



# Mitigation Strategies

for Lead Found in  
School Drinking Water



**Guidance Document for Mitigating Lead in Schools**



# New Guidance

*Pursuant to the Illinois Plumbing Licensing Law (225 ICLS 320/35.5), the Illinois Department of Public Health (IDPH) is required to provide guidance to schools concerning mitigation of hazards discovered by testing for lead in water.*

*While Section 35.5 does not specifically require mitigation, IDPH is requiring the mitigation strategies and requirements contained in this guidance document to be followed for all plumbing fixtures identified with any level of lead. Mitigation should continue until subsequent testing indicates no lead is present in water.*

*Mitigation strategies depend on many variables and schools may need to implement various and multiple steps to mitigate lead-in-water hazards. This guidance provides the most common mitigations strategies, but is not intended to be all inclusive.*

# WQMP

Water Quality Management Plan

## Steps to an Effective Water Quality Management Plan

Regardless of lead or any other potential plumbing issues within your facility, developing an effective Water Quality Management Plan (WQMP) is essential to ensuring that safe, potable drinking water is maintained at all times.

In many cases, the internal plumbing system in schools and other large facilities is extensive, often containing hundreds, if not thousands of feet of pipe. If left unused for extended periods of time (2-3 days), the water in this pipe can become stagnant and develop internal water quality issues such as high lead concentrations and harmful bacterial growth.

An effective WQMP can help mitigate the potential for these negative water quality issues.

The steps outlined in this section are not intended to be all inclusive, since every facility and administration is different, each with their own set of individual circumstances. However, it should help you understand the general concepts of a WQMP and how you can develop your unique team to address potential water quality conditions within your facility.

### Step 1

#### Select Your Team

Your team could include:

- Administrators and Faculty
- Facilities and Maintenance Staff
- Parents
- Students
- Water Suppliers

These individuals will be key to implementing whatever program you develop.

### Step 2

#### Understand Your Facility Layout

- Obtain building plans.
- Know where your drinking fountains and food service water fixtures are located.

- In general terms, familiarize yourself with the layout of your plumbing system. Look for long pipe runs with fixtures that may be used infrequently, even when the building is occupied.



### Step 3

#### Understand Your Facility Schedule

Although this step will be intuitive for facility staff, you should familiarize your team with the schedule of the facility. Questions to ask include:

- When is the facility closed for more than just one day?
  - Weekends, holidays, extended spring or summer break periods.

- Are there any particular areas of the building that are unused even when the rest of the facility is operational? These may include:
  - Gymnasiums
  - Churches or rectories
  - Childcare areas
  - Particular classroom areas or wings of the building.

## Step 4

### Develop Your Plan

The principal goal of your plan will be to flush an adequate amount of water through your plumbing system in order to maintain fresh (safe) drinking water at all times, in all areas of your facility. In addition, you want to do this without unnecessarily wasting water.

Flushing is the easiest method whereby fresh water may be delivered from the water main. Because lead concentrations increase the longer the water is in contact with pipes or plumbing fixtures containing lead, reducing the water age (how long water sits in the pipe) will reduce the levels of lead in water.

*Note: IDPH suggests the following program guidelines be considered as minimum steps:*

1. *Locate the fixtures farthest from the entry point of the water service to the building and flush them for 10 minutes each morning.*
2. *Open all fixtures used for cooking and drinking and run until you feel the water temperature get colder.*

*Additional information on flushing and other remedies is available in the U.S. Environmental Protection Agency's [3Ts for Reducing Lead in Drinking Water In Schools Technical Guidance](#).*

Schools can request help from their supplier in identifying potential lead hazards and developing mitigation strategies. The water supplier can also educate the school on topics like corrosion control and water age.

Schools on well water or non-community water systems, can request help from the Illinois Section American Water Works Association (AWWA) or the Illinois Rural Water Association.

Your plan may likely include some if not all of these actions:

**Mechanical Flushing** requires the installation of devices such as valves or other similar equipment on the ends of long pipes that can be set to automatically flush at pre-determined intervals.

Licensed plumbers and engineers can help determine the type of device that should be installed and where to install the device.

**Manual Flushing** will likely require a variety of individuals to implement.

**Faculty** - Faculty members may be able to flush fixtures (sinks, drinking fountains, etc.) if they are nearby or in their classroom or work area.

**Parents** - Parent volunteers may be helpful in flushing fixtures in general areas or in organizing student volunteers to help with that job.

**Students** - Faculty and school administrators often are interested in providing students with additional responsibilities outside the classroom. Utilizing students to assist in the implementation of your WQMP can help teach them responsibility and better understand the importance of safe drinking water.

- **Develop a Student Water Patrol**

Select a handful of students whom you believe are deserving of responsibility.

If you have a public water utility, engage those professionals to explain the importance of safe drinking water and how the students can help protect their classmates by participating in a Student Water Patrol.

## Step 5 Implement Your Plan

### Remove the problem fixture(s) from service

Immediately upon learning that a fixture has tested positive for lead, it should be removed from service. *Install signs, remove handles or bag the device to prevent use until it can be addressed.*



Once the fixture has been addressed, validation testing is required and should be conducted in the same manner in which the initial testing was performed.

### Persistent Problem Fixtures

- For sources of water that are not corrected by the steps outlined previously, infrastructure mitigation strategies may be required.
- Source investigation involves sequential sampling of the problem fixture to determine the relative location of the source of lead. Sequential sampling consists of a series of samples taken at defined time intervals from a single fixture.
- A plumbing survey, including a determination of installed plumbing materials, fixtures and length of pipes, should be developed to identify known and possible sources.
- Permanent removal of fixtures and branch plumbing should only be undertaken with the advice of a professional engineer or licensed plumber. Identified sources of lead, such as lead pipes, leaded plumbing fixtures and lead solder, should be replaced by a registered plumbing contractor with materials that do not contain lead.
- Automatic flushing valves, installed by a licensed plumber, may be implemented to ensure adequate flushing of piping systems.





Working Together ... Administration, Faculty, Students, Parents  
and Water Professionals we can...

**GET THE LEAD OUT !**

\* Illinois Section AWWA email: [jdillon@isawwa.org](mailto:jdillon@isawwa.org)

\* Illinois Rural Water Association email: [ilrwa@ilrwa.org](mailto:ilrwa@ilrwa.org)

*Questions regarding lead in schools should be directed to the:  
**Illinois Department of Public Health  
Plumbing and Water Quality Program***

*Email: [dph.leadh2o@illinois.gov](mailto:dph.leadh2o@illinois.gov)*