



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

IN REPLY REFER TO:
5090
G-F

JUN 24 2019

MARINE CORPS INSTALLATIONS COMMAND POLICY LETTER 6-19

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

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

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

Encl: (1) U.S. EPA 3Ts for Reducing Lead in Water Checklist, October 2018

1. Situation. Per reference (a), Marine Corps installations are required to follow U.S. 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 child care purposes, out-patient medical centers, or schools that are not owned or managed by the Department of Defense.

2. Cancellation. MCICOM Policy Letter 2-14.

3. Mission. To provide policy regarding sampling, testing, and action 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 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

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

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. This policy letter establishes a 15 ppb lead AL 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 that have completed the required five-year re-sampling effort must review all test results and take required actions for any water outlet that previously tested at 15 ppb or greater.

(3) A copy of all test results shall be made available and retained as specified in reference (a).

5. Administration and Logistics

a. Funding requests for sampling and testing for lead in drinking water in priority areas should be entered into the U. S. Marine Corps 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.

e. EPA has prepared a checklist (enclosure (1)) to assist schools and childcare facilities in establishing and maintaining a lead testing program, as well as provide available resources.

f. 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.


V. A. COGLIANESE

DISTRIBUTION: B

3Ts for Reducing Lead in Drinking Water

Establishing a Lead Testing Program *The 3Ts Checklist*

Establishing a Lead Testing Program

The 3Ts toolkit assists you with the steps needed to create a program to reduce children's exposure to lead in drinking water. Utilizing the 3Ts toolkit along with clear communication will help ensure a successful 3Ts Program.

Before sampling, facilities should establish a plan on how they will respond to their sample results to protect the school or child care facility population from lead in drinking water. You should consider potential partners, funding options, and how frequent testing will occur.

Communication Plan



Telling parents and staff about your lead monitoring program will demonstrate your commitment to protecting children and staff health.

Communicating early and often about your testing plans, results, and next steps will build confidence in your facility's ability to provide a safe environment for students and staff.

3Ts Toolkit

<http://epa.gov/safewater/3Ts>

Build a team and make a plan! Protecting school and child care facility drinking water is a group effort and you will need to have a plan for who you will work with, how you will test and how you will address elevated lead that may be found. Make sure you are transparent in your communications with your community. The 3Ts toolkit includes modules and helpful resources you can use to implement a successful program!



Module 1
Communicating the 3Ts

Module 2
Learning About Lead in Drinking Water

Module 3
Planning Your 3Ts Program

Module 4
Developing a Sampling Plan

Module 5
Conducting Sampling & Interpreting Results

Module 6
Remediation & Establishing Routine Practices

Module 7
Recordkeeping

The steps in the checklist are intended to help you learn about lead in drinking water, develop a program, test for lead, communicate the results, and take remediation actions where needed. The checklist includes things to consider in the TRAINING, TESTING, and TAKING ACTION sections of the 3Ts, as well as important COMMUNICATION and RECORDKEEPING items.

This checklist is designed to provide easy-to-follow steps. You may not have to complete all the steps or follow the steps in the exact order presented to have an effective program. Your 3Ts Program should be tailored for your school or child care facility.

	Checklist Item	Module
☐	Learn about lead problems in drinking water: Have you made a concerted effort to become educated on the health effects of lead, sources of lead, and how lead gets into drinking water?	
☐	Become familiar with Regulations: Do you understand current Regulations pertaining to lead in drinking water? Contact your state to learn more about state guidance or regulations.	
☐	Keep records: Have you developed a record of training activities?	
☐	Gather historical information: Has the school looked into records to learn more about previous lead testing the school might have already conducted?	
☐	Establishing partnerships: Has the school contacted: • Their Public Water System? • Their Local Health Office? • Their State Drinking Water Program? Health and/or Education program? • Certified Laboratories? • Local Community Organizations?	
☐	Assign roles and responsibility within the program: Have you begun identifying people to be responsible for each aspect of the lead program? • Who will be the main contact for the lead control program? • Who should create the sampling plan? • Who should collect the samples? • Who should ensure proper remediation? • Who is in charge of recordkeeping? • Who will be in charge of communicating with the public? • Who will coordinate with partners?	
☐	Develop a communication strategy: Consider how the school will keep its community, parents, staff, and partners in the loop regarding school efforts and sampling results.	
☐	Establish routine practices: Have you implemented routine practices such as cleaning, maintaining filters, and routine flushing to improve water quality?	
☐	Maintain records: Are you maintaining a record of routine practices, including: • Flushing times and schedules? • Filter status and replacement schedules?	
☐	Engage with the school and child care facility community: Has the school reached out to its community, parents, and staff to let them know that it will be sampling for lead in drinking water at its facility? Include any lead protection efforts the school is already implementing (e.g., routine practices).	

	Checklist Item	Module
☐	Conduct a walkthrough: Have you conducted a walkthrough of the facility? • Have you identified all the faucets and fixtures used for drinking water and cooking? • Have you developed a Plumbing Profile for the facility's plumbing? • Do you know where water enters your facility? • Are there outlets with filters or aerators? • Are any of the fixtures on EPA's list of lead coolers that should be immediately removed?	
☐	Determine whether your facility has a lead service line: Have you contact your water system to get more information?	
☐	Develop a sampling plan: Have you developed a sampling plan? • Have sampling locations been determined? • Have you created an inventory of outlets used for human consumption? • Have you established a coding system to label and manage samples?	
☐	Prepare for sampling: • Have you identified a state-certified laboratory to analyze water samples for lead? • Have you carefully studied the sampling procedures? • Have you identified a remediation trigger?	
☐	Conduct sampling using the 2-step sampling procedures outlined in the 3Ts toolkit.	
☐	Record samples: Have you recorded all sampling information and results from samples?	
☐	Communicate the Results: Have you communicated results to parents and staff? If parents and staff have been notified, did the school notify the public (e.g., local community, partners)?	
☐	Take immediate steps: If results showed elevated levels of lead, have you taken immediate steps to remove outlets from service or prevent use?	
☐	Take short-term measures: Can short-term measures be implemented while longer term measures are being considered and implemented?	
☐	Implement long-term remediation: Have you taken steps toward long-term remediation, such as replacing outlets, replacing lead pipes and/or service lines, reconfiguring plumbing and installing POU/POE devices?	
☐	Take follow-up samples: Have you taken follow-up samples to ensure your remediation effort was successful?	
☐	Maintain all records: • Have you maintained a record of all testing and remediation activities? • Have you maintained a record of all communications activities?	
☐	Continue to test outlets regularly and implement the routine practices: Have you established a schedule to continue to monitoring water quality?	



Available Resources

EPA Drinking Water Information

3Ts Links and Materials

- View the **State Map** and direct links to state programs and resources here: <https://www.epa.gov/safewater/3Ts>
- View the full **3Ts toolkit** at: <https://www.epa.gov/safewater/3Ts>
- View print outs, poster templates, and other **communication tools** here: <https://www.epa.gov/safewater/3Ts>
- View resources regarding the Water Infrastructure Improvements for the National Act grant program for schools and child care facilities: <https://www.epa.gov/safewater/grants>

Lead in Drinking Water Resources:

- Get basic information about lead in drinking water at: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>
- View EPA's infographic on lead in drinking water: https://www.epa.gov/sites/production/files/2017-08/documents/epa_lead_in_drinking_water_final_8.21.17.pdf
- View your water utilities Annual Water Report, also known as a Consumer Confidence Report: [https://ofmpub.epa.gov/apex/safewater/f?p=136:102:::~:::](https://ofmpub.epa.gov/apex/safewater/f?p=136:102:::)

Lead Resources:

- View EPA's lead homepage to learn more about lead from different sources (i.e., paint, air, dust, soil): <https://www.epa.gov/lead>

School and Student Resources:

- View Drinking Water Activities for Students and Teachers: <https://www.epa.gov/ground-water-and-drinking-water/drinking-water-activities-students-and-teachers>
- View EPA's school homepage: <https://www.epa.gov/schools>

Additional Lead Poison Prevention Information

- National Lead Information Center – Document Request Site: <http://www.epa.gov/lead/forms/lead-hotline-national-lead-information-centernlicdocs.htm>
- CDC Childhood Lead Poisoning Prevention Program: <http://www.cdc.gov/nceh/lead/lead.htm>
- Association of Environmental Clinics Pediatric Environmental Health Specialty Units (PEHSU) site: <http://www.pehsu.net/>