Air & Water SCIENCES
Environmental Consultants

April 10, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Comment letter on Drinking Water for Schools Grant Program

Dear Ms. Townsend,

Air & Water SCIENCES (AWS) would like to submit this comment letter on the proposed *Drinking Water for Schools Grant Program*. AWS has conducted hundreds of assessments of lead in drinking water for public schools located throughout Northern California. Our comments below are based on our experience and knowledge and on the data collected from these schools. All samples were collected with strict adherence to the EPA's guidance document -"3T's for Reducing Lead in Drinking Water in Schools".

While we sincerely support the Drinking Water for Schools Grant Program for providing a funding source to replace units that provide water above the MCL for lead it does not provide a funding source for the schools to adequately determine if their drinking water outlets meet or exceed these levels in the first place. We are aware that the SWRCB recently issued an order requiring community water systems to collect up to five (5) samples for each public school within their supply area. The Sampling Guidance (Appendix A) in the SWRCB's Sampling Instructions for Community Water Systems put forth for the water agencies to follow:

1) The collection of five (5) samples from the "busiest" locations in the school. We have found that the less frequently used outlets are most often the ones in a school that are found to have lead levels that exceed the action level or MCL. By providing for the top 5 busiest outlets to be sampled, these lesser used outlets are ignored; giving a false sense of security to the schools. Children have access and do consume water from outlets other than the five busiest ones and not sampling these outlets puts children at risk of consuming water containing excess levels of lead from these fixtures. The Lead and Copper Rule (LCR) sampling guidelines are not appropriate to use in a school as the LCR can cover a normal household with 5 samples, but not a school with dozens of drinking water outlets. A typical elementary school has one fountain in each classroom and then about 4-6 outdoor drinking fountains. Five samples do not come close to adequately assessing the risk from lead in drinking water at schools.

2) In addition to the above, collecting a sample in a one liter container, as opposed to 250 ml as recommended by EPA, will mix the water from the fixture with the water from the service piping behind it, thereby diluting it. Doing this does not give an accurate representation of what the level of lead is in the fixture itself as opposed to the service piping. In our experience the vast majority of the exceedances are found in the fixture and not in the piping. Again, the LCR method is not appropriate for use in a school as it was designed to randomly test the water being provided by the water agency in a home and not the water in an individual fixture in a school with many fixtures. The purpose of any testing in a school should be what level of lead the children are exposed to, not the quality of the water being provided by the water agency. Testing the water supplied by the water agency can be done with one sample from the main supply line or one three minute flush sample from an outlet closest to the main.

We recommend that a funding source be identified to help the schools perform testing on **all** of their primary drinking water outlets and that the EPA's 3T's guidance document be used as the reference document to perform this testing.

In addition, we would also like to comment on the Technical Assistance portion of the Invitation for Bid (IFB No. 16-070-550). Within the IFB preference is given to small businesses, however, a typical small business in California does not have offices in all of the geographical areas in California which would be needed to properly service clients. We suggest that not one contract be awarded for the entire state to one company, but that one contract per region or geographical area be awarded.

AWS appreciates the opportunity to provide these comments to you. Please do not hesitate to call or email if you have any further questions.

Respectfully submitted,
Air &Water SCIENCES

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