

# CHILD CARE SANITATION: Overview, History, & Things To Come

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N.C. Department of Health & Human Services  
Division of Public Health  
Environmental Health Section

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## AGENDA

- North Carolina (State & Local) Program Organization
- History
- Rule .2816 Amendment
- EPA 3Ts Methodology



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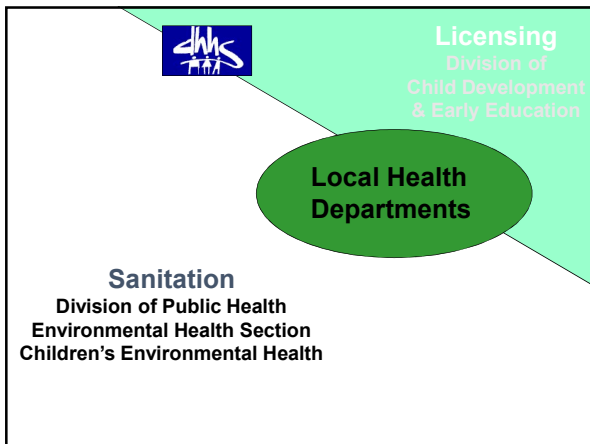
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## Children's Environmental Health (Regional Staff):

- **Kimly Blount (Rocky Mount), Field Supervisor**
  - David Brown (Durham)
  - Alan Huneycutt (Cornellius)
  - Brenda Bass (Mt. Olive)
  - Donna Gilbird (Elizabeth City)
  - Robert Hunt (Elm City)
  - Robert Pearsall (Hampstead)
  - Tonya Zimmerman (Salisbury)
  - Carissa Moore (Black Mountain)
  - Barrette Gregory (Wilkesboro)

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## Local Health Departments: Child Care Sanitation

- **Separate Authorization**
- **Inspection each 6 months**
- **Limited enforcement capacity**



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## History

- **Health-based Rules since 1991**
- **Program Reorganization in 1996**
- **Child Care Law Amended in 1997**
- **Comprehensive Administrative Rule Amendments 2006/2007**
- **Rule .2816 Amendment 2019**

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Administrative Rules  
18A NCAC 15A .2800

Definitions	Kitchen Specifications
Plan Review	Cleaning/Sanitizing
Handwashing	Equipment Storage
Food Supplies	Water Supply
Food Storage/Protection	Lead Poisoning Hazards
Food Preparation	Toilets
Food Service	Lavatories
Food Service Equipment	Diaper Changing

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Administrative Rules (cont.)

Storage	Communicable Diseases
Beds/Cots/Mats/Linens	Wastewater
Toys/Furniture	Solid Wastes
Personnel	Animals/Vermin Control
Floors	Outdoor Learning Environment
Walls/Ceilings	Swimming Pools
Lighting/Thermal Environment	Compliance/Inspections
Appeals Procedure	Mildly Ill Children

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Rule .2816 Amendment

- Periodic Drinking Water Lead Testing
- Initial Sampling By The Operator/ Analysis By RTI
- Follow-up Sampling By LHD & Regionals/ Analysis By State Lab
- Sample Collection Using EPA 3Ts Method
- Interim Measures, Reporting & Notification
- Gradesheet Demerits

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## What is the 3Ts Guidance?

A tool kit of voluntary guidance documents developed by the EPA for detecting and addressing elevated lead levels in drinking water at schools and child care facilities.



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## The 3Ts Guidance has Three Parts

### Training

Informing staff and developing plans

### Testing

Implementing a sample collection strategy and methods and how to use the results.

### Telling

Communicating the findings to the public.

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## Training

- Health effects of lead
- Sources of lead and how it gets into drinking water
- Assigning roles – responsible staff members
- Establishing partnerships (e.g., laboratories)
- Asking utility provider about lead service lines

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## Testing

Test all outlets used for drinking or cooking.



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- Take a 250 mL first draw sample at all taps used for drinking and cooking. Collect immediately after opening the faucet or valve.
- All samples should be collected before the facility opens and before the fixtures have been used.

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## Sampling requirements

8 to 72 hour stagnation period before sampling

If initial sample exceeds action level, follow-up flush testing is required to help determine the source of lead and remediation strategy.

250 mL samples for EPA 3Ts method vs. 1 L samples for Lead & Copper Rule



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### Follow-up Flush Sampling

Actions to take if the initial first draw sample meets or exceeds the action level of 15 ppb (soon to be 10 ppb as of December 1):

Restrict access to the problem outlet.

Provide safe alternative water.

Authorized State or County Agent collects first draw and 30-second flush samples.

The flush sample helps assess nearby interior plumbing.

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### Remediation

Appropriate strategy depends on system details and sampling results. Some methods include:

- Flushing (single outlet or whole system)
- Replacing fixtures or components
- Point-of-use filtration
- Reconfiguring plumbing to avoid lead sources
- Replacing lead service lines
- Shut off problem outlets
- Bottled water

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### Develop a communication plan

To support engagement with the community and build trust, it is important for operators to begin communication before testing starts and be open and transparent throughout. Operators should take the initiative to communicate with their community.

- Make sure information is honest, accurate, and comprehensive.
- Speak with one consistent voice.
- Anticipate questions and concerns and address them proactively.
- Be positive and forthcoming.
- Keep audiences up-to-date as new information becomes available.

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## Maintain Records

Maintain a record of correspondence and communication activities. Good recordkeeping can prove to be helpful in illustrating what steps you have taken to notify the public of testing efforts and results.

<https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit>

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## Questions?



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