



February 12, 2021

Mr. George Hula  
Director of Facilities  
Briarcliff Manor Union Free School District  
45 Ingham Rd  
Briarcliff Manor, NY 10510

**Subject: Lead Testing of School Drinking Water at Briarcliff Middle School**  
**Project Number: 31402629.002**

Dear Mr. Hula:

At your request on behalf of the Briarcliff Manor Union Free School District, WSP USA Inc. (WSP) has conducted a testing program for lead in water. WSP's team of industrial hygienists performed water sampling on October 10<sup>th</sup>, 2020 and Post Remediation Sampling on December 18, 2020. In addition to this final report, WSP has provided the following New York State Department of Health (NYS DOH) required documentation; Laboratory Results, Exceedance Table, a draft Parents Notification Letter and notification to the local department of health of exceedances, when applicable. When requested by the district, WSP completed required reporting into the NYS Health Electronic Response Data System (HERDS).

## BACKGROUND

On September 6, 2016, the Governor signed legislation requiring all school districts in NYS to test potable water systems for lead contamination and to take responsive actions. To implement this new law, the DOH issued emergency regulations, titled Lead Testing in School Drinking Water. On May 9, 2018, the Lead Testing in School Drinking Water final regulation was published in the State Register, replacing the emergency regulation:

- By September 30, 2016, all school buildings serving children in pre-K through grade 5 were required collect a sample from each outlet for testing.
- By October 31, 2016, all school buildings serving children in grades 6 through 12 must collect a sample from each outlet for testing.
- Schools must complete initial first-draw sampling for Compliance Year 2020 between January 1, 2020 – December 31, 2020, and every 5 years thereafter or at an earlier time as determined by the Commissioner of Health. On October 13, 2020, NYS DOH provided an Extension of School Lead Testing Requirements to June 30, 2021.

## KEY DEFINITIONS IN THE LAW/REGULATIONS

- Outlet means a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, hose bib, sinks or faucets.
- “Applicable” outlets: Outlets that should be sampled may be located anywhere on school property including external outlets (hose bibs) if the outlet may be used for drinking or cooking (including food preparation). Superintendents or their designees have the responsibility to identify which outlets on a school property meet the regulation requirements for sampling (“applicable outlets”). If a Superintendent or their designee determines that they have outlets that fall outside of the scope of the regulation (outlets not used or potentially used for drinking or cooking), the school must remediate or/and have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes (“non-applicable outlets”).
- “Non-applicable” outlets: The Rule of Thumb is that generally, any outlet in a room or office within a school that is not used by students (pre-kindergarten through grade 12) and does not provide water for drinking or cooking does not require sampling.
- Action level means 15 parts per billion (ppb). Lead test results greater than 15 ppb exceeds the lead action level and requires the outlet to be taken out of service and a remediation action plan be implemented.



- For additional guidance regarding applicable vs. non-applicable outlets, and other requirements please see the Appendices for NYS DOH Lead Testing in School Drinking Water 2020 Compliance Requirements, and NYS DOH Frequently Asked Questions (FAQs).

## SAMPLING METHODOLOGY

- 1** The NYS DOH Emergency Regulation, Section 67-4.3 – Monitoring states:
  - First-draw samples shall be collected from all “applicable” outlets. A first-draw sample volume shall be 250 milliliters (mL), collected from a cold-water outlet before any water is used. The water shall be motionless in the pipes for a minimum of 8 hours, but no more than 18 hours, before sample collection. Note: The NYS DOH requires that for outlets which do not have regular use and water remains motionless in the pipes for greater than 18 hours, the outlets were to be sampled as well (to represent “normal use patterns”).
  - All first-draw samples shall be analyzed by a laboratory approved to perform such analyses by the Department’s Environmental Laboratory Approval Program (ELAP).

Although not required by the NYS DOH Emergency Regulation, WSP also followed additional methodologies included in Environmental Protection Agency (EPA) document entitled “3Ts for Reducing Lead in Drinking Water in Schools”.

- 2** Sampling Plan
  - In developing a sampling plan before sample collection took place at the School, WSP determined the location of the water service line. Sampling at the School started from a location closest to the service line entrance and proceeded outwards from that point.
  - A map, depicting the location of the service line entrance, and arrows indicating the direction of sampling was provided to and used by the sampling team. The sampling team verified the location of the service line entrance prior to sampling.
- 3** Laboratory Analysis : Samples were submitted to York Analytical (Stratford, CT) and/or EMSL (Cinnaminson, NJ) for analysis under chain-of-custody. The laboratories are certified through the NYS DOH Environmental Laboratory Approval Program (ELAP) and are approved for analysis of lead in potable water.
- 4** Re-sampling can be performed provided corrective action or remediation options, as reviewed in the Recommendation section, are complete. Proper flushing of new equipment (e.g. pipes, faucets etc.) is recommended.
- 5** Flushing Program and Resampling: when routine flushing programs are implemented, the school plumbing system should be flushed according to an establish protocol. After flushing and before sampling or resampling, a period of 3-4 days of normal use is recommended. First-draw lead water sampling can be performed after the required hold time of 8-18 hours is completed.
- 6** In accordance with the NYS DOH, the following post-remediation testing requirements apply:
  - Follow-up samples collected after an outlet has been remediated must also be “first-draw” samples. Schools may choose to perform additional sampling (i.e., 30-second flush, etc.) to determine the contribution of lead from plumbing to guide remediation decisions.
  - Only those outlets that exceed the action level need to be resampled (following remediation).
  - All remediated outlets will likely require flushing before being placed back into service.
  - Post-remediation tests results need to be reported in the Department’s HERDS application on HCS, and on the school website within the same reporting timeframes/requirements as specified for the initial sampling.



## RESULTS DISCUSSION

The Assessment Results Exceedance Table provides details on the date of sampling, sample identification, location and laboratory results that exceeded 15 ppb. A copy of the full laboratory results and the chain of custody are presented at the end of this report in Appendix A. Laboratory approvals can be found in Appendix B.

- Of the 31 samples collected at Briarcliff Manor Middle School, 1 (3.2%) had lead concentrations that exceeded 15 ppb. The table below details the sample locations and the laboratory results.

Briarcliff Middle School				
Sample Date	Sample ID	Floor	Location	Lead Level (ppb)
10/10/2020	01-Kitchen-KF-P-01	1 <sup>st</sup>	Kitchen- Pot filler-KF-1	138

Upon receipt of the results, WSP made the following recommendations to the district as required by Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rules and Regulations of the State of New York:

- Review the Exceedance Table, Laboratory Results and Notification Letter, indicating lead water sample results exceeding the NYSDOH Action Level of 15 ppb, and require the outlet to be taken out of service and a remediation action plan be implemented. Please see Lead Testing in School Drinking Water, 10 NYCRR Subpart 67-4, adopted May 9, 2018 for applicable requirements ([https://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](https://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm))

## POST-REMEDIATION TESTING RESULTS

The District performed remediation actions which included implementing a systematic flushing program for the outlet which exceeded the Action Level of 15 ppb.

- Resampling was completed on December 18<sup>th</sup>, 2020. The post remediation laboratory results were below the NYS DOH Action Level of 15 ppb. The table below details the sample locations and the laboratory results.

Briarcliff Middle School – Post Remediation Sampling					
Sample Date	Sample ID	Floor	Location	Lead Level (ppb)	Initial Lead Level (ppb) 12/18/2020
12/18/2020	01-Kitchen-KF-P-01	1	Kitchen-Pot filler-KF- 1	3.14	138

## RECOMMENDATIONS

If lead concentrations exceeded 15 ppb, WSP offers the following recommendations to Briarcliff Manor Union Free School District for remediation:

**In accordance with Subpart 67-4, Section 67-4.4 Response, the following immediate Response Actions are necessary:**

- Prohibit the use of the outlet immediately (take outlet out of service or turn off) until:
  - A lead remedial action plan is implemented to mitigate the lead level at the outlet, and
  - Post-remediation test results indicate that the lead levels are at or below the action level;
- Provide building occupants with an adequate supply of water for drinking and cooking until remediation is performed;
- 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 (**Notification issued by WSP**);
- 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 (**See Attached Draft Letter for issuance by District**).

**If an outlet tested above the “action level”, it can still be used for cleaning and handwashing. However, please note:**



- Signage must be placed at such outlets stating that the water should not be used for drinking (only handwashing and cleaning).
- Pictures should be used if there are small children using the water outlets, and staff should ensure the children understand what the signs mean and monitor the outlets to ensure they are not used for drinking.

#### **Corrective Actions / Remediation Options**

- Permanent removal of an outlet
- Outlet replacement with “lead-free” plumbing materials
- Pipe replacement with “lead-free” plumbing materials
- Remove other sources of lead (lead pipe, lead solder joints, and brass plumbing components with “lead-free” materials)
- Flushing (systematic flushing program)
- Point of Use (POU) Filters\*
- Supervision
- Engineering controls
- Education
- Signage. Signage used at outlets are considered to be a temporary measure and cannot be used as a permanent measure.

#### **Non-applicable Outlets**

- Tempered Outlets. These outlets should be clearly posted with signs (“Do Not Drink” or equivalent), provide awareness education to students and staff and implement appropriate remedial actions to prevent drinking from these outlets.
- Science/Art sinks: as noted by NYSDOL, typically these classroom settings prohibit eating and/or drinking. The school Superintendent has the authority to determine whether these outlets may be used for drinking or cooking or whether they require sampling. Management controls such as restricted/secured access (e.g. locked doors), signage, required supervision and other management controls are part of the overall safety and health program elements that should be in place.

## **LIMITATIONS, EXCEPTIONS AND ASSUMPTIONS**

*Opinions and recommendations presented in this report apply to site conditions and features as they existed at the time of WSP’s site visits, and those reasonably foreseeable. They cannot necessarily apply to conditions and features of which WSP is unaware and has not had the opportunity to evaluate. The conclusions presented in this report are professional opinions based solely upon WSP’s visual observations of accessible areas and sampling data. These conclusions are intended exclusively for the purpose state herein, at the sites indicated, and for the project indicated. No expressed or implied representation or warranty is included or intended in our reports, except that our services were performed, within the limits prescribed by our client, with the customary thoroughness and competence of our profession.*

If you have any questions concerning this information, please feel free to contact us at 212-612-7900. We look forward to working with you in the future.

Report Completed by:

*Stephen Gruber*

Stephen Gruber  
Industrial Hygienist

Report Completed by:

*Joseph Kapp*

Joseph Kapp, CIH  
Industrial Hygiene Manager



*Appendix A – Laboratory Results & Chain of Custody*

*Appendix B - Laboratory ELAP Certifications*

*Appendix C - NYS DOH Lead Testing in School Drinking Water 2020 Compliance Requirements, and NYS DOH Frequently Asked Questions (FAQs)*

CC : P. Saha, C. Napolitano



## **APPENDIX A**

### **Laboratory Results & Chain of Custody**



**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone: (856) 303-2500 Fax: (856) 858-4571 Email: EnvChemistry2@emsl.com

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Attn:

**Joseph Kapp  
WSP USA Solutions Inc  
96 Morton Street  
8th floor  
New York, NY 10014**

10/20/2020

Phone: (212) 612-7900  
Fax:

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 10/13/2020. The results are tabulated on the attached data pages for the following client designated project:

**31402629.002.02; Briarcliff Manor School District (Briarcliff Manor Middle School)**

The reference number for these samples is EMSL Order #012011334. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 303-2500.

Approved By:

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Phillip Worby, Environmental Chemistry  
Laboratory Director



The test results contained within this report meet the requirements of NELAP and/or the specific certification program that is applicable, unless otherwise noted.  
NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA ELAP 1877

The samples associated with this report were received in good condition unless otherwise noted. This report relates only to those items tested as received by the laboratory. The QC data associated with the sample results meet the recovery and precision requirements established by the NELAP, unless specifically indicated. All results for soil samples are reported on a dry weight basis, unless otherwise noted. This report may not be reproduced except in full and without written approval by EMSL Analytical, Inc.

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>[EnvChemistry2@emsl.com](mailto:EnvChemistry2@emsl.com)

EMSL Order:	012011334
CustomerID:	LBAP78
CustomerPO:	20PO010630
ProjectID:	

Attn: **Joseph Kapp**  
**WSP USA Solutions Inc**  
**96 Morton Street**  
**8th floor**  
**New York, NY 10014**

Phone: (212) 612-7900  
 Fax:  
 Received: 10/13/2020 12:00 AM

Project: 31402629.002.02; Briarcliff Manor School District (Briarcliff Manor Middle School)

**Analytical Results**

**Client Sample Description** 01-Coachs Off-BF-P-01  
 1st- Coach's office- Bathroom-BF- 1  
**Collected:** 10/10/2020 8:22:00 AM  
**Lab ID:** 012011334-0001

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 20:53

**Client Sample Description** 01-PE office-BF-P-02  
 1st- PE office- Bathroom-BF- 2  
**Collected:** 10/10/2020 8:23:00 AM  
**Lab ID:** 012011334-0002

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 20:56

**Client Sample Description** 01-Home Ec-CF-P-01  
 1st- Home Economics- Classroom sink  
 (middle island front)-CF- 1  
**Collected:** 10/10/2020 8:24:00 AM  
**Lab ID:** 012011334-0003

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	3.04	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 20:58

**Client Sample Description** 01-Home Ec-CF-P-02  
 1st- Home Economics- Classroom sink  
 (middle island front hose)-CF- 2  
**Collected:** 10/10/2020 8:25:00 AM  
**Lab ID:** 012011334-0004

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 20:59

**Client Sample Description** 01-Home Ec-CF-P-03  
 1st- Home Economics- Classroom sink  
 (middle island back)-CF- 3  
**Collected:** 10/10/2020 8:25:00 AM  
**Lab ID:** 012011334-0005

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	2.39	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:05

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**Analytical Results**

<b>Client Sample Description</b>	01-Home Ec-CF-P-04 1st- Home Economics- Classroom sink (middle island back hose)-CF- 4	<b>Collected:</b>	10/10/2020 8:25:00 AM	<b>Lab ID:</b>	012011334-0006
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Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:07

<b>Client Sample Description</b>	01-Home Ec-CF-P-05 1st- Home Economics- Classroom sink (left countertop)-CF- 5	<b>Collected:</b>	10/10/2020 8:26:00 AM	<b>Lab ID:</b>	012011334-0007
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Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	3.28	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:08

<b>Client Sample Description</b>	01-Home Ec-CF-P-06 1st- Home Economics- Classroom sink (right countertop)-CF- 6	<b>Collected:</b>	10/10/2020 8:27:00 AM	<b>Lab ID:</b>	012011334-0008
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Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:09

<b>Client Sample Description</b>	01-Home Ec-CF-P-07 1st- Home Economics- Classroom sink (right countertop hose)-CF- 7	<b>Collected:</b>	10/10/2020 8:27:00 AM	<b>Lab ID:</b>	012011334-0009
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Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:10

<b>Client Sample Description</b>	01-Art-CF-P-08 1FL- Art rm- Classroom sink (right)-CF- 8	<b>Collected:</b>	10/10/2020 8:28:00 AM	<b>Lab ID:</b>	012011334-0010
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Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	2.02	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:12

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Project: 31402629.002.02; Briarcliff Manor School District (Briarcliff Manor Middle School)

**Analytical Results**

**Client Sample Description** 01-Art-CF-P-09 **Collected:** 10/10/2020 **Lab ID:** 012011334-0011  
 1FL- Art rm- Classroom sink (left)-CF- 9 8:27:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	4.23	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:13

**Client Sample Description** 01-FBRR-BF-P-03 **Collected:** 10/10/2020 **Lab ID:** 012011334-0012  
 1FL- Right faculty- BR-BF- 3 8:28:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:19

**Client Sample Description** 01-FBRL-BF-P-04 **Collected:** 10/10/2020 **Lab ID:** 012011334-0013  
 1FL- Left faculty- BR-BF- 4 8:29:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:21

**Client Sample Description** 01-Faculty rm-CF-P-10 **Collected:** 10/10/2020 **Lab ID:** 012011334-0014  
 1FL- Faculty rm- Classroom sink-CF- 10 8:03:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	1.29	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:22

**Client Sample Description** 01-BBR-BF-P-05 **Collected:** 10/10/2020 **Lab ID:** 012011334-0015  
 1FL- Boys BR- Bathroom sink (left)-BF- 5 8:31:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	5.29	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:23

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**Analytical Results**

**Client Sample Description** 01-BBR-BF-P-06  
 1FL- Boys BR- Bathroom sink (center)-BF- 6  
**Collected:** 10/10/2020 8:32:00 AM  
**Lab ID:** 012011334-0016

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	2.81	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:24

**Client Sample Description** 01-BBR-BF-P-07  
 1FL- Boys BR- Bathroom sink (right)-BF- 7  
**Collected:** 10/10/2020 8:34:00 AM  
**Lab ID:** 012011334-0017

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	10.7	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:26

**Client Sample Description** 01-GBR-BF-P-08  
 1FL- Girls BR- Bathroom sink (left)-BF- 8  
**Collected:** 10/10/2020 8:38:00 AM  
**Lab ID:** 012011334-0018

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	4.59	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:27

**Client Sample Description** 01-GBR-BF-P-09  
 1FL- Girls BR- Bathroom sink (right)-BF- 9  
**Collected:** 10/10/2020 8:47:00 AM  
**Lab ID:** 012011334-0019

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	3.89	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:28

**Client Sample Description** 01-SBR-BF-P-10  
 1FL- Student bathroom- Bathroom sink (right)-BF- 10  
**Collected:** 10/10/2020 8:48:00 AM  
**Lab ID:** 012011334-0020

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	1.47	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:29

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**Analytical Results**

**Client Sample Description** 01-SBR-WB-P-11 **Collected:** 10/10/2020 **Lab ID:** 012011334-0021  
 1FL- Student bathroom- Bathroom sink  
 (left)-WB- 11 8:49:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	2.21	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:37

**Client Sample Description** 01-Café-KF-P-01 **Collected:** 10/10/2020 **Lab ID:** 012011334-0022  
 1FL- Cafeteria- Water bottle filler-KF- 1 8:05:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:41

**Client Sample Description** 01-Kitchen-KF-P-01 **Collected:** 10/10/2020 **Lab ID:** 012011334-0023  
 1FL- Kitchen- Pot filler-KF- 1 8:54:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	138 D	2.00 µg/L	10/15/2020 JA	10/16/2020 JW 15:00

**Client Sample Description** 01-Kitchen-CF-P-02 **Collected:** 10/10/2020 **Lab ID:** 012011334-0024  
 1FL- Kitchen- Kitchen faucet (back right)-  
 CF- 2 8:55:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	13.9	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:42

**Client Sample Description** 01-Library off-CF-P-11 **Collected:** 10/10/2020 **Lab ID:** 012011334-0025  
 1FL- Library office- Classroom sink-CF- 11 8:56:00 AM

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	3.10	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:43

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077  
 Phone/Fax: (856) 303-2500 / (856) 858-4571  
<http://www.EMSL.com> [EnvChemistry2@emsl.com](mailto:EnvChemistry2@emsl.com)

EMSL Order: 012011334  
 CustomerID: LBAP78  
 CustomerPO: 20PO010630  
 ProjectID:

Attn: **Joseph Kapp**  
**WSP USA Solutions Inc**  
**96 Morton Street**  
**8th floor**  
**New York, NY 10014**

Phone: (212) 612-7900  
 Fax:  
 Received: 10/13/2020 12:00 AM

Project: 31402629.002.02; Briarcliff Manor School District (Briarcliff Manor Middle School)

**Analytical Results**

**Client Sample Description** 01-FBR-BF-P-12  
 1FL- Faculty BR adj. to Rm 110- BR sink-  
 BF- 12  
**Collected:** 10/10/2020 8:58:00 AM  
**Lab ID:** 012011334-0026

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:45

**Client Sample Description** 02-FBR-BF-P-13  
 2FL- Faculty BR adj. to Rm 302- BR sink-  
 BF- 13  
**Collected:** 10/10/2020 9:01:00 AM  
**Lab ID:** 012011334-0027

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	1.38	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:48

**Client Sample Description** 02-FBR-BF-P-14  
 2FL- Faculty BR adj. to Rm 210- BR sink-  
 BF- 14  
**Collected:** 10/10/2020 9:04:00 AM  
**Lab ID:** 012011334-0028

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	1.56	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:50

**Client Sample Description** 01-Nurse-NS-P-01  
 1FL- Nurses office- Classroom sink-NS- 1  
**Collected:** 10/10/2020 10:17:00 AM  
**Lab ID:** 012011334-0029

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	ND	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:51

**Client Sample Description** 01-Nurse-NS-P-02  
 1FL- Nurses office (Back right BR)-  
 Bathroom sink-NS- 2  
**Collected:** 10/10/2020 10:18:00 AM  
**Lab ID:** 012011334-0030

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	1.43	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:52

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (856) 303-2500 / (856) 858-4571

<http://www.EMSL.com>[EnvChemistry2@emsl.com](mailto:EnvChemistry2@emsl.com)

EMSL Order:	012011334
CustomerID:	LBAP78
CustomerPO:	20PO010630
ProjectID:	

Attn: **Joseph Kapp**  
**WSP USA Solutions Inc**  
**96 Morton Street**  
**8th floor**  
**New York, NY 10014**

Phone: (212) 612-7900  
 Fax:  
 Received: 10/13/2020 12:00 AM

Project: 31402629.002.02; Briarcliff Manor School District (Briarcliff Manor Middle School)

**Analytical Results**

**Client Sample Description** 01-Nurse-NS-P-03 **Collected:** 10/10/2020 **Lab ID:** 012011334-0031  
 1FL- Nurses office (Back left BR)- Bathroom 10:18:00 AM  
 sink-NS- 3

Method	Parameter	Result	RL Units	Prep Date & Analyst	Analysis Date & Analyst
<b>METALS</b>					
200.8	Lead	2.02	1.00 µg/L	10/14/2020 KB	10/14/2020 KB 21:53

**Definitions:**

- MDL - method detection limit
- J - Result was below the reporting limit, but at or above the MDL
- ND - indicates that the analyte was not detected at the reporting limit
- RL - Reporting Limit (Analytical)
- D - Dilution Sample required a dilution which was used to calculate final results

EMSL MANHATTAN LAB RECEIVED

### Lead (Pb) Chain of Custody

2020 OCT 10 PM 1:41

Client: Briarcliff Manor School District  
 Location Sampled: Briarcliff Manor Middle School  
 Date: 10/10/2020 Address: 444 Pleasantville Rd, Briarcliff Manor, NY 10510  
 Report To (Name): Joseph Kapp Sampled By: N. Casale, M. DeSouza (N.C. Ed 2/12/2021)  
 Email Address: [Joseph.Kapp@wsp.com](mailto:Joseph.Kapp@wsp.com); [LB.LabResults@wsp.com](mailto:LB.LabResults@wsp.com); [Alexander.Smolyar@wsp.com](mailto:Alexander.Smolyar@wsp.com)  
 Project Number: 31402629.002.02

#### Turnaround Time (TAT) Options\* - Please Check

3 Hour	6 Hour	24 Hour	48 Hour	72 Hour	<input checked="" type="checkbox"/> 120 Hour	1 Week	2 Week
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Drinking Water Preserved with HNO<sub>3</sub> pH < 2

Sample ID	Lab ID	Sample Description	Volume	Date/Time Sampled
Ex. 003-312-DW-P-015		Floor, Room Name, Room Number, Type, Type Number	250 mL	8:20am
01-COACH OFFICE BFP-01	M1	IFL, Coach's office bathroom. BFP1	250 mL	8:22am
01 PE OFFICE BFP-02	M2	IFL PE OFFICE bathroom BFP2	250 mL	8:23am
01 HOME EC CF P-01	M3	IFL Home Economics Classroom Sink (middle island front) CF1	250 mL	8:24am
01 HOME EC CF P-02	M4	IFL Home Economics classroom sink (middle island front Hox) CF2	250 mL	8:25am
01 HOME EC CF P-03	M5	IFL Home Economics classroom sink (middle island back) CF3	250 mL	8:25am
01 HOME EC CF P-04	M6	IFL Home Economics classroom sink (middle island back Hox) CF4	250 mL	8:25am
01 HOME EC CF P-05	M7	IFL Home Economics classroom sink (left countertop) CF5	250 mL	8:26am
01 HOME EC CF P-06	M8	IFL Home Economics Classroom sink (Right countertop) CF6	250 mL	8:27am
01 HOME EC CF P-07	M9	IFL Home Economics Classroom sink (Right countertop Hox) CF7	250 mL	8:27am
01 ART CF P-08	M10	IFL Art rm, Classroom sink Right CF8	250 mL	8:28am
01 ART CF P-09	M11	IFL Art rm, Classroom sink left CF9	250 mL	8:27am
01 FBRL BFP-03	M12	IFL Right Faculty BR BFP3	250 mL	8:28am
01 FBRL BFP-04	M13	IFL Left Faculty BR BFP4	250 mL	8:29am
01 Faculty room BFP-05	M14	IFL Faculty Rm, Classroom sink CF10	250 mL	8:30am
01 BBR-BFP-05	M15	IFL Boys BR Bathroom sink <sup>left</sup> BFP5	250 mL	8:31am
01 BBR-BFP-06	M16	IFL Boys BR Bathroom sink Center BFP6	250 mL	8:32am
01 BBR-BFP-07	M17	IFL Boys BR Bathroom sink Right BFP7	250 mL	8:34am
01 GBR-BFP-08	M18	IFL Girls BR Bathroom sink left BFP8	250 mL	8:38am
<del>01 BBR-BFP-09</del>	<del>M19</del>	<del></del>	250 mL	<del></del>
<del>01 BBR-BFP-10</del>	<del>M20</del>	<del></del>	250 mL	<del></del>
<del>01 BBR-BFP-11</del>	<del>M21</del>	<del></del>	250 mL	<del></del>

Relinquished by: STEPHEN GRUKEN Date: 10.10.20 Time: 1215  
 Received by: Diana Holoyak Date: 10/10/2020 Time: 1:41 PM  
 Comments: A first draw sample (P) was taken at a drinking water fountain (DW) on the 3rd floor (003) outside of room 312 (312) and is the 15th outlet counted (015). DW= drinking water fountain. WB= Water Bottle Filler. CF= Classroom Sink Faucet. KF= Kitchen Faucet. BF= Bathroom Sink Faucet. NS= Nurse's Office Faucet.  
N. Casale 10/12/2020 7:39

012011334

Sample ID	Lab ID	Sample Description	Volume	Date/Time Sampled
01-GBR-BF-P-09	M19	IFL GBR/BF, Bathroom sink right, BF 9	250 mL	8:47
01-SBR-BF-P-10	M20	IFL, Student Bathroom (Right) Bathroom sink, BF10	250 mL	8:48
01-SBR-BF-P-11	M21	IFL, Student Bathroom (left) Bathroom sink, BF11	250 mL	8:49
01-Cafe-WB-P-01	M22	IFL, Cafeteria, water bottle filler, WB1	250 mL	8:50
01-Kitchen-KF-P-01	M23	IFL, Kitchen, Pot filler, KF1	250 mL	8:54
01-Kitchen-KF-P-02	M24	IFL kitchen, kitchen faucet (back right) KF2	250 mL	8:55
01-Library-CL-P-11	M25	IFL library office, classroom sink, CF11	250 mL	8:56
01-FBR, BF-P-12	M26	IFL Faculty BR adj to Rm 110, BR sink BF12	250 mL	8:58
02-FBR-BF-P-13	M27	2FL, Faculty BR adj to Rm 302, BR sink BF13	250 mL	9:01
02-FBR-BF-P-14	M28	2FL, Faculty BR adj to Rm 210, BR sink, BF14	250 mL	9:04
01-Nurse-NS-P-01	M29	IFL, Nurses office classroom sink NS1	250 mL	10:17am
01 Nurse NS-P-02	M30	IFL, Nurses office (Back Right BR) Bathroom sink <sup>NS2</sup> B	250 mL	10:18am
01 Nurse NS-P-03	M31	IFL Nurses office (Back left BR) Bathroom sink NS3	250 mL	10:18am
			250 mL	

EMSL MANHATTAN LAB  
 RECEIVED  
 10/10/2020 10:41 AM

Relinquished by:	STEPHEN GRUBER	Date:	10/10/20	Time:	12:15
Received by:	<i>[Signature]</i>	Date:	10/10/2020	Time:	1:41 PM
Comments:					

*[Handwritten mark]*



# Technical Report

prepared for:

**WSP USA Solutions Inc. (New York, NY)**  
96 Morton Street, 8th Floor  
New York NY, 10011  
**Attention: Joseph Kapp**

Report Date: 12/28/2020  
**Client Project ID: 31402629.002.02.00**  
York Project (SDG) No.: 20L0953

CT Cert. No. PH-0723

New Jersey Cert. No. CT005 and NY037



New York Cert. Nos. 10854 and 12058

PA Cert. No. 68-04440

120 RESEARCH DRIVE  
[www.YORKLAB.com](http://www.YORKLAB.com)

STRATFORD, CT 06615  
(203) 325-1371

132-02 89th AVENUE  
FAX (203) 357-0166

RICHMOND HILL, NY 11418  
[ClientServices@yorklab.com](mailto:ClientServices@yorklab.com)

Report Date: 12/28/2020  
Client Project ID: 31402629.002.02.00  
York Project (SDG) No.: 20L0953

**WSP USA Solutions Inc. (New York, NY)**  
96 Morton Street, 8th Floor  
New York NY, 10011  
Attention: Joseph Kapp

## Purpose and Results

This report contains the analytical data for the sample(s) identified on the attached chain-of-custody received in our laboratory on December 18, 2020 and listed below. The project was identified as your project: **31402629.002.02.00**.

The analyses were conducted utilizing appropriate EPA, Standard Methods, and ASTM methods as detailed in the data summary tables.

All samples were received in proper condition meeting the customary acceptance requirements for environmental samples except those indicated under the Sample and Analysis Qualifiers section of this report.

All analyses met the method and laboratory standard operating procedure requirements except as indicated by any data flags, the meaning of which are explained in the Sample and Data Qualifiers Relating to This Work Order section of this report and case narrative if applicable.

The results of the analyses, which are all reported on dry weight basis (soils) unless otherwise noted, are detailed in the following pages.

Please contact Client Services at 203.325.1371 with any questions regarding this report.

<u>York Sample ID</u>	<u>Client Sample ID</u>	<u>Matrix</u>	<u>Date Collected</u>	<u>Date Received</u>
20L0953-01	01-Kitchen-KF-P-015	Drinking Water	12/18/2020	12/18/2020

## General Notes for York Project (SDG) No.: 20L0953

1. The RLs and MDLs (Reporting Limit and Method Detection Limit respectively) reported are adjusted for any dilution necessary due to the levels of target and/or non-target analytes and matrix interference. The RL(REPORTING LIMIT) is based upon the lowest standard utilized for the calibration where applicable.
2. Samples are retained for a period of thirty days after submittal of report, unless other arrangements are made.
3. York's liability for the above data is limited to the dollar value paid to York for the referenced project.
4. This report shall not be reproduced without the written approval of York Analytical Laboratories, Inc.
5. All analyses conducted met method or Laboratory SOP requirements. See the Sample and Data Qualifiers Section for further information.
6. It is noted that no analyses reported herein were subcontracted to another laboratory, unless noted in the report.
7. This report reflects results that relate only to the samples submitted on the attached chain-of-custody form(s) received by York.
8. Analyses conducted at York Analytical Laboratories, Inc. Stratford, CT are indicated by NY Cert. No. 10854; those conducted at York Analytical Laboratories, Inc., Richmond Hill, NY are indicated by NY Cert. No. 12058.

Approved By:



Benjamin Gulizia  
Laboratory Director

Date: 12/28/2020





### Sample Information

**Client Sample ID:** 01-Kitchen-KF-P-015

**York Sample ID:** 20L0953-01

<u>York Project (SDG) No.</u>	<u>Client Project ID</u>	<u>Matrix</u>	<u>Collection Date/Time</u>	<u>Date Received</u>
20L0953	31402629.002.02.00	Drinking Water	December 18, 2020 6:18 am	12/18/2020

**Lead by EPA 200.8**

**Log-in Notes:**

**Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	3.14		ug/L	1.00	1	EPA 200.8	12/24/2020 10:44	12/28/2020 15:19	BML
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		



## Analytical Batch Summary

**Batch ID:** BL01422

**Preparation Method:** EPA 200.8

**Prepared By:** BML

YORK Sample ID	Client Sample ID	Preparation Date
20L0953-01	01-Kitchen-KF-P-015	12/24/20
BL01422-BLK1	Blank	12/24/20
BL01422-BS1	LCS	12/24/20



**Metals by ICP/MS - Quality Control Data**  
**York Analytical Laboratories, Inc.**

Analyte	Result	Reporting Limit	Units	Spike Level	Source* Result	%REC	%REC Limits	Flag	RPD	RPD Limit	Flag
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**Batch BL01422 - EPA 200.8**

**Blank (BL01422-BLK1)** Prepared: 12/24/2020 Analyzed: 12/28/2020

Lead	ND	1.00	ug/L								
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**LCS (BL01422-BS1)** Prepared: 12/24/2020 Analyzed: 12/28/2020

Lead	51.0		ug/L	50.0		102	85-115				
------	------	--	------	------	--	-----	--------	--	--	--	--



## Sample and Data Qualifiers Relating to This Work Order

### Definitions and Other Explanations

*	Analyte is not certified or the state of the samples origination does not offer certification for the Analyte.
ND	NOT DETECTED - the analyte is not detected at the Reported to level (LOQ/RL or LOD/MDL)
RL	REPORTING LIMIT - the minimum reportable value based upon the lowest point in the analyte calibration curve.
LOQ	LIMIT OF QUANTITATION - the minimum concentration of a target analyte that can be reported within a specified degree of confidence. This is the lowest point in an analyte calibration curve that has been subjected to all steps of the processing/analysis and verified to meet defined criteria. This is based upon NELAC 2009 Standards and applies to all analyses.
LOD	LIMIT OF DETECTION - a verified estimate of the minimum concentration of a substance in a given matrix that an analytical process can reliably detect. This is based upon NELAC 2009 Standards and applies to all analyses conducted under the auspices of EPA SW-846.
MDL	METHOD DETECTION LIMIT - a statistically derived estimate of the minimum amount of a substance an analytical system can reliably detect with a 99% confidence that the concentration of the substance is greater than zero. This is based upon 40 CFR Part 136 Appendix B and applies only to EPA 600 and 200 series methods.
Reported to	This indicates that the data for a particular analysis is reported to either the LOD/MDL, or the LOQ/RL. In cases where the "Reported to" is located above the LOD/MDL, any value between this and the LOQ represents an estimated value which is "J" flagged accordingly. This applies to volatile and semi-volatile target compounds only.
NR	Not reported
RPD	Relative Percent Difference
Wet	The data has been reported on an as-received (wet weight) basis
Low Bias	Low Bias flag indicates that the recovery of the flagged analyte is below the laboratory or regulatory lower control limit. The data user should take note that this analyte may be biased low but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
High Bias	High Bias flag indicates that the recovery of the flagged analyte is above the laboratory or regulatory upper control limit. The data user should take note that this analyte may be biased high but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
Non-Dir.	Non-dir. flag (Non-Directional Bias ) indicates that the Relative Percent Difference (RPD) (a measure of precision) among the MS and MSD data is outside the laboratory or regulatory control limit. This alerts the data user where the MS and MSD are from site-specific samples that the RPD is high due to either non-homogeneous distribution of target analyte between the MS/MSD or indicates poor reproducibility for other reasons.

If EPA SW-846 method 8270 is included herein it is noted that the target compound N-nitrosodiphenylamine (NDPA) decomposes in the gas chromatographic inlet and cannot be separated from diphenylamine (DPA). These results could actually represent 100% DPA, 100% NDPA or some combination of the two. For this reason, York reports the combined result for n-nitrosodiphenylamine and diphenylamine for either of these compounds as a combined concentration as Diphenylamine.

If Total PCBs are detected and the target aroclors reported are "Not detected", the Total PCB value is reported due to the presence of either or both Aroclors 1262 and 1268 which are non-target aroclors for some regulatory lists.

2-chloroethylvinyl ether readily breaks down under acidic conditions. Samples that are acid preserved, including standards will exhibit breakdown. The data user should take note.

Certification for pH is no longer offered by NYDOH ELAP.

Semi-Volatile and Volatile analyses are reported down to the LOD/MDL, with values between the LOD/MDL and the LOQ being "J" flagged as estimated results.

For analyses by EPA SW-846-8270D, the Limit of Quantitation (LOQ) reported for benzidine is based upon the lowest standard used for calibration and is not a verified LOQ due to this compound's propensity for oxidative losses during extraction/concentration procedures and non-reproducible chromatographic performance.





## **APPENDIX B**

### **Laboratory ELAP Certifications**

**NEW YORK STATE DEPARTMENT OF HEALTH  
WADSWORTH CENTER**



Expires 12:01 AM April 01, 2021  
Issued April 01, 2020  
Revised June 24, 2020

**CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE**

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

**MR. PHILLIP M. WORBY**  
**EMSL ANALYTICAL INC**  
**200 ROUTE 130 NORTH**  
**CINNAMINSON, NJ 08077**

NY Lab Id No: 10872

*is hereby APPROVED as an Environmental Laboratory in conformance with the  
National Environmental Laboratory Accreditation Conference Standards (2003) for the category  
ENVIRONMENTAL ANALYSES POTABLE WATER  
All approved analytes are listed below:*

**Bacteriology**

Coliform, Total / E. coli (Qualitative) SM 20, 21-23 9223B (-04) (Collert)  
Heterotrophic Plate Count SM 20, 21-23 9215B (-04)

**Disinfection By-products**

Bromide EPA 300.0 Rev. 2.1

**Fuel Additives**

Methyl tert-butyl ether EPA 524.2  
Naphthalene EPA 524.2

**Metals I**

Arsenic, Total EPA 200.8 Rev. 5.4  
Barium, Total EPA 200.7 Rev. 4.4  
Cadmium, Total EPA 200.8 Rev. 5.4  
Chromium, Total EPA 200.7 Rev. 4.4  
Copper, Total EPA 200.7 Rev. 4.4  
Iron, Total EPA 200.7 Rev. 4.4  
Lead, Total EPA 200.8 Rev. 5.4  
Manganese, Total EPA 200.7 Rev. 4.4  
Mercury, Total EPA 200.8 Rev. 5.4  
Selenium, Total EPA 245.1 Rev. 3.0  
Silver, Total EPA 200.7 Rev. 4.4

**Metals I**

Silver, Total EPA 200.8 Rev. 5.4  
Zinc, Total EPA 200.7 Rev. 4.4  
EPA 200.8 Rev. 5.4

**Metals II**

Aluminum, Total EPA 200.7 Rev. 4.4  
Antimony, Total EPA 200.8 Rev. 5.4  
Beryllium, Total EPA 200.8 Rev. 5.4  
Nickel, Total EPA 200.7 Rev. 4.4  
Thallium, Total EPA 200.8 Rev. 5.4

**Metals III**

Calcium, Total EPA 200.7 Rev. 4.4  
Magnesium, Total EPA 200.7 Rev. 4.4  
Potassium, Total EPA 200.7 Rev. 4.4  
Sodium, Total EPA 200.7 Rev. 4.4  
Uranium (Mass) EPA 200.8 Rev. 5.4

**Microextractables**

1,2,3-Trichloropropane, Low Level EPA 504.1  
1,2-Dibromo-3-chloropropane, Low Level EPA 504.1  
1,2-Dibromoethane, Low Level EPA 504.1

**Miscellaneous**

Asbestos EPA 100.1  
EPA 100.2

Serial No.: 62059

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**



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ENVIRONMENTAL ANALYSES POTABLE WATER  
All approved analytes are listed below:*

**Miscellaneous**

Organic Carbon, Total	SM 21-23 5310C (-00)
Surfactant (MBAS)	SM 21-23 5540C (-00)
Turbidity	SM 21-23 2130 B (-01)
	EPA 180.1 Rev. 2.0

**Non-Metals**

Alkalinity	SM 21-23 2320B (-97)
Calcium Hardness	EPA 200.7 Rev. 4.4
Chloride	EPA 300.0 Rev. 2.1
Color	SM 21-23 2120B (-01)
Cyanide	SM 20, 21-23 4500-CN E
	SM 20, 21-23 4500-CN G
Fluoride, Total	EPA 300.0 Rev. 2.1
Nitrate (as N)	EPA 300.0 Rev. 2.1
Nitrite (as N)	EPA 300.0 Rev. 2.1
Orthophosphate (as P)	EPA 300.0 Rev. 2.1
Silica, Dissolved	EPA 200.7 Rev. 4.4
Solids, Total Dissolved	SM 21-23 2540C (-97)
Specific Conductance	SM 21-23 2510B (-97)
Sulfate (as SO4)	EPA 300.0 Rev. 2.1

**Radiological Analytes**

Gamma Emitters	EPA 901.1
Gross Alpha	EPA 900.0
Gross Beta	EPA 900.0
Radium-226	EPA 903.0
Radium-228	EPA 904.0

**Radiological Analytes**

Radon	SM 20-22 7500-Rn B(-06)
Tritium	EPA 906.0
Uranium (Activity)	EPA 908.0

**Trihalomethanes**

Bromodichloromethane	EPA 524.2
Bromoform	EPA 524.2
Chloroform	EPA 524.2
Dibromochloromethane	EPA 524.2

**Volatile Aromatics**

1,2,3-Trichlorobenzene	EPA 524.2
1,2,4-Trichlorobenzene	EPA 524.2
1,2,4-Trimethylbenzene	EPA 524.2
1,2-Dichlorobenzene	EPA 524.2
1,3,5-Trimethylbenzene	EPA 524.2
1,3-Dichlorobenzene	EPA 524.2
1,4-Dichlorobenzene	EPA 524.2
2-Chlorotoluene	EPA 524.2
4-Chlorotoluene	EPA 524.2
Benzene	EPA 524.2
Bromobenzene	EPA 524.2
Chlorobenzene	EPA 524.2
Ethyl benzene	EPA 524.2
Hexachlorobutadiene	EPA 524.2
Isopropylbenzene	EPA 524.2
n-Butylbenzene	EPA 524.2

Serial No.: 62059

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



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ENVIRONMENTAL ANALYSES POTABLE WATER  
All approved analytes are listed below:*

**Volatile Aromatics**

n-Propylbenzene	EPA 524.2
p-Isopropyltoluene (P-Cymene)	EPA 524.2
sec-Butylbenzene	EPA 524.2
Styrene	EPA 524.2
tert-Butylbenzene	EPA 524.2
Toluene	EPA 524.2
Total Xylenes	EPA 524.2

**Volatile Halocarbons**

1,1,1,2-Tetrachloroethane	EPA 524.2
1,1,1-Trichloroethane	EPA 524.2
1,1,2,2-Tetrachloroethane	EPA 524.2
1,1,2-Trichloroethane	EPA 524.2
1,1-Dichloroethane	EPA 524.2
1,1-Dichloroethene	EPA 524.2
1,1-Dichloropropene	EPA 524.2
1,2,3-Trichloropropane	EPA 524.2
1,2-Dichloroethane	EPA 524.2
1,2-Dichloropropane	EPA 524.2
1,3-Dichloropropane	EPA 524.2
2,2-Dichloropropane	EPA 524.2
Bromochloromethane	EPA 524.2
Bromomethane	EPA 524.2
Carbon tetrachloride	EPA 524.2
Chloroethane	EPA 524.2
Chloromethane	EPA 524.2

**Volatile Halocarbons**

cis-1,2-Dichloroethene	EPA 524.2
cis-1,3-Dichloropropene	EPA 524.2
Dibromomethane	EPA 524.2
Dichlorodifluoromethane	EPA 524.2
Methylene chloride	EPA 524.2
Tetrachloroethene	EPA 524.2
trans-1,2-Dichloroethene	EPA 524.2
trans-1,3-Dichloropropene	EPA 524.2
Trichloroethene	EPA 524.2
Trichlorofluoromethane	EPA 524.2
Vinyl chloride	EPA 524.2

Serial No.: 62059

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**NEW YORK STATE DEPARTMENT OF HEALTH  
WADSWORTH CENTER**



Expires 12:01 AM April 01, 2021  
Issued April 01, 2020

**CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE**

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

**MR. ROBERT Q. BRADLEY**  
**YORK ANALYTICAL LABORATORIES INC**  
**120 RESEARCH DRIVE**  
**STRATFORD, CT 06615**

**NY Lab Id No: 10854**

*is hereby APPROVED as an Environmental Laboratory in conformance with the  
National Environmental Laboratory Accreditation Conference Standards (2003) for the category  
**ENVIRONMENTAL ANALYSES POTABLE WATER**  
All approved analytes are listed below:*

**Fuel Additives**

Methyl tert-butyl ether                   EPA 524.2  
Naphthalene                               EPA 524.2

**Metals I**

Arsenic, Total                           EPA 200.8 Rev. 5.4  
Barium, Total                           EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Cadmium, Total                       EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Chromium, Total                       EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Copper, Total                           EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Iron, Total                               EPA 200.7 Rev. 4.4  
Lead, Total                               EPA 200.8 Rev. 5.4  
Manganese, Total                       EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Mercury, Total                         EPA 245.1 Rev. 3.0  
Selenium, Total                       EPA 200.8 Rev. 5.4  
Silver, Total                            EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Zinc, Total                               EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4

**Metals II**

Aluminum, Total                       EPA 200.7 Rev. 4.4  
Antimony, Total                       EPA 200.8 Rev. 5.4

**Metals II**

Beryllium, Total                       EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Molybdenum, Total                    EPA 200.8 Rev. 5.4  
Nickel, Total                            EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4  
Thallium, Total                        EPA 200.8 Rev. 5.4  
Vanadium, Total                        EPA 200.7 Rev. 4.4  
  EPA 200.8 Rev. 5.4

**Metals III**

Calcium, Total                         EPA 200.7 Rev. 4.4  
Magnesium, Total                     EPA 200.7 Rev. 4.4  
Potassium, Total                     EPA 200.7 Rev. 4.4  
Sodium, Total                         EPA 200.7 Rev. 4.4

**Miscellaneous**

Turbidity                               EPA 180.1 Rev. 2.0

**Non-Metals**

Alkalinity                               SM 21-23 2320B (-97)  
Calcium Hardness                    EPA 200.7 Rev. 4.4  
Chloride                                EPA 300.0 Rev. 2.1  
Color                                    SM 21-23 2120B (-01)  
Fluoride, Total                        EPA 300.0 Rev. 2.1  
Orthophosphate (as P)               EPA 300.0 Rev. 2.1  
  SM 19, 21-23 4500-P E (-99)  
Solids, Total Dissolved             SM 21-23 2540C (-97)

**Serial No.: 61203**

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All approved analytes are listed below:*

**Non-Metals**

Specific Conductance EPA 120.1 Rev. 1982  
Sulfate (as SO4) EPA 300.0 Rev. 2.1

**Trihalomethanes**

Bromodichloromethane EPA 524.2  
Bromoform EPA 524.2  
Chloroform EPA 524.2  
Dibromochloromethane EPA 524.2

**Volatile Aromatics**

1,2,3-Trichlorobenzene EPA 524.2  
1,2,4-Trichlorobenzene EPA 524.2  
1,2,4-Trimethylbenzene EPA 524.2  
1,2-Dichlorobenzene EPA 524.2  
1,3,5-Trimethylbenzene EPA 524.2  
1,3-Dichlorobenzene EPA 524.2  
1,4-Dichlorobenzene EPA 524.2  
2-Chlorotoluene EPA 524.2  
4-Chlorotoluene EPA 524.2  
Benzene EPA 524.2  
Bromobenzene EPA 524.2  
Chlorobenzene EPA 524.2  
Ethyl benzene EPA 524.2  
Hexachlorobutadiene EPA 524.2  
Isopropylbenzene EPA 524.2  
n-Butylbenzene EPA 524.2  
n-Propylbenzene EPA 524.2

**Volatile Aromatics**

p-Isopropyltoluene (P-Cymene) EPA 524.2  
sec-Butylbenzene EPA 524.2  
Styrene EPA 524.2  
tert-Butylbenzene EPA 524.2  
Toluene EPA 524.2  
Total Xylenes EPA 524.2

**Volatile Halocarbons**

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1,1,2,2-Tetrachloroethane EPA 524.2  
1,1,2-Trichloroethane EPA 524.2  
1,1-Dichloroethane EPA 524.2  
1,1-Dichloroethene EPA 524.2  
1,1-Dichloropropene EPA 524.2  
1,2,3-Trichloropropane EPA 524.2  
1,2-Dichloroethane EPA 524.2  
1,2-Dichloropropane EPA 524.2  
1,3-Dichloropropane EPA 524.2  
2,2-Dichloropropane EPA 524.2  
Bromochloromethane EPA 524.2  
Bromomethane EPA 524.2  
Carbon tetrachloride EPA 524.2  
Chloroethane EPA 524.2  
Chloromethane EPA 524.2  
cis-1,2-Dichloroethene EPA 524.2



**Serial No.: 61203**

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Dibromomethane	EPA 524.2
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Methylene chloride	EPA 524.2
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Trichloroethene	EPA 524.2
Trichlorofluoromethane	EPA 524.2
Vinyl chloride	EPA 524.2



Department  
of Health

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## **APPENDIX C**

### **NYS DOH Lead Testing in School Drinking Water 2020 Compliance Requirements and NYS DOH Frequently Asked Questions (FAQs)**



Department  
of Health

# Lead Testing in School Drinking Water 2020 Compliance Requirements

Kim Evans, Bureau of Water Supply Protection  
Amanda St. Louis, Bureau of Environmental and Occupational Epidemiology  
Deanna Ripstein, Director of Strategic Priorities and Planning  
Center for Environmental Health

# Background

- On September 6, 2016, Governor Cuomo signed into law a bill passed by the New York State Legislature ([A10740/S8158](#)).
- The law requires the New York State Department of Health (Department) to develop regulations to require all public school districts and Boards of Cooperative Educational Services (BOCES) - collectively, “schools” - to test all potable water outlets for lead contamination, and to take action if lead levels exceed 15 micrograms per deciliter.



# Regulation

- The Department established regulation to conform with the law - introduced as an emergency regulation, effective on September 6, 2016
- Title: ***Lead Testing in School Drinking Water***  
*10 NYCRR Subpart 67-4 (Subpart 67-4)*
- The final regulation was adopted on May 9, 2018



# Who Must Comply with Subpart 67-4?

- All NYS public school districts
  - Including those schools who are classified as a public water system (PWS)
- BOCES
- All buildings owned or leased by a public school



The regulation does not apply to:

- private, charter, or Indian Nation schools
- daycare facilities

# “Lead-Free” Buildings

Any school building, facility, addition, or wing with **internal plumbing** that meets the new definition of “lead-free”, as defined by Section 1417 of the Federal Safe Drinking Water Act, is exempt from sampling.

A building is deemed lead-free if:

- The building was built after January 4, 2014, - OR -
- A NYS Professional Engineer or Architect certifies the building to be lead-free.

## Exemptions from sampling:

- Do not apply to individual outlets
- For an existing building, renovated wing (portion of a building), or an addition to a building to be exempt from sampling - all internal plumbing and service line connections must be “lead-free”



# Key elements of Subpart 67-4

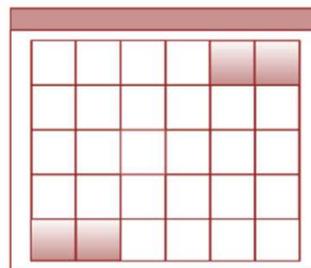
- Monitoring
- Response
- Public Notification
- Reporting
- Recordkeeping



# Monitoring

# Sampling Schedule

- First round of testing in accordance with Subpart 67-4 was performed in 2016
- **Next round to be performed in 2020** (NYC performing testing now)
- Every 5 years thereafter or at an earlier time as determined by the Commissioner of Health



# Compliance Year 2020 Second Round of Testing

Schools must complete *initial first-draw* sampling for Compliance Year 2020 between:

💧 January 1, 2020 – December 31, 2020



# Sampling Locations

Outlets that should be sampled may be located anywhere on school property including external outlets (hose bibs) if the outlet may be used for drinking or cooking (including food preparation). Samples must be collected at all outlets used or potentially used for drinking or cooking, including but not limited to:

- bubblers/drinking fountains
- classroom sinks
- classroom combination sinks and drinking fountains
- kitchen sinks
- kitchen kettle filler outlets
- bathroom sinks
- family and consumer sciences room sinks
- teachers' lounge sinks
- nurse's office sinks
- athletic field outlets and any other sink known to be or potentially used for consumption (e.g., coffeemaker or cups are nearby).



## “Applicable” vs. “Non-applicable” outlets

**Superintendents or their designees** have the responsibility to identify which outlets on a school property meet the regulation requirements for sampling (“**applicable outlets**”).

If a Superintendent or their designee determines that they have outlets that fall outside of the scope of the regulation (outlets not used or potentially used for drinking or cooking), the school must have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes (“**non-applicable outlets**”).

## Other Examples of “Applicable outlets”

- **Food washing sinks:** Food washing faucets must be sampled as they are used for cooking (including food preparation) and potentially for drinking
- **Ice machines:** The ice made in an ice machine should be sampled for lead
- **Combination bottle fill station and drinking fountain:** A sample should be collected from both outlets. The Department recommends sampling the outlet that is most frequently used first
- **Hand washing outlets:** In general, all hand washing outlets in a bathroom should be sampled as bathroom outlets may be used to obtain water for drinking and/or food preparation. The Department recognizes that there are many different types of outlets in the bathroom that present challenges for sampling. Guidance has been developed to assist with sampling the various outlets. *This Guidance is coming soon.*
- **Foot level operated multi-outlet gang sink:** In general, samples should be collected from each outlet of a gang sink, however, if the gang sink design does not allow sample collection from each outlet, the schools should contact the local health department or the Department to discuss.
- **Traditional outlet with hot and cold water handle:** Samples must be collected from each outlet but only the cold water should be turned on for sampling

## “Non-applicable outlets”

### Rule of Thumb:

In general, any outlet in a room or office within a school that is not used by students (pre-kindergarten through grade 12) and does not provide water for drinking or cooking does not require sampling.

## Examples of possible “Non-applicable outlets”

- **Dishwashing sinks:** If an outlet is designated for dish washing only and involves no opportunity for drinking or cooking (including food preparation), the outlet does not require sampling
- **Bus garage:** Outlets in bus garage buildings do not require sampling for lead unless the building is occupied by students (e.g., BOCES classes)
- **Point of entry:** Samples from the point of entry are not required under Subpart 67-4. Point of entry is the location where water *enters* the building from the distribution system of a public water system
- **Science/Art sinks:** Typically, classrooms in these settings prohibit eating and/or drinking. The school Superintendent has the authority to determine whether these outlets may be used for drinking or cooking and whether they require sampling

# NEW Guidance Concerning Tempered Outlets

## “Non-applicable outlets”

### Tempered Outlets:

The Department and the US EPA recommend that hot or tempered water *not* be used for drinking or cooking as warm or hot water increase the leaching of lead into the water.

### Tempered outlets do not require sampling.

However, all tempered water outlets should be clearly posted with signs (“Do Not Drink” or equivalent), education should be provided to the students and staff to ensure awareness, and the remedial action plan should address, document, and describe continued management of the controls in place for these outlets.

# Sample Collector Qualifications

- Any individual who is familiar with the regulation and a “first-draw” sampling protocol may collect samples. This includes but is not limited to:
  - a school staff member,
  - a laboratory representative, or
  - a consultant.
- The individual collecting the sample must be able to maintain quality assurance and control over the sampling, and must ensure the chain of custody of the water samples is maintained.
- The school Superintendent or designee is ultimately responsible for ensuring that the samples are collected in accordance with Subpart 67-4.



# “First-draw” Samples

Any sample collected for compliance under Subpart 67-4 must be a “first-draw” sample.

## First-draw sample:

- A water sample collected from a cold water outlet before any water is used from that outlet
- Water must be motionless in pipes for a **minimum of 8-hours and maximum of 18-hours** before sample collection
  - This timeframe represents water that would be consumed during normal operating conditions on any school day.



# Sampling Collection Guidance

- **Pre-stagnation flushing:** The Department does not allow for pre-stagnation flushing prior to sampling unless a school is directed to do so by the Department or local health department
- **Aerators:** Aerators should not be removed prior to sampling
- **Required sample volume = 250 milliliters (mL)**
  - Department recommends using wide mouth 250 mL plastic containers
  - Ensure laboratory is aware of sample volume
  - Note: This sample volume differs from the 1 liter requirement under the Lead and Copper Rule (LCR)

# Environmental Laboratory Qualifications

- Samples must be analyzed by a laboratory that is approved to perform lead testing of drinking water samples by the Department's Environmental Laboratory Approval Program (ELAP)
- A listing of approved laboratories can be found at:  
<http://www.wadsworth.org/regulatory/elap/certified-labs>

To find a laboratory, select the following criteria to narrow your search:

- For lab type: select "commercial"
- For matrix: select "potable water"
- For analyte: select "lead, total"

# Interpreting Results

# Lead Action Level

The action level for lead in school drinking water is 15 micrograms per liter or parts per billion (ppb).



- Lead test results  $\leq 15$  ppb do *not* exceed the lead action level, and therefore do not require further testing or remediation.
- Lead test results  $> 15$  ppb (i.e., 15.1 ppb, or greater) *exceeds* the lead action level and requires the outlet to be taken out of service and a remediation action plan be implemented.

# Can Sample Results be Invalidated?

All lead test results *regardless of circumstances* must be reported on the school's website and to the Department, the NY State Education Department, and the local health department using the Department's HERDS application on the Health Commerce System (HCS). *(Additional reporting requirements are covered in next section)*

If a sample result is suspected to be erroneous, a complete explanation of the circumstance should be retained with other related records in the central repository at the school. **In such cases, schools should retest the specific outlet(s) to determine the level of lead in water.**

# Response and Corrective Actions

# Steps following an Action Level Exceedance

## Immediate Response

- Prohibit the use of the outlet immediately (take outlet out of service or turn off) until:
  - (1) A lead remedial action plan is implemented to mitigate the lead level at the outlet, and
  - (2) Post-remediation test results indicate that the lead levels are at or below the action level;
- Provide building occupants with an adequate supply of water for drinking and cooking until remediation is performed;
- 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;
- 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.

## If an outlet tested above the “action level”, can it still be used for cleaning and handwashing?

- Yes
- Signage must be placed at such outlets stating that the water should not be used for drinking (only handwashing and cleaning)
- Pictures should be used if there are small children using the water outlets, and staff should ensure the children understand what the signs mean and monitor the outlets to ensure they are not used for drinking



# Corrective Actions / Remediation Options

- Permanent removal of an outlet
- Outlet replacement with “lead-free” plumbing materials
- Pipe replacement with “lead-free” plumbing materials
- Remove other sources of lead (lead pipe, lead solder joints, and brass plumbing components with “lead-free” materials)
- Flushing (systematic flushing program)
- Point of Use (POU) Filters\*
- Supervision
- Engineering controls
- Education
- Signage

# Corrective Actions / Remediation Options

- Signage



# Post-Remediation Testing

- Follow-up samples collected after an outlet has been remediated must also be “first-draw” samples. Schools may choose to perform additional sampling (i.e., 30-second flush, etc.) to determine the contribution of lead from plumbing to guide remediation decisions.
- Only those outlets that exceed the action level need to be resampled (following remediation).
- All remediated outlets will likely require flushing prior to being placed back into service.
- Post-remediation tests results need to be reported:
  - in the Department’s HERDS application on HCS, and
  - on the school’s website within the same reporting timeframes/requirements as specified for the initial sampling (*addressed in next section*).

# Public Notification

# Public Notification Requirements

- **Within 1 business day of receipt of laboratory reports:**
  - ✓ Report any and all exceedances (lead result greater than 15 ppb) to the local health department
- **Within 10 business days of receipt of laboratory reports:**
  - ✓ Report all exceedances to all staff, parents, and guardians in writing.
  - ✓ Report test results (including post-remediation results) in the Department's electronic reporting system, HERDS accessed through HCS. This information is posted on the Department's website for the public
- **Within 6 weeks of receipt of laboratory reports:**
  - ✓ Post numeric test results of all lead testing and information about remediation actions taken to address outlets where lead exceeded the action level on the school's website. This should remain posted on the school's website for the duration of the compliance period (i.e. 2020-2024)
- **Report any lead-free buildings on the school's website**



# Public Notification Requirements (continued)

- Within 6 weeks of receipt of laboratory reports:
  - ✓ Post numeric test results of all lead testing and information about remediation actions taken to address outlets where lead exceeded the action level on the school's website. This should remain posted on the school's website for the duration of the compliance period (i.e. 2020-2024)

*Required per Section 67-4.5(b)(1) "The school shall make available, on the school's website, the results of all lead testing performed and lead remediation plans implemented pursuant to this Subpart, as soon as practicable, but no more than 6 weeks after the school received the laboratory reports."*

- The Department has created a template to assist schools with reporting the pertinent result information on their website.



# Electronic Reporting

# Electronic Reporting in HCS/HERDS

- ✓ Within 10 business days of receipt of laboratory reports:  
Summary data must be reported in the Department's electronic reporting system, HERDS accessed through HCS. Summary data includes:
  - General information (lead-free status, website address)
  - Sampling information
  - Lead analysis results
  - Response and remediation



Do not submit laboratory reports directly to the Department or local health department unless otherwise directed.

# New and Improved HERDS Reporting Format for 2020

- One form for each building (no longer 3 forms!)
- Simplified format

**Note: The 2020 reporting form will not be accessible until January 1<sup>st</sup> 2020.**

# HCS/HERDS Access - for School Lead in Drinking Water Reporters

## 1. Have an HCS Account

### 1. To register:

1. Internet search engine: 'NYS HCS' and click the link
2. Click **Create an HCS Account**
3. Follow the prompts to create an account
4. Print the confirmation email and bring to your HCS Coordinator who must finalize your account
5. Sign into HCS to verify access

## 2. Be assigned the **School Lead in Drinking Water Reporter role** by an HCS Coordinator for **each building** they are to report under

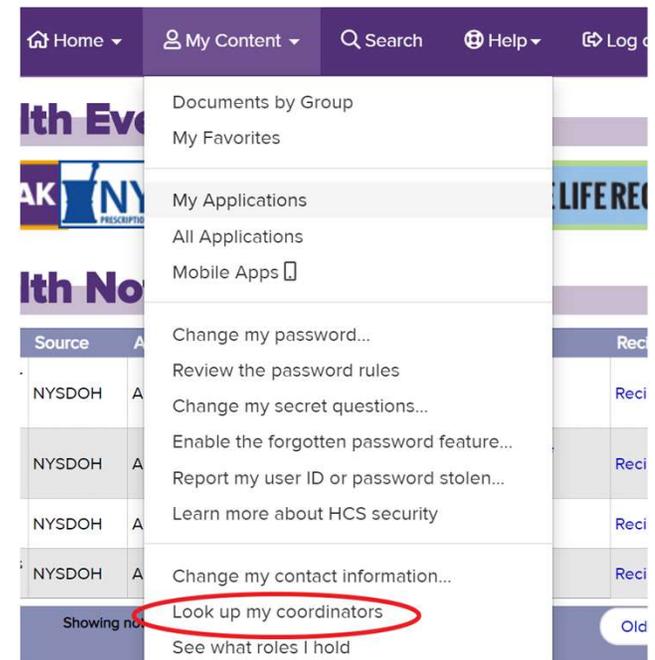
# How to look up your HCS Coordinator

## If you have an HCS Account:

- Sign into [HCS](#)
- Click 'My Content'
- Click 'Look up My Coordinators'
  - You'll see each HCS Coordinator's name, phone, and email in a table. Any of those individuals can assist you.

## If you do not have an HCS Account:

- Ask a colleague with HCS access
  - they can sign into HCS and follow the steps above
- Call Commerce Accounts Management Unit ((CAMU) 1-866-529-1890 option 1)
- Call your [LHD](#), or
- Email the [Department](#) for a list of your school's HCS Coordinators.



# New and Improved HERDS Reporting Format for 2020

Live Demo

# Recordkeeping

# Recordkeeping Requirements

- Schools must retain all records of:
  - Test results
  - Remedial action plans
  - Determinations that a building is lead-free; and
  - Waiver requests (only applicable to compliance year 2016)
- **Per Subpart 67-4**, schools must retain records for 10 years following document creation (Note: other agencies may have additional records retention requirements, i.e., NYS Department of Labor)
- Copies of documents must be provided to the Department, the NY State Education Department, or the local health department upon request
- Department recommends that all records be kept in a centrally located and accessible repository for each school building



# Claims and Reimbursement

# NY State Education Department Reimbursement

- For testing costs only, pursuant to Education Law 3602 (6-h.), claims may be submitted for State Aid using Form FB Schedule W (similar to 2016). These claims may be submitted for expenditures in the 2019-20 school year and every year thereafter.
- No remediation costs may be claimed for building aid on Form FB Schedule W.
- Remediation costs may be eligible for building aid reimbursement. The scope would need to qualify as approved capital construction and claimed as such pursuant to Education Law 3602(6.).
- *Claims for the Lead Testing in School Drinking Water program are not reimbursed as part of the Building Condition Survey.*

*(Information provided by NYS Education Department)*

# Enforcement

# Enforcement

- Upon reasonable notice to a school, an employee of the Department or the local health department may enter any building for the purpose of determining compliance with Subpart 67-4.
- If a school does not comply with the Subpart 67-4, the Department or the local health department may take any action authorized by law.



# Best Management Practices

## Best Management Practices to Reduce Lead in Drinking Water

- Aerator cleaning
- Routine flushing practices (after vacations and long weekends)
- Use only certified lead-free materials when performing plumbing work
- Follow the manufacturer's recommendations for water softener settings to ensure an appropriate level of hardness
- Temperature control
- Educating staff and students of the benefits of running water at a tap briefly prior to using it for drinking or food preparation. Letting the water run for 30-60 seconds or until the water feels cold can reduce the potential levels of lead in the drinking water

# Next Steps

## Next Steps

- Release of updated Guidance, to be posted at: [https://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](https://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm)
- Perform lead testing between January 1 and December 31, 2020
- Enter data in HERDS within 10 days of receipt of laboratory results

# Questions?

## Contact us:

Email: [lead.in.school.drinking.water@health.ny.gov](mailto:lead.in.school.drinking.water@health.ny.gov)

Phone: 518-402-7650

# FREQUENTLY ASKED QUESTIONS

## For School Buildings and Grounds Personnel

### Lead in NYS School Drinking Water

November 1, 2016

#### Background

The “on-again, off-again” nature of water use at most schools can raise lead levels in school drinking water. Water that remains in pipes overnight, over a weekend, or over vacation periods stays in contact with lead pipes or lead solder and could contain higher levels of lead. It is important to identify and address elevated levels of lead in drinking water in schools as part of reducing a child’s overall exposure to lead in the environment.

#### General Information

##### **REVISED**

#### **1. What is the new lead testing in school drinking water legislation?**

The New York State Legislature recently passed a bill ([A10740/S8158](#)) which requires the Department to develop regulations to require all school districts and boards of cooperative educational services (BOCES)—collectively, “schools”—to test all potable water outlets for lead contamination, and to take responsive actions. Governor Cuomo signed the proposed legislation, and the DOH adopted emergency regulations, titled *Lead Testing in School Drinking Water*-10 NYCRR Subpart 67-4 (Subpart 67-4), on September 6, 2016. The legislation includes all buildings owned or leased by a school.

#### **2. Where can I find the regulations?**

The regulation can be found at: [http://health.ny.gov/regulations/emergency/docs/2016-09-06\\_lead\\_testing\\_in\\_school\\_drinking\\_water.pdf](http://health.ny.gov/regulations/emergency/docs/2016-09-06_lead_testing_in_school_drinking_water.pdf).

##### **REVISED**

#### **3. Are private, charter, or Indian nation schools required to conduct lead testing under this regulation?**

No. Only NYS schools districts and boards of cooperative educational services (BOCES) are required to test for lead under this regulation. Note: The regulation includes all buildings owned or leased by a school.

#### Monitoring

#### **4. Where must samples be collected?**

Samples must be collected at all outlets within the school. An outlet is a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to bubblers, drinking fountains and faucets. Faucets may be located anywhere on school property where drinking water is currently or potentially obtained, including but not limited to the athletic field.

**NEW**

**5. What are the acceptable types of laboratory containers for collecting samples?**

The required sample volume for analysis of lead in school drinking water is 250 milliliters (mL). DOH recommends wide mouth 250 ml containers. New York State Environmental Laboratory Approval Program (ELAP) certified laboratories have been notified of the 250 mL container requirement and should supply the correct sampling containers. Note: Nitric acid is added to lead sample bottles by the lab as a sample preservative. As a safety precaution, due to the potential for accidental contact with the nitric acid which could burn skin and clothing, schools may request their contract lab send out bottles without the nitric acid preservative. The lab will add the nitric acid upon receipt of the samples in the laboratory. Schools will need to discuss this option with their lab in advance of the bottles being shipped.

**NEW**

**6. Are samples collected prior to September 6, 2016, using 1-liter bottles, acceptable under Subpart 67-4?**

No. Samples collected using 1-liter sample bottles will not be accepted.

**NEW**

**7. Does a school need to sample outlets that are not used (or potentially used) for drinking or cooking purposes?**

If the school has evaluated and determined that an outlet is not currently or potentially used for cooking or drinking purposes, then sampling is not required under Subpart 67-4.

**NEW**

**8. Should aerators be removed before collecting samples?**

Aerators should be left in place.

**NEW**

**9. Is a point of entry sample a requirement in Subpart 67-4?**

No, point of entry samples are not required under Subpart 67-4.

**NEW**

**10. What is the proper sampling protocol for collecting samples from ice machines? Which bottles should be used?**

Refer to the USEPA 3T's sample collection procedures, exhibit 4.7, initial screening sample 1E. [https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf)

The required sampling container size is a 250 ml bottle. Wide mouth bottles are recommended.

**NEW**

**11. Should a foot lever operated multi-outlet gang sink in a school bathroom be sampled? Is one sample from one outlet representative of all outlets on the gang sink?**

All fixtures that are currently or potentially used for cooking or drinking should be sampled. Representative sampling or composite sampling are not allowed. Note: The school is responsible for determining if an outlet is currently or potentially used for cooking or drinking.

**NEW**

**12. What is the protocol for collecting samples from fixtures that are tempered?**

All outlets that are currently or potentially used for cooking or drinking purposes should be evaluated/sampled pursuant to a normal operating conditions scenario. Please refer to The Department's Recommended Sampling Instructions for Lead Testing in School Drinking Water. [http://www.health.ny.gov/environmental/water/drinking/lead/docs/sampling\\_instructions\\_10\\_04\\_16.pdf](http://www.health.ny.gov/environmental/water/drinking/lead/docs/sampling_instructions_10_04_16.pdf)

**NEW**

**13. The Department recently updated its guidance regarding tempered outlets to reflect the outlet being monitored under normal operations, and stated that hot water feeds should not be turned off. What should a school do if they have already collected a sample from a tempered fixture with the hot water feed turned off?**

The Department does not recommend turning off hot water feeds. The school is not required to resample unless directed by the Department or local health department. All future monitoring must follow the most current sampling protocols.

**NEW**

**14. Should drinking fountains with bottle fills be sampled from both the fill and from the fountain portion? If so does it matter which is collected first?**

Both fixtures should be sampled if they are used or have the potential to be used for drinking or cooking purposes. The Department recommends sampling the outlet that is most frequently used first.

**15. Who can collect the samples?**

Any individual who is familiar with the regulation's "first-draw" sampling protocol may collect samples. This includes but is not limited to a school staff member, a laboratory representative, or a consultant. The individual collecting the sample must be able to maintain quality assurance and control over the sampling, and must ensure the chain of custody of the water samples is maintained. However, the school is ultimately responsible for ensuring that the samples are correctly taken.

**16. What is a "first-draw" sample?**

A "first-draw" sample is a water sample that is collected from an outlet before any water is used from that outlet. The water shall be motionless in the pipes for a minimum of 8 hours, but not more than 18 hours, before sample collection. The required sample volume for analysis of lead in school drinking water sample is 250 milliliters (mL).

**17. What does the "water must be motionless" mean?**

The water in the school facility must remain motionless in the plumbing for a minimum of 8 hours but no more than 18 hours. During this time period, no water can be used in the facility. This includes non-drinking water outlets, janitorial sinks, toilets, outside hoses and irrigation systems (unless the irrigation system is served by its own service line). This amount of time was established to ensure that the collected samples are representative of water that typically a student or faculty member may consume. Sampling should be conducted to reflect normal school operating conditions.

**NEW**

**18. Can sample collection be done in stages (i.e. on different days)?**

Yes. Samples can be collected in stages as long as sampling is conducted in compliance with Subpart 67-4 and within the compliance dates.

**NEW**

**19. Is pre-stagnation flushing allowed prior to sampling?**

The Department does not recommend pre-stagnation flushing prior to sampling unless they are directed to do so by the State or Local Health Department

**20. When does a school need to complete initial first-draw sampling?**

By September 30, 2016, for any school serving children in any of the levels prekindergarten through grade five.

By October 31, 2016, for any school serving children in any of the levels grades six through twelve that are not also serving students in any of the levels prekindergarten through grade five.

Prior to occupancy for buildings put into service after September 6, 2016.

If your school performed sampling prior to September 6, 2016, please refer to FAQ #51.

**NEW**

**21. My school sampled outlets before September 6, 2016, in accordance with United States Environmental Protection Agency's (USEPA) 3Ts program, but did not include outlets that were considered as not water consumptive, such as bathroom sinks.**

All outlets used or potentially used for drinking or cooking purposes must be sampled as outlined in Subpart 67-4. Therefore, any samples that were omitted but required to be tested under Subpart 67-4 must **be sampled**.

For samples taken before September 6, 2016, the school should consult with their local health department to determine if the sampling conducted was in full or substantial compliance with Subpart 67-4. If the sampling was conducted in full compliance with the regulation, only the omitted outlets are required to be sampled. If some outlets were sampled in substantial compliance with the regulation, the school may apply for a waiver for those outlets, but must sample the omitted outlets.

**22. Does Subpart 67-4 require schools to test for any other substances?**

No. Only testing for lead is required of schools under this regulation.

**23. After initial monitoring is complete, will there be periodic monitoring?**

Yes. Schools must collect first-draw samples again in 2020, or at an earlier time as determined by the State Commissioner of Health. Sampling will be required at least every five years thereafter.

## **Laboratory Analysis**

### **24. Who can analyze the samples?**

All drinking water samples must be analyzed by an environmental laboratory certified by the Department's Environmental Laboratory Approval Program (ELAP) to conduct lead in drinking water analysis.

### **25. Where can we find a list of New York certified laboratories?**

A listing of approved laboratories can be found at:

<http://www.wadsworth.org/regulatory/elap/certified-labs>

Once you click the above link, click on the following drop down boxes to narrow your search:

For lab type – select on commercial

For matrix – select potable water

For analyte – select lead, total

### ***NEW***

### **26. Is there a process for sample invalidation, if a school believes the test result is erroneous?**

There is no process for sample invalidation. All lead results regardless of circumstances must be reported on the HERDS application on the Health Commerce System (HCS). The HCS link is: <https://commerce.health.state.ny.us>. A complete explanation of the circumstance should accompany the reporting of the initial and repeat sampling demonstrating the reduction in lead concentration at the outlet.

## **“Lead-free” plumbing in School Buildings**

### ***REVISED***

### **27. Is sampling required for school buildings that are “lead-free”?**

Any school building with internal plumbing that meets the new definition of “lead-free,” as defined by 1417 of the Federal Safe Drinking Water Act, is exempt from sampling. A building can be deemed lead-free if: (1) it was built after January 4, 2014; or (2) a New York State Professional Engineer or Architect certifies the building to be lead-free.

Note that schools must report their list of lead-free buildings on the schools website by October 31, 2016.

By November 11, 2016, schools must report a list of lead-free building using the Department's designated statewide electronic reporting system (SERS).

### ***NEW***

### **28. Significant renovations were made within our schools. During the renovations most of the fountains and faucets were replaced. If the school can demonstrate that these outlets are “lead free” according to the federal regulations is the school exempt from testing those outlets?**

Subpart 67-4.2 (b) exempts buildings with plumbing materials that are lead free as defined in section 1417 of the Federal Safe Drinking Water Act. To qualify for an exemption, all outlets must be lead-free. Exemptions cannot be granted for individual outlets.

## **Response**

### **NEW**

#### **29. What is the “action level” for lead in school drinking water under Subpart 67-4?**

The action level for lead in school drinking water is 15 micrograms per liter (mcg/L) or parts per billion (ppb). That is also equivalent to 0.015 milligrams per liter (mg/L) or parts per million (ppm). For the purposes of interpreting analytical laboratory results relative to what constitutes a lead action level exceedance under the Lead Testing in School Drinking Water regulation, the following guidance is provided:

- Lead results reported by the laboratory that are to be equal to, or less than, 15 micrograms per liter ( $\leq 15$ ) does not constitute a lead action level exceedance, and therefore does not require further testing or remediation.
- Lead results reported by the laboratory that are greater than 15 micrograms per liter (i.e. 15.1 micrograms per liter, or greater) exceeds the lead action level and therefore requires the outlet to be taken out of service and a remediation plan to be implemented.

#### **30. If the lead concentration of water at an outlet exceeds the action level under Subpart 67-4, what does the school need to do?**

If the lead concentration of water at an outlet exceeds the action level, the school must:

- prohibit use of the outlet (take out of service or turn off) until:
  - (1) A lead remediation plan is implemented to mitigate the lead level of such outlet;
  - (2) Test results indicate that the lead levels are at or below the action level;
- provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed;
- 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
- 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; and, for results of tests performed prior to the effective date of this Subpart, within 10 business days of this regulation’s effective date, unless such written notification has already occurred.

### **NEW**

#### **31. What is the required follow up testing protocol for samples above the action level? First-draw or flush-draw?**

Initial and follow-up samples collected after an outlet has been remediated must be a first-draw sample, as required by Subpart 67-4 for compliance purposes. Additional sampling (i.e 30-second flush, etc.) may be conducted to determine the plumbing contribution to lead in drinking water test result.

#### **NEW 32. Does the entire building need to be re-sampled for post-remediation testing, or only those outlets that exceeded the action level?**

Only those outlets that exceed the action level need to be resampled following remediation. In accordance with Subpart 67-4, if the lead concentration of water at an individual outlet exceeds the action level, the school must prohibit use of the outlet (take out of service or turn off) 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.

**33. If an outlet has tested above the action level, can the water still be used for cleaning and handwashing?**

Yes. The water can be used for handwashing and cleaning. Lead is not absorbed through the skin. Signage should be placed at non-drinking water outlets stating that water should not be used for drinking; only handwashing and cleaning. Pictures should be used if there are small children using the water outlets, and staff should ensure they understand what the signs mean and monitor to ensure that they don't drink the water. Example signage can be found on the department's website at:

[http://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](http://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm)

**NEW**

**34. Can posting signs be used as a permanent measure for outlets that exceed an action level, rather than taking the outlet out of service?**

Signage used at outlets are considered to be a temporary measure and cannot be used as a permanent measure.

**NEW**

**35. Can an outlet be removed from service permanently if determined unnecessary?**

Yes. The school is still required to meet SED's requirements for access to potable water. To ensure an outlet is permanently taken out of service the department recommends removing the fixture and/or capping the supply lines before the fixture

**NEW**

**36. Will the Department be providing sample signage for schools to post, e.g., indicating that an outlet is not for drinking use, or is for hand washing only?**

Example signage is posted on the Department website at:

[http://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](http://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm) .

**NEW**

**37. Is the school required to post signage on non-potable water outlets?**

There is no requirement to post signage on non-potable outlets in Subpart 67-4. However, if the school deems that an outlet is non-potable it may be prudent to label those outlets as non-potable.

**Public Notification to School Community**

**38. What are a school's public notification requirements?**

Schools must list on their website:

- Any lead-free buildings by October 31, 2016.
- The results of all lead testing performed and lead remediation plans implemented as soon as practicable, but no more than 6 weeks after the school received the laboratory reports
- For schools that received lead testing results and implemented lead remediation plans in a manner consistent with the regulation, prior to September 6, 2016, the school shall

make available such information on the school's website, as soon as practicable, or before October 18, 2016.

**NEW**

**39. What level of detail is required when posting lab results on the school's website?**

Schools are encouraged to publish as much detail as possible but at a minimum, should include the sampling location (i.e. building, room, outlet, etc.) and the lead result(s). Public notification guidance can be found in the USEPA 3Ts under section III, "Telling" at:

[https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf)

**NEW**

**40. If a district tests an outlet that was not defined within the regulation as requiring testing and the results are above the action level, is there still a required reporting process for this outlet?**

Although the posting of information regarding outlets not defined in Subpart 67-4 is not required, schools are encouraged to provide as much information as possible regarding lead testing in their schools on their website.

**NEW**

**41. Will the Department be providing any suggested or required language to be included with the public notification for a lead action level exceedance?**

Language for public notification as well as an example that schools can use is available in subsection 6.7 of the USEPA 3T's Guidance document. See:

[https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf)

Additional resources will be posted on the Department's website when available.

**NEW**

**42. Subpart 67-4 requires schools to notify staff and persons in parental relation to students, in writing, when an outlet exceeds the action level, no more than 10 days after the school receives the lab report. Does posting a notice on the school website or through social media count as written notification?**

No. Posting on the school website or through social media does not count as written notification. Physical written notification must be distributed to all staff and persons in parental relation to the child, not just those that the school believes were exposed to a particular outlet.

**NEW**

**43. How long do schools need to post testing results on their websites?**

Schools should maintain the most recent lead testing results on their website.

**Reporting Requirements to: the Department, Local Health Departments and the State Education Department**

**44. What are a school's general reporting requirements?**

Schools must report using DOH's statewide electronic reporting system:

- As soon as practicable, but no later than November 11, 2016:
  - completion of all required first-draw sampling;

- a list of all buildings that are determined to have lead-free plumbing, as defined in section 1417 of the Federal Safe Drinking Water Act.
- for any outlets that were tested prior to September 6, 2016, and for which the school wishes to assert that such testing was in substantial compliance with Subpart 67-4, an attestation that:
  - the school conducted testing that substantially complied with the testing requirements, consistent with guidance issued by the DOH;
  - any needed remediation, including re-testing, has been performed;
  - the lead level in the potable water of the applicable building(s) is currently below the action level; and
  - the school has submitted a waiver request to the local health department, in accordance with the regulation; and
- As soon as practicable, but no more than 10 business days after the school received the laboratory reports, the school shall report data relating to test results to the Department, local health department, and State Education Department, through the Department's designated statewide electronic reporting system.

**NEW**

**45. How does a school report their data in the Statewide Electronic Reporting System (SERS)?**

Please view the Department and SED webinar/presentation on HERDS at:

[http://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](http://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm).

For more information on obtaining access to Health Commerce System (HCS) log-in, call 1-866-529-1890 or contact your local school HCS coordinator.

**NEW**

**46. For HERDS data base related questions:**

Questions regarding access to HCS log-in – Direct the caller to CAMU at 1-866-529-1890 or their local school HCS coordinator.

If CAMU or the school's HCS coordinator could not provide the needed assistance – please submit questions to [lead.in.school.drinking.water@health.ny.gov](mailto:lead.in.school.drinking.water@health.ny.gov)

If it is a survey related question that cannot be answered by the Q&A, contact your local health department – [https://www.health.ny.gov/prevention/prevention\\_agenda/contact\\_list.htm](https://www.health.ny.gov/prevention/prevention_agenda/contact_list.htm)

**47. What are a school's recordkeeping requirements?**

The school shall retain all records of test results, lead remediation plans, determinations that a building's plumbing is lead-free, and any waiver requests for ten years following the creation of such documentation. Copies of such documentation shall be immediately provided to the Department, local health department, or State Education Department upon request.

**Waivers**

**NEW**

**48. What are the criteria the local and State Health Departments will use to issue a waiver for "substantial" compliance?**

Waivers may be considered for:

- Prior to sampling, the water in the facility was motionless between 6 hours and 72 hours (rather than between 8 and 18).
- Sample volume less than 250 ml.

Waivers will not be considered for:

- Failure to sample all “outlets,” as defined in the regulation.
- Any sample size greater than 250mL.
- Lab testing was not performed by an ELAP-certified testing lab.
- Any test results exceeding 15 micrograms per liter.
- Water had been used within the building less than 6 hours prior to sampling.

The Department will consider other circumstances on a case-by-case basis.

**NEW**

**49. Are waivers available for testing performed after September 6, 2016?**

No. Waivers are not available for samples collected after September 6, 2016.

**50. What is the process for applying for a waiver? Is there a standard format that schools should be using?**

To apply for a waiver, schools should first contact their local health department (LHD) to determine whether the sampling performed fully complies with Subpart 67-4. If it does fully comply, no waiver is required. Contact information for the LHD can be found at: [http://health.ny.gov/environmental/water/drinking/doh\\_pub\\_contacts\\_map.htm](http://health.ny.gov/environmental/water/drinking/doh_pub_contacts_map.htm)

If a waiver is needed, the LHD will review the waiver request and, if approval is recommended, provide a recommendation to the Department. The LHD will advise the school as to whether the waiver request was approved or denied and the next steps required.

See the policy/procedure for applying for a waiver at:

[http://www.health.ny.gov/environmental/water/drinking/lead/docs/waiver\\_protocols\\_9-27-16.pdf](http://www.health.ny.gov/environmental/water/drinking/lead/docs/waiver_protocols_9-27-16.pdf)

**51. My school tested outlets prior to September 6, 2016. Are those results acceptable?**

First-draw sampling conducted consistent with the requirements in Subpart 67-4 that occurred after January 1, 2015 will satisfy the initial first-draw sampling requirement.

If the sampling was conducted prior to September 6, 2016 and was not consistent with Subpart 67-4, but was in substantial compliance with the regulation, the school can apply for a waiver from the testing requirements in Subpart 67-4. More information about the waiver process will be forthcoming.

**NEW**

**52. Are waivers granted for individual outlets?**

No. Waivers will be granted for specific buildings. Waivers will not be granted for individual outlets, or for an entire district.

## **Lead in Schools and Lead and Copper Rule (LCR) for Public Water Systems (PWS)**

### **53. What is the lead action level under the LCR for PWSs?**

Under the federal LCR, the EPA also established an action level 15 mcg/L (micrograms per liter), which may also be expressed as 15 parts per billion (ppb), for lead in drinking water for public water supplies. The EPA's action level for the LCR, which is the same as DOH's action level under Subpart 67-4, serves as an indicator of the effectiveness of corrosion control treatment throughout the drinking water distribution system.

### **54. If my school has its own PWS and performs monitoring as part of the LCR, does the school need to do additional monitoring under Subpart 67-4?**

Yes. Schools with their own PWS are required to comply with the requirements of the LCR as well as with Subpart 67-4, Lead Testing in School Drinking Water regulations.

### **55. If a school has its own PWS and took responsive actions after an exceedance of the action level under the LCR, is it still obligated to comply with Subpart 67-4?**

Yes. The LCR and the NYS Lead in School Drinking Water regulations are two distinct and separate regulatory programs. Schools that are also designated as a PWS must also comply with Subpart 67-4.

#### **NEW**

### **56. Our school is a PWS and conducts Lead testing under the LCR. Should the school report LCR testing results when it submits reports to the Department Statewide Electronic Reporting System pursuant to Subpart 67-4?**

No. The LCR is a separate program, and LCR results should be reported in the usual manner.

## **Remediation**

#### **NEW**

### **57. Where can I find guidance on remediation strategies?**

Information on remediation strategies can be found in the USEPA 3T's Guidance document. [https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf)

Note: The school is responsible for obtaining professional services to achieve remediation.

#### **NEW**

### **58. Schools have been informed by plumbing manufacturers that new outlets, even those that comply with the 2014 lead free fixture regulations, require flushing before use. Does the Department recommend flushing new outlets prior to use?**

All remediated taps will require flushing prior to being placed back into service and only retesting will confirm the effectiveness of the flushing program. Since the actual installation event of replacement outlets can introduce lead particulates into the drinking water, as well as the fact that even new outlets meeting the new "lead-free" content requirements may still contain some lead, we recommend a period of flushing simulating normal use patterns prior to re-sampling. It is difficult to recommend a generic flushing regimen and time period for post-remediation retesting for every school building and every scenario. How much flushing is required to achieve lead concentrations to be at or below the action level will need to be evaluated on a case by case basis due to various factors, including varying water chemistries and materials used in various

outlets. Please follow manufacturer/industry recommendations or consult with a professional (i.e. plumber, engineer, etc.). Flushing and re-testing may need to be repeated multiple times before the results meet the action level requirements. Re-testing should follow the Departments sampling protocol, including the 8 - 18 hour stagnation period prior to first-draw sampling.

**NEW**

**59. Our plumbing outlet supplier told us that outdoor hose bibs are exempt from the 2014 lead free fixture regulation: Safe Drinking Water Act 1417 (a) (4). If these outlets are sampled and the results are above the action level and a lead free replacement does not exist, what does the Department recommend to rectify this issue?**

If a lead free replacement fixture that meets the 2014 Safe Drinking Water Act 1417 (a) (4) definition of lead free is not available, the outlet should be secured (only opened with a special tool or key) and marked with signage as “non-potable.”

**Additional Information**

**60. Where can more information about lead be found?**

More information about **lead** can be found on the Department’s website at:  
[https://www.health.ny.gov/environmental/lead/education\\_materials/index.htm](https://www.health.ny.gov/environmental/lead/education_materials/index.htm)

Additional information regarding the “**Lead in School Drinking Water Program**” can be found on the Department's website at:  
[http://www.health.ny.gov/environmental/water/drinking/lead/lead\\_testing\\_of\\_school\\_drinking\\_water.htm](http://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm) The Department will update this website as more information becomes available.

If you have any additional questions, please contact your local health department. Contact information is available at:  
[http://health.ny.gov/environmental/water/drinking/doh\\_pub\\_contacts\\_map.htm](http://health.ny.gov/environmental/water/drinking/doh_pub_contacts_map.htm)