

October 31, 2016

God's Bible School and College Cheryl Watters Executive Assistant to the President Human Resource Director 1810 Young St., Cincinnati, OH 45202

Dear Cheryl Watters:

Attached please find the results of the additional lead analyses performed for God's Bible School and College by the Greater Cincinnati Water Works (GCWW). The following comments speak to the process, samples analyzed and additional steps needed to help ensure the safety of all the students within the school.

## School Sampling Process and Results

The USEPA 3Ts for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance Document (3Ts Guidelines) is the process and guidelines used for assisting schools with testing for lead.

The first round of sampling for God's Bible School and College occurred in August 2016.

Early October, twenty (20) samples were collected at multiple God's Bible School and College locations. The results show the following:

- 17 samples (85%), below the detection level (<1)
- 3 samples (15%), between 1ppb and 5ppb

www.myGCWW.org

Fifteen parts per billion (ppb) is the federal Lead and Copper Rule action level; desired results are below 15. The federal action level of 15ppb pertains to water utilities and GCWW's review and comments are based on this action level. However, the USEPA 3Ts Guidelines document outlines practices for schools to put in place if samples are greater than 20 ppb.

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 from your samples and provides some next-steps comments:

1. Three samples had low lead detections. Although lower than the 15 ppb action level, for samples with lead detections, consider flushing the lines before using the water. Refer to the USEPA 3Ts Guidelines for more information.

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2. 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 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 http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx.

3. 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 God's Bible School and College. Sampling results will be posted on the GCWW lead.mygcww.org website with other school sampling results.

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 God's Bible School and College. Our resources are available to assist in many ways. Please contact Jim Nelson at 591-6869 to discuss how we can assist with next steps within your school.

Sincerely,

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Cathy B. Bailey Director/Greater Cincinnati Water Works

Cc: Dr. Marilyn Crumpton, Cincinnati Health Department Dr. Camille Jones, Cincinnati Health Department Chuck DeJonckheere, Hamilton County Public Health Sheila Hill-Christian, City of Cincinnati Verna Arnette, Greater Cincinnati Water Works Jeff Swertfeger, Greater Cincinnati Water Works



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GOD'S BIBLE SCHOOL AND COLLEGE-Lead Testing Results					
SAMPLE			PARAMETER		GCWW COMMENTS/REVIEWS/
DATE	SAMPLE NAME	ADDRESS	CODE	AMOUNT	RECOMMENDATIONS
					Lead detected; less than 15ppb action level. Review 3Ts Guidelines to
					understand options to further reduce
10/8/2016	#1_GBS	511 CARMALT	Lead, ppb	3.46	the risk of lead.
10/8/2016	#2_GBS	511 CARMALT	Lead, ppb	<1	Less than detection level
10/8/2016	#10_GBS	511 CARMALT	Lead, ppb	<1	Less than detection level
					Lead detected; less than 15ppb action
					level. Review 3Ts Guidelines to
10/0/001/	<b>#2.052</b>			1.07	understand options to further reduce
10/8/2016	#8_GBS	511 CARMALT	Lead, ppb	1.97	the risk of lead.
10/8/2016	GBS_CAMPUS		Lead, ppb	<1	Less than detection level
10/8/2016	#4_GBS	511 CARMALT	Lead, ppb	<1	Less than detection level
10/8/2016	#5_GBS	511 CARMALT	Lead, ppb	<1	Less than detection level
10/8/2016	#1_GBS_SINK_1800#1	1800 JOSEPHINE	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1800#2	1800 JOSEPHINE	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1805#1	1805 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1805#2	1805 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1844	1844 JOSEPHINE	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_535	535 RINGGOLD	Lead, ppb	<1	Less than detection level
10/8/2016	#6_GBS	511 CARMALT	Lead, ppb	<1	Less than detection level
					Lead detected; less than 15ppb action
					level. Review 3Ts Guidelines to
	000 0000 4000 44				understand options to further reduce
10/8/2016	GBS_SINK_1809#1	1809 YOUNG	Lead, ppb	1.14	the risk of lead.
10/8/2016	GBS_SINK_1809#2	1809 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1807#1	1807 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1807#2	1807 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1807#3	1807 YOUNG	Lead, ppb	<1	Less than detection level
10/8/2016	GBS_SINK_1809#2	1809 YOUNG	Lead, ppb	<1	Less than detection level