

FY20-21 Grant Program

LEAD TESTING IN SCHOOL AND CHILD CARE PROGRAM

Safe Drinking Water Act, Section 1464(d) – DRINKING WATER GRANT

WORK PLAN FOR THE STATE OF WYOMING

Summary statement

The State of Wyoming, through the Wyoming Department of Environmental Quality (WDEQ), is committed to taking action to address lead in drinking water in schools and child care facilities. The WDEQ's goal is to identify and reduce any elevated lead levels with available resources.

In February 2019, Wyoming Governor Mark Gordon submitted a Notice of Intent to Participate to the U.S. Environmental Protection Agency, Region 8 (EPA R8) indicating Wyoming's intentions to receive grant funding appropriated through Section 1464(d) of the Safe Drinking Water Act (as amended by the Water Infrastructure Improvement for the Nation Act (WIIN) section 2107). Wyoming intends to prioritize these resources to create the highest potential of having the greatest impact. Funds will be prioritized to school and child care facilities in underserved and low-income communities, older facilities (pre-1988) and will also be directed towards facilities serving younger children (those age six and under).

In accordance with the directives of the funding, Wyoming will adhere to EPA's *3T's for Reducing Lead in Drinking Water* guidance procedures. This will allow Wyoming to:

- ☐ **Train:** Communicate the risks of lead in drinking water on our younger and more vulnerable populations and the need for testing. A work group has been established, comprised of school officials, water-testing entities, health professionals and others. This work group will assist the WDEQ in identifying priorities for implementation and communication of the program.
- ☐ **Test:** A prioritization system is established, which will assist the WDEQ in identifying facilities with a higher probability of being at risk for lead contamination or with populations that have higher likelihood of being impacted by lead contamination in drinking water. EPA certified laboratories have been identified to which samples will be sent for testing.
- ☐ **Take action:** Chains of communication and other appropriate protocols have been established which will assist in the event any lead level exceedances are identified. The WDEQ work with entities to identify funding or available programs to assist with remediation, but it is important to understand that there is no dedicated funding source available for remediation in the event of exceedances of the action level.
- ☐ **Communication:** The WDEQ has developed a communication chain of command to ensure all stakeholders stay apprised of funding availability, facilities selected for testing, test results and any remedial actions, as necessary. Additionally, local entities which receive funding will have primary responsibility to communicate with local stakeholders.

SCOPE OF WORK

This section is a discussion of the State of Wyoming's plan to develop and implement the lead testing program in schools and child care facilities. It outlines how this program meets the goals as they relate to reducing exposure risks to children from lead in drinking water at their educational facilities.

The scope of work contained in this project description includes the following categories and information:

1. STATE GOALS AND PRIORITIES
2. PROGRAM IMPLEMENTATION AND ACTIVITIES
3. ROLES AND RESPONSIBILITIES
4. TIMELINES AND MILESTONES
5. WIIN PROGRAMMATIC PRIORITIES AND EPA'S STRATEGIC PLAN LINKAGE
6. ANTICIPATED OUTCOMES/OUTPUTS
7. BUDGET NARRATIVE

1. STATE GOALS AND PRIORITIES

The State of Wyoming has 93,029 students enrolled at 347 public schools across our 48 school districts. There are 649 child care facilities licensed through the Wyoming Department of Family Services, facilities which have a capacity to hold 20,564 children. Wyoming has established goals and will prioritize funding consistent with the objectives developed by EPA and outlined in EPA's State Lead Testing in School and Child Care Program Drinking Water Grant Implementation Document (www.epa.gov/safewater/grants).

The State of Wyoming will assist in voluntary testing for lead contamination in drinking water at school and child care facilities that are in low-income areas. Wyoming intends to hire a third-party contractor to coordinate implementation of this program.

Facilities will be selected based upon the affordability criteria established by the State under SDWA section 1452(d)(3). This includes facilities in which at least 50% of the students receive free or reduced lunch and Head Start facilities. Wyoming will additionally prioritize funding to:

- I. Elementary and child care programs that primarily care for children age six and under;
- II. Older facilities that are more likely to contain lead plumbing; schools and child care facilities built before 1988; and
- III. Established and sustainable child care programs with factors indicating the facility may be serving children into the future.

It is the WDEQ's goal to reduce lead exposure at these facilities to the extent possible given available resources. This will be accomplished through testing for lead, identifying potential lead sources and taking action. Using the priorities listed above, this testing effort includes the goals of:

- I. Testing water outlets used for consumption at 22 school and child care facilities in low-income areas by the end of the project period;
- II. Testing water outlets used for consumption at 22 school and child care facilities with children age six and under.
- III. Testing water outlets used for consumption at 11 facilities may fit into the previous two categories, or may be another school or child care facility eligible through this program.
- IV. There will be a total of 55 school and child care facilities tested, with the former priorities mentioned and additional attention directed towards older facilities.
- V. Providing education about lead and the importance of testing to all 48 school districts. The WDEQ will develop informational material, and will work with facilities in providing additional information to local stakeholders, as necessary and requested.

The basis for Wyoming's goals are estimations on the average number of drinking water sources that will need to be tested at school and child care facilities, as well as the average cost to collect and test water samples. For Wyoming, it is projected that each school and child care facility will have, on average, 25 drinking water sources needing testing. The actual number varies widely, as the largest school in Wyoming hosts about 1,800 students and will have a higher number of possible drinking water sources. On the other end of the spectrum, some child care facilities will only host a few individuals and may only have a few drinking water sources necessary to be tested.

Test cost estimates were provided by the Wyoming Department of Agriculture's Analytical Services Laboratory, which provided an estimate of \$40.00 per test. With minor additional costs of hiring a third-party contractor, WDEQ estimates it will cost \$2,310 total to test drinking water sources in each facility.

WDEQ has estimated that, of the \$128,000 total grant funding appropriation through this program in FY20 and FY21, \$128,000 will be available for direct sample and testing of water for lead contamination utilizing the services of a third-party contractor. This will allow testing at a total of 55 school or child care facilities. Of the 55 total, Wyoming will strive to test for lead in 22 schools or child care facilities which serve children age six years and under. Additionally, of the total 55 facilities, Wyoming will strive to test for lead contamination in drinking water at 22 facilities located in low-income areas.

These numbers may shift, based on the funding prioritization listed above, once letters of interest are received from facilities across the state and WDEQ has the ability to analyze the priority factors within each facility interested in this opportunity.

2. PROGRAM IMPLEMENTATION AND ACTIVITIES

WDEQ will utilize the EPA's 3T's guidance (www.epa.gov/safewater/3ts) to implement this program. This includes:

- I. Training – WDEQ will ensure that the hired third-party contractor will have the capability to train select facility staff for sample collection. These qualifications will be

detailed in responses receive through the RFP. The WDEQ still intends to participate in facility selection based on approved priorities and risk communication at the community level, as appropriate.

- II. Testing – The WDEQ will ensure the hired third-party entity will be qualified to develop sample plans for facilities, deliver testing equipment, select EPA-certified laboratories to conduct the testing and deliver results to the facility.
- III. Taking action – The WDEQ will ensure third-party entities respond with their level of capacity to offer assistance to facilities for necessary remedial action, pending sample results. Additionally, the WDEQ intends to be involved with local communities on risk communication and identification of remedial activities.
- IV. Communication - The WDEQ and the select facilities will be responsible to communicating this program and any necessary action required at facilities. Adhering to the EPA’s 3Ts Program, selected facilities will still be required to develop “local teams” who will be primarily responsible for communicating to local interested stakeholders, including but not limited to parents and teachers. The WDEQ intends to supplement these communications, offer advice to local teams and identify remedial options, as appropriate.

3. ROLES AND RESPONSIBILITIES

Listed below are the assigned roles and responsibilities.

Topic	Contact
3T's Program state contact: This person will act as the point of contact for WDEQ's 3T's Program and help coordinate the communication efforts, with assistance of a contractor. This individual will also administer the program, the budget, ensure the EPA has all information it needs, as well as disseminating information to interested stakeholders, eligible entities and affected communities.	WDEQ Colin McKee Senior Policy Advisor 200 W. 17th St., Cheyenne, WY 82002 wyodeq@wyo.gov (307) 777-7937
Public communications team: Communicate testing plans, results and remediation efforts to the public. Develop educational material for distribution. Assist with disseminating information on WDEQ’s website and social media accounts.	-Staff, WDEQ and contractor -Additionally, School district boards, school administrators and other school and/or child care facilities will conduct communications appropriate with actions occurring at their facilities and in accordance with EPA’s 3T’s guidance to ensure local stakeholder stay apprised.

Website and social media contact: This person will make sure website and social media are up to date and offer information on lead contamination, which facilities were tested, the results of those tests, and necessary remediation efforts.	-Staff, WDEQ - deq.wyoming.gov -Individuals should contact their local education facility for information specific to their testing.
Partner liaison contact: The WDEQ individual will coordinate with certified laboratories and groups established by local entities receiving funding. Local entities receiving funding will establish a work team (members discussed above) and will coordinate necessary information to interest groups, school boards and other partners supporting the 3T's Program to schedule activities and maintain communications.	-WDEQ - Senior Policy Advisor. The hired contractor will work directly with labs with regard to testing. -Individuals school districts and facilities will identify necessary staff to manage these responsibilities.
Sampling plan and execution contact: This person leads the effort to develop a sampling plan for each school to be sampled. They will engage other program points of contact and external resources and partners, as appropriate.	Hired contractor will oversee these efforts.
Remediation activities contact: This person will lead the remediation efforts, if necessary, and engage with other program points of contact and other external partners. WDEQ has developed a remediation document which highlights Module 6 within the EPA's 3T guidance relating to remediation actions based upon lead levels. Additionally, the EPA's 2006 document detailing various funding sources (with acknowledgement to the EPA's effort to update) has been identified.	This Program's funding is limited to testing for lead contamination. No funding has been appropriated for remedial efforts. EPA's 3T's guidance provides options for remediation of elevated lead levels identified. It will be incumbent upon the local official with decision-making authority (school board, district, etc.) to determine necessary remedial actions.
Recordkeeping contact: Ensure a central repository is created to house all 3T's Program documents within the WDEQ. Lead effort to create, maintain and update documentation with the team.	Local facility recipients will be required to develop any records pertinent to their individual sampling obligations. The WDEQ Senior Policy Advisor will be responsible for being the main repository for that developed information. Additionally, each facility sampled will be required to publicly post the results of their testing through distribution to interested and affected stakeholders. Records will also be kept in a publically available

	location at each facility, the appropriate location to be determined by the facility.
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4. TIMELINE AND MILESTONES

Below is a scheduled timeline for this program, including milestones for specific tasks. Fiscal year (FY) is based on the State of Wyoming’s fiscal year, which starts on July 1 and ends June 30.

FY20 – Q2 through duration of funding availability: Wyoming received funding during the FY19 appropriation cycle for this grant. Therefore, Wyoming is already in the process of developing the foundation for this program. Once the contract is sign with the third-party, WDEQ will issue a notice to all schools and childcare facilities of the availability of testing through the program. Upon receipt of interest from facilities, WDEQ will prioritize the facilities based upon the prioritization list provided in Section 1. Please reference the final scope of work developed between WDEQ and its third-party contractor for additional details on program implementation.

The new appropriations will be used for sample collection and analysis, which will be implemented by a hired third-party contractor. DEQ will expend the funds to attempt testing in the number of facilities listed above in the most efficient manner possible.

Additional information will be provided by EPA in the Terms and Conditions for project completion. The project objectives and milestones will align with the terms and conditions as required by the Agency.

5. WIIN PROGRAMMATIC PRIORITIES AND EPA’S STRATEGIC PLAN

The objective of the program is to: 1) reduce children’s exposure to lead in drinking water at these facilities; 2) help target funding toward school and child care facilities unable to pay for such testing; 3) utilize the 3T’s model to establish best practices for a lead in drinking water prevention program; 4) foster sustainable partnerships at the state and local level to allow for more efficient use of existing resources and exchange of information among experts in various educational and health sectors; and 5) enhance community, parent and teacher cooperation and trust.

The activities described in this work plan support the WIIN Programmatic Priorities and EPA’s FY2018-22 Strategic Plan, Goal 1, “Core Mission: Deliver real results to provide Americans with clean air, land, and water, and ensure chemical safety,” Objective 1.2, “Provide for Clean and Safe Drinking Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities.”

6. ANTICIPATED OUTCOMES/OUTPUTS

Outcomes and outputs expected to be achieved through this work plan and funding availability are described below.

Outcomes

- 1) Schools or child care programs unable to pay for testing, implementing a program and mitigating lead exposure by utilizing the 3T's guidance in determining best action to take for remediation;
- 2) The reduction of children's exposure to lead in drinking water;
- 3) Improvement of staff and community knowledge on lead in drinking water and other environmental harms;
- 4) Water quality improvement and lead exposure reduction in drinking water; and
- 5) Establishment of routine practices such as those outlined in the 3T's guidance.

Other outcomes include

- 1) Fostering sustainable partnerships at the state and local level to allow for a more efficient use of resources and the exchange of information among experts in the various areas of school, child care, utility, environmental and health sectors; and
- 2) The enhancement of community, parent and teacher trust.

Outputs

- 1) Use the EPA's 3T's for Reducing Lead in Drinking Water guidance to implement the state program;
- 2) Development of a state lead testing in drinking water in schools and child care facilities management strategy that supports a robust training, monitoring and maintenance plan that protects children from lead exposure now and in the future;
- 3) Prioritization of testing to target vulnerable communities and populations;
- 4) Providing results of any voluntary testing for lead contamination in school and child care facility drinking water carried out using grant funds and notifying parents, teachers and organizations of the availability of the results;
- 5) Developing a regular lead testing program under this initiative when funds are available; and
- 6) Establishment of routine practices such as those outlines in the 3T's guidance as funds are available.

7. BUDGET NARRATIVE

The primary goal of this grant funding and program is to test for lead in drinking water at school and child care facilities. With available funding and limited capacity within WDEQ, WDEQ intends to utilize all of the funding for contractual services and hire a third-party entity to administer this program. This will provide a higher level of confidence in program accuracy and

WDEQ expects a third-party will have capacity and experience to lend towards this program, which will be an asset.

FY2020 total grant appropriation	Total \$64,000
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FY2021 total grant appropriation	Total \$64,000
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Contractual services	Total \$128,000
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WDEQ intends to utilize a third-party entity to administer this program. Entities exist which can handle all aspects, including establishing a platform through which sampling plans are developed, delivering necessary supplies and equipment for sample collection, delivery of samples to an EPA-certified testing laboratory, delivery of sample results to facilitates and assistance with remediation options post-testing, as necessary. The WDEQ still anticipates average cost of a sample to be \$40, but understands there are other costs associated with testing, in addition to analysis.