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January 25, 2017

David Spacone  
City School District of the City of Niagara Falls  
Director of Facilities  
630 – 66<sup>th</sup> Street  
Niagara Falls, NY 14304

**Re: Follow-Up Sampling of Drinking Water for Lead Concentrations**

Dear Mr. Spacone:

Included with this letter is Stohl Environmental LLC's report for the follow-up Water Sampling performed at the educational buildings of the City School District of the City of Niagara Falls:

- Geraldine J. Mann Elementary School, 1330 95<sup>th</sup> Street, Niagara Falls, New York

This report is prepared to assist the District in complying with the requirements of NYS regulations, *SUBPART 67-4: Lead Testing in School Drinking Water*, by identifying the sources of potable water with lead concentrations greater than the NYS "Action Level of 15 parts per billion (ppb)".

**Initial Sampling and Analysis:** In Compliance with NYS regulations, initial first draw water sampling was completed on 9/24/2016 and 3 samples were identified as containing lead concentrations above the NYS Action Level of 15 ppb.

**Mitigation by District and Follow-up Sampling by Stohl Environmental LLC:**

- Following the receipt of initial sampling results, in accordance with guidance received from NYS, the District is reported to have prohibited use of the outlets analyzed as above the NYS Action Level of 15 ppb until "(1) a lead remediation plan is implemented... and (2) test results indicate that the lead levels are at or below the action level".
- Subsequent to reported mitigation by the District, Stohl Environmental LLC was requested to perform follow-up sampling and laboratory analysis.
- Follow-up sampling was performed by Stohl Environmental LLC in accordance with the requirements and protocols outlined in NYS regulations, as well as USEPA Technical Guidance Document "3-T's for Reducing Lead in Drinking Water in Schools".

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**Results of Follow-up Sampling:** As further detailed in Section 1.2 (*Executive Summary*) of the accompanying report, based upon the follow-up sampling and analysis performed, the following is reported:

- **Follow-up First Draw Samples:** Following remediation by the District, or for confirmatory purposes, 3 outlets were re-sampled on 12/8/2016 and analyzed by a certified and independent laboratory. **Of the three samples collected, one contained lead concentrations above the action level.**

**Interpretation of First Draw Sampling Results:** Under NYSDOH regulations Section 67-4.4, for the one outlet that continues to have First Draw test results above the NYS action level, the District must “prohibit use of the outlet until lead remediation is implemented and (First Draw) test results indicate that lead levels are at or below the action level.”

- **Flush Samples:** As additional confirmation of lead concentrations, and in an attempt to determine whether lead concentrations above the action level result from the outlet/fixture or from the plumbing to the outlet, 3 flush samples were also collected from these same outlets on 12/8/2016 and submitted to and analyzed by a certified and independent laboratory. All 3 sample results indicated lead concentrations were below the action level.

**Interpretation of Flush Sampling Results:** As detailed in EPA guidance (“3T’s for Reducing Lead in Drinking Water in Schools”), *“If initial test results reveal lead concentrations greater than (the action level) for a given outlet, follow-up flush testing... is recommended to determine if the lead contamination results are from the fixture or from the plumbing.”*

Based upon this guidance, the one outlet tested on 12/8/16 continues to have First Draw Sample lead concentrations above the action level, the Flush Sample results infer that the source of lead at these outlets is the fixture, rather than the plumbing to the fixture.

Thank you for the opportunity to be of service to City School District of the City of Niagara Falls.

Sincerely,  
Stohl Environmental, LLC.



William K. Sisco  
Senior Project Manager

**Follow-Up Investigation and Sampling  
Of Sources of Potable Water  
For Lead Concentrations**

**Prepared for:**

**David Spacone  
City School District of the City of Niagara Falls  
Director of Facilities  
630 – 66<sup>th</sup> Street  
Niagara Falls, NY 14304**

**Prepared by:**



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**Conditions as of December 8, 2016**



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## Summary Tabulation

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## 1.1 Sampling Protocol and Summary of Results:

Stohl Environmental was retained by City School District of the City of Niagara Falls to perform follow-up sampling and analysis of potable water outlets that were identified in report dated 11/29/2016 as having lead concentrations greater than the NYS action level of 15 ppb. Sampling was performed in the following buildings:

- Geraldine J. Mann Elementary School, 1330 95<sup>th</sup> Street, Niagara Falls, New York

### Scope of Work:

Stohl Environmental was charged with collecting follow-up water samples from outlets which previously were analyzed as having lead concentrations above 15 ppb in the Geraldine J. Mann Elementary School Building. Outlets are defined in NYS regulations as: “a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, or faucets”.

### Sampling Protocol:

In accordance with NYS regulations, ***Subpart 67-4: Lead Testing in School Drinking Water***, and the EPA guidance document, ***3Ts for Reducing Lead in Drinking Water in Schools***, Stohl Environmental’s protocol can be summarized as follows:

- **Follow-up Samples** were collected to verify initial findings of lead contaminations, to assist in problem assessment to determine remediation, and/or verify that lead levels are at or below action level post-remediation. Confirmatory samples were collected as follows:
  - **Follow-up First-Draw samples** of 250 milliliters (mL) were collected from cold water outlets before any water was used. Sampling was coordinated with District representatives to assure that water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours before sample collection.
  - **To supplement follow-up first draw samples, in some instances, Flush samples** of 250 mL were collected from cold water outlets after the outlet was run for 30 seconds before any water was used or following a second first-draw sample at the same outlet. Sampling was coordinated with District representatives to assure that water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours before sample collection.
  - **Laboratory Analysis:** Samples were submitted following strict chain-of-custody protocols to an independent laboratory approved by the NYS Department of Health’s Environmental Laboratory Approval Program (ELAP).

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## 1.2 Executive Summary of Sampling and Analysis:

### Total Number of Samples Collected by Building Classified by Initial First Draw & Follow-up Samples

Building Name	Date of Sample Events	Total Number Samples Collected	Initial First Draw Samples		Follow-up Samples			
			Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb	First Draw Samples		Flush Samples	
					Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb	Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb
Geraldine J. Mann Elementary School Building	9/24/2016, and 12/8/2016	111	102	3	2	1	3	0

\*\* Follow-up samples are samples collected subsequent to "Step 1" First Draw samples to verify initial findings of lead contamination, to assist in problem assessment to determine remediation and/or verify that lead levels are at or below action level post-remediation.



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**Sample Results: Initial First Draw, Follow-up First Draw and Flush Samples**

Sample #	Sample Type (Initial First Draw, Follow-up First Draw or Flush)	Sample Location	Fixture/Outlet type	Laboratory Analysis in ppb
111.3-7	Initial First Draw sample	Custodian's Office Sink	Sink	19.0
111.3-7 I	Follow-up First Draw sample	Custodian's Office Sink	Sink	4.80
111.3-7 F	Flush sample	Custodian's Office Sink	Sink	<2.0
111.3-97	Initial First Draw sample	Kitchen, Brown Sink	Sink	78.4
111.3-97 I	Follow-up First Draw sample	Kitchen, Brown Sink	Sink	57.6
111.3-97 F	Flush sample	Kitchen, Brown Sink	Sink	11.0
111.3-99	Initial First Draw sample	Kitchen, Steamer Sink	Sink	24.4
111.3-99 I	Follow-up First Draw sample	Kitchen, Steamer Sink	Sink	13.2
111.3-99 F	Flush sample	Kitchen, Steamer Sink	Sink	<2.0

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### 1.3 Response Actions Required Under NYS Regulations, Section 67-4.4:

For outlets analyzed with a lead concentration in excess of the NYS Action Level, regulations require:

- (a) Prohibit use of the outlet until:
  - (1) a lead remediation plan is implemented to mitigate the lead level of such outlet; and
  - (2) test results indicate that the lead levels are at or below the action level;
- (b) Provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed;
- (c) Report the test results to the local health department as soon as practicable, but no more than 1 business day after the school received the laboratory report; and
- (d) Notify all staff and all persons in parental relation to students of the test results, in writing, as soon as practicable but no more than 10 business days after the school received the laboratory report.





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## 1.4 Laboratory Analytical Reports by Building



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## 1.5 Laboratory Certifications



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## 1.6 Chains of Custody