



September 29, 2016

St. Aloysius on the Ohio  
Mr. Andy Martini  
6207 Portage St.  
Cincinnati, OH 45233

Dear Mr. Martini:

Attached please find the results of the lead analyses performed for St. Aloysius on the Ohio School by the Greater Cincinnati Water Works (GCWW). We appreciate the opportunity to assist you in understanding the water quality within your school. Our water utility provides a robust partnership with the schools within our service area to help all the schools understand their water quality. We consider this a high priority and have proactively partnered with schools to:

- explain our records of service lines providing water to the schools;
- verify the actual service lines;
- share a link or a copy of the recommended *USEPA 3Ts for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance Document (3Ts Guidelines)*;
- provide sample kits to the schools;
- analyze the samples;
- discuss the results in detail;
- consider follow-up samples, if needed;
- offer assistance with a remediation plan;
- post the results to the [lead.mygcww.org](http://lead.mygcww.org) website, school section;
- assist with creating a communications plan for the school community.

The following comments speak to the process and samples analyzed and additional steps needed to help ensure the safety of all the students within the school. GCWW suggestions and comments are outlined as well as a summary of the short-term and long-term solutions discussed with St. Aloysius that are now underway.

### **School Sample Results**

Earlier this month, St. Aloysius on the Ohio School collected 16 samples from drinking fountains and sinks. The results show the following:

- 7 samples (43.75%), between 5ppb and 10ppb
- 6 samples (37.50%), between 10ppb and 15ppb
- 3 samples (18.75%), greater than 15ppb

100% of samples had some detection of lead when analyzed.

Fifteen parts per billion (ppb) is the federal Lead and Copper Rule action level; desired results are below 15. While we strive to have results less than 15, we recognize that lead is a pervasive environmental contaminant, and no safe blood lead threshold has been identified in children or adults. Therefore, we provide recommendations to further reduce any lead levels discovered at drinking water and cooking outlets.



## Next steps

GCWW has reviewed the results and offers next-step suggestions and comments. We have also included a summary of the discussion and planned remedies from the September 27, 2016 meeting.

<b>Next Steps suggestions and GCWW comments September 23, 2016</b>	<b>Discussion by St. Aloysius and GCWW and Short-term/Long-term Solutions September 27, 2016</b>
1. The <i>USEPA 3Ts for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance Document (3Ts Guidelines)</i> outlines practices to put in place if samples are greater than 20 ppb. GCWW's review and comments are based on the federal Lead and Copper Rule action level of 15 ppb.	Staff at St. Aloysius on the Ohio indicated on Sept. 27, 2016 that they had a copy of this Guidance document, have read it, and will reference it for further understanding. St. Aloysius is aware of the 20ppb trigger level for schools to take action.
2. Given lead was detected in 100% of the samples, GCWW recommends moving quickly to reduce any further risk of lead within the building.	St. Aloysius was informed on Friday Sept. 23 that lead was detected in samples. St. Aloysius acted quickly and on Tuesday met with GCWW to discuss a remediation plan and next steps. St. Aloysius took action on Sept. 27 with changes in the building.
3. GCWW checked the service line material on both sides of the curb stop at 134 Whipple St. on Friday, September 23, 2016. A copper line was found leading to the curb stop from the water main and after the curb stop. However given the high leads, GCWW would like to work with your facilities staff to continue the investigation of the service line after the curb stop leading into the building. If a portion of the line is found to be lead, GCWW recommends removing this line.	Upon further review and discussion of the lead service lines on September 27, 2016 during and after the meeting: <ul style="list-style-type: none"><li>• GCWW crews and staff at St. Aloysius were able to discuss and identify service lines leading to this property.</li><li>• On Sept. 23, 2016 GCWW verified a copper line at 134 Whipple St. (Church and Rectory service lines).</li><li>• However, on Sept. 27, 2016, GCWW reviewed service lines to this property and realized an additional service line was present with a different address, but was part of the school. School staff verified this. GCWW dug up the curb stop at 6207 Portage (school address) and found the service line to be lead on both sides (public and private).</li><li>• Another property on this school complex also has a lead service line (library). GCWW crews were working to verify this line.</li></ul> St. Aloysius is working with a plumber to provide a quote and work will be scheduled as soon as feasibly possible. GCWW will work with this schedule so the plumber and a GCWW crew can work simultaneously to remove the lead service line. The plan is to not interrupt school but to quickly remove the line.

<p>4. For results greater than 15 ppb, consider immediate remedies such as taking the sample location out of service until a more defined plan can be created and implemented. Refer to the 3Ts Guidelines document that suggests shutting off or disconnecting problem outlets until the problem is resolved.</p>	<p>Discussions with St. Aloysius on September 27 lead to the following short-term solutions:</p> <ul style="list-style-type: none"> <li>• Remove problem outlets with high lead levels from service; tag out of service.</li> <li>• As the water sits stagnant overnight in the building, flushing in the building will occur each morning before children arrive for school until the lead service line is removed.</li> <li>• For those students, teachers and staff that do not bring water with them to school, bottled water will be provided as an option.</li> <li>• Coolers of water will be filled from other buildings (no lead service lines) on the property and made available.</li> </ul>
<p>5. Consider completing a plumbing profile to review the fixtures in the school as some fixtures may be contributing to the lead detections in samples. If the fixtures are the source of the lead, plan to replace them. The USEPA 3Ts Guidelines outlines a great approach to creating and implementing a complete remediation plan. A copy of the Guidelines can be found on our website <a href="http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf">http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf</a>. State funds are available through the new Lead Plumbing Fixture Replacement Assistance Grant Program established to provide reimbursement to eligible schools for the assessment and replacement of certain plumbing fixtures. The program is open to traditional public schools, community schools, and chartered non-public schools. Program information can be found on the Ohio Facilities Construction Commission (OFCC) Services and Programs website <a href="http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx">http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx</a>.</p>	<ul style="list-style-type: none"> <li>• St. Aloysius applied for and has been approved for a grant to replace fixtures and conduct water assessments in the building.</li> <li>• Upon review and further inquiry at the State level to determine if funding could be provided to remove the lead service line at the library as well, the State informed St. Aloysius staff that the money could not be used for replacing lead service lines.</li> <li>• GCWW is working to assist St. Aloysius in finding other grants/financing to remove the lead service lines from the school and library.</li> </ul>
<p>6. If it hasn't occurred already, a robust communications plan is suggested. Communications plan steps are outlined in the 3Ts Guidelines. This plan will inform the school community of the sampling work the school has done to date and the steps the school will take to correct any issues discovered. GCWW employees can assist with this plan and are available to attend any school meetings to help explain our lead program, the sample results and our partnership with St. Aloysius on the Ohio School.</p>	<ul style="list-style-type: none"> <li>• St. Aloysius worked quickly on September 27 to inform their school community of the lead testing results and short-term and long-term solutions to fix the problem.</li> <li>• St. Aloysius will continue to communicate with the school community as this process evolves.</li> </ul>

<p>7. Given the health effects of lead, EPA advocates that any school conducting sampling for lead make public any test results. The results from lead testing at your school will be placed on the GCWW website for schools at <a href="http://lead.mycgw.org">lead.mycgw.org</a>. Outlined remedies can be included on this site as well.</p>	<p>GCWW will place the results of lead testing for St. Aloysius on the Ohio on the <a href="http://lead.mycgw.org">lead.mycgw.org</a> website and associated documentation related to testing at St. Aloysius.</p>
<p>8. After identifying potential problems and fixing them, retest the water. GCWW is available to analyze these samples.</p>	<p>Testing can occur after the lead service line(s) are removed at this complex. Similar to other school properties, lead may still be detected in samples due to fixture materials. The sampling process and review of fixtures will occur if needed to further reduce lead in the school. GCWW and St. Aloysius are committed to moving swiftly to reduce the lead in the school.</p>

GCWW appreciates the rapid response and remedies St. Aloysius quickly put in place upon hearing the results of the sampling. St. Aloysius recognized that sample results were below the 20ppb trigger level for schools to take action as outlined in the 3Ts Guidelines, however, decided to take proactive measures to reduce lead in the building, further minimizing lead risk. Your decisions and quick actions speak to your care and commitment to ensure the children remain safe and healthy while attending your school.

Greater Cincinnati Water Works takes the presence of lead service lines and the removal of those service lines in our system very seriously. In addition, minimizing the exposure of lead within our preschools, schools, and daycares is one of our highest priorities under our Enhanced Lead Program. We look forward to our continued partnership with St. Aloysius on the Ohio School. Our resources are available to assist in many ways. Please contact me at 591-7977 or Lynette Whitteberry at 591-7976 to discuss how we can assist with next steps within your school.

Sincerely,



Cathy B. Bailey  
Director/Greater Cincinnati Water Works

Cc: Kristin Penley, St. Aloysius on the Ohio  
Tim Gates, St. Aloysius on the Ohio  
Dr. Camille Jones, Cincinnati Health Department  
Chuck DeJonckheere, Hamilton County Public Health  
Sheila Hill-Christian, City of Cincinnati  
Verna Arnette, Greater Cincinnati Water Works  
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