classroom cooking projects)
- Bathroom faucets (children may drink from these)

Low Priority:

- Utility sinks and hose attachments, unless used to fill water jugs (for example, for sports team practice)
- Hot water outlets

Know the School's Source of Water

The EPA's action level is 15 parts per billion (ppb) for lead for public water sources (PWS). For schools that receive water from a PWS, obtain a copy of the most current lead test results. Ask if the water is optimized for corrosion control. Also ask if the PWS has a corrosion control permit. This information will assist determination of the appropriate remedies to any lead problems.

Short-term Measures

- Flush the pipes: Let the water run to bring in fresh water that has not been standing in the pipes. Do this over a night or weekend. Flushing times can vary based on the plumbing configuration. It also depends on whether the facility has lead service lines. If unsure of the appropriate flushing time, contact the water utility.
- Provide bottled water. Confirm that the source of bottled water is lead-free.

Permanent Remedies

First, obtain an understanding of the water supply, including water characteristics. Also understand the lead conditions in the facility as a result of testing. Then examine permanent remedies and select the most appropriate to the situation.

- Install corrosion control devices for individual buildings, known as point-of-entry devices.
- Install point-of-use devices that control lead at the tap.
- Find alternate grounding for electrical wires that are grounded to water pipes.
- Replace lead service line and other lead pipes.
- Replace outlets where there is localized contamination with new, certified components. The EPA recognizes NSF Standard 61, Section 9 as a performance standard. It limits leaching of lead into the drinking water. The standard regulates devices that dispense water for human ingestion.

For additional information or training on best practices and safety management within your school entity, please contact Director of Risk Management Sharon Orr at (866) 401-6600, ext. 7152 or sorr@cmregent.com.