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**Finding Building Water Quality Challenges in a 7-Year Old Green School: Implications for Building Design, Sampling, and Remediation**

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**Water Impact Statement**

Safe water is vital to child development and children spend much of their early life at schools. School building water systems can contribute to high concentrations of chemicals and microbiological contaminants that can endanger children's health. Actions needed to understand how system design and operation affect water quality in a large building are lacking.

1 **Finding Building Water Quality Challenges in a 7-Year Old Green School: Implications for**  
2 **Building Design, Sampling, and Remediation**

3

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24

**25 Abstract**

26 Water safety was investigated at a school certified as a green building. The study was  
27 conducted during low water use (summer break) to normal water use (after break) periods. The  
28 copper plumbed building contained water saving devices, a water softener, four hot water  
29 recirculation zones, and received chloraminated water from a public water system. Six sampling  
30 events at 19 in-building locations (and extra 19 locations for metal analysis) were conducted  
31 (June 2018 to October 2018). At the building entry point, 65% of the samples (n=74/114) had no  
32 detectable disinfectant residual, heterotrophic plate count ranged from 11 to 400 CFU/100 mL,  
33 and no copper action level (AL) exceedances were found; the AL is a health-based threshold.  
34 Inside the building, almost 70% of first draw cold samples exceeded the AL during summer,  
35 while 37% of samples exceeded the AL after classes resumed. Total copper concentration in  
36 the building was related to the distance from the building entry point. The softener was an  
37 incubator for bacterial growth and nitrification was detected throughout the plumbing (n=29/29  
38 for hot, n=17/22 for cold). The state's recommended spot flushing remediation strategy for  
39 reducing copper concentration was ineffective. Water chemical and microbiological testing is  
40 recommended before new schools are placed into service and during the life of new and  
41 existing buildings. Building water system design standards lack explicit consideration of source  
42 water quality, plumbing operation, and material-water compatibility. School plumbing was  
43 designed and operated in a way that presented a risk to the health of its occupants.

44

## 45 1. Introduction

46 Safe water is vital to child development, as children have less sanitary habits and their  
47 immune systems are still in the developmental stage.<sup>1</sup> The U.S. Centers for Disease Control  
48 and Prevention (CDC) specifically emphasizes the importance of school drinking water safety.<sup>2</sup>  
49 While the American Academy of Pediatrics indicates there is no safe level of lead exposure for  
50 children,<sup>3</sup> school building water can be contaminated by lead, copper, and opportunistic  
51 pathogens.<sup>4-6</sup> Schools that are considered a public water system must comply with the *Lead and*  
52 *Copper Rule*. But, if these facilities receive water from a public water system they have no  
53 specific federal water testing and safety requirements.<sup>7</sup> In early 2019, the U.S. Environmental  
54 Protection Agency (USEPA) estimated that about 98,000 public schools were not regulated  
55 under the Safe Drinking Water Act,<sup>8</sup> meaning that these facilities may or may not conduct any  
56 water quality testing.

57 Copper piping is one of the most common materials for domestic cold and hot water  
58 transport, and copper contaminated drinking water can pose health (nausea and vomiting) and  
59 aesthetic problems (blue water).<sup>9</sup> The *Lead and Copper Rule* stipulates that the public water  
60 system must undertake a number of additional actions to control corrosion if more than 10% of  
61 the homes sampled in their service area exceed the health-based copper action level (AL) of 1.3  
62 mg/L.<sup>10</sup> However, there is no federal requirement for a school, that receives water from a public  
63 water system, to have their in-building drinking water tested.

64 A literature review revealed that few school water testing studies have been conducted  
65 and some states have required school water testing in recent years. For example, in  
66 Massachusetts, more than 1,994 schools and childcare centers were tested and copper action  
67 level exceedances were found (n=2,302/84,153 samples collected were at or above 1.3 mg/L,  
68 with a maximum of 53.2 mg/L at a classroom faucet, and 39.8 mg/L at a drinking water  
69 bubbler).<sup>11</sup> Several studies have previously reported school drinking water copper levels in the  
70 U.S. and Canada (maximum of 10.2 mg/L),<sup>12-17</sup> but only one study reported other water quality

71 information such as disinfectant residual levels.<sup>13</sup> In Hamilton County, Indiana, Johnson et al.  
72 (2018)<sup>16</sup> found 187 of 295 schools (63.4%) had a drinking water sample that exceeded the  
73 copper (maximum of 7.3 mg/L), but no other water quality parameter was reported. For the 2018  
74 Indiana study, the sampling location, time of day and day of week the sample was collected,  
75 and other water quality factors were not reported. A 2020 study of copper levels in a new office  
76 building in Arizona indicated copper concentration (maximum of 1.7 mg/L) was significantly  
77 correlated to building occupancy.<sup>17</sup>

78 Little information was found for how to design building water systems that minimize  
79 copper drinking water concentrations, design building water sampling plans, and select  
80 remediation strategies. Current plumbing codes do not recommend chemical water testing when  
81 buildings are opened, nor is the type of source water mentioned in building water system  
82 design.<sup>18,19</sup> Copper release can be influenced by stagnation time,<sup>20,21</sup> water pH, alkalinity,<sup>22,23</sup>  
83 and water temperature.<sup>24</sup> Current USEPA “3Ts” guidance for responding to drinking water lead  
84 exceedances recommends building owners shutoff problem fixtures, conduct a cleaning  
85 program and follow up testing, but lacks recommendations for copper.<sup>25</sup> A few previous studies  
86 in the U.S. and Canada recommended using point-of-use (POU) devices to reduce copper at  
87 problem locations.<sup>12,26,27</sup> Much of the available recommendations emphasize implementing a  
88 flushing procedure, terminating faucets that had issues, and adding corrosion inhibitors. No  
89 guidance was found on determining if the source water is at high risk of copper leaching *before*  
90 building construction. No guidance was found that described how water quality should be  
91 considered in plumbing design, allowable copper pipe lengths, or post-construction copper  
92 testing.

93 Few studies were found that reported chemical and microbiological water quality  
94 characteristics of school building water systems. Chloramine residual disinfectant use is popular  
95 in the U.S.,<sup>28,29</sup> but no studies were found that reported nitrification in school buildings.  
96 Nitrification, the conversion of ammonia to nitrate, can generate a health risk as nitrate has a 10

97 mg/L maximum contaminant level. Nitrification is possible with total chlorine levels lower than  
98 1.6 mg/L as Cl<sub>2</sub>.<sup>30</sup> Doré et al. (2018)<sup>13</sup> found that average disinfectant residual in large  
99 institutional buildings (schools and non-residential buildings) in Canada measured after 10  
100 minutes of flushing ranged 0.073 to 2.13 mg/L as Cl<sub>2</sub> of free chlorine. The minimum  
101 recommended chlorine level in drinking water is 0.2 mg/L as Cl<sub>2</sub>,<sup>31</sup> but 2 of 10 locations did not  
102 reach the minimum disinfectant residual level within 10 minutes. Samples were also not  
103 classified as cold or hot water, but average temperature ranged from 17 to 26 °C after 30  
104 seconds of flushing. Richard et al. (2020)<sup>17</sup> measured copper and chlorine concentration twice  
105 weekly in cold water and found 95% of first and second draw samples had disinfectant residual  
106 less than method detection limit (MDL) of 0.02 mg/L as Cl<sub>2</sub>. The investigators hypothesized that  
107 the water softener ion exchange resin may have affected chlorine residual decay, and further  
108 study was recommended.<sup>17</sup>

109         The goal of the present study was to better understand the degree building water  
110 chemical and microbiological quality changes during the transition from summer break (low  
111 water use) and during several weeks after classes resumed (normal use). The school building  
112 studied was certified in accordance with the U.S. Green Building Council Leadership in Energy  
113 and Environmental Design (LEED) program. Specific research objectives were to (1) document  
114 first draw water quality at 19 different cold and hot water locations, (2) determine the  
115 relationships between water quality and distance from the building entry point for the  
116 parameters examined, and (3) determine if water quality differed between summer break and  
117 after classes resumed.

## 118 **2. Materials and methods**

### 119 *2.1 School campus water use and plumbing characteristics*

120         The school campus was located in Indiana, USA. Chloraminated drinking water was  
121 provided to the campus through a single water meter by a public water system that served more

122 than 800,000 people. Water originated from two different water treatment plants depending on  
123 their overall system demand (75% from a wellfield, 25% from a river). According to the water  
124 supplier, corrosion inhibitor has never been added and they have focused on maintaining  
125 alkalinity and pH levels for corrosion control. After passing through the campus water meter, the  
126 drinking water entered a 20.3 cm (8 in) diameter polyvinylchloride pipe campus loop system,  
127 which circled the building (**Figure 1**) (length 3,481 ft, volume 9,089 gallons). From the service  
128 loop, a dedicated 10.1 cm [4 inch] diameter domestic line branched off the fire line to the utility  
129 room 48.7 m [160 ft] length (530 L [104 gallons]) [ductile iron] service line conveyed water into  
130 to the school building. The 7-year-old building was the focus of this study, but water was also  
131 used for a campus irrigation system, the athletic field house, and concession stands. School  
132 campus water meter records were reviewed, but no records were available specifically for the  
133 school building.

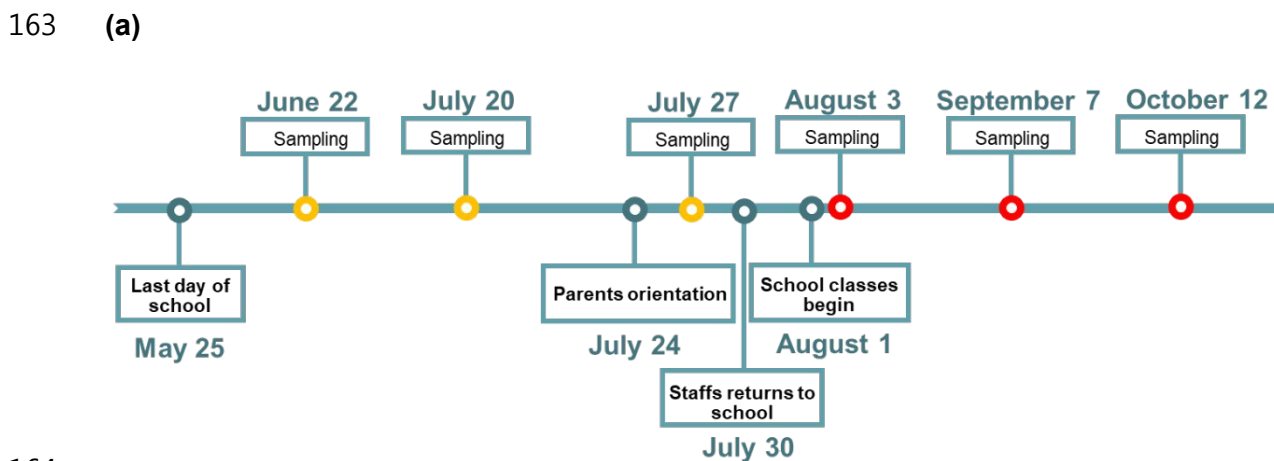
134 A timeline of key events at the school can be found in **Figure 1**. Six sampling events  
135 were conducted inside the building, 3 during the summer break and 3 after the school returned  
136 in session. During summer break some water use occurred in the building (**Figure SI-1**). The  
137 building's north section was used for summer camps, primarily in the auditorium, gym, and  
138 athletic fields. Every weekend, the building's north section was also used for church services,  
139 and each service had a reported capacity of up to 500 people (two church services one in the  
140 morning, one in the afternoon every Sunday all year long). Before our sampling events, the  
141 north section of the building was used the most for the summer camps: up to 250 students were  
142 in sports camps, 50 students in orchestra camps in the music room, and 200 students in a band  
143 camp. During July, one music camp was held for 100 students in the auditorium in the building's  
144 north section before the second sampling event. In contrast, the south section of the building  
145 was the "academic" classroom side. This building section was primarily unused during the  
146 summer. When classes resumed in August 2018, about 830 students staff and faculty began



147 inhabiting the building 5 days a week thereby increasing water use on the south section of the  
148 building.

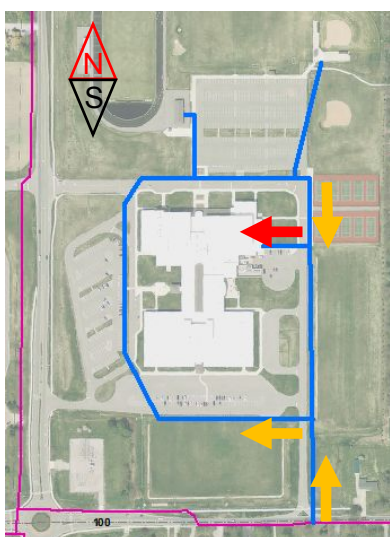
149 All water that entered the school building passed through one of two water softeners  
150 (model # 2900 series 700 duplex, 198 L [7 cubic ft]) manufactured by Aqua Systems, Inc.  
151 (Fishers, IN). Next, water entered one of four water heaters (model # BTH-300, 492 L [130 gal.])  
152 manufactured by A.O. Smith. Hot water exiting each heater entered one of four recirculation  
153 systems. The location of the four hot water recirculation zones can be found in **Figure 1(c)**. All  
154 piping was copper and as-built plumbing drawings were used to estimate the total length of pipe  
155 and volume of water in the plumbing between the water meter and each fixture. Pipe diameters  
156 inside the building varied (cold water pipes = 1.9 to 10.2 cm [0.75 to 4 in], and hot water pipes =  
157 1.27 to 6.35 cm [0.5 to 2.5 in]). The distance from the point-of-entry to the furthest water outlet  
158 was longer than 152 m [500 ft] for both cold and hot. The building contained 363 water outlets:  
159 81 cabinet/classroom sinks, 92 lavatory sinks, 25 drinking water bubblers, 33 showers, 5  
160 mop/service sinks, and 127 toilets in the building. Cold and hot water sampling locations were  
161 sampled throughout the building (**Figure 1, Table 1**).

162

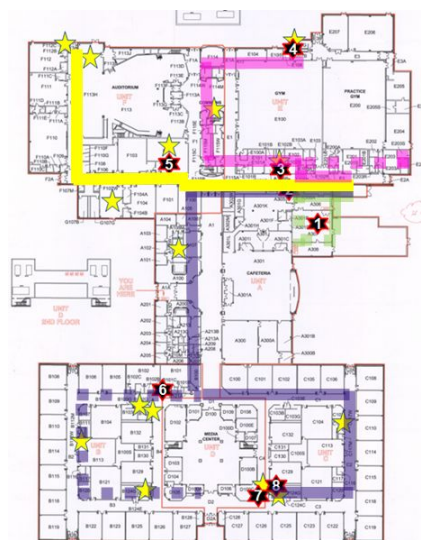


164

165 (b)



(c)



166

167 **Figure 1. (a) Timeline for sampling and major school events, (b) the water service loop at**  
 168 **school campus**, the service line comes off the road to provide water from the south of the  
 169 school and circles the entire school campus. Red arrow is the domestic service line that goes  
 170 into the utility room, (c) Water sampling locations (stars) and four hot water recirculation loops  
 171 (colored lines). Black numbered stars are sampling locations at all 6 visits: #1 utility room (BE,  
 172 AS, BWH, HWRa, HWRb, AWH), #2 closest bathroom (B1C, B1H), #3 student showers (SH1,  
 173 SH2), #4 Farthest bathroom (B2C, B2H), #5 students' kitchen (SKC, SKH), #6 teachers' kitchen  
 174 (TKC, TKH), #7 bathroom south (B3C, B3H), and #8 water bubblers (WF1, WF2). Yellow stars  
 175 are additional locations that were sampled on last visit for metal analysis.

## 176 2.2 Water Sampling Approach

177 Water sampling began between 7:00 am and 7:15 am on Fridays and samples were  
178 collected from 9 hot water and 9 cold water locations for 5 of the 6 events (**Figure 1, Table 1**).  
179 No students were there but a few faculty and staff members had arrived in the building before  
180 sampling. Drinking water was first collected where water entered the building (BE) and the  
181 authors proceeded to sampling locations in the north section (the most used area during  
182 summer break and closer to the entry point) and then moved to the south section (least used  
183 during summer break). No water flowrate was measured, but all the stagnant water samples  
184 were collected at a slow flowrate. Water was constantly flowing while collecting each sample but  
185 closed the tap after collection. Approximately 150 mL of water was collected for immediate  
186 analyses (pH, temperature, dissolved oxygen, total chlorine, free chlorine, free ammonia,  
187 monochloramine). Next, several samples were collected for metals [125 mL HDPE bottles with  
188 0.05 mL acid], metals [125 mL HDPE bottles without acid], total organic carbon (TOC) [250 mL  
189 amber glass], alkalinity [250 mL amber glass], total trihalomethanes (TTHM) [two 20 mL glass  
190 vials], total cell counts (TCC) [two 15 mL falcon tubes], heterotrophic plate count  
191 (HPC)/quantitative polymerase chain reaction (qPCR) [two 1 L HDPE bottles],  
192 nitrification/denitrification [two 15 mL bottles]. Samples were kept in coolers with ice packs,  
193 transported to the laboratory a 1.5 hr drive away and were immediately analyzed. Water was  
194 screened for nitrification and denitrification processes using biological activity reaction test  
195 (BART) kits at all locations in the utility room one shower, and a bathroom sink for cold and hot.  
196 In accordance with the manufacturer's instruction, samples were evaluated for nitrification 5  
197 days after the water was collected, and every day for 4 days for denitrification.<sup>32</sup> A detailed  
198 explanation of chemical and microbiological analysis methods, including equipment, instrument  
199 and method detection limits, can be found in the **SI** section.

200 After the first sampling event, the copper concentration in the building water system  
201 became a significant focus of this study. Initial copper results indicated building-wide copper AL

202 exceedances. The authors then collected additional water samples for metals analysis on  
203 sampling events 2, 5, and 6. These additional water samples (same volume as the routine  
204 samples analyzed for metals) were collected after all the other water samples had been  
205 collected at each location (2.8 L later per sampling location). After finding further copper  
206 exceedances, the school, public water supplier, health department, and state drinking water  
207 primacy agency discussed the issue. Next, the school followed the state primacy agency's  
208 recommendation to flush each fixture where the authors found copper in exceedance of the AL,  
209 not implement a school-wide flushing program. Because of the author's concerns that such an  
210 action would not reduce copper concentration for other locations in the building, the authors  
211 then added an additional 19 new cold water sampling locations for the final sampling event (trip  
212 6 of 6). To mimic the sampling approach used at other faucets the authors had previously tested  
213 during sampling events 1-5, at each new location on event 6 the first 125 mL of cold water was  
214 discarded, then a sample (125 mL) was collected for metals analysis, and then 2.8 L of cold  
215 water was discarded again before another sample (125 mL) for metals analysis was collected.  
216 This extra water sample still represents the stagnant water in different plumbing sections  
217 between fixtures (a lot of cold water pipes would store more than 3.7 L between fixtures). This  
218 approach enabled direct comparison of data collected on sampling event 6 to all other sampling  
219 events.

220 **Table 1. Cold and hot water sampling locations included the building entry point, inside**  
 221 **the utility room, water heaters, recirculation loops, water fountains, and sink faucets.**  
 222 Green shading represents a utility room location, yellow shading represents the north part of the  
 223 building (most used building portion during Summer break), and orange shading indicates the  
 224 south part of the building (least used building portion during Summer break).

225

Regular Routine Sampling Location [Room#]	Acronym	Additional New Sampling Location [Room#]	Acronym
Building entry point sampling tap [utility room]	BE	Shower room right sink faucet [E102B]	SRS
After Softener sampling tap [utility room]	AS	Shower room left sink faucet [E102B]	SLS
Before Water Heater (combined) sampling tap [utility room]	BWH	Bathroom 2 cold right sink faucet [E207J]	B2CR
Hot Water Recirculation Loop-a 120 °F temperature sampling tap [utility room]	HWRa	Bathroom 2 cold left sink faucet [E207J]	B2CL
Hot Water Recirculation Loop-b, 140°F temperature sampling tap [utility room]	HWRb	Student kitchen sink faucet D [F102]	SKD
After Water Heater sampling tap [utility room]	AWH	Student kitchen sink faucet F [F102]	SKF
Bathroom outside utility room cold sink faucet [A306R]	B1C	Faculty kitchen sink faucet [A108]	FK
Bathroom outside utility room hot sink faucet [A306R]	B1H	Art room right sink faucet [F105]	ARRS
Shower head ADA compliant [E102S]	SH1	Auditorium back sink faucet [F113]	ABS
Farthest bathroom cold sink faucet [E207G]	B2C	Water fountain in coral room [F112]	WF3
Farthest bathroom hot sink faucet [E207G]	B2H	Bathroom sink faucet in office [A108M]	B9
Student's kitchen cold sink faucet [F102]	SKC	Drinking water fountain 5 [B103B]	WF5
Student's kitchen hot sink faucet [F102]	SKH	Bathroom 3 left sink faucet [C124B]	B3LS
Teacher's kitchen cold sink faucet [B102A]	TKC	Bathroom 4 next to sink 2 faucet [C124G]	B4
Teacher's kitchen hot sink faucet [B102A]	TKH	Bathroom 5 sink faucet [B103B]	B5
Men's bathroom cold sink faucet [C124B]	B3C	Bathroom 6 faucet [B124B]	B6
Men's bathroom hot sink faucet [C124B]	B3H	Staff bathroom sink faucet [B112W]	B7

Drinking water fountain [C124B]	WF1	Staff bathroom sink faucet [C112W]	B8
Drinking water fountain ADA compliant [C124B]	WF2		

226

### 227 *2.3 Building water quality in nearby commercial buildings*

228 Because of copper exceedances within the building, the authors collected first draw  
 229 water samples at 21 nearby commercial restaurant and retail buildings from either water  
 230 bubblers or bathroom sinks (**Figure SI-2**). These sites received drinking water from the same  
 231 public water supplier. The sampling event was conducted on September 5, 2018 from 11:57 am  
 232 to 5:50 pm. Similar methods applied at the school building were also applied for these water  
 233 samples. For each sample, about 250 mL water was first collected in a glass beaker to directly  
 234 measure at the site for temperature, pH, dissolved oxygen (DO), total and free chlorine,  
 235 monochloramine, free ammonia measurements. Then, a 125 mL amber bottle was filled for a  
 236 metal water sample and all the metal samples were transported at 4 °C in the coolers with ice  
 237 packs to the laboratory for analysis.

### 238 *2.4 Statistical analysis*

239 All water quality data were statistically analyzed using IBM SPSS Statistics 25. A  
 240 multiple linear regression was applied to all water quality analysis done to better understand  
 241 what variables affect the specific water quality measurement. Bivariate Pearson correlation  
 242 analysis was also conducted to compare significant correlation between each water quality  
 243 parameter. A significance level of 0.05 was used for all statistical analysis.

## 244 **3. Results and discussion**

### 245 *3.1. Water delivered to the campus meter and transported to the school building*

246 In August and September, water usage was much higher than any month in the  
 247 previous three years (**Table SI-1, Figure SI-1**). The total campus water use ranged from 1.4M  
 248 to 18M gallons per day and included irrigation, buildings, and other purposes (**Table SI-2**). The

249 water supplier reported that, on average, 63 hours was needed for their treated drinking water to  
250 reach the campus water meter. Water use records and usage allocation information was not  
251 available for the main school building where water quality testing was conducted.

### 252 *3.2 Water quality entering the building was consistent across sampling events*

253 Drinking water at the building entry point (BE) had different characteristics than water  
254 reported in the public water supplier's annual report. Water entering the building however did  
255 not exceed any U.S. federal primary or secondary drinking water limits.<sup>33</sup> The water supplier  
256 reported that the average of total chlorine concentration entering their distribution system was  
257 1.48 mg/L-Cl<sub>2</sub>. The water supplier changes disinfectants from chloramine to free chlorine for few  
258 weeks each year. During 4 of the 6 sampling events (3 of 5 months) total chlorine was not  
259 detected entering the building according to Indiana State law's definition of "nondetectable"  
260 [ $<0.2$  mg/L as Cl<sub>2</sub>] (PWS,1996): June (0.20 mg/L as Cl<sub>2</sub>), July (0.16, 0.14 mg/L as Cl<sub>2</sub>), August  
261 (0.43 mg/L as Cl<sub>2</sub>), Sept (0.17 mg/L as Cl<sub>2</sub>), Oct (BDL mg/L as Cl<sub>2</sub>). The low disinfectant residual  
262 may be due to the long travel time from the water meter to the building. The public water  
263 supplier reported water pH ranged from 7.00 to 8.48, and a narrower range was found entering  
264 the building during the present study (7.62 to 7.87). Other organic (TTHM) and inorganic  
265 contaminants were also found entering the building but within levels reported by the water  
266 supplier (Al, Cl<sup>-</sup>, Cr, F<sup>-</sup>, Fe, Mn, Na, Ni, Zn, NO<sub>3</sub><sup>-</sup>, NO<sub>2</sub><sup>-</sup>, SO<sub>4</sub><sup>-2</sup>, hardness) (**Table 2, Table SI-1**).

267 Additional water sampling was conducted at the BE location to better interpret in-  
268 building drinking water results. Slight differences were found at the building entry point  
269 throughout the sampling event for water temperature (20.4 to 27.3°C), TOC (1.7 to 2.0 mg/L),  
270 HPC (11 to 400 CFU/100 mL), but much larger differences were found for TCC (30,200 to  
271 433,533 cells/mL). Inorganic contaminants that were detected entering the building included  
272 NH<sub>3</sub> (0.8 to 2.8 mg/L-N), NO<sub>3</sub><sup>-</sup> (0.82 to 2.78 mg/L-N), NO<sub>2</sub><sup>-</sup> (0 to 0.06 mg/L-N), NH<sub>4</sub><sup>+</sup> (0.37 to 1.34  
273 mg/L-N), and PO<sub>4</sub><sup>-3</sup> (0 to 0.04 mg/L-P) were found (**Table SI-1**). Other contaminants were found

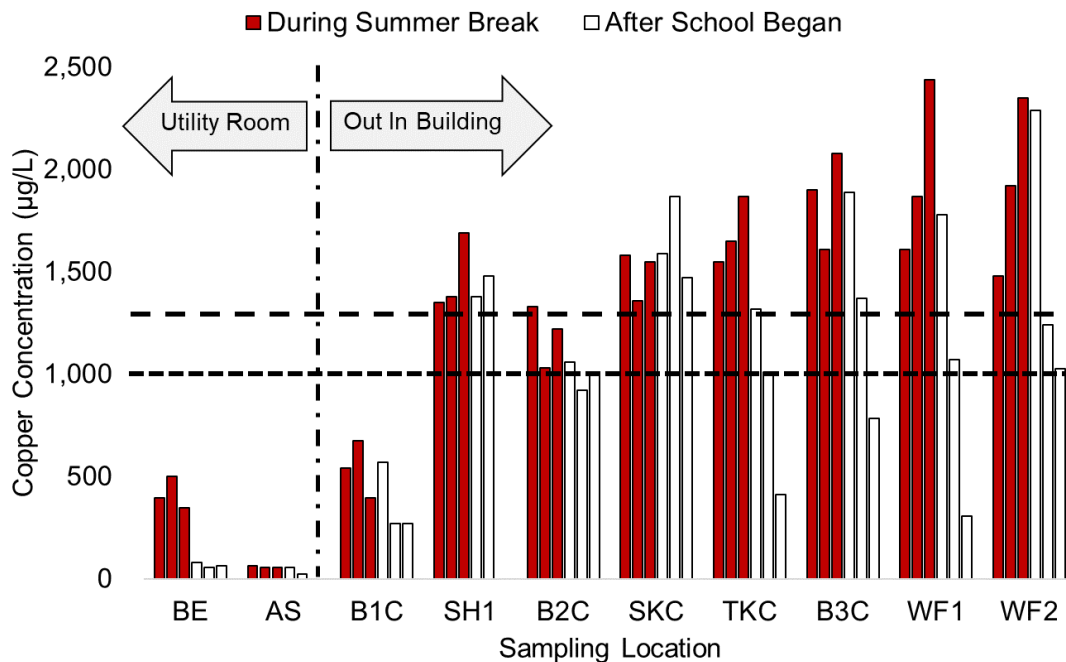
274 at insignificant levels (Br, K<sup>+</sup>). Alkalinity was also measured (>183 mg/L as CaCO<sub>3</sub>) but no  
 275 significant correlation between temperature, location, or water use was found (**Figure SI-3**).

276 *3.3 Building copper levels exceeded the health-based action level, were correlated to pipe*  
 277 *length, and flushing was ineffective at their reduction*

278 Water exiting the water softener never exceeded the copper AL, but the copper AL was  
 279 frequently exceeded for cold water at building fixtures (**Figure 2**). More than half of the total first  
 280 draw water samples [29 of 54] exceeded the copper AL. Within the building cold water, copper  
 281 levels significantly reduced after the school returned to session ( $p=0.006$ ) [Before  $1.4 \pm 0.66$   
 282 mg/L ( $n=27$ ); After  $0.94 \pm 0.57$  mg/L ( $n=46$ )].

283 Hot water copper levels were often lower in magnitude than cold water copper levels at  
 284 the same fixtures. In contrast to cold water, only 2 of 54 hot water samples collected exceeded  
 285 1.3 mg/L (**Figure 2**). Hot water copper levels did not differ before and after school returned to  
 286 session ( $p=0.962$ ): Before  $0.69 \pm 0.27$  mg/L ( $n=27$ ); After  $0.69 \pm 0.34$  mg/L ( $n=7$ ).

287 **(a)**

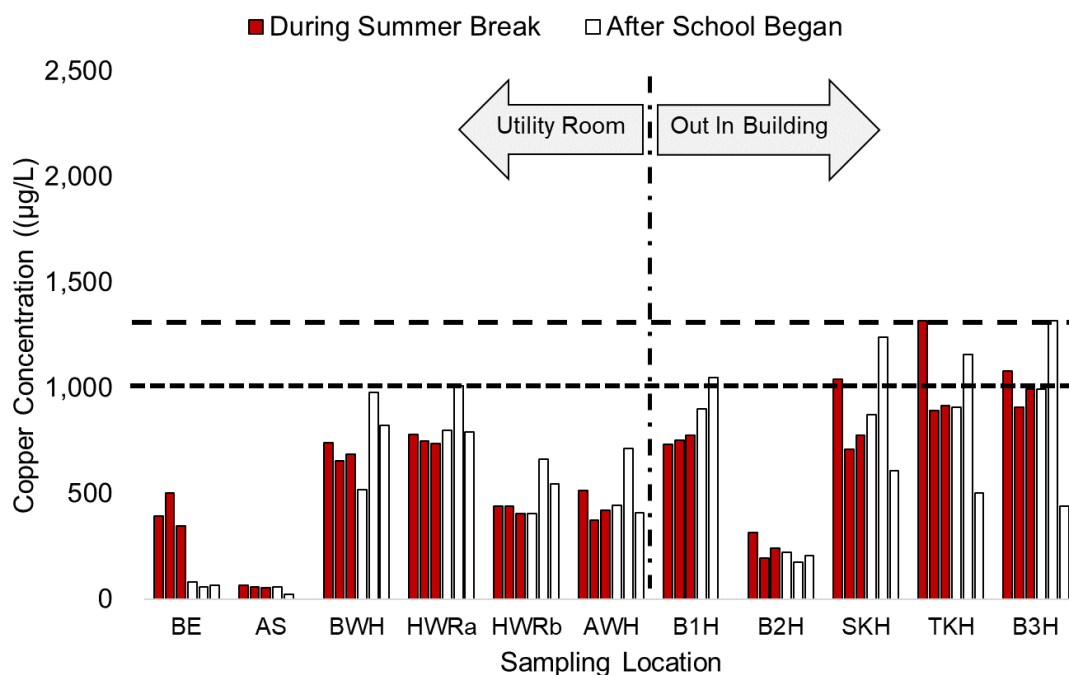


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290 (b)

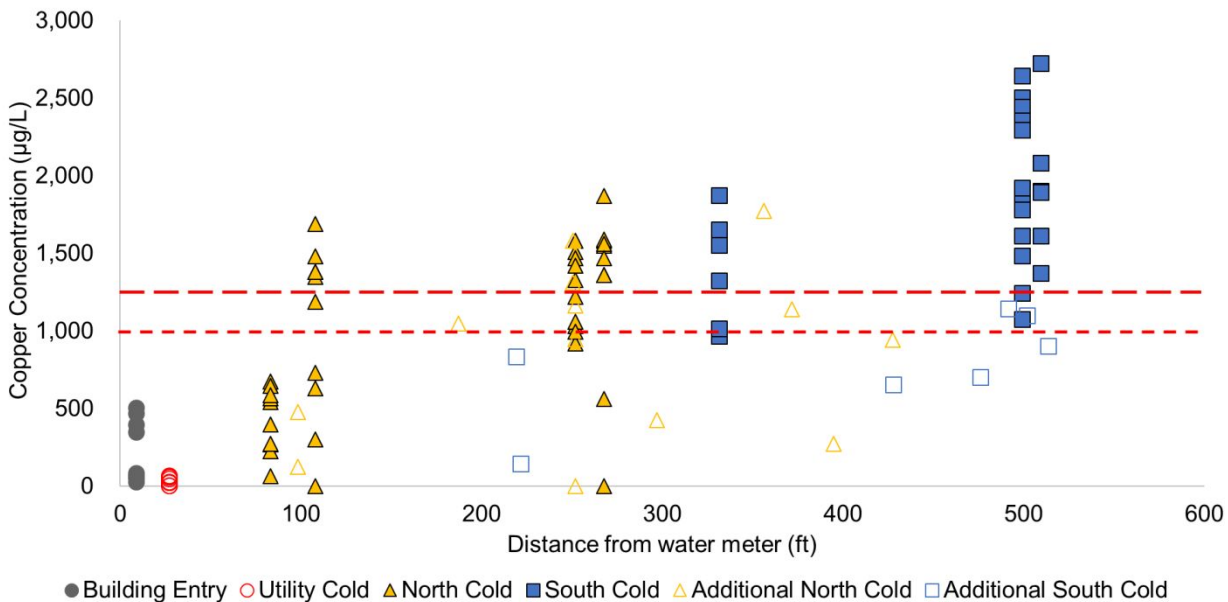


291  
 292 **Figure 2. From June to October, 2018 total copper concentration was monitored at the**  
 293 **building entry point (BE), water exiting the softener (AS), and (a) 8 cold water locations in**  
 294 **the building, and (b) 4 hot water locations in the utility room and 5 hot water locations in**  
 295 **the building.** Each bar represents one sampling event and the results represent first draw  
 296 samples only. Sampling location (left to right) is corresponds to distance from the water meter.  
 297 The dashed horizontal lines indicate the health based AL of 1,300 µg/L, and aesthetic based  
 298 secondary MCL of 1,000 µg/L. Trip and field blanks were free of contamination. BE = Entering  
 299 building, AS = After softener, BWH = Before water heater, HWR = Hot water return, AWH =  
 300 After water heater, B = Bathroom, C = Cold water, H = Hot water, SK = Student's classroom  
 301 kitchen sink, TK = Teacher's lounge kitchen sink, WF = water fountain.

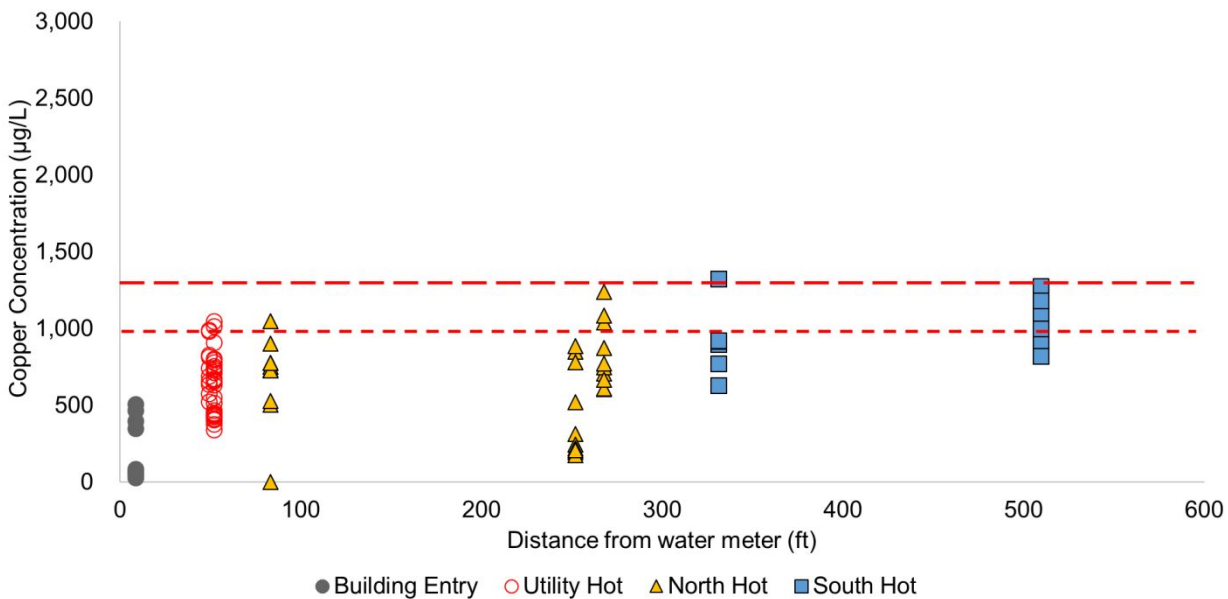
302  
 303 As distance from the water meter increased, the observed copper concentration increased for  
 304 both cold and hot water ( $p < 0.001$ ) (**Figure 3**). A prior study indicated that total copper  
 305 concentration increased in school plumbing as alkalinity increased and pH decreased,<sup>8</sup> but

306 other variables such as DO, pH and before/after the break were also significantly correlated with  
 307 copper concentration just for hot water samples ( $p < 0.05$ ). Unlike the prior study,<sup>34</sup> total chlorine,  
 308 free ammonia, and alkalinity were not correlated with the observed copper concentration in the  
 309 present study.

310 **(a)**



312 **(b)**



314 **Figure 3. Total copper concentration of all collected (a) cold, (b) hot water samples**  
315 **compared to the faucet location's distance from the water meter.** Dotted lines represent the  
316 health-based copper AL of 1,300  $\mu\text{g/L}$  and aesthetic based secondary MCL of 1,000  $\mu\text{g/L}$ .

317

318 Flushing individual fixtures did not consistently reduce cold and hot water copper levels  
319 below the AL across the school. Of the 28 cold water locations (9 routine + 19 additional  
320 fixtures) sampled during the final sampling event, only 4 locations were found where copper  
321 exceeded the AL (4/28 exceeded). These were first draw samples. When a water sample was  
322 collected after all other water samples were drawn (2.8 L later), 3 *new* locations exceeded the  
323 AL (maximum of 1.47 mg/L), and 2 previously problematic locations again exceeded the AL  
324 (6/28 exceeded). Finally, after a 5 minute flush of the 9 routine fixtures, 1 location exceeded AL  
325 again. As-built drawings (pipe length and volume from location to location) indicated this water  
326 originated from one of the largest pipe volume sections for cold water in the building (~14.58  
327 gallon [55 L] could be stored). Because copper pipes and fittings existed throughout the  
328 building, copper contaminated water elsewhere in the building water system likely was drawn to  
329 different fixtures during flushing. Also, many water outlet locations had long pipe lengths from  
330 faucet to faucet, which also meant a large volume of water was stored (these pipes would need  
331 greater than 5 minutes to flush out the water). This result underscores how applying finite  
332 flushing times, without understanding the building water system itself, to reduce copper  
333 contamination can fail. Others have reported that flushing did not consistently reduce cold water  
334 copper levels in school buildings.<sup>11-13</sup> Complete building water system turnover seems  
335 necessary to rid the building water system of copper contaminated water.

336 While hot water is not considered potable, none of the hot water samples exceeded the  
337 1.3 mg/L level for first draw or 5 minute flushed samples (**Figure SI-4**). However, all 9 routine  
338 hot water samples increased copper levels for the second draw samples, then decreased for the  
339 third draw samples. Like the cold water copper observations, these changes can be attributed to

340 water with varying levels of copper being drawn from different parts of the building water system  
341 to the sampled fixture. As distance from water entry point increased, water travel time also  
342 increased. Overall, copper concentration was greater in the cold water samples than hot water  
343 samples because copper is more soluble.<sup>35</sup>

#### 344 *3.4 Building water carbon loading, bacteria, and nitrification differed before and after school* 345 *returned to session*

346 Cold water samples always had a lower TOC concentration than hot water samples for  
347 the same location. TOC levels in cold water were not statistically different before and after  
348 school returned to session ( $p=0.34$ ). Cold water TOC levels ranged from 1.5 to 6.7 mg/L ( $n=54$ )  
349 compared to hot water 1.6 to 3.4 mg/L ( $n=54$ ) (**Table 2, Figure SI-5**). The greatest TOC levels  
350 were found exiting the water softener during the summer break (2.1 to 6.7 mg/L), much greater  
351 than the levels found in water entering the building and other fixtures in the building. The water's  
352 TOC concentration entering the softener was  $1.9 \pm 0.16$  mg/L. Prior evidence indicates  
353 softeners can be sources of biological activity, providing substrate for growth and possibly  
354 leaching organic carbon to support microbial processes.<sup>36, 37</sup> For hot water, TOC levels were  
355 significantly reduced after school returned to session ( $p<0.05$ ). TOC and other variables (pH,  
356 DO, total  $\text{Cl}_2$ ,  $\text{NH}_3\text{-N}$ , alkalinity and distance from the BE location) were evaluated with linear  
357 regression. Cold water TOC level was significantly correlated with pH ( $p<0.05$ ) and total  $\text{Cl}_2$   
358 ( $p<0.05$ ), while hot water TOC level was significantly correlated with alkalinity and  $\text{NH}_3\text{-N}$ .

359 Nitrifying bacteria were found in both cold and hot water samples, and their detection  
360 and magnitude differed between summer and fall, fixture location, and water temperature. Water  
361 entering the building often contained a low number of nitrifying bacteria ( $<1,000$  CFU/mL). A  
362 previously reported nitrifying bacteria concentration in a chloraminated surface water was  $<850$   
363 CFU/mL.<sup>38</sup> Studies have shown that copper could limit nitrification (10% lower than PVC, brass  
364 and lead pipes),<sup>39,40</sup> but no correlation was found in this study. Cold water collected from a distal  
365 shower head (SH2) contained nitrifying bacteria up to 1,000 CFU/mL, but cold water collected

366 from a distal bathroom (B3C) had a nitrifying bacteria level of ~1,000 to 100,000 CFU/mL. Hot  
367 water from the same distal bathroom fixture (B3H) had ~1,000 CFU/mL during the summer  
368 break and <1,000 CFU/mL when school was in session. Interestingly, when school returned to  
369 session the concentration of nitrifying bacteria exiting the water softener increased from no  
370 bacteria or 1,000 CFU/mL to about 10,000 CFU/mL. Coupled with the greater TOC values and  
371 nitrification bacteria loading at the softener, it is likely that the softener was a bioreactor for  
372 microbial growth.

373         Within the hot water recirculation systems, nitrifying bacteria levels differed between  
374 summer and fall months. During summer break, 4 of 4 water samples collected from hot water  
375 recirculation lines and water heaters contained nitrifying bacteria (~10,000 to 100,000 CFU/mL).  
376 When school returned to session, the amounts of bacteria at these locations gradually reduced  
377 as time goes, with much lower amounts of bacteria (~1,000 to 10,000 CFU/mL).

378         No relationship between nitrification, pH, and chloramine concentration was observed,  
379 while the literature indicates that increasing nitrification can decrease pH and chloramine  
380 residual<sup>41</sup>.  $\text{NO}_3^-$  and  $\text{NO}_2^-$  were detected when nitrifying bacteria were found, and regression  
381 analysis showed  $\text{NO}_3^-$  concentration was significantly correlated ( $p < 0.001$ ) with nitrifying  
382 bacteria concentration while  $\text{NO}_2^-$  concentration was not. Others have reported that the  
383 ammonia-oxidizing bacteria population increased as monochloramine residual increased,<sup>42</sup> but  
384 no trend was found in this study. Denitrifying bacteria were detected in the present study (<350  
385 CFU/mL) in 2 of 20 cold and 3 of 20 hot water samples.

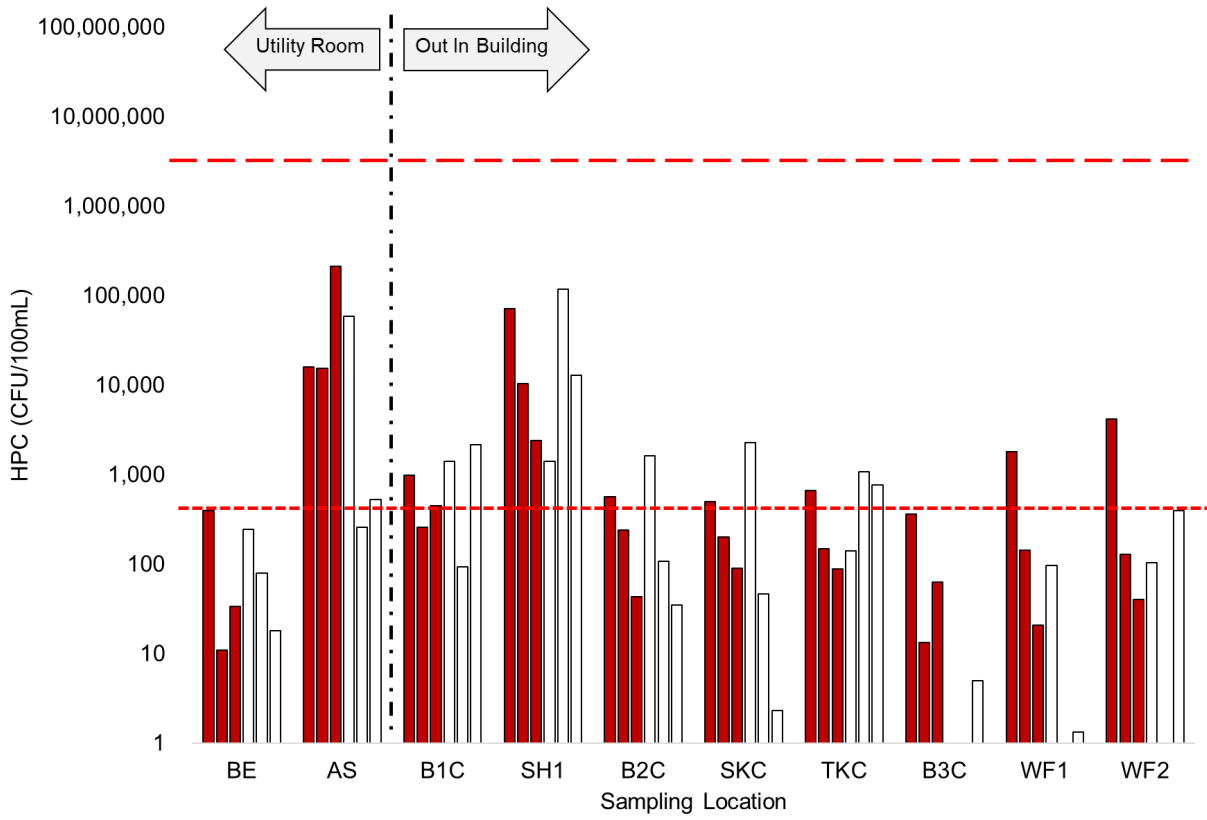
386         HPCs at the BE location (11 to 400 CFU/100mL) were within the range of levels found  
387 by others at reported service lines that used free chlorine disinfectant (3,300 to 23,100  
388 CFU/100mL)<sup>43</sup> and (0 to 2.1 CFU/100mL)<sup>34</sup>. HPC levels increased by 3 orders of magnitude in  
389 the short distance from water entering the building to the softener (about 37 ft). It was expected  
390 that HPC values would be greater inside the building than at the BE location.<sup>44</sup> None of the in-  
391 building cold water samples exceeded the USEPA drinking water guideline of 500,000

392 CFU/100mL<sup>45,46</sup> except for one hot water location one time during the final sampling event  
393 (**Figure 4**). No significant difference for HPC between cold and hot water samples was  
394 observed for the same location, but HPC levels gradually decreased at the heater tanks  
395 (decreased more after the tank with higher temperature), but then increased again. As expected,  
396 HPC levels at the higher temperature hot recirculation loop (60 °C) was lower (1 to 4  
397 CFU/100mL), than at the lower temperature loop (48.8°C) (1 to 583 CFU/100mL).

398 A Pearson correlation analysis indicated a statistically significant correlation between  
399 HPC and TCC for cold water ( $p=0.01$ ) but no relationship was found for hot water ( $p=0.471$ ).  
400 HPC results were more variable across locations, temperatures and between sampling trips,  
401 while TCC results were less variable and consistent throughout the sampling trips and between  
402 locations (**Figure 4, Figure SI-6**). HPCs have been previously shown to be correlated with  
403 residence time and the presence of disinfectant residual.<sup>43</sup> HPCs in cold water samples were  
404 statistically correlated with distance from the water meter, while no relationship was found for  
405 HPCs in hot water to expected predictors (i.e., total chlorine, free ammonia, DO, pH,  
406 temperature, alkalinity, distance from the water meter). Past study indicated significant bacterial  
407 decline in the first 500 mL, similar level of HPC as the past study<sup>45</sup> were found even after  
408 collecting 2 L before HPC sample. Though, the study also indicated HPC significantly increased  
409 after only 1 hr of stagnation. Additional work should examine the relationship between HPC and  
410 presence and magnitude of pathogens like *Legionella pneumophila*, as this would be more  
411 relevant to understand building water health risks.<sup>47,48</sup> No other trends for microbiological  
412 parameters and the distance from the water meter were observed.

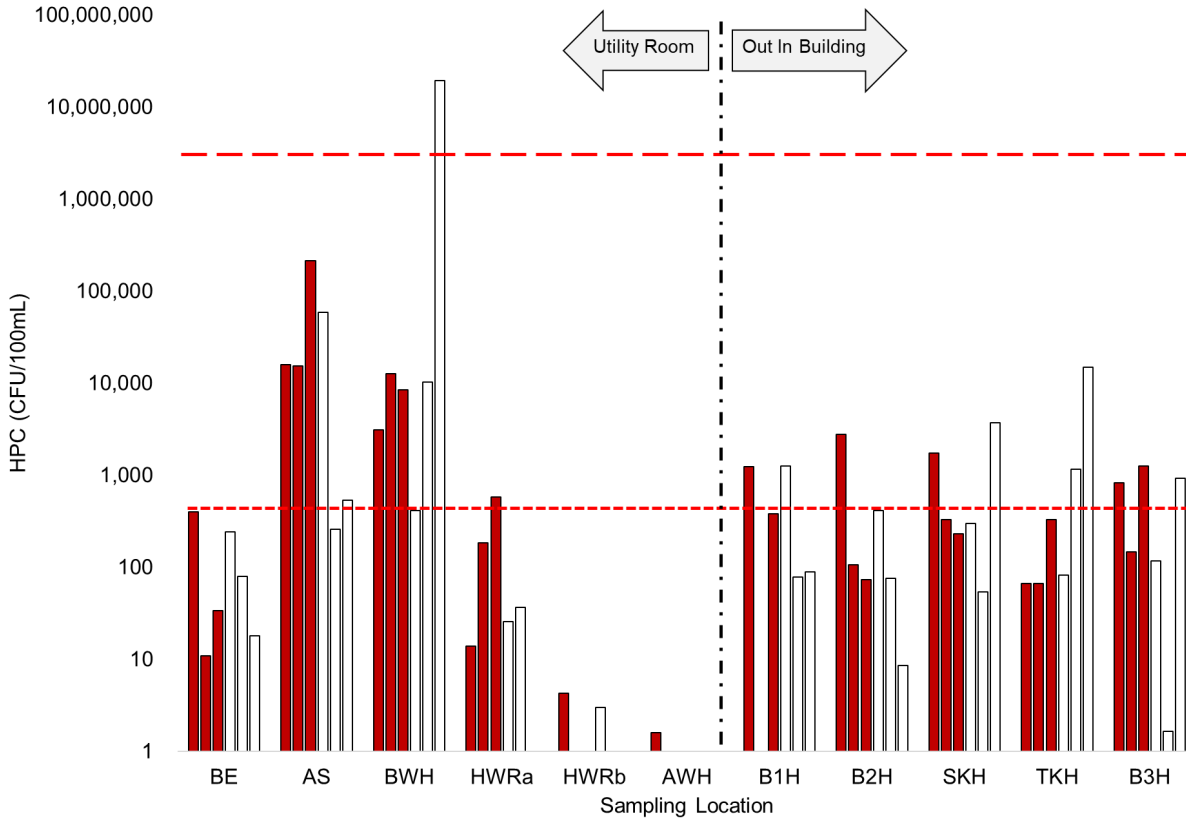
413

414 (a)



415

416 (b)



417

418 **Figure 4. Heterotrophic plate count of first draw from building entry point (BE), water**  
 419 **existing the softener (AS), and (a) 8 cold water locations in the building, and (b) 4 hot**  
 420 **water locations in the utility room and 5 hot water locations in the building.** Red dotted  
 421 line is HPC drinking water guideline from the World Health Organization (500,000 CFU/100mL),  
 422 and 500 CFU/100mL limit. BE = Entering building, AS = After softener, BWH = Before water  
 423 heater, HWR = Hot water return, AWH = After water heater, B = Bathroom, C = Cold water, H =  
 424 Hot water, SK = Student's classroom kitchen sink, TK = Teacher's lounge kitchen sink, WF =  
 425 water fountain.

426

### 427 3.5 Water quality comparison to other off-campus commercial buildings

428 Similar low disinfectant residual concentrations were found in restaurant and retail  
 429 commercial buildings near the school campus (33% had less than 0.2 mg/L as Cl<sub>2</sub>). Nearly all



430 water samples from off-campus commercial building bathroom sinks did not exceed the copper  
431 AL (**Figure 2, Table SI-3**). Because the two locations that exceeded copper AL were drinking  
432 water fountains (maximum of 1.62 mg/L) also had low disinfectant residual, it is hypothesized  
433 water age was a contributing factor. Other water quality characteristics such as temperature  
434 (16.2 to 30.7°C), pH (7.56 to 7.88), and DO concentration (3.63 to 8.46 mg/L) were similar to  
435 school building water quality results.

#### 436 **4. Limitations**

437 This study provides water quality insights for a 7 year old green building where previous  
438 copper water testing had not previously been conducted. Six sampling events were conducted  
439 over a 5 month period due to the geographical distance from the author's laboratory and amount  
440 of work required for sample processing and analysis. Only discrete water samples were  
441 collected and prior studies have shown wide fluctuations of water quality entering buildings  
442 elsewhere when continuous online monitoring was conducted<sup>34</sup>. While water quality was only  
443 characterized at 10% of the water outlets (38 of 363), school wide copper water contamination  
444 was discovered. Also, the flushing recommendation given by others to the school was  
445 ineffective partly due to the fact that the recommendations did not consider plumbing design.  
446 School building water use data was not available for more detailed analysis. Further, few water  
447 quality studies pertaining to schools were found for comparison.

448

449 **Table 2. Water quality measurements of first draw samples**

Parameter		Summer									Fall								
		After meter (n=3)			Cold lines (n=27)			Hot lines (n=27)			After meter (n=3)			Cold lines (n=27)			Hot lines (n=27)		
		Min	x	max	min	x	max	min	x	max	min	x	max	min	x	max	min	x	max
General	Temp, °C	25.2	26.1	27.3	15.8	21.9	26.4	21.5	29.3	47.3	20.4	24.2	27.1	14.5	21.8	30.2	19.7	29.8	46.3
	pH	7.6	7.8	7.9	7.2	7.8	8.5	7.7	8	8.2	7.7	7.8	7.9	7.6	7.9	8.2	7.7	8	8.2
	DO, mg/L	8.9	9	9.1	2.6	6.9	10.2	3.1	5.6	8.9	7.4	8.4	9.2	4.4	7.4	9.2	3.2	6.6	9
	Total Cl <sub>2</sub> , mg/L	0.1	0.2	0.2	0	0.1	1.4	0	0.1	1	0	0.2	0.2	0	0.03	0.3	0.01	0.03	0.13
	NH <sub>2</sub> Cl, mg/L	0.1	0.2	0.3	0	0.08	0.5	0	0.04	0.1	0.07	0.5	0.94	0	0.07	0.41	0	0.1	0.7
	Free NH <sub>3</sub> , mg/L	0	0.2	0.48	0	0.1	0.41	0.01	0.2	0.84	0	0.06	0.13	0	0.08	0.21	0.01	0.06	0.16
Organics	TOC, mg/L	1.7	1.9	2	1.5	2.2	6.7	2.9	3.4	3.8	1.8	2	2.2	1.5	1.9	2.3	1.6	2.3	3.4
	DOC, mg/L	1.7	1.9	2	1	2.1	6.5	2.6	3.3	3.6	1.8	2	2.1	1.4	1.9	2.2	1.7	2.2	3.3
Microbiology	HPC, cfu/100mL	11	148	400	13	12,614	214,000	0	1,284	12,667	18	114	245	0.667	7,489	117,670	0	720,894	19,430,000
	TCC, cell/mL x 10 <sup>4</sup>	3.02	20.9	35.6	4.79	23.8	62.8	54.8	81.6	116.1	5.89	80.5	43.4	6.86	19.9	32.8	15.4	34.2	79.8
Nitrogen	NH <sub>4</sub> -N, mg/L	0.4	0.7	1.3	0.1	0.3	0.5	0.1	0.1	0.2	0.4	0.6	0.8	0.1	0.4	3.2	0.0	0.1	0.2
	NO <sub>2</sub> -N, mg/L	-	-	-	-	-	-	0.0	0.1	0.3	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
	NO <sub>3</sub> -N, mg/L	0.8	1.5	2.8	0.8	1.9	3.0	0.9	1.3	1.7	1.2	1.4	1.5	1.0	1.5	2.6	1.0	1.3	2.2
Metal	Cu, µg/L	347	415	503	55	1,356	2,440	196	689	1,320	57	68	81	0	980	2,290	0	693	1,320
	Pb, µg/L	0	0	0	18.5	2.2	40.9	0	0	0	0	0	0	0	1.3	35.1	0	0	0

450 x = mean; lead was only detected in shower cold water, also detected for second draw (7.79 µg/L) but not for third draw on the last sampling event.

451 For all water samples, 68% did not detect disinfectant residual (BDL 0.05 mg/L), and 83% contained free ammonia (BDL 0.02 mg/L)

## 452 **5. Conclusions and recommendations**

453 The study goal was to better understand how drinking water chemical and  
454 microbiological parameters change in a school during the transition from summer break (low  
455 water use) and during several weeks after classes resumed (normal use). Specific objectives  
456 were to (1) document first draw water quality at 19 different cold and hot water locations, (2)  
457 determine the relationship between water quality and distance from the building entry point for  
458 the parameters examined, and (3) determine if water quality differed between before and after  
459 school returned to session. Clear trends of water quality changes at different locations and  
460 various analysis that increase level of understanding the water quality were found that can help  
461 inform building water sampling and plumbing design.

462 Building cold and hot water quality differed between the low and normal use session.  
463 Water entering the school building often contained less than the state government agency  
464 designated level for a detectable disinfectant residual concentration. Within the building,  
465 chemical and microbiological water quality depended on the pipe system (cold vs. hot) and  
466 fixture location. Copper contaminated drinking water was found throughout the school and  
467 during every sampling event (maximum of 2.72 mg/L). Copper leaching was likely influenced by  
468 stagnation time and also the high alkalinity water. A statistically significant relationship was  
469 found between copper concentration and the pipe length conveying the water to a fixture. Spot  
470 flushing, as recommended by a government agency, did not effectively reduce the copper level.  
471 Also found was that long times were needed for hot water to reach distal faucets, indicating the  
472 potential for increased bacterial growth conditions in temperate water.

473 Building water system design standards and plumbing code requirements are lacking  
474 that require an explicit consideration of source water quality, system operation, and material  
475 interactions to minimize cold and hot water quality impacts. The authors recommend both  
476 chemical and microbiological testing should be conducted before new construction is placed into  
477 service and periodically during the life of the building. Copper testing should be required for all

478 new and renovated buildings. Water testing plans should be developed based on as-built  
479 plumbing drawings and types of the water outlets. Copper exceedances likely went undetected  
480 for 7 years because water quality testing was not conducted. Because copper leaching  
481 decreases with time, it is likely that higher copper levels were present during that 7 year period  
482 where children and other persons may have been exposed. Microbial contamination also went  
483 undetected for similar reasons. While the school building was LEED certified, and some  
484 requirements were to meet environmental regulations, standards, and focus on water efficiency  
485 <sup>51</sup>, the plumbing caused water inside the building to exceed safe drinking water limits.

486         Once school water safety problems are identified, restricting water use, installing in-  
487 building treatment, and/or point-of-use devices may be necessary. Spot flushing should not be  
488 relied upon to reduce copper levels, and can result in higher copper levels at the fixture. For  
489 high alkalinity groundwater with copper plumbing, additional schools may have similar drinking  
490 water safety problems. With the continued absence of codes and regulations that require initial  
491 and periodic water testing at schools, communities should initiate their own testing to determine  
492 if the plumbing poses a health risk to children and other occupants.

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