

LEAD in the School Water: Guideposts from CHML

As of May 4, 2016

Background

In April 2016 Capitol Hill Montessori at Logan learned that lead tests conducted in August 2015 showed 3 water sources with lead levels above 15ppb. The Department of General Services (DGS), which is responsible for conducting lead tests, did not inform our principal, parents, or PTSO of the results. The results came to light in Valerie Jablow's April 4, 2016 post on educationdc.net. This sparked weeks of research and meetings to determine what we now understand: DGS had no protocol to routinely test every water source, no process for keeping clear and consistent data, and no communication with school officials or communities about the tests, results, or remediation procedures.

Our community felt, as many others do, that there must be a better way. Only after extensive advocacy efforts did we secure testing of all of our water sources under a new and improved DGS protocol. DGS conducted the testing on April 27, 2016. We have not yet received results from those tests. We hope other schools can use our experience to ensure consistent, accurate testing and clear communications.

What We Have Learned

Flaws in the Original Process

- DGS tested only a fraction of water sources used by children. In August 2015 and March 2016, they tested nine of our 94 water sources. They tested water fountains, but not sinks used in classrooms, bathrooms, nap rooms, or kitchens. They also failed to test outdoor hose faucets used to water edible gardens.
- DGS did not use unique identifiers for each source. DGS used colloquial descriptions, that varied by technicians for the same source, making it impossible to compare data over time.
- DGS did not follow its own remediation guidelines. Their internal policies required them to shut off a problematic source, install a filter, and then re-test with the filter after roughly eight hours. The source should remain off until a re-test showed it was safe. We are aware that DGS did **not** follow this procedure for compromised water sources at CHML. Instead, they left running a water source that had failed a test.
- DGS did not have a policy to notify anyone at the school of the results. Data was posted on the Department of Energy and Environment's website with no notice to interested parties. We do not know when DOEE started posting data.

Proposed Process Going Forward

Thanks to the leadership of Chairman Grosso, Chairwoman Cheh, Councilman Allen, and DGS Director Weaver, the new process as we understand it will be that DGS will:

- test every water source at every school between now and summer, with future testing to occur annually;
- give every water source in every school a bar code that is a permanent unique identifier, which links to a picture of the source for verification, as well as other testing data;
- turn off every source that has a lead level of 15ppb or above, and tag it as non-drinkable;
- put a filter on any source with a lead level of 15ppb or above, and re-test the source;
- remove the warning and turn the source back on only when the re-test shows less than 15ppb;
- work to develop protocols for sources that test below 15ppb but more than 1ppb; and
- work to develop protocols for notifying principals, staff, and parents of test results to ensure that communities are well-informed now and at every testing phase and follow up.

Major Players to Contact

- Jenny Niles, Deputy Mayor of Education (DME)

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- Christopher Weaver, Director of the Department of General Services. (DGS)
- Brian Killian, Safety and Health Supervisor, or Kathleen Walsh, Environmental Protection Specialist, DGS.
- David Grosso, Councilmember At-Large, Chairman of the Committee on Education.
- Mary Cheh, Councilmember for Ward 3, Chairwoman of the Committee on Transportation and the Environment (oversees DGS).
- The Councilmember for your Ward. Charles Allen, Member of the Committee on Education and the Committee on Transportation and the Environment, has been an advocate for CHML and Ward 6 schools.

Questions to Ask

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| <p>Sampling Process</p> <ul style="list-style-type: none"> • How often are our water sources tested? • When was our last test? • Which sources were tested? • How were those sources located and identified? • Was anyone from the school involved in locating and identifying sources, particularly those used by children or for food preparation? • When is our next test? | <p>Remediation</p> <ul style="list-style-type: none"> • Were problematic sources shut off until remediation was complete? • Were filters installed on those sources? • Can you provide the work orders showing when those filters were installed? • What type of filters were installed? • When were the sources re-tested after the filters were installed? • How often are the filters replaced? • When will the filters next be replaced? |
| <p>Results</p> <ul style="list-style-type: none"> • Which sources showed elevated levels of lead? • What levels do you consider elevated? • Where can we find results from our previous tests? • Can you determine the source of the lead (source pipe, feed pipe, solder, etc.)? | <p>Communications</p> <ul style="list-style-type: none"> • When will we get results from our next test? • Which school officials will receive the results? • Which DCPS and other public officials will receive the results? • How will you deliver them? • Who should we contact with questions/concerns? |

Tips for Working with DGS

- ✓ Meet with your principal to develop a collaborative strategy for your school community.
- ✓ Find any data for your school at <http://dgs.dc.gov/page/water-sampling-results-dc-public-schools>.
- ✓ Hold an open meeting to identify your community's concerns with respect to lead.
- ✓ Identify **all** of your school's water sources. Your custodial staff can help you accomplish this.
- ✓ Invite DME & DGS to meet with your community to allow everyone to voice concerns directly to them.
- ✓ Before the meeting, send DME/DGS your community's questions. Insist on answers and supporting data delivered **before** the meeting.
- ✓ If needed, schedule a follow-up meeting with DME/DGS before the first meeting ends.
- ✓ Request a walk-through with DGS officials. Include your principal, custodial staff, teachers, and parents.
- ✓ Request a schedule for testing and remediation from DGS.
- ✓ Request clear and specific communication from DME/DGS on results and remediation. Identify points of contact for the school and DGS.
- ✓ If lead has been discovered (now or previously), request that DGS provide on-site lead poisoning tests for all students, former students, and staff at no cost to the community.

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