

November 29, 2016

Mr. Mark Rampado
North Tonawanda City School District
Director of Facilities
176 Walck Road
North Tonawanda, New York 14120

re: Investigation and Sampling of Drinking Water for Lead Concentrations

Dear Mr. Rampado:

Included with this letter is Stohl Environmental LLC's report for the Water Sampling performed at the educational buildings of the North Tonawanda City School District, including:

- Drake Elementary School, 388 Drake Drive, North Tonawanda, 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)".

The Investigation and Sampling was performed on October 1, 2016. The Protocol for the Investigation followed the requirements of NYS regulations as well as USEPA Technical Guidance Document "3-T's for Reducing Lead in Drinking Water in Schools".

As detailed in Section 1.2 (*Executive Summary*) of the accompanying report, based upon the sampling and analysis performed, 14 sources of potable water in Drake Elementary have been identified as having lead concentrations in water above the NYS Action Level of 15 parts per billion. To comply with NYS regulations, Response actions as identified in this report by the District are required.

Thank you for the opportunity to be of service to North Tonawanda City School District.

Sincerely,
Stohl Environmental, LLC.



William K. Sisco
Senior Project Manager

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

Prepared for:

**Mr. Mark Rampado
North Tonawanda City School District
Director of Facilities
176 Walck Road
North Tonawanda, New York 14120**

Prepared by:



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Conditions as of October 1, 2016

Summary Tabulation

Lead in Drinking Water Investigation

- 1.1. Scope of Work and Sampling Protocol
- 1.2. Executive Summary of Sampling and Analysis
- 1.3. Response Actions Required Under NYS Regulations
- 1.4. Laboratory Analytical Reports by Building
- 1.5. Laboratory Certifications
- 1.6. Chains of Custody
- 1.7. Photo documentation of Outlets Above Action Level for rooms where there are multiple outlets in a room

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1.1 Sampling Protocol and Summary of Results:

Stohl Environmental was retained by North Tonawanda City School District to perform sampling and analysis of potable water for elevated lead concentrations. Sampling was performed in the following buildings:

- Drake Elementary School, 388 Drake Drive, North Tonawanda, NY

Scope of Work:

Stohl Environmental was charged with collecting first-draw water samples from all outlets in Drake Elementary School. 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:

- **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.
- **Service Connection Sampling:** Samples were collected at the service connection as follows:
 - **Service Connection Sample:** As detailed in EPA guidance documents, this sample is not a first-draw sample. The cold water tap closest to the service connection was opened, and the sample was collected immediately after a change in water temperature was detected, or after 30 seconds.
 - **Water Main Sample:** This sample was collected at the same location as the Service Connection sample; however, it was collected after water was allowed to run an additional 3 minutes after the temperature change, but not more than 3 minutes and 30 seconds.
- **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 First Draw & Confirmatory Samples:

Building Name	Date of Sample Event	Total Number Samples Collected	First Draw Samples		Confirmatory Samples **	
			Number of Samples Below Action level of 15 ppb	Number of Samples Above Action Level of 15 ppb	Number of Samples Below Action level of 15 ppb	Number of Samples Above Action Level of 15 ppb
Drake Elementary School	10/1/2016	80	66	14	0	0

** Confirmatory 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.

Listing of Outlets Requiring Remediation

Locations of Outlets Analyzed above the NYS Action Level of 15 parts per billion based upon Analysis of First Draw Samples and Confirmatory Samples				
Sample #	Sample Type	Classroom or other Location	Fixture/Outlet type	Laboratory Analysis in ppb
448.5-1 WMF	Flush	Basement Boiler Room-Main Valve	Main Valve	48.9
448.5-2 WMTC	Temperature Change	Basement Boiler Room-Main Valve	Main Valve	19.0
448.5-3	First Draw	Room 24	Sink	34.0
448.5-7	First Draw	Room 22	Sink	32.4
448.5-11	First Draw	Room 21	Sink	17.0
448.5-13	First Draw	Room 20	Sink	398
448.5-14	First Draw	Room 20	Bubbler	37.8
448.5-26	First Draw	Room 17	Sink	15.6
448.5-28	First Draw	Room 13	Sink	25.8
448.5-48	First Draw	Room 8	Sink	16.2
448.5-71	First Draw	Room 7	Sink	19.0
448.5-72	First Draw	Room 7	Bubbler	32.6
448.5-75	First Draw	Kitchen (See Photo Section 1.7)	Sink	44.4
448.5-76	First Draw	Kitchen (See Photo Section 1.7)	Spigot	15.7

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



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- 1.7 Photo documentation of Outlets Above Action Level for rooms where there are multiple outlets in a room



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View of Kitchen Sink Location, Sample #:
448.5-75



View of Kitchen Spigot Location, Sample #:
448.5-76