



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Thomas S. Burack, Commissioner

June 29, 2016

Subject: Potential Occurrence of Lead in Child Care Facility Drinking Water

Dear Child Care Provider:

The purpose of this letter is to provide licensed child care programs with information and recommendations about the potential occurrence of lead in drinking water. Recent events in cities across the United States have shown that lead in drinking water remains an ongoing public health challenge and important concern for children's health. The New Hampshire Department of Environmental Services (NHDES) is encouraging you to test water from regularly used taps for lead. **Please note, NHDES recently issued guidance on this matter to all K-12 schools; if your program is located in a school, NHDES recommends consulting with the school to find out if water testing has been, or will be, performed and to make sure the drinking water taps used by your program are included in the testing program and you receive copies of the testing results.**

Protecting children from exposure to lead is important to lifelong good health. There is no known safe level of lead exposure for children. **Babies and children under the age of 6 are especially vulnerable to the effects of lead exposure. If any lead is present in your water, use water from a source known to be lead-free (such as bottled water) for cooking and drinking purposes, especially for making baby food and formula.** Babies and children who are exposed to lead could experience long-term problems with physical and mental growth and development, including slowed body growth, kidney problems, hearing problems, seizures, brain damage, lower IQ level, learning delays, reduced attention span, and behavior problems. Effects of lead exposure can be managed, but they cannot be remedied.

In New Hampshire, public water systems and NHDES work diligently to ensure that drinking water provided to the public is tested and safe and does not contain elevated lead levels.¹ Public water systems, however, are not required to test the tap water of every customer and lead is most likely to enter, or "leach," into drinking water from components of older service connections and internal plumbing and fixtures, such as faucets, bubblers, and coolers that may contain lead.² As such, it is advisable that all child care providers determine whether lead in drinking water is a problem in their facility and to eliminate or reduce dangerous lead sources. In some cases, adopting a daily morning routine of flushing the water at regularly used taps may be an effective strategy for reducing lead levels.

To assist you in this matter, NHDES recommends using the USEPA's "3Ts (Training, Testing, and Telling) Program for Child Care Facilities." This program was specifically developed to help child care providers implement simple strategies to ensure the drinking water in their facility does not contain elevated lead levels and provides guidance on the health effects of lead exposure, potential sources of lead in plumbing, developing and carrying out a water testing plan, fixing problems when elevated lead levels are found, and sharing information with staff and parents.

¹ Many child care programs obtain their drinking water from community public water systems, which supply water to the same population year-round and test their water for lead and other regulated drinking water parameters (example, municipal systems). Programs that are licensed for more than 24 children and have their own drinking water source are regulated by NHDES as non-transient, non-community public water systems and also test their water for lead and other regulated drinking water parameters.

² Copper pipes installed prior to 1987 may have been connected with lead solder; allowable lead content in solder was reduced from 50% to 0.2% in 1986. Faucets or brass fittings may also contain lead; fixtures certified for drinking water use purchased before January 4, 2014 may contain up to 8% lead content.

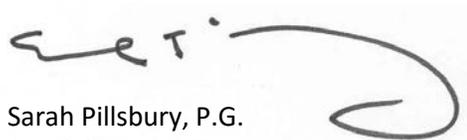
In settings where third-party professional services are needed to inventory plumbing and fixtures, collect water samples, or fix a lead problem, NHDES strongly recommends retaining a NH-licensed plumber or NH-certified drinking water system operator. When water samples are collected, sample analysis should be performed by a laboratory accredited in NH for the analysis of lead in drinking water. You may also wish to coordinate with your water supplier on any water testing efforts.

Attached for your reference are the cover page from the "3Ts Revised Guidance for Child Care Facilities" and information on water coolers known to contain lead components. The entire 3Ts guidance document and related resources are available for your use on NHDES' "Lead in Drinking Water" website at <http://des.nh.gov/organization/divisions/water/dwgb/lead-drinking-water.htm>.

If you have any questions about this letter or require technical assistance, please contact NHDES' Drinking Water and Groundwater Bureau at (603) 271-2516 or Joan.Fitzsimmons@des.nh.gov or (603) 271-3108 or Cynthia.Klevens@des.nh.gov.

Thank you for your continued efforts to provide a healthy child care environment for New Hampshire's children.

Sincerely,



Sarah Pillsbury, P.G.
Administrator
NHDES Drinking Water and Groundwater Bureau

Enclosures: Cover Page from 3Ts Revised Guidance for Child Care Facilities
Water Cooler Summary from 3Ts Revised Guidance

cc: Public Water Systems
Melissa Clement, Chief - Child Care Licensing Unit, NH Department of Health and Human Services (email)

3Ts for Reducing Lead in Drinking Water

in **Child Care Facilities:**
Revised Guidance



Appendix B: Water Cooler Summary

The Lead Contamination Control Act (LCCA), which amended the Safe Drinking Water Act, was signed into law on October 31, 1988 (P.L. 100 572). The potential of water coolers to supply lead to drinking water in schools and child care centers was a principal focus of this legislation. Specifically, the LCCA mandated that the Consumer Product Safety Commission (CPSC) order the repair, replacement, or recall and refund of drinking water coolers with lead-lined water tanks. In addition, the LCCA called for a ban on the manufacture or sale in interstate commerce of drinking water coolers that are not lead-free. Civil and criminal penalties were established under the law for violations of this ban. With respect to a water cooler that may come in contact with drinking water, the LCCA defined the term “lead-free” to mean:

“not more than 8 percent lead, except that no drinking water cooler which contains any solder, flux, or storage tank interior surface which may come in contact with drinking water shall be considered lead free if the solder, flux, or storage tank interior surface contains more than 0.2 percent lead.”

Another component of the LCCA was the requirement that EPA publish and make available to the States a list of drinking water coolers, by brand and model, that are not lead-free. In addition, EPA was to publish and make available to the states a separate list of the brand and model of water coolers with a lead-lined tank. EPA is required to revise and republish these lists as new information or analyses become available.

Based on responses to a Congressional survey in the winter of 1988, three major manufacturers, the Halsey Taylor Company, EBCO Manufacturing Corporation, and Sunroc Corporation, indicated that lead solder had been used in at least some models of their drinking water coolers. On April 10, 1988, EPA proposed in the *Federal Register* (at 54 *FR* 14320) lists of drinking water coolers with lead-lined tanks and coolers that are not lead-free. Public comments were received on the notice, and the list was revised and published on January 18, 1990 (Part III, 55 *FR* 1772). See Table B-2 for a list of water coolers and lead components.

Prior to publication of the January 1990 list, EPA determined that Halsey Taylor was the only manufacturer of water coolers with lead-lined tanks.¹ Table B-1 presents a listing of model numbers of the Halsey Taylor drinking water coolers with lead-lined tanks that had been identified by EPA as of January 18, 1990.

Since the LCCA required the CPSC to order manufacturers of coolers with lead-lined tanks to repair, replace, or recall and provide a refund of such coolers, the CPSC negotiated such an agreement with Halsey Taylor through a consent order published on June 1, 1990 (at 55 *FR* 22387). The consent agreement calls on Halsey Taylor to provide a replacement or refund program that addresses all the water coolers listed in Table B-2 as well as “all tank-type models of drinking water coolers manufactured by Halsey Taylor, whether or not those models are included on the present or on a future EPA list.” Under the consent order, Halsey Taylor agreed to notify the public of the replacement and refund program for all tank type models. Currently, a company formerly associated with Halsey Taylor, Scotsman Ice Systems, has assumed responsibility for replacement of lead-line coolers previously marketed by Halsey Taylor. See below for the address of Scotsman Ice Systems.

Scotsman Ice Systems
775 Corporate Woods Parkway
Vernon Hills, IL 60061
PH: (800) SCOTSMAN or 800-726-8762
PH: (847) 215-4500

SPECIAL NOTE:

Experience indicates that newly installed brass plumbing components containing 8 percent or less lead, as allowed by the SDWA, can contribute high lead levels to drinking water for a considerable period after installation. U.S. water cooler manufacturers have notified EPA that since September 1993, the components of water coolers that come in contact with drinking water have been made with non-lead alloy materials. These materials include stainless steel for fittings and water control devices, brass made of 60 percent copper and 40 percent zinc, terillium copper, and food grade plastic.

¹Based upon an analysis of 22 water coolers at a US Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.

Table B-1**Halsey Taylor Water Coolers With Lead-Lined Tanks²**

The following six model numbers have one or more units in the model series with lead-lined tanks:

WM8A WT8A GC10ACR GC10A GC5A RWM13A

The following models and serial numbers contain lead-lined tanks:

WM14A Serial No. 843034 WM14A Serial No. 843006 WT11A Serial No. 222650
 WT21A Serial No. 64309550 WT21A Serial No. 64309542 LL14A Serial No. 64346908

Table B-2**Water Coolers With Other Lead Components****EBCO Manufacturing**

- ▶ All pressure bubbler water coolers with shipping dates from 1962 through 1977 have a bubbler valve containing lead. The units contain a single, 50-50 tin-lead solder joint on the bubbler valve. Model numbers for coolers in this category are not available.
- ▶ The following models of pressure bubbler coolers produced from 1978 through 1981 contain one 50-50 tin-lead solder joint each.

CP3	DP15W	DPM8	7P	13P	DPM8H	DP15M	DP3R	DP8A
DP16M	DP5S	C10E	PX-10	DP7S	DP13SM	DP7M	DP7MH	DP7WD
WTC10	DP13M-60	DP14M	CP10-50	CP5	CP5M	DP15MW	DP3R	DP14S
DP20-50	DP7SM	DP10X	DP13A	DP13A-50	EP10F	DP5M	DP10F	CP3H
CP3-50	DP13M	DP3RH	DP5F	CP3M	EP5F	13PL	DP8AH	DP13S
CP10	DP20	DP12N	DP7WM	DP14A-50/60				

Halsey Taylor

- ▶ Lead solder was used in these models of water coolers manufactured between 1978 and the last week of 1987:

WMA-1	SCWT/SCWT-A	SWA-1	DC/DHC-1
S3/5/10D	BFC-4F/7F/4FS/7FS	S300/500/100D	

- ▶ The following coolers manufactured for Haws Drinking Faucet Company (Haws) by Halsey Taylor from November 1984 through December 18, 1987, are not lead free because they contain 2 tin-lead solder joints. The model designations for these units are as follows:

HC8WT	HC14F	HC6W	HWC7D	HC8WTH	HC14FH	HC8W	HC2F	HC14WT
HC14FL	HC14W	HC2FH	HC14WTH	HC8FL	HC4F	HC5F	HC14WL	HCBF7D
HC4FH	HC10F	HC16WT	HCBF7HO	HC8F	HC8FH	HC4W	HWC7	

If you have one of the Halsey Taylor water coolers noted in Table B-2, contact Scotsman Ice Systems (*address and phone noted on page 26*) to learn more about the requirements surrounding their replacement and rebate program.

²Based upon an analysis of 22 water coolers at a US Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.