



MEMORANDUM

Date: May 5, 2017

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

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to be "CHH", is written over the typed name "C.H. Huckelberry".

Re: **Public School Drinking Water Lead Screening Program**

Please find attached a May 2, 2017 memorandum from Dr. Francisco Garcia, Assistant County Administrator for Health Services and Ursula Nelson, Department of Environmental Quality Director, related to the Arizona Department of Environmental Quality (ADEQ) initiated lead screening of drinking water in public schools.

The ADEQ initiated a six-month testing program in March of this year, which is scheduled to conclude in August 2017. This program will evaluate lead levels in drinking water in 1,917 buildings at 235 public schools. To date, 114 schools have completed testing. Thirteen schools from five school districts have shown elevated test results, which triggered parental notification and retesting for confirmation.

The County's actions are described on Pages 2 and 3 of the attached memorandum. We will continue to cooperate with all parties and closely monitor the program to ensure schoolchildren drink safe water. We will continue to support the Pima County Superintendent of Schools in this matter and closely coordinate necessary remedial actions with the school districts and the public water supplier.

CHH/lab

Attachment

c: The Honorable Dustin Williams, Superintendent of Schools
Jan Leshar, Chief Deputy County Administrator
Carmine DeBonis, Deputy County Administrator for Public Works
Dr. Francisco Garcia, Assistant County Administrator for Health Services
Ursula Nelson, Director, Department of Environmental Quality



MEMORANDUM

Community and Health Services

Date: 2 May 2017

To: C.H. Huckelberry
Pima County Administrator

From: Francisco García 
Assistant County Administrator for
Health Services
Ursula Nelson 
Director, Pima County Department of
Environmental Quality

Via: Jan Leshner 
Chief Deputy County Administrator
Carmine DeBonis 
Deputy County Administrator for Public Works

Re: Public School Drinking Water Lead Screening Program

Background

Chronic childhood lead exposure is a serious condition that affects many communities, most notably Flint Michigan in recent times. Concerns are greatest for children younger than six years old and developing fetuses both of whom are vulnerable to the health effects of chronic lead exposure, which may include learning disabilities, behavioral problems, and impaired growth. In Arizona, these concerns are greatest in certain geographic areas where the age and condition of the housing stock may be associated with an increased risk of environmental exposure to lead.

Young children are most frequently exposed when lead paint peels or cracks, creating dust or chips that may be inhaled or swallowed. Food products, traditional home remedies, toys, and ceramics that are antiques or imported from other countries may also be associated with lead exposure. Parent's occupational settings, soils and diesel exhaust are other more common sources of lead in our environment. Public water systems regularly test and monitor lead levels within the distribution system; however, older buildings may have lead plumbing fixtures, such as faucets or pipes that leach lead into the drinking water. Still, drinking water is not a common source of lead poisoning in Arizona.

ADEQ School Lead Screening Program

In late January of this year, the Arizona Department of Environmental Quality (ADEQ) announced that it would test lead levels in water coming from fixtures in 7000 public school buildings throughout the

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state through the Public School Drinking Water Lead Screening Program. This initiative was not in response to any specific threat or systemic concern, but rather ADEQ represents this to be “proactive” program to minimize children’s exposure to lead. To be clear this effort was undertaken without consultation or input of the Pima County Health Department (PCHD), the Pima County Department of Environmental Quality (PDEQ), the Pima County School Superintendent’s Office (PCSSO) or any of the individually impacted school districts. We also believe that this was done with little input or consideration of the Arizona Department of Health Services or the Arizona Department of Education.

The 6-month testing period began in March and scheduled to conclude August 2017. In Pima County, ADEQ intends to evaluate drinking water lead levels in 1,917 buildings in 235 schools. Designated school facilities staff are responsible for collecting water samples. ADEQ has provided written guidance and subsequently an informational video on the proper sampling methodology; however, language and literacy barriers have been challenges in sampling the intended sources. PDEQ and the Health Department have offered technical assistance to the school districts in our jurisdiction to facilitate sampling and to assist with parent and stakeholder communication. To date, 114 Pima County schools completed testing, and 13 schools from five school districts have had elevated test results triggering parental notification. Program results are publicly available at www.azdeq.gov/LeadScreeningProg. (See Table Attached)

Although confirmatory testing is required after a positive screen, at this time confirmatory testing has not yet been completed in any of the schools with elevated lead levels. Confirmatory samples are to be analyzed by laboratories throughout the state under contract with ADEQ. In Pima County, Tucson Water does the analysis for Tucson Unified School District and Turner Laboratories does the analysis for other districts. ADEQ’s goal is to have laboratory turnaround results within 19 days. ADEQ’s recommended Public School Drinking Water Lead Screening Program Corrective Action Guidance for schools with higher screening results is available at www.azdeq.gov/LeadScreeningProg.

Pima County Action

Our immediate response upon becoming aware of the proposed screening program in late January was to reach out to PDEQ and the County Superintendent’s Office, to tap into their expertise and contacts to better understand the potential impact on Pima County. The result was a series of telephone conference calls, electronic and in-person communications with ADEQ and/or ADHS to examine the details of the lead screening program and to register our concerns with the proposed implementation strategy.

We (PCHD, PDEQ, and PCSSO) also contacted the Superintendents of the individual school districts, the school nurses or health leads of those school districts to create awareness of the proposed program, provide contacts within ADEQ, and to offer local technical assistance. As part of this effort, we developed website content (www.pima.gov/lead) for schools, parents, and health care providers. Finally, we also reached out to Tucson Water to understand the scope and capabilities of the residential screening program, and how we might collaborate to respond to the questions that would inevitably emerge.

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As the results have trickled in during the last three weeks, we have reached out individually to the affected school superintendents and their communications team with the goal of providing assistance and coordinating messaging. As the number of school districts with elevated screening levels increases, we increasingly rely on working with the PCSO team to ensure that the informational needs of schools and families are met throughout the process.

PCHD and PDEQ continue to engage actively with ADEQ, and the quality of these communications has improved tremendously to the benefit of our community. We continue to work with local partners to provide a context for the elevated screening results and provide clarity as to the required implications for the health of children and pregnant women in those school settings.

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 school lead screening program. It is our assessment that there is not an immediate threat to the health of students, faculty or staff even in those schools with elevated screening levels to date. These elevated levels do represent an opportunity for school districts to reassess the age and quality of their fixtures in an effort to provide the highest quality drinking water to their users. We are committed to continue to support the Pima County School Superintendent and the individual school district superintendent as they manage through this latest challenge.

FG/cbc

Attachment - Table

c: Dustin Williams, Pima County Superintendent of Schools

C.H. Huckelberry, County Administrator
 Re: Public School Drinking Water Lead Screening Program
 May 2, 2017

Attachment

School District/School	Sample Collection Date	Screening Level (ppb)	Fixture Type	Fixture Location
Catalina Foothills Unified School District				
Orange Grove Middle School	4/4/2017	54	Kitchen Sink	Kitchen (Snack Bar)
Marana Unified School District				
Mountain View High School	4/12/2017	20, 23	Water Fountain	Bookstore; Second Floor Balcony
Tortolita Middle School	4/7/2017	730	Sink	Concession Room
Sahuarita Unified School District				
Sopori Elementary School	3/31/2017	16	Sink	Nurse's Office
Sunnyside Unified School District				
Challenger Middle School	4/6/2017	22	Outside Water Spigot	Unknown
Los Ranchitos School	4/5/2017	58	Drinking Fountain	Room
Tucson Unified School District				
Catalina High Magnet School	3/21/2017	53, 51	Sink	Classroom
Maxwell Middle School	3/21/2017	16	Drinking Fountain/Bubbler	Storage Room
Myers/Ganoung Elementary School	3/21/2017	86	Cafeteria/ Kitchen Sink	Barn Y Lab
Palo Verde High Magnet School	3/21/2017	31	Sink	General Shop
Rincon / University High School	3/21/2017	190	Sink	Library/Classroom
Sabino High School	3/21/2017	78	Drinking Fountain /Bubbler	General
Sahuaro High School	3/21/2017	43	Sink	General Nurse's Office