# Information on Water Coolers

The Lead Contamination Control Act (LCCA), which amended the Safe Drinking Water Act, was signed into law on October 31, 1988 (P.L. 100-572). The potential of water coolers to supply lead to drinking water in schools and day care centers was a principle focus of this legislation. Specifically, the LCCA mandated that the Consumer Product Safety Commission (CPSC) order the repair, replacement, or recall and refund of drinking water coolers with lead-lined water tanks. In addition, the LCCA called for a ban on the manufacture or sale in interstate commerce of drinking water coolers that are not lead-free. Civil and criminal penalties were established under the law for violations of this ban. With respect to a water cooler that may come in contact with drinking water, the LCCA defined the term "lead-free" to mean:

> "not more than 8 percent lead, except that no drinking water cooler which contains any solder, flux, or storage tank interior surface which may come in contact with drinking water shall be considered lead free if the solder, flux, or storage tank interior surface contains more than 0.2 percent lead."

Another component of the LCCA was the requirement that EPA publish and make available to the states a list of drinking water coolers, by brand and model, that are not lead-free. In addition, EPA was to publish and make available to the states a separate list of the brand and model of water coolers with a lead-lined tank. EPA is required to revise and republish these lists as new information or analyses become available.

Based on responses to a Congressional survey in the winter of 1988, three major manufacturers, the Halsey Taylor Company, EBCO Manufacturing Corporation, and Sunroc Corporation, indicated that lead solder had been used in at least some models of their drinking water coolers. On April 10, 1988, EPA proposed in the *Federal Register* (at 54 *FR* 14320) lists of drinking water coolers with lead-lined tanks and coolers that are not lead-free. Public comments were received on the notice, and the list was revised and published on January 18, 1990 (Part 111, 55 *FR* 1772). *See Table B-1 for a list of water coolers with lead components.*

**'Based on an analysis of 22 water coolers at a U.S. Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.**

Prior to publication of the January 1990 list, EPA determined that Halsey Taylor was the only manufacturer of water coolers with lead-lined tanks.' Table B-2 presents a listing of model numbers of the Halsey Taylor drinking water coolers with lead-lined tanks that had been identified by EPA as of January 18, 1990.

Since the LCCA required the CPSC to order manufacturers of coolers with lead-lined tanks to repair, replace or recall and provide a refund of such coolers, the CPSC negotiated such an agreement with Halsey Taylor through a consent order published on June 1, 1990 (at 55 *FR* 22387). The consent agreement calls on Halsey Taylor to provide a replacement or refund program that addresses all the water coolers listed in Table B-2 as well as "all tank-type models of drinking water coolers manufactured by Halsey Taylor, whether or not those models are included on the present or on a future EPA list." Under the consent order, Halsey Taylor agreed to notify the public of the replacement and refund program for all tank type models.

If you have one of the Halsey Taylor water coolers noted in Table B-2, contact Halsey Taylor *(address and phone noted below)* to learn more about the requirements surrounding their replacement and refund program.

Halsey Taylor
2222 Camden Court
Oak Brook, IL 60520
(708) 574-3500

***SPECIAL NOTE:***

Experience indicates that newly installed brass plumbing components containing 8 percent or less lead, as allowed by the LCCA and the Lead Ban, can contribute high lead levels to drinking water for a considerable period after installation. U.S. water cooler manufacturers have notified:- EPA that since September 1993, the components of water coolers that come in contact with drinking water have been made with non-lead alloy materials. These materials include stainless steel for fittings. and water control devices, brass made of 60 percent copper and 40 percent zinc, terillium copper, and food grade plastic;

**Table B-1**
**Water Coolers With Other Lead Components**

**EBCO Manufacturing**

- All pressure bubbler water coolers with shipping dates from 1962 through 1977 have a bubbler valve containing lead. The units contain a single, 50-50 tin-lead solder joint on the bubbler valve. Model numbers for coolers in this category are not available.

- The following models of pressure bubbler coolers produced from 1978 through 1981 contain one 50-50 tin-lead solder joint each.

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| CP3 | DP15W | DPM8 | 7P | 13P | DPM8H | DP15M | DP3R | DP8A |
| DP16M | DP5S | C10E | PX-10 | DP7S | DP13SM | DP7M | DP7MH | DP7WD |
| WTC10 | DP13M-60 | DP14M | CPIO-50 | CP5 | CP5M | DP15MW | DP3R | DP14S |
| DP20-50 | DP7SM | DPIOX | DP13A | DP13A-50 | EP10F | DP5M | DP10F | CP3H |
| CP3-50 | DP13M | DP3RH | DP5F | CP3M | EP5F | 13PL | DP8AH | DP13S |
| CP10 | DP20 | DP12N | DP7WM | DP14A-50/60 | | | | |

**Halsey Taylor**

- Lead solder was used in these models of water coolers manufactured between 1978 and the last week of 1987:

| | | | |
|---|---|---|---|
| WMA-1 | SCWT/SCWT-A | SWA-I | DC/DHC-1 |
| S3/5/10D | BFC-4F/7F/4FS/7FS | S300/500/100D | |

- The following coolers manufactured for Haws Drinking Faucet Company (Haws) by Halsey Taylor from November 1984 through December 18, 1987 are not lead-free because they contain 2 tin-lead solder joints. The model designations for these units are as follows:

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| HC8WT | HC14F | HC6W | HWC7D | HC8WTH | HC14FH | HC8W | HC2F | HC14WT |
| HC14FL | HC14W | HC2FH | HC14WTH | HC8FL | HC4F | HC5F | HC14WL | HCBF7D |
| HC4FH | HCI0F | HC16WT | HCBF7H0 | HC8F | HC8FH | HC4W | HWC7 | |

**Table B-2**
**Halsey Taylor Water Coolers With Lead-Lined Tanks**

- The following six model numbers have one or more units in the model series with lead-lined tanks:

| | | | | | |
|---|---|---|---|---|---|
| WM8A | WT8A | GCIOACR | GC10A | GC5A | RWM13A |

- The following models and serial numbers contain lead-lined tanks:

| | | |
|---|---|---|
| WM14A Serial No. 843034 | WM14A Serial No. 843006 | WTIIA Serial No. 222650 |
| WT21A Serial No. 64309550 | WT21A Serial No. 64309542 | LL14A Serial No. 64346908 |