




MEMORANDUM

Date: July 20, 2017

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator 

Re: **Public School Drinking Water**

Attached is a July 11, 2017 memorandum from our Health and Environmental Quality Departments regarding this matter. The memorandum is an update to previous information provided to the Board of Supervisors regarding this subject. These two departments have been closely monitoring the ongoing implementation of the Arizona Department of Environmental Quality's Public School Drinking Water Lead Screening Program.

The conclusion is that there are no immediate threats to the health of public school students, faculty or staff at the schools with reported elevated lead screening levels, since the water fixtures that provided this water have been taken out of service.

Our staff will continue to follow up with the small number of schools that require mitigation to ensure appropriate corrective action has been taken.

CHH/anc

Attachment

c: Jan Leshner, Chief Deputy County Administrator
Dr. Francisco Garcia, Assistant County Administrator for Community and Health Services
Ursula Nelson, Director, Environmental Quality
Marcy Flanagan, Director, Health Services



MEMORANDUM

Date: July 11, 2017

To: Chuck H. Huckelberry
Pima County Administrator

From: Marcy Flanagan *MF*
Director, Health Department Director

Ursula Nelson *UN*
Director, Department of
Environmental Quality

Via: Francisco García *FG*
Assistant County Administrator for Health
Services

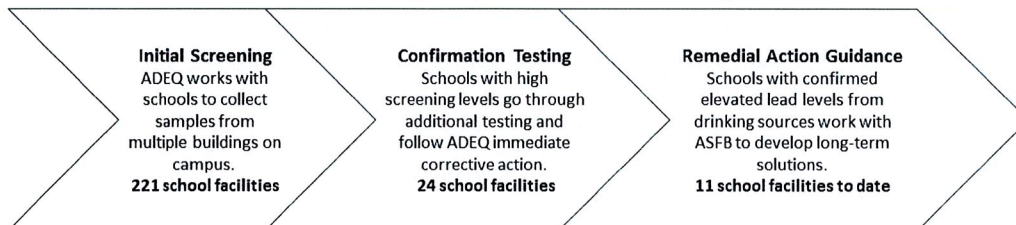
Re: Public School Drinking Water Lead Screening Updates

Arizona Department of Environmental Quality (ADEQ) has completed initial screening for lead levels in all 221 Pima County public school facilities from 15 school districts that participated in the Public School Drinking Water Lead Screening Program. At this time, eleven school buildings have confirmed high lead levels in drinking water sources, and one school is currently going through the confirmation process (Attachment A).

ADEQ manages the screening and confirmation testing processes, and the Arizona School Facilities Board (ASFB) facilitates recommended remediation. All schools with confirmed high lead levels have complied with ADEQ's recommended *immediate* corrective action to protect the users of those facilities. Simultaneously school districts are working with ASFB to develop long-term solutions.

Testing Process for Schools with Elevated Screening Results

Public School Drinking Water Lead Screen Program Process



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Confirmatory Testing

The confirmation testing process includes a more rigorous two-day sampling regimen and documentation regarding the location and intended use of the water source. Through confirmation testing, many elevated screening level tests were determined to come from non-drinking water sources, such as outdoor hoses or handwashing sinks. This water is safe for bathroom use, to wash hands and other non-consumption uses. Confirmatory samples are sent to ADEQ contracted laboratories throughout the state for analysis. In Pima County, Tucson Water is responsible for screening analysis of water samples from Tucson Unified School District and Turner Laboratories is responsible for screening analysis for the remaining Pima County school districts.

When school water sources have an elevated lead screening result, ADEQ recommends Immediate Corrective Actions while confirmation testing occurs. The corrective action recommendations are graduated according to the level of lead in the water. Recommendations may range from flushing procedures to shutting off drinking water sources to the building altogether.

Remedial Action Guidance

Schools with confirmed elevated lead levels from drinking water sources engage with ADEQ and the Arizona School Facilities Board (ASFB) to implement long-term actions to remove the source of lead in school plumbing systems. Older schools in particular may have lead within plumbing fixtures, such as faucets or pipes that leach lead into the drinking water. ASFB works with schools to identify fiscal resources either from the school district or an ASFB Building Renewal Grant to identify specific fixtures, formulate a corrective action plan, pursue corrective actions, and conduct follow up testing. The timeline for full remedial action to be completed is largely subjective to each school district's process.

Regulatory Authority

ADEQ and the US EPA have no regulatory authority to impose compliance orders associated with elevated levels of lead in the drinking water that are identified by the Screening Program. Federal regulation of drinking water standards, such as the Clean Water Act, apply to public water distribution systems and do not extend into individual property plumbing systems. ADEQ provides voluntary Corrective and Remedial Action Guidance designed to protect the public health. The County has no enforcement responsibility under the existing delegation agreement with ADEQ. We may use the County's independent (non-delegated) authority if

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the concern rises creates a public nuisance.

Schools with elevated screening followed by elevated confirmatory testing are referred from ADEQ to the Arizona Schools Facilities Board who in turn works with individual schools to bring them into voluntary compliance. At this time all schools with confirmed elevated levels of lead coming from specific fixtures have voluntarily taken these out for use as potable water sources and are working on longer term solutions.

Conclusion

The Pima County Health Department and the Pima County Department of Environmental Quality continue to monitor closely the ongoing implementation and the dissemination of the results of ADEQ's Public School Drinking Water Lead Screening Program. It is important to note, there is not an immediate threat to the health of students, faculty, or staff including schools with reported elevated screening levels since these water fixtures are now off line. The confirmatory testing has identified a small number of schools that require follow-up and mitigation. We will be following up with them to understand their mitigation plans.

PCHD and PDEQ remain committed to continue to support the Pima County School Superintendent and individual school district superintendents as they manage through this statewide lead screening and follow-up program.

c: Dustin Williams, Pima County Superintendent of Schools
Jan Leshner, Chief Deputy County Administrator
Carmine DeBonis, Deputy County Administrator for Public Works
Paula Perrera, Deputy County Attorney
Kim Tham, Pima County Health Department

Attachment A: Confirmed Elevated Lead Levels in Pima County School Facilities

School Facility Name	School District	Number of Samples Above Screening Level (15 PPB)	Confirmatory Elevated Level in Drinking Water Source	Analytical Result (PPB)
Amphitheater Unified District	Marion Donaldson Elementary	1	Y	16
Indian Oasis-Baboquivari Unified District	Indian Oasis Intermediate School	1	Y	22
Marana Unified District	Butterfield Elementary School	1	Y	21
	Marana High School	TBD	TBD	TBD
	Mountain View High School	4	Y	21, 730, 52, 82
	Tortolita Middle School	1	Y	64
Sunnyside Unified District	Los Ninos Elementary School	16	Y	220, 180, 330, 170, 110, 690, 360, 120, 190, 200, 400, 120, 16, 250, 260, 670, 29
	Los Ranchitos School	9	Y	160, 33, 38, 20, 110, 82, 2600, 64, 57
Tucson Unified District	Maxwell Middle School	1	Y	29
	Palo Verde High Magnet School	1	Y	31
	Rincon / University High School	1	Y	25
	Sabino High School	2	Y	30, 17