

INFORMATION FOR PARENTS, GUARDIANS AND CAREGIVERS

December 10, 2020

Notification of Lead in Drinking Water Results and GECDsB Process for Testing, Flushing and Record Keeping

Dear Parents, Guardians or Caregivers:

This is to inform you about the process of testing our water at Greater Essex County District School Board (GECDsB) schools.

Under *Ontario Regulation 243/07* entitled “*Schools, Private Schools and Child Care Centres*” enacted under the *Safe Drinking Water Act 2002*, all school boards are required to test each school’s water annually to monitor lead levels. Acceptable lead levels, as per the Regulation, are to be less than 10 parts per billion or 10 ug/L and a vast majority of the drinking water in our schools fall within this threshold without the need for any corrective measures.

Please be assured that the GECDsB is committed to maintaining GECDsB schools as safe, quality learning and teaching environments for our students and staff. The Board has been and continues to be diligent in its adherence to the legislation and follows strict protocols when a drinking water test fails to meet the mandated threshold.

The protocols are outlined in Ontario Regulation 243/07 of the *Safe Drinking Water Act* and include the following steps that must be completed when lead levels exceed provincially mandated limits (an exceedance is identified). This includes:

- Immediately notifying the local Medical Officer of Health, the Ministry of Environment, Conservation and Parks (MOECP) Spills Action Centre, and the Ministry of Education;
- Taking corrective actions to ensure the issue is resolved by the requirements of the *Regulation* and/or as directed by the Medical Officer of Health, and
- Once the corrective actions are complete, notify the Medical Officer of Health, the MOECP Spills Action Centre and the Ministry of Education.

For your information, there was an exceedance during the 2020 testing that was addressed through the noted corrective action.

School	Sample		Sample Location	Follow-up Sample		Corrective Action
	Standing (ug/L)	Flushed (ug/L)		Standing (ug/L)	Flushed (ug/L)	
Herman Academy	31.4	3.65	B22 bottle filler 1 st floor	69.9	38.6	Additional flushing to correct increased levels. Bottle filler removed from use. New copper pipe to be installed to fixture.
				0.54	0.21	Test results after old pipe was replaced with new. Issue resolved.

	14.5	2.21	B36 bottle filler 2 nd floor	24.1	17.6	Removed from use. New copper pipe to be installed to fixture.
				2.31	0.46	Test results after old pipe was replaced with new. Issue resolved.

A more detailed explanation of the testing, flushing and record keeping processes the GECDSB has in place to ensure compliance with the requirements of the regulation is provided below.

Water Testing

From 2007 until July 1st, 2017, the regulation required that one sample be taken annually between May 1st and October 31st of each year, and using a fixture located in the areas used by the youngest children. In elementary schools, samples were taken from a room occupied by childcare or full day kindergarten.

Samples are taken nearing the end of the school year, rather than during the summer, as results are more representative of the quality of water while the school is occupied.

For each sample point,

- The sampler ensures the water has been sitting in the piping and the fixture for at least 6 hours. This usually results in samples being taken on a Saturday or Sunday and usually means the water has been sitting much longer than the 6 hours required.
- After at least 6 hours, a 1-litre sample is taken immediately from that fixture and labelled as a “standing water sample”.
- The fixture is then allowed to run (flushed) for 5 minutes.
- The fixture must then not be used for 30 minutes and the water allowed to sit in the piping and the fixture.
- The subsequent 1-litre sample is taken from that fixture between the 30 and 35 minute mark and then labelled as a “flushed water sample”.
- Each sample must be accompanied at all times by a “chain of custody” document which identifies the sample number, time, date, flushing time, locations etc.
- Each sample must be kept in a cooler and delivered to an accredited laboratory, approved by the Ministry of Environment and Climate Change (MOECC) for analysis. The sample results are typically communicated to the Board within 1 – 1.5 weeks.

Sampling is completed by Facility Services Staff who receive annual training on sampling protocols, completion of chain of custody documents and handling of completed samples.

Prior to any sampling the Board must seek MOECC approval of the choice of accredited laboratories.

As of July 1st, 2017, the regulation has changed to require all school boards to sample water at every fixture used for water consumption or food preparation. The Board began the process of

increased sampling in June 2017. The legislation requires 1/3 of all elementary school fixtures be completed annually to ensure all fixtures are tested by 2020. In 2018, the Board completed the majority of all sampling requirements for elementary and secondary schools, taking over 1,520 samples (one standing and one flushed sample at each point) across all schools. Once all points have been sampled in a school, then one sample will be taken annually, rotating through all sample points.

Water Flushing

At a minimum, the legislation requires all schools to be flushed on the first school day of every week, prior to the entry of children, regardless of any sampling results. The Board has documented water flushing points on floor plans for each school indicating the location of all of the plumbing ends of line, taps used for food preparation and/or consumption, as well as all drinking fountains.

Custodians are responsible for all water flushing and receive regular training to ensure flushing protocols are followed. It is the custodian's first responsibility of the morning, using the floorplan as a guide, to flush the building's plumbing ends of line for 5 minutes each, and then flush each tap used for food preparation and/or consumption and each drinking fountain for 10 seconds. Custodians are required to record every flushing event on a log stored in the Environmental binder located in the school's office.

For several years, the board has also adopted a MOECC approved practice of using signage above sinks that are not flushed to ensure occupants do not use these fixtures for potable water. This would apply to sinks not typically intended for potable water use, such as washroom sinks, utility sinks, handwashing only sink, etc. This signage is in place at every school, regardless of historical exceedance results.

Lead Exceedances

The regulation identifies that a lead exceedance has occurred when a water sample is found to have a concentration greater than 10 ug/L of lead. When a sample analysis indicates that there is a lead exceedance, the laboratory has the responsibility to immediately notify the Board and the MOECC Spills Action Centre. Under the requirements of O.Reg.243/07, it is the Board's responsibility to complete documentation and provide corrective actions taken within 24 hours to the MOECC Spills Action Centre, the Windsor Essex County Health Unit (WECHU), the Ministry of Education and the Childcare branch of the Ministry of Education, if a daycare is co-located. Prior to submitting documentation, the Board consults with the WECHU regarding corrective actions to be taken.

In every case of lead exceedance, the custodian of the affected school will immediately begin daily flushing of all plumbing fixtures based on the floor plan. If the lead exceedance is on the standing sample, but not on the flushed sample, this indicates that flushing is reducing the water lead concentration below the legislated limit. Neither the WECHU nor the MOECC require any further corrective action other than flushing.

If an exceedance occurs on both standing and flushed samples, the fixture is immediately taken out of use and corrective action is taken to eliminate the source of lead, which may include the fixture, piping or tap replacement. Follow-up samples are taken and the fixture remains out of service until the sample result indicated the exceedance is resolved. All corrective actions are done in consultation with the WECHU and scrutinized by the MOECC.

In addition to complying with notification requirements to authorities, the Board immediately contacts the school principal, the Health & Safety worker representative, the daycare (if applicable), the site operations supervisor, the Board Coordinator of Operations and the Superintendent of Education – Student Well-Being. They are notified of the results and corrective action being taken, and follow-up information is provided as required.

The Board will also post information on the school website and forward information to parents/guardians indicating that there was an exceedance and the Health Unit approved remediation.

Records

All current and 7 year historical records, including sample result reports, exceedance notifications and related documentation, flushing records, and MOECC inspections are kept in the school Environmental binder, located and available in the main office.

Information on the Regulation and Requirements

Regulation 243/07 is a [MOECC](#) regulation. You may wish to contact gary.s.wheeler@ontario.ca if you have any technical questions about the regulation.

For questions about sample data please contact the MOECC Drinking Water Registration Help Desk's toll-free line at 866-793-2588 or email drinking.water@ontario.ca.