

**Ministry of
the Environment**

Drinking Water Management
Division

14th floor
135 St. Clair Avenue West
Toronto ON M4V 1P5

**Ministère de
l'Environnement**

Division de la gestion de la qualité de
l'eau potable

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135, avenue St. Clair Ouest
Toronto (Ontario) M4V 1P5



September 24, 2007

Attention Operators of Schools, Private Schools and Day Nurseries:

The ministries involved with lead in drinking water issues in schools, private schools and day nurseries (Ministries of Health and Long Term Care, Environment, Education, and Children and Youth Services) continue to monitor the progress of lead testing for drinking water in schools, private schools and day nurseries across Ontario. The purpose of this letter is to clarify for you what the protocols are for re-testing in schools, private schools and day nurseries that have had an exceedance in any flushed sample. I am also taking this opportunity to remind you of your obligation to maintain records related to flushing and testing water for lead and the requirement to make these records available to the public.

The province is recommending that where there are exceedances in flushed samples above the Ontario Drinking Water Quality Standard for lead (10 ug/l), the MOE Protocol, requiring two consecutive re-samples, taken within a 30 day period (at least seven days apart) be followed. This recommendation is based on my advice, and supported by the Chief Medical Officer of Health. If the two consecutive re-samples do not show exceedances (both are below 10 ug/l) then the school, private school or day nursery meets the regulatory standard. If at least one re-sample shows an exceedance, then the school must follow the direction of the local medical officer of health.

The required two consecutive re-samples (at least seven days apart) addresses the expected variability in drinking water quality within a large plumbing system or distribution system which may not be apparent after a shorter time frame. This better reflects lead exposure over the long term. This means that in cases where re-sampling were taken less than seven days apart, a further test should be completed.

While the province has expressed its confidence in the testing completed to date and recommendations made by local medical officers of health, in an abundance of caution, the recommendation is that school boards and private schools that have had exceedances in flushed samples and have not taken two re-samples at least seven days apart now re-sample to comply with the protocol (copy attached).

Schools, private schools and day nurseries are advised to continue to work with their local medical officer of health where there are exceedances in water tests for lead, and consult with them about questions regarding the safety of drinking water or the use of alternative water supplies or filters.

Yours truly,

A handwritten signature in cursive script, appearing to read "Keith West".

Keith West
Chief Drinking Water Inspector
Assistant Deputy Minister (A)
Drinking Water Management Division

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Ministry of the Environment Protocol for O. Reg. 243/07 Facilities Which Exceed the Ontario Drinking Water Quality Standard for Lead

Action Protocol

The following measures are recommended at any O. Reg. 243/07 facility that has a drinking water sample that exceeds the Ontario Drinking Water Quality Standard (ODWQS) of 10 µg/L for any 'flushed' sample (30 minute standing which was preceded by a minimum 5 minute flush).

Scenario A: All 'flushed' sample results 30 µg/L or below

The facility should carry out additional flushing activities before re-sampling. The facility can be considered to be providing water that meets the provincial standards when:

- two consecutive 'flushed' re-samples (a minimum 5 minute flush followed by a 30 minute standing sample) from a facility's water plumbing system taken within a 30 day period (minimum of 7 days apart) meet the ODWQS, and
- flushing activities are continued on a daily basis.

Scenario B: Any 'flushed' sample result above 30 µg/L

The facility is expected to work in conjunction with the local Medical Officer of Health to carry out any appropriate site-specific risk assessment activities as directed.

At minimum, at least one sample should be taken from a drinking or food preparation fixture upstream and one sample should be taken from a drinking or food preparation fixture downstream of the location where the initial adverse test sample was taken. If the initial sampling was done at the endpoint of the system then two samples should be taken upstream.

The facility can be considered to be providing water that meets the provincial standard when:

- at least 2 consecutive 'flushed' re-samples taken within a 30 day period (at least 7 days apart) that meet the ODWQS are obtained from every fixture where a preceding sample had exceeded the standard, and
- all directions of the local Medical Officer of Health have been carried out.

When adverse test results can not be 'cleared' the facility should:

- continue to carry out the directions of the local Medical Officer of Health,
- complete a school plumbing profile (applicable to other facility types) to identify any problem plumbing fixtures / lines, and
- develop a longer-term remediation / action plan under the advice of the local MOH, school board, private school or Day Nursery that can be presented to an MOE officer upon request or inspection.