



July 7, 2017

Assumption Mt. Healthy School and Church
Greg Stiens
7711 Joseph Street
Cincinnati, OH 45231

Dear Mr. Stiens,

Thank you for taking the responsibility seriously to protect the health of the children by voluntarily testing the water in your school and church for lead!

Attached please find the results of the lead analyses performed for Church of the Assumption Mt. Healthy and School by 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 and church.

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.

In May, sixty-four (64) samples were collected from drinking fountains, cooking outlets and sinks throughout the school. One additional sample location was not included in the process (drinking fountain out of service). The results show the following:

- 23 samples (35.94%), below the detection level (<1)
- 17 samples (26.56%), between 1ppb and 5ppb
- 9 samples (14.06%), between 5ppb and 10ppb
- 4 samples (6.25%), between 10ppb and 15ppb
- 11 samples (17.19%) greater than 15ppb.

Nearly eighty-three percent (82.81%) of the sample results were below the detection level or below the federal action level. Sixty-four percent (64%) of all the samples had some lead level detection.

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 the Greater Cincinnati Water Works 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.

Next steps

GCWW has reviewed the results from your samples and provides some next-steps comments.

1. Several drinking fountains and bottle fillers had lead detections:
 - a. ASMh-FL2OLDSCH-HALLWAYNEARSANTABREAK-DF-ASMh3 (4.07ppb)

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- b. ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-LDF-ASMH19 (37.8ppb)
- c. ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-RDF-ASMH20 (2.5ppb)
- d. ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-BF-ASMH21 (105ppb)
- e. ASMH-BASENEWSCH-MOTORRM-BF-ASMH30 (6.79ppb)
- f. ASMH-BASECH-HALLWAYNEARSTEPS-DF-ASMH41 (1.11ppb)

For the locations with results greater than 15ppb, consider immediate remedies such as taking the sample locations out of operation until a more defined plan can be created. Work to understand what might be contributing to these lead detections and correct the problem before putting these locations back in service.

For the locations with lead detections but below 15ppb, consider flushing the line (let the water run) before use to further reduce the risk of lead.

If any of these locations are not used on a regular basis, then infrequent use may be contributing to the lead detections. Consider if these fountains are needed and if not, permanently remove them from service to avoid infrequent use and risk of high lead levels.

2. A kitchen sample location, ASMH-BASEOLDSCH-KITNEARSTOVE-FILLER-ASMH12, had a lead level of 32.7ppb. Consider taking this sample location out of service until a more defined plan can be created. Work to understand what might be contributing to this lead level (infrequent use, piping, dirty or old faucet and aerator, etc.) and put the solutions in place before putting the sample location back in service.
3. Several restroom sinks had high lead levels. Based on the sample names, it is assumed these are not drinking water or cooking outlets. Although the locations are not used for these purposes, consider immediate remedies such as taking the sample locations out of service until a more defined plan can be created OR post a sign above the locations limiting the purpose of these sinks ('hand washing only', 'work sink only'). Posting a sign will deter students and staff from potentially using the sinks to fill a water bottle, etc.
4. For the other sample locations with lead detections, we have known and learned from other schools (that are participating in this program) that cleaning the faucet and aerator may reduce the lead levels. This is due to the cleaning that removes trapped particles on the aerator. Cleaning may help reduce the lead levels further and may prove to be more helpful than completing a plumbing profile (mentioned below). Cleaning may help reduce the high sink and kitchen lead levels. Follow-up sampling can occur at these locations; GCWW can assist with this.
5. *You might want to consider this for the sample locations with results greater than 15ppb).* 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 <http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf>.

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 was established in House Bill 390 to provide \$12,000,000 in funding to eligible schools to reimburse for the sampling and replacement of drinking fountains, water coolers, plumbing fixtures, and limited connected piping. Schools built before 1990 can apply for reimbursement up to \$15,000 for sampling of eligible fixtures and the material costs to replace those fixtures if they are identified as being over the federal action level

for lead. 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>.

6. Review how water is being used within your facility. If water is not used on a regular basis at some of these outlets, the infrequent use at the outlet may be contributing to the lead detections. For example,
 - a. ASMH-BASEOLDSCH-HOTLUNCHCAFEBOYSRR-LSINK-ASM10 (4.05ppb)
 - b. ASMH-BASEOLDSCH-HOTLUNCHCAFEBOYSRR-RSINK-ASM11 (<1ppb).

These are two sinks in the same restroom. If sample location ASM11 is used more often than ASM10, then the infrequent use at location ASM10 may be contributing to the lead detection. Review the results and understand the water use patterns in several locations as this observation can be seen in a number of the restrooms.


7. While the observation above was noticed, this is not always the case. Review samples ASM4 and ASM5 as a different example where both locations in the restroom have lead detections. While one result is clearly higher than the other, if one sink was used more often on a regular basis, it is expected that the lead level would be lower (or not detected). Again, work to understand how water is used and how often water is used at all locations. In a situation like this, cleaning the aerator and retesting might work as a start.
8. Given the results, be mindful of how all water outlets are used. When the new school year begins, consider if all outlets should be in operation.
9. 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 your school. Suggestions for language and a letter template can be provided if needed. Sampling results will be posted on the GCWW lead.mygcww.org website with other school sampling results.

Overall, there were several lead detections. Suggestions such as removing the outlet from operation, cleaning, flushing the line, posting signs etc. have been outlined above. Taking some outlets out of operation until a more defined plan can be developed and cleaning fixtures and aerators are great starts to reduce the risk of lead in the building. While the cleaning can be done now, retesting will need to occur at the beginning of the school year when school is in session with normal scheduled work and classes. GCWW is available to discuss these suggestions and information via a conference call or in a meeting. Please let us know if this is desired.

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 your school. Our resources are available to assist in many ways. Please contact Jim Nelson at 591-6869 for further assistance.

Thanks again for your partnership with Greater Cincinnati Water Works and your work to further understand the water quality within your building. Your extra steps and care to keep the children in our community safe are appreciated!

Sincerely,

A handwritten signature in black ink that reads "Cathy B. Bailey". The signature is written in a cursive style with a large initial 'C' and a long, sweeping tail on the 'y'.

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
Jason DeLaet, Greater Cincinnati Water Works

Assumption Mt. Healthy School and Church - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	LOCATION	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
ASM1	5/19/2017	5:17	ASM1-FL2OLDSCH-BOYSRR-LSINK-ASM1	LEAD, PPB	3.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM2	5/19/2017	5:16	ASM1-FL2OLDSCH-BOYSRR-RSINK-ASM2	LEAD, PPB	6.89	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM3	5/19/2017	5:15	ASM1-FL2OLDSCH-HALLWAYNEARSANTABREAK-DF-ASM3	LEAD, PPB	4.07	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM4	5/19/2017	5:20	ASM1-FL2OLDSCH-GIRLSRR-LSINK-ASM4	LEAD, PPB	37.2	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM5	5/19/2017	5:20	ASM1-FL2OLDSCH-GIRLSRR-RSINK-ASM5	LEAD, PPB	6.69	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM6	5/19/2017	5:10	ASM1-FL1OLDSCH-HALLWAYNEARVESTRM-DF-ASM6	LEAD, PPB	<1	Less than detection level
ASM7	5/19/2017	5:11	ASM1-FL1OLDSCH-UNIRR-LSINK-ASM7	LEAD, PPB	<1	Less than detection level
ASM8	5/19/2017	5:12	ASM1-FL1OLDSCH-UNIRR-RSINK-ASM8	LEAD, PPB	<1	Less than detection level
ASM9	5/19/2017	5:05	ASM1-BASEOLDSCH-HOTLUNCHCAFE-DF-ASM9	LEAD, PPB	<1	Less than detection level
ASM10	5/19/2017	5:05	ASM1-BASEOLDSCH-HOTLUNCHCAFEBOYSRR-LSINK-ASM10	LEAD, PPB	4.05	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM11	5/19/2017	5:05	ASM1-BASEOLDSCH-HOTLUNCHCAFEBOYSRR-RSINK-ASM11	LEAD, PPB	<1	Less than detection level
ASM12	5/19/2017	5:04	ASM1-BASEOLDSCH-KITNEARSTOVE-FILLER-ASM12	LEAD, PPB	32.7	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM13	5/19/2017	5:01	ASM1-BASEOLDSCH-KITNEARSTOVE-HANDSINK-ASM13	LEAD, PPB	<1	Less than detection level
ASM14	5/19/2017	5:02	ASM1-BASEOLDSCH-KIT2TUB-LSINK-ASM14	LEAD, PPB	<1	Less than detection level

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ASMH15	5/19/2017	5:03	ASMH-BASEOLDSCH-KIT2TUB-RSINK-ASMH15	LEAD, PPB	2.44	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASMH16	5/19/2017	4:51	ASMH-FL2NEWSCH-BOYSRR-LSINK-ASMH16	LEAD, PPB	23.8	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASMH17	5/19/2017	4:50	ASMH-FL2NEWSCH-BOYSRR-MSINK-ASMH17	LEAD, PPB	11.2	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASMH18	5/19/2017	4:51	ASMH-FL2NEWSCH-BOYSRR-RSINK-ASMH18	LEAD, PPB	11.2	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASMH19	5/19/2017	4:51	ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-LDF-ASMH19	LEAD, PPB	37.8	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASMH20	5/19/2017	4:54	ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-RDF-ASMH20	LEAD, PPB	2.5	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASMH21	5/19/2017	4:50	ASMH-FL2NEWSCH-HALLWAYNEARBOYSRR-BF-ASMH21	LEAD, PPB	105	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASMH22	5/19/2017	4:56	ASMH-FL2NEWSCH-PENTHOUSERR-SINK-ASMH22	LEAD, PPB	7.56	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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ASM23	5/19/2017	4:47	ASM23-FL1NEWSCH-HSSTAFFRR-SINK-ASM23	LEAD, PPB	2.61	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM24	5/19/2017	4:46	ASM24-FL1NEWSCH-HALLWAYNEARSTAFFRR-LSINK-ASM24	LEAD, PPB	<1	Less than detection level
ASM25	5/19/2017	4:46	ASM25-FL1NEWSCH-HALLWAYNEARSTAFFRR-RSINK-ASM25	LEAD, PPB	1.28	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM26	5/19/2017	4:48	ASM26-FL1NEWSCH-TEACHERWORKRM-SINK-ASM26	LEAD, PPB	9.69	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM27	5/19/2017	4:37	ASM27-FL1NEWSCH-JULIERM-SINK-ASM27	LEAD, PPB	<1	Less than detection level
ASM28	5/19/2017	4:33	ASM28-BASENEWSCH-LIBRARYRR-SINK-ASM28	LEAD, PPB	1.23	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM29	N/A	N/A	ASM29-BASENEWSCH-MOTORRM-LDF-ASM29	LEAD, PPB	N/A	Drinking fountain - out of service.
ASM30	5/19/2017	4:30	ASM30-BASENEWSCH-MOTORRM-BF-ASM30	LEAD, PPB	6.79	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM31	5/19/2017	4:27	ASM31-BASENEWSCH-MOTORRMRR-LSINK-ASM31	LEAD, PPB	<1	Less than detection level
ASM32	5/19/2017	4:27	ASM32-BASENEWSCH-MOTORRMRR-MSINK-ASM32	LEAD, PPB	<1	Less than detection level
ASM33	5/19/2017	4:33	ASM33-BASENEWSCH-MOTORRMRR-RSINK-ASM33	LEAD, PPB	2.13	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM34	5/19/2017	4:20	ASM34-FL1CH-SACRESTYRR-SINK-ASM34	LEAD, PPB	30.9	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM35	5/19/2017	4:20	ASM35-FL1CH-SACRESTY-SINK-ASM35	LEAD, PPB	5	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM36	5/19/2017	4:21	ASM36-FL1CH-SERVERM-SINK-ASM36	LEAD, PPB	7.25	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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ASM37	5/19/2017	4:12	ASM37-BASECH-GIRLSRR-LSINK-ASM37	LEAD, PPB	<1	Less than detection level
ASM38	5/19/2017	4:11	ASM38-BASECH-GIRLSRR-RSINK-ASM38	LEAD, PPB	2.76	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM39	5/19/2017	4:13	ASM39-BASECH-BOYSRR-LSINK-ASM39	LEAD, PPB	1.09	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM40	5/19/2017	4:14	ASM40-BASECH-BOYSRR-RSINK-ASM40	LEAD, PPB	<1	Less than detection level
ASM41	5/19/2017	4:15	ASM41-BASECH-HALLWAYNEARSTEPS-DF-ASM41	LEAD, PPB	1.11	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM42	5/19/2017	5:24	ASM42-PC-CONCESSION2TUB-SINK-ASM42	LEAD, PPB	<1	Less than detection level
ASM43	5/19/2017	5:24	ASM43-PC-CONCESSION-IM-ASM43	LEAD, PPB	<1	Less than detection level
ASM44	5/19/2017	5:25	ASM44-PC-CONCESSION3TUB-SINK-ASM44	LEAD, PPB	<1	Less than detection level
ASM45	5/19/2017	5:25	ASM45-PC-CONCESSIONNEAR3TUBW/HOSE-HB-ASM45	LEAD, PPB	<1	Less than detection level
ASM46	5/19/2017	5:23	ASM46-PC-PROVIDENCERM-SINK-ASM46	LEAD, PPB	<1	Less than detection level
ASM47	5/19/2017	5:30	ASM47-PC-GIRLSRR-LSINK-ASM47	LEAD, PPB	<1	Less than detection level
ASM48	5/19/2017	5:30	ASM48-PC-GIRLSRR-MSINK-ASM48	LEAD, PPB	<1	Less than detection level
ASM49	5/19/2017	5:31	ASM49-PC-GIRLSRR-RSINK-ASM49	LEAD, PPB	<1	Less than detection level
ASM50	5/19/2017	5:35	ASM50-PC-BOYSRR-LSINK-ASM50	LEAD, PPB	<1	Less than detection level
ASM51	5/19/2017	5:35	ASM51-PC-BOYSRR-MSINK-ASM51	LEAD, PPB	2.66	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM52	5/19/2017	5:35	ASM52-PC-BOYSRR-RSINK-ASM52	LEAD, PPB	1.57	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM53	5/19/2017	5:36	ASM53-PC-HALLWAY-DF-ASM53	LEAD, PPB	<1	Less than detection level
ASM54	5/19/2017	6:34	ASM54-FL2REC-FATHERSRMRR-SINK-ASM54	LEAD, PPB	9.3	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM55	5/19/2017	6:35	ASM55-FL2REC-EARLSRMRR-SINK-ASM55	LEAD, PPB	14.6	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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ASM56	5/19/2017	6:31	ASM56-FL2REC-REDCURTAINSRMRR-SINK-ASM56	LEAD, PPB	58.3	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM57	5/19/2017	6:08	ASM57-FL2REC-KITCHEN-SINK-ASM57	LEAD, PPB	17.9	Above 15ppb federal action level. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM58	5/19/2017	6:33	ASM58-FL2REC-GOLDCURTAINSRMRR-SINK-ASM58	LEAD, PPB	162	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
ASM59	5/19/2017	6:12	ASM59-FL1REC-WRR-SINK-ASM59	LEAD, PPB	<1	Less than detection level
ASM60	5/19/2017	6:12	ASM60-FL1REC-MRR-SINK-ASM60	LEAD, PPB	1.32	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM61	5/19/2017	6:12	ASM61-FL1REC-KITCHEN-SINK-ASM61	LEAD, PPB	<1	Less than detection level
ASM62	5/19/2017	6:17	ASM62-FL1REC-FRONTENTUNIRR-SINK-ASM62	LEAD, PPB	8.98	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASM63	5/19/2017	6:40	ASM63-BASEREC-MENSRR-SINK-ASM63	LEAD, PPB	34	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).

Assumption Mt. Healthy School and Church - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	LOCATION	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
ASMH64	5/19/2017	6:41	ASMH-BASEREC-MENSRR-UTILITYSINK-ASMH64	LEAD, PPB	10.8	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
ASMH65	5/19/2017	6:42	ASMH-BASEREC-WOMENSRR-SINK-ASMH65	LEAD, PPB	27	Above 15ppb federal action level and the 20ppb trigger level to take action as explained in the USEPA 3Ts Guidelines for schools. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).