



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

Date: January 29, 2016

RE: Important Notice and Survey on Lead and Copper in Drinking Water at Early Education and Care Facilities

Dear Director:

The federal Lead Contamination Control Act of 1988 (LCCA) directs the United States Environmental Protection Agency (USEPA) and its state designees to assist school system administrators, schools and programs, to identify and reduce or eliminate lead contamination in their facilities' drinking water. The Massachusetts Department of Environmental Protection (MassDEP) is the USEPA's designee. This means that MassDEP is responsible for educating school/childcare facility officials about the LCCA and coordinating statewide efforts to reduce or eliminate lead in drinking water at Early Education and Care Facilities.

Even though drinking water is not a significant source of lead, lead in drinking water in schools and childcare facilities continues to be an important concern for children's health. The Massachusetts Action Level for lead in drinking water is 0.015 milligrams per liter (also known as parts per million). The Centers for Disease Control and Prevention (CDC) has identified a blood lead level of 10 micrograms per deciliter as the level of concern for lead in children, but in 2005 said that there is no safe level of lead in children. Learning deficits and long-term development impairments in children are two of the serious effects of lead exposure. See CDC factsheet at [http://www.cdc.gov/biomonitoring/Lead\\_FactSheet.html](http://www.cdc.gov/biomonitoring/Lead_FactSheet.html).

The same mechanisms that cause plumbing to contribute lead to drinking water may also contribute copper. The Massachusetts Action Level for copper in drinking water is 1.3 milligrams per liter. Copper is a concern because a child's rapid development results in his/her body absorbing more copper than an adult does. For this reason, MassDEP includes information and technical assistance on copper in its LCCA program. Information on copper in drinking water is available at <http://www.mass.gov/eea/agencies/massdep/water/drinking/lead-and-other-contaminants-in-drinking-water.html#19>.

The source water supplied to facilities is generally well below the Massachusetts lead and copper Action Levels. However, plumbing and fixtures in buildings may contain lead and copper, resulting in an increase in the lead and copper content in tap water. Of the 1,562 schools responding to our last survey in 2010, 881 reported that they were in compliance with the state Action Level for lead for all LCCA fixtures used for drinking water, beverage preparation or cooking purposes. MassDEP provided technical assistance to all facilities that did not report that they were in compliance.

Every five years MassDEP requests updated information from school and early education and care facility administrators about lead and copper at their facilities. Please complete the on-line **2015 Lead and Copper Maintenance Checklist** at <https://goo.gl/8aEqOg> for each facility under your jurisdiction. If you are unable to

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

Printed on Recycled Paper

complete the on-line checklist you may download a printable version at <http://www.mass.gov/eea/agencies/massdep/water/drinking/lead-and-other-contaminants-in-drinking-water.html#8> (Lead & Copper Maintenance Checklist), complete, and email it to: [program.director-dwp@state.ma.us](mailto:program.director-dwp@state.ma.us), Subject: LCCA, or contact MassDEP at 617-292-5770 or [program.director-dwp@state.ma.us](mailto:program.director-dwp@state.ma.us) to request a paper copy to complete. **All responses are due back by March 15, 2016.** Your responses to this checklist will help MassDEP and the USEPA plan our outreach to Early Education and Care Facilities on lead and copper in the future.

#### New Information Since MassDEP's 2010 Correspondence

- MassDEP strongly recommends that fixtures, such as water fountains or bubblers, with elevated lead levels be removed rather than disconnected so that they cannot be reconnected in the future.
- The Reduction of Lead in Drinking Water Act of 2011 became effective on January 4, 2014. The Act amended Section 1417 of the Safe Drinking Water Act (SDWA), which prohibits the use of certain plumbing products that are not "lead free" (as defined by SDWA), and makes it unlawful to introduce into commerce products that are not "lead free." See <http://water.epa.gov/drink/info/lead/index.cfm> for additional information.
- USEPA's Office of Ground Water & Drinking Water, in coordination with MassDEP's Drinking Water Programs released the *3Ts of Reducing Lead in Drinking Water in Schools*. EPA developed the 3Ts (Training, Testing, and Telling) to help schools/facilities implement simple strategies for managing the health risks of lead in school drinking water. This document is available at <http://water.epa.gov/infrastructure/drinkingwater/schools/guidance.cfm#3ts>.
- A recent study by the American Water Works Association on lead service lines recommends testing for lead when a lead service line is partially removed or repaired. The study indicated that removal or repair can cause elevated lead levels at the tap. This document is available at <http://www.awwa.org/Portals/0/files/resources/publicaffairs/pdfs/FINALLeadServiceLineCommGuide.pdf>
- More information on Lead in Drinking Water at Schools, Programs, and Early Education & Care Facilities is located on MassDEP's web site at <http://www.mass.gov/eea/agencies/massdep/water/drinking/lead-and-other-contaminants-in-drinking-water.html#8>. This includes guidance to assist school and Early Education & Care Facilities and local public water suppliers in coordinating efforts for sampling LCCA fixtures.

If you have questions on lead or copper in drinking water please contact the Drinking Water Program at [Program.Director-DWP@state.ma.us](mailto:Program.Director-DWP@state.ma.us) or 617-292-5770. Thank you for your continued efforts in protecting drinking water.

Sincerely,



Yvette DePeiza, Program Director  
Drinking Water Program

cc: Massachusetts Department of Public Health (DPH), Jan Sullivan  
Massachusetts Department of Elementary & Secondary Education (ESE), Christine Lynch  
Massachusetts Department of Early Education and Care (EEC), Donna Cohen-Avery  
MA Plumbing Board (DPL), Wayne Thomas  
U.S. Environmental Protection Agency, Eleanor Kwong  
MassDEP Regional Drinking Water Program Chiefs  
Municipal Officials: Public Water Supplier, Board of Health & Plumbing Inspector