

Mandatory Lead in Water Testing



Training Module 4 - Elevated Lead Levels and Remediation

August 2023

Table of Contents

Action Level	3
Immediate Action	3
Possible Exception to Rule	3
Additional Testing.....	3
Remediation	3
Return to Service	4
Reporting Remediation.....	4
Moderate Level Results	4



Action Level

The action level is 15 parts per billion (ppb). **Any fixture testing at 15 ppb or higher must be addressed immediately.**

Immediate Action

Any fixture testing at 15 ppb or higher must be immediately removed from service. **In no instance shall this take more than 48 hours per [OAR 333-061-400](#).** This can be accomplished by shutting off the water to the fixture, and/or bagging the fixture. The fixture cannot be returned to service until it has been remediated and retested, showing the lead level to be below 15 ppb.

Possible Exception to Rule

If the fixture is used primarily for sanitation purposes only, access may continue for up to 30 days, provided that clear signage is posted indicating the tap is not to be used for drinking or food preparation. **If remediation cannot be completed within 30 days, the fixture must be removed from service unless an alternate schedule is approved by ODE.**

Additional Testing

When an initial Draw sample tests at 15 ppb or higher, a follow-up Flush sample should be taken to help determine the source of the elevated lead level. If the results from the Flush test drop below 15 ppb, it potentially indicates that the cause of the elevated lead level is the fixture itself. If the results are the same or similar to the Draw sample results, it potentially indicates the cause to be something in the piping.

A Flush sample below the action level following a Draw sample above the action level is NOT an indication that lead levels are acceptable. Remediation must still take place. The fixture cannot be returned to service until remediation has been completed and the fixture has passed a follow-up Draw test.

Remediation

Remediation can be accomplished by replacement of the plumbing components that are the cause of the problem. In most instances, elevated levels of lead can be corrected by replacing the fixture and the shut off valves beneath the fixture.

Alternatively, it is possible to remediate through the installation of lead filters, however, keep in mind that filters need regular maintenance and replacement, as well as regular monitoring to ensure the ongoing effectiveness of the filter.

Permanent removal of a fixture is also an acceptable form of remediation, but generally should be considered only as a last resort, unless a fixture is truly not used and is not likely to be useful at some point in the future.

Instituting a regular flushing schedule is no longer considered an acceptable form of remediation.

Return to Service

Only after a fixture has been properly remediated and follow-up Draw testing shows the lead level to be below 15 ppb can a fixture be returned to service.

Reporting Remediation

All remediation actions by each ESD, school district, and charter school must be recorded in their [Annual Statement](#) due **June 1st** to ODE and published on the district's HASS Plan website.

ODE also needs records of the remediation measures. The [Reimbursement Form Template](#) has a column to record your remediation activities for each fixture. Select the action taken from the drop down menu and if needed add clarifications in the Notes column.

Moderate Level Results

If your test result is less than 15 ppb, but close to that level (from 12 to 14.999 ppb), you should consider remediating and retesting the fixture. While not legally required to do so, this is recommended for two reasons:

1. Lead levels tend to increase with age and wear of fixtures. With a 6 year testing cycle, the potential exists that the lead concentration will increase and exceed the 15 ppb threshold before your next test. Replacing now will eliminate that future need.
2. It helps assure parents that you are taking the health and safety of their children seriously, by not leaving fixtures that are close to the action level untreated.