STOHL ENVIRONMENTAL
ENVIRONMENTAL CONSULTANTS

4169 Allendale Parkway
Buffalo, New York 14219
(P) 716-312-0070 (F) 716-312-8092
www.stohlenvironmental.com

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February 23, 2017

David Spacone
City School District of the City of Niagara Falls
Director of Facilities
630 – 66th 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:

- Niagara Falls Community Education Center, 6040 Lindbergh Avenue, Niagara Falls, NY

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 10/15/2016 and 7 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, 7 outlets were re-sampled on 2/8/2017 and analyzed by a certified and independent laboratory. **Of the 7 samples collected, all 7 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, 7 flush samples were also collected from these same outlets on 2/8/2017 and submitted to and analyzed by a certified and independent laboratory. **Of the 7 samples collected, 1 contained lead concentrations above 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, 6 outlets tested on 2/8/2017 continue 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 in the fixture, rather than the plumbing to the fixture. In addition, 1 outlet tested on 2/8/2017 continues to have concentrations above the action level for both the Follow-up First Draw and Flush Samples. Results infer that the source of lead at this outlet is possibly the fixture and plumbing.

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 – 66th Street
Niagara Falls, NY 14304

Prepared by:

ENVIRONMENTAL CONSULTANTS - A MEMBER OF THE STOHL GROUP OF COMPANIES
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Conditions as of February 8, 2017

STOHL ENVIRONMENTAL
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Summary Tabulation

Lead in Drinking Water Investigation

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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 12/9/2016 as having lead concentrations greater than the NYS action level of 15 ppb. Sampling was performed in the following buildings:

- Niagara Falls Community Education Center, 6040 Lindbergh Avenue, Niagara Falls, NY

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 Niagara Falls Community Education Center 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			
					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	Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb
Community Education Center Building	10/15/16, and 2/3/17	68	47	7	0	7	6	1

****** 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
111.14-8	First Draw	Men's Lavatory Sink Across the Hall from Office 144	Sink	28.5
111.14-8R	Follow-Up First Draw	Men's Lavatory Sink Across the Hall from Office 144	Sink	27.0
111.14-8F	Flush	Men's Lavatory Sink Across the Hall from Office 144	Sink	4.00
111.14-20	First Draw	Room 104 Sink	Sink	299
111.14-20R	Follow-Up First Draw	Room 104 Sink	Sink	19.5
111.14-20F	Flush	Room 104 Sink	Sink	5.20
111.14-21	First Draw	Room 104 Bubbler	Bubbler	142
111.14-21R	Follow-Up First Draw	Room 104 Bubbler	Bubbler	28.2
111.14-21F	Flush	Room 104 Bubbler	Bubbler	2.90
111.14-30	First Draw	Room 109 Left Sink	Sink	18.6
111.14-30R	Follow-Up First Draw	Room 109 Left Sink	Sink	19.6
111.14-30F	Flush	Room 109 Left Sink	Sink	3.20
111.14-52	First Draw	Storage Closet Next to Room 102 Sink	Sink	47.7
111.14-52R	Follow-Up First Draw	Storage Closet Next to Room 102 Sink	Sink	26.6
111.14-52F	Flush	Storage Closet Next to Room 102 Sink	Sink	6.80
111.14-53	First Draw	Room 201 Library Sink	Sink	17.6
111.14-53R	Follow-Up First Draw	Room 201 Library Sink	Sink	158
111.14-53F	Flush	Room 201 Library Sink	Sink	94.0
111.14-54	First Draw	Basement Slop Sink	Slop Sink	53.4
111.14-54R	Follow-Up First Draw	Basement Slop Sink	Slop Sink	122
111.14-54F	Flush	Basement Slop Sink	Slop Sink	11.3

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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

iATL INTERNATIONAL
ASBESTOS TESTING LABORATORIES

9000 Commerce Parkway Suite B
Mt. Laurel, New Jersey 08054
Telephone: 856-231-9449
Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

Client: Stohl Environmental
4169 Allendale Pkwy; Suite 100
Blasdell NY 14219

Client: STO708

Report Date: 2/17/2017
Report No.: 529613 - Lead Water
Project:
Project No.: 2016L-111.14

LEAD WATER SAMPLE ANALYSIS SUMMARY

Lab No.:6147732 **Client No.:**111.14-8R	**Location:**M Lav Across Hall M. Office-S	**Result(ppb):**27.0
Lab No.:6147733 **Client No.:**111.14-8F	**Location:**M Lav Across Hall M. Office-S	**Result(ppb):**4.00
Lab No.:6147734 **Client No.:**111.14-20R	**Location:**Rm 104-S	**Result(ppb):**19.5
Lab No.:6147735 **Client No.:**111.14-20F	**Location:**Rm 104-S	**Result(ppb):**5.20
Lab No.:6147736 **Client No.:**111.14-21R	**Location:**Rm 104-B	**Result(ppb):**28.2
Lab No.:6147737 **Client No.:**111.14-21F	**Location:**Rm 104-B	**Result(ppb):**2.90
Lab No.:6147738 **Client No.:**111.14-30R	**Location:**Rm 109-S	**Result(ppb):**19.6
Lab No.:6147739 **Client No.:**111.14-30F	**Location:**Rm 109-S	**Result(ppb):**3.20
Lab No.:6147740 **Client No.:**111.14-52R	**Location:**Str. Closet Near 102-S	**Result(ppb):**26.6
Lab No.:6147741 **Client No.:**111.14-52F	**Location:**Str. Closet Near 102-S	**Result(ppb):**6.80

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 2/13/2017
Date Analyzed: 02/17/2017
Signature:
Analyst: Mark Stewart

Approved By:
Frank E. Ehrenfeld, III
Laboratory Director

iATL INTERNATIONAL
ASBESTOS TESTING LABORATORIES

9000 Commerce Parkway Suite B
Mt. Laurel, New Jersey 08054
Telephone: 856-231-9449
Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

Client: Stohl Environmental
4169 Allendale Pkwy; Suite 100
Blasdell NY 14219

Client: STO708

Report Date: 2/17/2017
Report No.: 529613 - Lead Water
Project:
Project No.: 2016L-111.14

LEAD WATER SAMPLE ANALYSIS SUMMARY

Lab No.:6147742 **Client No.:**111.14-53R	**Location:**Room 201 Library Sink-S	**Result(ppb):**158
Lab No.:6147743 **Client No.:**111.14-53F	**Location:**Room 201 Library Sink-S	**Result(ppb):**94.0
Lab No.:6147744 **Client No.:**111.14-54R	**Location:**Basement Slop Sink-S	**Result(ppb):**122
Lab No.:6147745 **Client No.:**111.14-54F	**Location:**Basement Slop Sink-S	**Result(ppb):**11.3

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 2/13/2017
Date Analyzed: 02/17/2017
Signature:
Analyst: Mark Stewart

Approved By:
Frank E. Ehrenfeld, III
Laboratory Director

iATL INTERNATIONAL
ASBESTOS TESTING LABORATORIES

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CERTIFICATE OF ANALYSIS

Client: Stohl Environmental
4169 Allendale Pkwy; Suite 100
Blasdell NY 14219

Client: STO708

Report Date: 2/17/2017
Report No.: 529613 - Lead Water
Project:
Project No.: 2016L-111.14

Appendix to Analytical Report:

Customer Contact: Lab Results Final
Analysis: AAS-GF - ASTM D3559-08D, USEPA 40CFR 141.11B, 2010

This appendix seeks to promote greater understanding of any observations, exceptions, special instructions, or circumstances that the laboratory needs to communicate to the client concerning the above samples. The information below is used to help promote your ability to make the most informed decisions for you and your customers. Please note the following points of contact for any questions you may have.

iATL Customer Service: customerservice@iatl.com
iATL OfficeManager: cdavis@iatl.com
iATL Account Representative: Shirley Clark
Sample Login Notes: See Batch Sheet Attached
Sample Matrix: Water
Exceptions Noted: See Following Pages

General Terms, Warrants, Limits, Qualifiers:

General information about iATL capabilities and client/laboratory relationships and responsibilities are spelled out in iATL policies that are listed at www.iATL.com and in our Quality Assurance Manual per ISO 17025 standard requirements. The information therein is a representation of iATL definitions and policies for turnaround times, sample submittal, collection media, blank definitions, quantification issues and limit of detection, analytical methods and procedures, sub-contracting policies, results reporting options, fees, terms, and discounts, confidentiality, sample archival and disposal, and data interpretation.

iATL warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted. iATL disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. iATL accepts no legal responsibility for the purpose for which the client uses test results. Any analytical work performed must be governed by our Standard Terms and Conditions. Prices, methods and detection limits may be changed without notification. Please contact your Customer Service Representative for the most current information.

This confidential report relates only to those item(s) tested and does not represent an endorsement by NIST-NVLAP, AIHA LAP LLC, or any agency of local, state or province governments nor of any agency of the U.S. government.

This report shall not be reproduced except in full, without written approval of the laboratory.

Information Pertinent to this Report:

Analysis by AAS Graphite Furnace:
- ASTM D3559-08D, USEPA 40CFR 141.11B, 2010
- USEPA 200.9Pb, AAS-GF, RL <2 ppb/sample
- USEPA SW 846-7000B:7421 - Pb(AAS-GF, RL <2 ppb/sample)

Certification:
- NYS-DOH No. 11021
- NJDEP No. 03863

Regulatory limit for lead in drinking water is 15.0 parts per billion as cited in EPA 40 CFR 141.11 National Primary Drinking Water Regulations, Subpart B: Maximum contaminant levels for inorganic chemicals.

All results are based on the samples as received at the lab. iATL assumes that appropriate sampling methods have been used and that the data upon which these results are based have been accurately supplied by the client.

Sample results are not corrected for contamination by field or analytical blanks.

PPB = Parts per billion. 1 µg/L = 1 ppb MDL = 0.24 PPB Reporting Limit (RL) = 2.0 PPB

Disclaimers / Qualifiers:

There may be some samples in this project that have a “NOTE:” associated with a sample result. We use added disclaimers or qualifiers to inform the client about something that requires further explanation. Here is a complete list with highlighted disclaimers pertinent to this project. For a full explanation of these and other disclaimers, please inquire at **customerservice@iatl.com.**

Water Sample Turbidity greater than 1.0 NTU does not meet Federal and NJ State Primary & Secondary Drinking Water Standards.

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1.5 Laboratory Certifications

NEW YORK STATE OF OPPORTUNITY. Department of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

LAB ID: 11021

April 01, 2016

MR. FRANK E. EHRENFELD III
INTERNATIONAL ASBESTOS TESTING LABS
9000 COMMERCE PARKWAY
SUITE B
MT LAUREL, NJ 08054

Certificate Expiration Date:
April 01, 2017

Dear Mr. Ehrenfeld Iii,

Enclosed are certificate(s) of approval issued to your environmental laboratory for the current permit year. The certificate(s) supersede(s) any previously issued one(s) and is(are) in effect through the expiration date listed. Please carefully examine the certificate(s) to insure that the categories, subcategories, analytes, and methods for which your laboratory is approved are correct. In addition, verify that your laboratory's name, address, lead technical director, and identification number are accurate.

Pursuant to NYCRR Subpart 55-2.2, original certificates must be posted conspicuously in the laboratory and copies shall be made available to any client of the laboratory upon request.

Pursuant to NYCRR Subpart 55-2.6, any misrepresentation of the fields of accreditation (category - method - analyte) for which your laboratory is approved may result in denial, suspension, or revocation of your certification. Any use of the Environmental Laboratory Approval Program (ELAP) or National Environmental Laboratory Accreditation Program (NELAP) name, reference to the laboratory's approval status, and/or using the NELAP logo in any catalogs, advertising, business solicitations, proposals, quotations, laboratory analytical reports, or other materials must include the laboratory's ELAP identification number and distinguish between testing for which the laboratory is approved and testing for which the laboratory is not approved.

If you have any questions, please contact ELAP at the New York State Department of Health (NYS DOH), Wadsworth Center, PO Box 509, Albany NY, 12201-0509; by phone at (518) 485-5570; by facsimile at (518) 485-5568; and by email at elap@health.ny.gov.

Sincerely,

Michael P. Ryan, M.T. (ASCP), Ph.D.
Director, Division of Laboratory Quality Certification
Environmental Laboratory Approval Program

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2017
Issued April 01, 2016

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. FRANK E. EHRENFELD III
INTERNATIONAL ASBESTOS TESTING LABS
9000 COMMERCE PARKWAY SUITE B
MOUNT LAUREL, NJ 08054

NY Lab Id No: 11021

is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES POTABLE WATER
All approved subcategories and/or analytes are listed below:

Metals I	
Lead, Total	ASTM D3559-90, 96, 03 & 08 (D)
Miscellaneous	
Asbestos	EPA 100.1
	EPA 100.2

Serial No.: 54134

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2017
Issued April 01, 2016

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. FRANK E. EHRENFELD III
INTERNATIONAL ASBESTOS TESTING LABS
9000 COMMERCE PARKWAY SUITE B
MOUNT LAUREL, NJ 08054

NY Lab Id No: 11021

is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:

Characteristic Testing	
TCLP	EPA 1311
Metals I	
Lead, Total	EPA 7000B
Miscellaneous	
Asbestos in Friable Material	Item 198.1 of Manual
	EPA 600/M4/82/020
Asbestos in Non-Friable Material-PLM	Item 198.6 of Manual (NOB by PLM)
Asbestos in Non-Friable Material-TEM	Item 198.4 of Manual
Lead in Dust Wipes	EPA 7000B
Lead in Paint	EPA 7000B
Sample Preparation Methods	
	EPA 3050B

Serial No.: 54135

Property of the New York State Department of Health. Certificates are valid only at the address shown, must be conspicuously posted, and are printed on secure paper. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (518) 485-5570 to verify the laboratory's accreditation status.

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2017
Issued April 01, 2016

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. FRANK E. EHRENFELD III
INTERNATIONAL ASBESTOS TESTING LABS
9000 COMMERCE PARKWAY SUITE B
MOUNT LAUREL, NJ 08054

NY Lab Id No: 11021

is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES AIR AND EMISSIONS
All approved subcategories and/or analytes are listed below:

Metals I	
Lead, Total	NIOSH 7082
Miscellaneous	
Asbestos	40 CFR 763 APX A No. III
	NIOSH 7402
Fibers	NIOSH 7400 A RULES

Serial No.: 54136

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1.6 Chains of Custody

Chain of Custody Document

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Submitted to: (Lab Name) _____

STOHL Job # 2016L-111.14

Client: Niagara Falls

Contact: Joe Giarrizzo

Building: Niagara Falls Community Education Center

Location: Niagara Falls New York

LEAD

Water by AAS-GF: ASTM D3559-03D, US EPA 200.9 — X

Turnaround: 5 Days

Sample #	Location	Outlet Type	Time	Cooler Model	Lab ID	Results
111.14-8R	M Lav across hall M.office	S	7:00	6147732		
111.14-8F	M Lav across hall M.office	S	7:00	6147733		
111.14-20R	Rm 104	S	7:05	6147734		
111.14-20F	Rm 104	S	7:05	6147735		
111.14-21R	Rm 104	B	7:05	6147736		
111.14-21F	Rm 104	B	7:05	6147737		
111.14-30R	Rm 109	S	7:08	6147738		
111.14-30F	Rm 109	S	7:08	6147739		
111.14-52R	Str. Closet Near 102	S	7:10	6147740		
111.14-52F	Str. Closet Near 102	S	7:10	6147741		
111.14-53R	Room 201 Library Sink	S	7:22	6147742		
111.14-53F	Room 201 Library Sink	S	7:22	6147743		
111.14-54R	Basement slop sink	S	7:15	6147744		
111.14-54F	Basement slop sink	S	7:15	6147745		
	ACID +					
	2.16.17 RV					

Notes:

Please e-mail lab results to labs@stohlenv.com ☐ If checked, also e-mail results to: _____

Sampled By: _____ Print Name Stohl Env: Scott Edwards Date: 2/8/2017

Relinquished By: _____ Print Name Stohl Env: _____ Date: 2-8-17

Received (Name / Lab): _____ Date: _____ Time: _____

Sample Login (Name / Lab): RV 2.13.17 Date: _____ Time: _____

Analysis (Name / Lab): MS Date: 2/17/17 Time: _____

QA/QC Review (Name / Lab): 2/21/17 Date: _____ Time: _____

Archived / Released: _____ QA/QC InterLAB Use: _____ Date: _____ Time: _____