

New York State promulgated regulations last year that require testing drinking water for lead contamination in public K-12 schools. While the regulation does not apply to colleges and universities, it has prompted many campuses to voluntarily consider testing facility drinking water for lead. Conversations about lead testing have occurred at several SUNY professional conferences, has been the subject of a previous [newsletter item](#), and [information](#) has been added to the Office for Capital Facilities webpage.

There are a few decision points that may cause campuses to pause - here are nine things to consider:

1. The recent NYS regulation for K-12 does not apply to colleges and universities.
2. Campuses would be best served to have *considered* testing for lead and developed a voluntary risk-reducing program, and be able to articulate the basis. (This may mean that the campus decided to test all outlets over a period of time, test areas where complaints have been made or there is concern, test older buildings, test a sample of outlets in each building, or test some percentage of buildings over the next few years, etc.)
3. Children are more susceptible to lead's effects. Campuses should confirm the availability of dependable and recent results for areas frequently used by children (e.g., childcare areas, school-age program areas, family-type residential facilities, etc.). Similarly, areas serving other particularly vulnerable populations should be considered.
4. Before embarking on a sampling program, campuses should consider possible response actions. Corrective actions, if necessary, should be implemented with minimal delays.
5. Before embarking on a sampling program, campuses should have discussions about communicating findings and corrective action decisions to the campus community in a timely manner.
6. Campuses should not randomly collect samples; all sampling programs should be carefully considered and the protocols carefully crafted so that campus results can be compared to recommended action levels. (For example, if the campus intends to compare its results to standards under a given EPA program, the protocol for campus testing needs to match the protocols for the reference program. Protocols include the period that water has been undisturbed in the plumbing, as well as sample size, sampling condition, preservatives, etc.)
7. The EPA standard for lead testing in schools is the venerable 3T program (Training, Testing, and Telling). It is a well-considered program that has stood the test of time. While not directly applicable to colleges and universities, it has clear protocols and approaches and should be carefully considered as a model. (Note that the 3T program has a traditional action level of 20 ppb, while the NYS program, using similar protocols, has set the action level at 15 ppb.)
8. The Safe Drinking Water Act with its Lead and Copper Rule (LCR) applies to public *suppliers* of drinking water, not *consumers* of water. Most campuses are consumers, not suppliers. LCR measures for lead using a different methodology than the 3T program, and the protocols are designed to provide feedback on the water treatment at the supplier. LCR protocols are generally not appropriate when looking at water from individual building outlets.
9. The EPA has recommendations for safer water consumption, independent of the testing programs. It has long recommended that the public be told:
 - Use only cold water for drinking and cooking.
 - Let water at the outlet flow for about 30 seconds, or until cold, to flush plumbing before using it for drinking or cooking.