

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GUIDANCE FROM HOTLINE COMPENDIUM

WSG H44
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SUBJECT: Lead Action Level Versus LCCA Guidance Level

SOURCE: Jeff Cohen

The final Lead and Copper Rule published in the *Federal Register* on June 7, 1991 (56 FR 26460) establishes a lead action level of 0.015 mg/l that triggers treatment technique requirements in public water systems. In 1989, EPA issued guidance in the Lead Contamination Control Act (LCCA) of 1988 (PL 100-572) recommending that schools on public water systems take remedial action on an individual outlet whenever the lead levels exceed 0.020 mg/l at that outlet.

Will EPA change the recommended guidance level for schools on public water supplies to 0.015 mg/l to be consistent with the new regulations? Additionally, what is the action level for schools classified as public water system?

Response:

According to the preamble of the Lead and Copper Rule (page 26479), EPA is still recommending that 0.020 mg/l be used to trigger action at individual outlets in schools using water from a public water system. Schools that are classified as public water systems will have to follow the treatment and public education requirements of the Lead and Copper Rule if they fail to meet the action level of 0.015 mg/l in 90% of sampled taps.

The difference between these two action levels springs from the size of the sample taken. The EPA's "Lead in School Drinking Water" manual recommends schools collect 250 ml first-draw samples from water fountains and outlets. This sampling was designed to pinpoint specific fountains and outlets that required remediation. In contrast, the Lead and Copper Rule requires systems to take a one liter first-draw sample to determine system-wide problems.