



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

IN REPLY REFER TO:

5090

G-F

18 Mar 26

MARINE CORPS INSTALLATIONS COMMAND POLICY LETTER 1-26

From: Commander, Marine Corps Installations Command

To: Distribution List

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

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, A Training, Testing, and Taking Action Approach: Revised Manual, October 2018
(d) SECNAV M-5210.1, "Department of the Navy Records Management Program," September 2019

Encl: (1) Lead in Drinking Water in Priority Areas Generic School/Child Care Center Water Sampling Results Letter Template
(2) Lead in Drinking Water in Priority Areas Direct Notification Letter Template

1. Situation. Per reference (a), Marine Corps installations are required to follow United States 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 childcare purposes, outpatient medical centers, or schools that are not owned or managed by the Department of War. This Policy Letter updates previous guidance in Marine Corps Installations Command (MCICOM) Policy Letter 3-21 by providing more specific information on requirements for coordination and notification of testing results for lead in drinking water in priority areas and by providing updated templates.

2. Cancellation. MCICOM Policy Letter 3-21.

3. Mission. To provide policy regarding sampling, testing, and screening levels relating to lead in drinking water in priority areas at Marine Corps installations to ensure a uniform, consistent, and effective program.

4. Execution

a. Commander's Intent and Concept of Operations

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(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 remediating such contamination. EPA has published guidance for both schools and day care centers in reference (c). In the Lead and Copper Rule Improvements (LCRI), reference (b), EPA established a lead action level (AL) in drinking water that prompts certain response requirements. All installations are to use a 15 ppb AL when sampling and testing drinking water for lead in priority areas until 1 November 2027. Beginning 1 November 2027, the lead AL will be 10 ppb in accordance with reference (b).

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 are to be conducted in addition to, not in place of, sampling to determine whether a water supply system meets system-wide regulations under the LCRI covered by reference (b). Installations must use certified laboratories approved by the state or EPA for testing lead in drinking water.

(2) Marine Corps installations are required to re-sample all priority areas every five years and when Marine Corps-owned water treatment processes are added or modified in any way. A baseline sampling event is required for all modifications, regardless of lead-free certification, and must be conducted immediately upon identification. Affected outlets must be secured until sampling is completed, and results demonstrate lead levels less than or equal to the AL. All test results must be reviewed and appropriate actions taken for any water outlet tested at or above the AL.

(3) As part of the installation annual internal Environmental Compliance Evaluation, all priority areas shall be evaluated to determine if any plumbing modifications have been made and if sampling needs to be completed.

(4) Coordination with the Preventive Medicine Authority (PMA) and a representative from the facility being sampled is required during the planning process for sampling.

(5) A copy of all test results shall be made available at locations where testing was conducted and retained for 12 years as required in reference (d). At a minimum, a notice of availability of the testing results should be provided to the facility staff and parents or legal guardians of children attending schools or child development centers, school age centers, and youth and teen centers.

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(6) Direct notification of results shall be conducted for any lead detection greater than the AL during a sampling event. Notifications shall be coordinated with Public Affairs staff, installation PMA, and any other appropriate installation, regional, or command staff.

(7) Templates are provided as enclosures (1) and (2) to facilitate notification of test results. All notification letters shall be reviewed by the Navy Marine Corps Force Health Protection Command (NMCFHPC) prior to issuance. With concurrence from the installation PMA, the letter shall be signed by the installation commanding officer and distributed to the parents, staff, and the installation and region public affairs officers (PAO).

5. Administration and Logistics

a. Funding requests for sampling and testing for lead in drinking water in priority areas should be entered into the USMC 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).

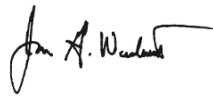
d. Reference (c) can be found using the following link:
<https://www.epa.gov/system/files/documents/2024-11/epa-3ts-guidance-document-english-508-compliant.pdf>

e. The point of contact for this Policy is Ms. Nicole Johnson at (571) 256-2809 or nicole.johnson@usmc.mil.

6. Command and Signal

a. Command. This Policy is applicable to MCICOM HQ and all subordinate commands.

b. Signal. This Policy is effective the date signed. 3/18/2026

X 

J. G. WOODWORTH

DISTRIBUTION: B

Signed by: USMC

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Delete blue-highlighted instructional text.

PMA MUST HAVE FINAL REVIEW OF ALL NOTIFICATION LETTERS

Template Letter—Staff/Parental Notification (At or Below 15 ppb)

{Template designed one letter per facility. If the installation chooses to combine all facilities on one letter, please send draft for medical review prior to sampling to prevent delays in disseminating the letters. Medical review cannot be expected to be completed in a quick timeframe (i.e., less than two business days) due to workload.}

From: Commander, Installation Name

To: Parents and Staff

Subj: Name of Child Development Center (CDC)/School Age Center/Youth or Teen Center's Drinking Water

Encl: (1) Complete Test Results

1. The Marine Corps is committed to protecting the health of our Marines, civilian staff, and their families by maintaining safe drinking water on its installations. Our drinking water distribution system is regularly tested for lead and is in compliance with the Environmental Protection Agency's (EPA) Lead and Copper Rule and the Safe Drinking Water Act. It is Marine Corps policy to follow EPA voluntary guidelines for testing and sampling of water from drinking water fountains, faucets, and other outlets from which children may drink at schools and daycare centers (priority areas).
2. EPA recommends that priority areas are tested for lead because high levels of lead in drinking water can cause health problems. Pregnant women, infants, and children under 6 years old are most vulnerable to lead exposure. Lead in drinking water typically comes from the plumbing inside buildings including lead service lines, fittings, solder, water fountains/coolers, or water faucets. Marine Corps policy requires we test the drinking water lead content in priority areas such as primary and secondary schools owned or managed by the Department of Defense, Child Development Centers, School Age Centers, and Youth and Teen Centers.
3. I am pleased to report that we received the results of recent water testing of Name CDC and all drinking water intended for consumption, to include drinking water and water intended for cooking or washing, is at or below the lead action level of 15 parts per billion (ppb).
4. Marine Corps environmental personnel conducted this testing at the Name CDC following Marine Corps policy. Samples from various locations in the CDC were sent to a state-certified laboratory for analysis.
5. We also tested other sinks used for washing. These fixtures were also below the action level for lead in schools and childcare centers. In all, ## samples were taken and tested.
6. A copy of all test results is enclosed for your information. You can also see a hard copy of our water testing results at the Name CDC, which is open Monday to Friday (Hours).

Replace yellow-highlighted text with the appropriate information.
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a. To learn more about lead in drinking water in schools and childcare centers visit the following EPA website: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

b. To learn more about the installation's public water supplier, see their annual water quality report: [Region-specific links](#).

7. While lead in the drinking water at these facilities is below the action levels for schools and daycare centers, if you have any health-related questions or concerns about lead exposure, you are encouraged to contact your health care provider, or if you are a TRICARE beneficiary, use the [Region](#) Appointment Center to schedule an appointment with your primary care provider at [1-866-XXX-XXXX](#).

Sincerely,

Replace yellow-highlighted text with the appropriate information.
Delete blue-highlighted instructional text.

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Template Letter—Staff/Parental Results Notification (Above 15 ppb)

{Template designed one letter per facility. If the installation chooses to combine all facilities on one letter, please send draft for medical review prior to sampling to prevent delays in disseminating the letters. Medical review cannot be expected to be completed in a quick timeframe (i.e., less than two business days) due to workload.}

From: Commander, **Installation Name**

To: Parents and Staff

Subj: **Name of Child Development Center (CDC)/School Age Center/Youth or Teen Center's**
Drinking Water

Encl: (1) Overview of Results & Actions

(2) Complete Test Results

(3) Floor Plan of the **CDC/School Age Center/Youth or Teen Center**

1. The Marine Corps is committed to protecting the health of our Marines, civilian staff, and their families by maintaining safe drinking water on its installations. Our drinking water distribution system is regularly tested for lead and is in compliance with the Environmental Protection Agency's (EPA) Lead and Copper Rule and the Safe Drinking Water Act. It is Marine Corps policy to follow EPA voluntary guidelines for testing and sampling of water from drinking water fountains, faucets, and other outlets from which children may drink at schools and daycare centers (priority areas).

2. EPA recommends that priority areas are tested for lead because high levels of lead in drinking water can cause health problems. Pregnant women, infants, and children under 6 years old are most vulnerable to lead exposure. Lead in drinking water typically comes from the plumbing inside buildings including lead service lines, fittings, solder, water fountains/coolers, or water faucets. Marine Corps policy requires we test the drinking water lead content in priority areas such primary and secondary schools owned or managed by the Department of Defense, Child Development Centers (CDCs), School Age Centers, and Youth and Teen Centers.

2. This week, we received the results of recent water testing of **## CDC/School Age Center/Youth or Teen Center** drinking water outlets. Of these, **##** outlets tested higher than the lead action level of 15 parts per billion (ppb), which is the level requiring action to include additional testing and corrective measures. The source of lead in drinking water typically comes from the existing plumbing inside buildings including service lines, fittings, solder, water coolers, or water faucets. Lead is more likely to be found in drinking water when the water has not been run for an extended period of time and has been sitting in the system (e.g., overnight or weekends).

3. The lead testing results were higher than the action level at water fountains/coolers in rooms **X, Y, and Z** and at sinks in rooms **X, Y, and Z**. We found the source of lead was **{a specific**

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source of lead; e.g., fixture component or solder} After receiving the test results, we immediately took these water outlets out of service. Details on the corrective actions we {plan to take / have already taken} (phrase choice will depend on whether the letter is being used as initial results notification or progress notification) {For example: (1) The outlets placed out of service will be replaced with lead-free fixtures. (2) The outlets placed out of service will be fitted with point-of-use reverse osmosis filters to reduce lead concentrations.} to reduce the amount of lead in water at these fixtures, are discussed in the attached Overview of Results & Actions. We retested the outlet and found that the problem was {resolved—if unresolved, describe further measures taken}. {Describe additional mitigating factors. For example: (1) The facilities use commercially-filtered water for drinking water. (2) The outlets requiring additional measures were already out of service. (3) The outlets requiring additional measures were used infrequently for purposes other than providing drinking water (e.g., cleaning, hand washing).} Also enclosed are Complete Test Results and a Floor Plan of the CDC/School Age Center/Youth or Teen Center that indicates the location of the fixtures that had lead levels higher than the screening level.

4. I know this issue will generate more questions than this letter can answer. As such, I invite you to attend an informational forum that I will host at the CDC/School Age Center/Youth or Teen Center Date/Time, as well as Date/Time. This will be an opportunity for you to speak with facilities and medical representatives, have your questions answered, and voice your concerns. {Informational forum is optional based on installation preferences. If no information forum is being held, please provide a knowledgeable POC, preferably medical and environmental.} Here are some additional resources you may find informative:

a. Environmental Protection Agency (EPA) (lead in drinking water in schools and childcare centers):

<https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

b. Annual water quality report for the installation:
Region-specific links.

5. If you have any health questions or concerns, I encourage you to contact your health care provider, or if you are a TRICARE beneficiary, use the Region Appointment Center to schedule an appointment with your primary care provider at 1-866-XXX-XXXX.

6. Rest assured that my team and I will continue to monitor the situation, test water quality, and take actions where necessary at the Name CDC/School Age Center/Youth or Teen Center to ensure our drinking water lead levels are lower than screening levels. I am committed to the safety and health of all personnel and family members using our facilities and will keep you updated on this issue.

Sincerely,