

**DOCKETED**

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## **Lead testing requirements**

The AB 841 legislative language didn't include anything about testing the plumbing piping for lead, As a result, we do not plan to include this scope and corresponding costs in our draft application.

Also, it is difficult to derive what is actually being required by language. Typically fixtures, soldered and valves contain lead, but old water pipes are constructed of galvanized piping, not lead pipes.

Will this requirement be removed since no funding is going to be awarded for capital replacements?

The section referring to has been included as the attached file.

*Additional submitted attachment is included below.*

The AB 841 legislative language didn't include anything about testing the plumbing piping for lead. As a result, we've not included this scope in our draft application shared with you. Is this a requirement, or will it be removed since no funding is going to be awarded for capital replacements?

The section I'm referring to is provided below.

### **C. Documentation of Completed Work**

Upon completion of all work funded by a SNPFA grant, the applicant must document noncompliant fixture and appliance replacement at each school included in the grant. The documentation of completed work must include all the following information:

1. Name and address of school facility and person or contractor preparing and certifying information.
2. Description of initial fixture and appliance documentation.
3. Verification that the applicant has replaced all plumbing fixtures and appliances not meeting the requirements as specified in Section 1630 of the PUC. These include the minimum water efficiencies for fixtures and minimum ENERGY STAR ratings for appliances.
4. The new water use efficiencies for each of the replaced fixtures and appliances.
5. Testing for the presence of lead plumbing pipes. These tests will be in accordance with industry standards and will be utilized to determine if these schools have lead pipes on their premises.
6. Verification that all work has been performed by qualified personnel, including the provision of the contractor's name and license, and verification that all construction work has been performed by a skilled and trained workforce.

The Respective ENERGY STAR databases can be found at the following locations:

- a. ENERGY STAR Requirements for Dishwashers:
  - i. [Energy Star Commercial Dishwasher Requirement 1.1](#)
- b. Energy Star Requirements for Commercial Ice Makers:
  - i. [Energy Star Requirements for Automatic Commercial Ice Makers 1.0](#)
- c. Energy Star Requirements for Commercial Clothes Washers:
  - i. [Energy Star Requirement for Commercial Clothes Washers Version 5.0](#)