1.0 Purpose & Scope

GSA complies with applicable federal, state, county, and city drinking water regulations. It is GSA’s policy to ensure that the potential lead concentration in drinking water is less than 15 parts per billion, as prescribed in drinking water regulations. GSA minimizes lead-in-drinking water exposures to building occupants through testing of water systems and by not using lead containing materials in renovation and new building projects.

2.0 Activities & Departments Affected

The Regional Lead Program (RLP) is developed and implemented by the Regional Industrial Hygienist (RIH) and Regional Safety Officer.

3.0 Exclusions

No buildings are excluded.

4.0 Forms Used & Permits Required: (include reporting requirements)

- **Federal and State Forms and Permits**: No forms are required.

- **In-house GSA Region 8 and Contractor Forms**: No forms are required.

5.0 Acronyms, Abbreviations and Definitions

<table>
<thead>
<tr>
<th>Acronyms</th>
<th>Meaning</th>
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<tbody>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
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<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
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<tr>
<td>MCL</td>
<td>Maximum Contaminant Level</td>
</tr>
<tr>
<td>NPDWRs</td>
<td>National Primary Drinking Water Regulations</td>
</tr>
<tr>
<td>OSHA</td>
<td>Occupational Safety and Health Administration</td>
</tr>
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<td>RIH</td>
<td>Regional Industrial Hygienist</td>
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<tr>
<td>RLP</td>
<td>Regional Lead Program</td>
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<tr>
<td>SDWA</td>
<td>Safe Drinking Water Act of 1974</td>
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Definitions:

- **Action Level**: The concentration of lead or copper in water specified in 40 CFR 141.80(c) which determines treatment requirements.

- **Maximum Contaminant Level**: The maximum permissible level of a contaminant in water which is delivered to any user of a public water system.

- **Public Water System**: A system for the provision to the public of water for human consumption through pipes or, after August 5, 1988, other constructed conveyances, if such system has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year.

6.0 Procedure

State Specific Procedures & Requirements [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]:

The Region 8 states have adopted the EPA water contaminant levels by reference so there are no major differences. GSA will follow the EPA contaminant levels.

Standardized Procedure:

6.1 Buildings will be assessed to determine if water meets acceptable regulatory requirements. Sampling procedures will be conducted as per 40 CFR 141.23(k)(1). Lead-in-water assessments shall be accomplished of all drinking/cooking water outlets every 5 years in GSA owned buildings and every 3 years in child care centers. Additionally, a tenant can request testing by contacting the Property Manager or seek their own agent to test directly. If requesting testing of the Property Manager, the Property Manager forwards the testing request to the Industrial Hygienist (IH) who then can accept or reject the request.

6.2 All water samples will be tested by a laboratory certified by the Environmental Protection Agency (EPA). The IH will work with the Property Manager or Contractor to obtain a qualified sampler when testing is needed, as well as discuss proper water sampling procedures, documentation, and shipping requirements. The Property Manager or Contractor will collect water samples.

6.2.2 Sample locations shall be chosen in a non-random fashion.

6.3 The IH prepares a report summarizing the lead testing results and forwards it to the Property Manager.

6.3 Buildings with sampling results at or above regulatory requirements will be prioritized for repair or replacement schedules by the IH and Property Manager.

7.0 Records Management

Lead-In-Water Building Assessment
Lead-In-Water Sampling Report

8.0 References
- 40 CFR 141, National Primary Drinking Water Regulations
- 40 CFR 142, National Primary Drinking Water Regulations Implementation

9.0 Appendices

Attachment A: Drinking Water Lead Testing Flowchart

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<th>Approved &amp; Dated:</th>
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<td>RJM July 6, 2012</td>
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<td>Nature of Revision</td>
</tr>
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<td>03/16/2006</td>
<td>Original Release</td>
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<tr>
<td>01/29/2010</td>
<td>Add ISO 14001 Document Controls, add state regulations, add Flowchart (by Erik Petrovskis).</td>
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<tr>
<td>03/11/2010</td>
<td>Update Procedure, assess Region 8 requirements</td>
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<tr>
<td>05/16/2012</td>
<td>Emphasize Roles and Responsibilities in section 6, update flowchart</td>
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Scheduled Test

**Industrial Hygienist (IH):** Arrange with Contracting to obtain a qualified sampler

Sample GSA buildings every 5 years and Child Care Centers every 3 years

**Property Manager or Contractor:** Procure lab and any special requirements

**Regional IH and Property Manager:** Choose non-random sampling locations

**Property Manager or Contractor:** Collect water samples

**Regional IH:** Forward lab results to Property Manager

**YES**

Measurements above acceptable levels

**Property Manager:** Schedule repair

**NO**

Done

Requested Test

**Tenant:** Request testing and forwards requests to the Property Manager

**OR Tenant (Agency):** May contract for testing directly

**Property Manager:** Forward request to Regional Industrial Hygienist (IH)

**Regional IH:** Approves/disapproves request

**YES**

Measurements above acceptable levels

**Property Manager:** Schedule repair

**NO**

Done

Responsible Parties:
- Contracting Officer’s Representative (COR)
- Contractor (i.e., O&M)
- Industrial Hygienist (IH)
- Property Manager
- Tenant

Rev. 03/20/2012