Lead Testing Instructions
Testing the Water Supply for Lead in Child Care Facilities

The Child Care Licensing Division requires all applicants for child care licensing to test the water supply for lead if the plumbing fixture is used for drinking, cooking, preparing infant formula, or preparing food. All test results must be submitted to complete the application. Providers must test all drinking water faucets or fixtures at least once every six (6) years from the date of the last test.

Guidance Overview

Use this guidance to help you identify what plumbing fixtures to test, how to find a certified lab to perform the analysis, and what appropriate follow-up action to take.

Sampling Procedures

Preparations – Before You Begin Sampling

1. Identify the fixtures you need to test. You will have to collect a water sample from each water fixture that is used for drinking, cooking, preparing infant formula, or preparing food. Make a list and give each fixture a unique name (for example, kitchen tap, refrigerator dispenser, or infant area sink). Keep this list so you can match the results you get from the lab to the fixture you tested. If you have several fixtures and it is difficult to sample all of them at once, these samples can be taken on different days. Follow this sampling procedure each time you collect a sample.

2. Contact an accredited drinking water laboratory to test your sample. The Oregon Health Authority administers Oregon’s Environmental Laboratory Accreditation Program (ORELAP). There is a list of all labs accredited to analyze for lead in drinking water samples. Call the lab, tell them that you need to test for lead in water according to the 3Ts method and how many water fixtures you will be testing, and make a plan to get the bottles you will need (labs usually supply these). Samples must be collected in a 250ml bottle.

Collecting the Samples

You’ll collect a “first-draw” sample, which means the water has to sit in the plumbing system for at least 8 hours, but not more than 18 hours. It is easiest to collect these samples first thing in the morning. If your facility is closed on weekends, do not sample on Mondays.

- Do not remove the aerator from the fixture at any time during the initial sampling process.
- Only sample cold water.
- Collect the first water from the faucet without overflowing the sample bottle.

Helpful Hints

If you rent your facility, notify the building owner of your testing plans, ask for help, and provide them with a copy of the test results. Encourage your landlord to participate in this testing process and to take corrective actions if lead problems are found.

Submitting Results

Where do I send the results I receive from the lab? Submit lead test results to the Child Care Licensing Division by email, DELC.LeadTesting@delc.oregon.gov or mail, Child Care Licensing Division, Attn: Lead, 700 Summer Street NE #350, Salem, OR 97301.

You are entitled to language assistance services and other accommodations at no cost. If you need help in your language or other accommodations, please contact the Child Care Licensing Division at 503-947-1400.
**Step-By-Step Instructions**

How to Take “First Draw” or “Initial” Samples

**STEP 1:** Place the sample bottle under the fixture and open the cold water tap to a normal flow.

**STEP 2:** Fill the sample bottle to the shoulder or the line marked “250 ml” leaving a little bit of room at the top of the bottle. Close the cap tightly.

**STEP 3:** Fill out the lab form and bottle label (if applicable) according to the lab instructions. Some important information to capture is:
- Name of your facility, contact and billing information
- Collection date and time
- Name of person collecting the sample
- Type of sample (these are “first-draw” samples)
- Fixture name (kitchen tap, infant area sink, etc.)

**STEP 4:** Repeat this process for each fixture used for drinking, cooking, or preparing infant formula and submit the samples to lab for analysis.
Test Results That Do Not Meet Requirements

What do you do if your results are greater than the action level for child care facilities? When you get your results from the lab, review them to see if any of the fixtures had a result at or above 15 parts per billion (ppb) (0.015 mg/L) for lead. If any of your fixtures exceed these levels you must take the following steps:

**STEP 1:** Immediately stop serving water from the fixtures that exceed the action level. Start using bottled or packaged water, or lead filtered water for drinking, cooking, and preparing food or infant formula. If you are not able to provide bottled or packaged water to meet the needs of your facility, you must contact your licensing specialist immediately and may need to close until you can provide adequate bottled water.

Water from these fixtures with results at or above 15 parts per billion can still be used for household uses (washing dishes, clothes, housekeeping, etc.). Sign and submit the CEN-0016 Alternative Water Declaration form to the Child Care Licensing Division.

**STEP 2:** Determine your corrective action plan and submit to the Child Care Licensing Division within 60 days. The corrective action plan should include follow-up sampling and remediation actions outlined in the EPA 3T’s for Reducing Lead in Drinking Water in Schools. The Child Care Licensing Division has a resource, CEN-0015 Lead Corrective Action Plan to help programs that need to create a plan. This resource, and others, are available on our website and by request.

**STEP 3:** Notify all parents and guardians of the test results. It is important that you communicate with your parents and staff regarding your test results and what actions you are taking. The rules require that you notify parents and guardians of the test result within one business day and post the results in a visible place. The EPA 3 T’s for Reducing Lead in Drinking Water in Child Care Facilities Section III has good information on communication and is a resource to help you determine how to communicate with your parents and staff.

**STEP 4:** Take “flushed” samples. Flushed samples are designed to show whether there is lead in the first-draw sample in plumbing behind the wall leading to the fixture that may be contributing to the lead in the first-draw sample. Follow these steps to collect follow-up samples:

- Make sure water sits in the plumbing for at least 8 hours without use, but not more than 18 hours.
- Do not remove the aerator from the fixture at any time during the sampling process.
- Only sample cold water. Make sure that cold water is the last water to go through the fixture before it sits overnight.
- Allow the water to run for 30 seconds, and then fill the 250 ml. bottle.

Continue to follow the Alternative Water Declaration plan that is on file. After corrective action has been completed, you must re-test the water from the faucet(s) and submit the results to CCLD.

Please refer to the child care licensing rule book for a complete set of regulations and specific rule language.
How to Take “Flushed” Samples

**STEP 1:** First thing in the morning, open the cold water tap to a normal flow and allow the water to run for 30 seconds.

**STEP 2:** After 30 seconds, while the water is flowing place the sample bottle under the fixture and fill the sample bottle to the shoulder or the line marked “250 mL.” Close the cap tightly.

**STEP 3:** Fill out the lab form and bottle label (if applicable). Make sure you capture the same information on the lab slip (name, sample date, etc.) you captured before, and note that these are “flush samples.”

**STEP 4:** Repeat this process for each fixture where the first draw sample exceeded the lead action level and submit the samples to lab for analysis.