September 21, 2018

Heritage Hill Elementary School

Princeton City School District
Heritage Hill Elementary School
Jon W. Fricke
11961 Chesterdale Road
Cincinnati, OH 45246

Dear Mr. Fricke,

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

Attached please find the results of the lead analyses performed for Heritage Hill Elementary School 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

GCWW and Princeton School District staff worked together to finalize a sampling plan for the school. 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 April, one hundred-fifteen (115) samples were collected from drinking fountains, cooking outlets and sinks throughout the school. The results show the following:

- 98 samples (85.22%), below the detection level (<1)
- 12 samples (10.43%), between 1ppb and 5ppb
- 3 samples (2.61%), between 5ppb and 10ppb
- 0 samples (0.00%), between 10ppb and 15ppb
- 2 samples (1.74%), greater than 15ppb

Ninety-eight percent (98.26%) of the school sample results were below the detection level or below the federal action level.

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. Great news! No lead was detected in thirty (30) of the thirty-two (32) drinking fountains in the school. No further action is needed at these locations. Low lead detections occurred for the other two sample locations, if these fountains are not used on a regular basis, consider flushing the lines (letting the water run) before use.

2. Two (2) sample locations, HHE18 and HHE51, had a lead detection above the federal action level or above the 3Ts Guidelines trigger of 20ppb for schools to take action.
    a. Lead is not an issue for body contact such as bathing, showering, and washing hands. However, consider an immediate remedy such as taking the sample locations out of service until a more defined plan can be created or post a sign limiting the use at these locations. Refer to the USEPA 3Ts Guidelines for more information and suggestions on signage.
    b. After posting a sign to immediately limit use or removing the location from service, consider cleaning the aerator (screen) and flushing the location after cleaning. This cleaning may help to reduce the risk of lead at these locations. GCWW can assist with resampling and retesting these locations after cleaning aerators.
    c. If the locations are not used on a regular basis, then the infrequent use may be contributing to the lead detections.
    d. If lead detections still occur after resampling or if the locations are used infrequently, consider posting a sign above the locations or in the room limiting the purpose of the sinks ('hand washing only', 'work sink only', 'for art class only-not for drinking purposes', etc.). Posting a sign will deter students and staff from potentially using the sinks to fill a water bottle, etc. Other suggestions can be provided once we have the results from retesting.

3. Three (3) sample locations (HHE61, HHE64, and HHE65) in the kitchen had low lead detections. It is assumed these locations are used for food or drink preparation. Consider flushing the line (letting the water run) before use to reduce the risk of lead.

4. Sample location, HHE-FL1-KIT-IM-HHE67, an ice machine in the kitchen, had a low lead detection (1.98ppb).
    a. Work to understand what might be creating this lead value. How is the ice machine used and how often? Does this unit have a water filter and when was it last replaced?
    b. Consider cleaning the unit, flushing the line, and resampling. GCWW can assist with this.

5. Other locations had lead detections. Based on the names, these are not used for drinking water or cooking purposes.
    a. Lead is not an issue for body contact such as bathing, showering, and washing hands.
    b. Cleaning the aerators at these locations may lower the lead levels at these locations too.
    c. If the locations are not used on a regular basis, then the infrequent use may be contributing to the lead detections. Consider posting signs limiting the purpose of the sinks and other locations.

6. Bottom-line, the majority of the sample results were below the federal action level or below the 3Ts guidelines trigger level for schools to take action. After removing locations from service, cleaning aerators and posting signs should be initial steps to consider before faucets are replaced, etc. We can work quickly with your team to resample and retest the out of service locations.

7. 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.

Greater Cincinnati Water Works takes the presence of lead service lines and the removal of 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 school. Your extra steps and care to keep the children in our community safe are appreciated!

Sincerely,

Cathy B. Bailey
Director/Greater Cincinnati Water Works

Cc: Melba Moore, 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
James Nelson, Greater Cincinnati Water Works

GREATER CINCINNATI WATER WORKS
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Princeton City School District - Heritage Hill Elementary - Lead Testing Results						
SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS
HHE1	4/3/2018	9:00	HHE-FL1-HALLNEAR106-LDF-HHE1	Lead, ppb	<1	Less than detection level
HHE2	4/3/2018	9:01	HHE-FL1-HALLNEAR106-RDF-HHE2	Lead, ppb	<1	Less than detection level
HHE3	4/3/2018	9:03	HHE-FL1-STAFFRRNEAR103-SINK-HHE3	Lead, ppb	<1	Less than detection level
HHE4	4/3/2018	9:03	HHE-FL1-103-SINK-HHE4	Lead, ppb	<1	Less than detection level
HHE5	4/3/2018	9:05	HHE-FL1-103-DF-HHE5	Lead, ppb	<1	Less than detection level
HHE6	4/3/2018	9:06	HHE-FL1-103RR-SINK-HHE6	Lead, ppb	<1	Less than detection level
HHE7	4/3/2018	9:11	HHE-FL1-101-SINK-HHE7	Lead, ppb	<1	Less than detection level
HHE8	4/3/2018	9:11	HHE-FL1-101-DF-HHE8	Lead, ppb	<1	Less than detection level
HHE9	4/3/2018	9:11	HHE-FL1-101RR-SINK-HHE9	Lead, ppb	<1	Less than detection level
HHE10	4/3/2018	9:14	HHE-FL1-100-SINK-HHE10	Lead, ppb	<1	Less than detection level
HHE11	4/3/2018	9:14	HHE-FL1-100-DF-HHE11	Lead, ppb	<1	Less than detection level
HHE12	4/3/2018	9:14	HHE-FL1-100RR-SINK-HHE12	Lead, ppb	<1	Less than detection level
HHE13	4/3/2018	9:14	HHE-FL1-102-SINK-HHE13	Lead, ppb	<1	Less than detection level
HHE14	4/3/2018	9:16	HHE-FL1-102-DF-HHE14	Lead, ppb	<1	Less than detection level
HHE15	4/3/2018	9:16	HHE-FL1-102RR-SINK-HHE15	Lead, ppb	<1	Less than detection level
HHE16	4/3/2018	9:20	HHE-FL1-104-SINK-HHE16	Lead, ppb	<1	Less than detection level
HHE17	4/3/2018	9:20	HHE-FL1-104-DF-HHE17	Lead, ppb	<1	Less than detection level
HHE18	4/3/2018	9:20	HHE-FL1-104RR-SINK-HHE18	Lead, ppb	25.4	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).
HHE19	4/3/2018	9:20	HHE-FL1-106A-SINK-HHE19	Lead, ppb	3.09	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE20	4/3/2018	9:20	HHE-FL1-106A-DF-HHE20	Lead, ppb	<1	Less than detection level
HHE21	4/3/2018	9:20	HHE-FL1-106B-SINK-HHE21	Lead, ppb	<1	Less than detection level
HHE22	4/3/2018	9:21	HHE-FL1-106B-DF-HHE22	Lead, ppb	<1	Less than detection level
HHE23	4/3/2018	9:21	HHE-FL1-GIRLSRRNEAR106-LSINK-HHE23	Lead, ppb	<1	Less than detection level
HHE24	4/3/2018	9:21	HHE-FL1-GIRLSRRNEAR106-MSINK-HHE24	Lead, ppb	<1	Less than detection level
HHE25	4/3/2018	9:24	HHE-FL1-GIRLSRRNEAR106-RSINK-HHE25	Lead, ppb	<1	Less than detection level

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HHE26	4/3/2018	9:23	HHE-FL1-BOYSRRNEAR106-LSINK-HHE26	Lead, ppb	<1	Less than detection level
HHE27	4/3/2018	9:24	HHE-FL1-BOYSRRNEAR106-MSINK-HHE27	Lead, ppb	<1	Less than detection level
HHE28	4/3/2018	9:26	HHE-FL1-BOYSRRNEAR106-RSINK-HHE28	Lead, ppb	<1	Less than detection level
HHE29	4/3/2018	9:26	HHE-FL1-108-SINK-HHE29	Lead, ppb	<1	Less than detection level
HHE30	4/3/2018	9:26	HHE-FL1-108-DF-HHE30	Lead, ppb	<1	Less than detection level
HHE31	4/3/2018	9:29	HHE-FL1-110-SINK-HHE31	Lead, ppb	<1	Less than detection level
HHE32	4/3/2018	9:29	HHE-FL1-110-DF-HHE32	Lead, ppb	<1	Less than detection level
HHE33	4/3/2018	9:30	HHE-FL1-STAFFRRNEAR112-SINK-HHE33	Lead, ppb	<1	Less than detection level
HHE34	4/3/2018	9:30	HHE-FL1-112-SINK-HHE34	Lead, ppb	<1	Less than detection level
HHE35	4/3/2018	9:30	HHE-FL1-112-DF-HHE35	Lead, ppb	<1	Less than detection level
HHE36	4/3/2018	9:34	HHE-FL1-113-SINK-HHE36	Lead, ppb	<1	Less than detection level
HHE37	4/3/2018	9:34	HHE-FL1-113-DF-HHE37	Lead, ppb	<1	Less than detection level
HHE38	4/3/2018	9:35	HHE-FL1-111-SINK-HHE38	Lead, ppb	<1	Less than detection level
HHE39	4/3/2018	9:35	HHE-FL1-111-DF-HHE39	Lead, ppb	<1	Less than detection level
HHE40	4/3/2018	9:30	HHE-FL1-109-SINK-HHE40	Lead, ppb	<1	Less than detection level
HHE41	4/3/2018	9:38	HHE-FL1-109-DF-HHE41	Lead, ppb	<1	Less than detection level
HHE42	4/3/2018	9:38	HHE-FL1-107-SINK-HHE42	Lead, ppb	<1	Less than detection level
HHE43	4/3/2018	9:39	HHE-FL1-107-DF-HHE43	Lead, ppb	<1	Less than detection level
HHE44	4/3/2018	9:40	HHE-FL1-105-SINK-HHE44	Lead, ppb	<1	Less than detection level
HHE45	4/3/2018	9:40	HHE-FL1-105-DF-HHE45	Lead, ppb	<1	Less than detection level
HHE46	4/3/2018	9:43	HHE-FL1-105RR-SINK-HHE46	Lead, ppb	<1	Less than detection level
HHE47	4/3/2018	9:46	HHE-FL1-131LC-SINK-HHE47	Lead, ppb	<1	Less than detection level
HHE48	4/3/2018	10:24	HHE-FL1-140COMRM-SINK-HHE48	Lead, ppb	<1	Less than detection level
HHE49	4/3/2018	10:25	HHE-FL1-GIRLSRRNEAR150-LSINK-HHE49	Lead, ppb	<1	Less than detection level
HHE50	4/3/2018	10:25	HHE-FL1-GIRLSRRNEAR150-MSINK-HHE50	Lead, ppb	<1	Less than detection level
HHE51	4/3/2018	10:28	HHE-FL1-GIRLSRRNEAR150-RSINK-HHE51	Lead, ppb	23.2	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).
HHE52	4/3/2018	10:25	HHE-FL1-BOYSRRNEAR150-LSINK-HHE52	Lead, ppb	<1	Less than detection level
HHE53	4/3/2018	10:23	HHE-FL1-BOYSRRNEAR150-MSINK-HHE53	Lead, ppb	<1	Less than detection level

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HHE54	4/3/2018	10:25	HHE-FL1-BOYSRRNEAR150-RSINK-HHE54	Lead, ppb	<1	Less than detection level
HHE55	4/3/2018	10:27	HHE-FL1-161STAFFDINE-SINK-HHE55	Lead, ppb	<1	Less than detection level
HHE56	4/3/2018	10:27	HHE-FL1-160ART-LSINK-HHE56	Lead, ppb	<1	Less than detection level
HHE57	4/3/2018	10:27	HHE-FL1-160ART-MSINK-HHE57	Lead, ppb	<1	Less than detection level
HHE58	4/3/2018	10:28	HHE-FL1-160ART-RSINK-HHE58	Lead, ppb	<1	Less than detection level
HHE59	4/3/2018	10:27	HHE-FL1-162MUSIC-SINK-HHE59	Lead, ppb	<1	Less than detection level
HHE60	4/3/2018	10:27	HHE-FL1-162MUSIC-DF-HHE60	Lead, ppb	<1	Less than detection level
HHE61	4/3/2018	10:37	HHE-FL1-KIT3TUB-LSINK-HHE61	Lead, ppb	3.75	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE62	4/3/2018	10:37	HHE-FL1-KIT3TUB-RSINK-HHE62	Lead, ppb	<1	Less than detection level
HHE63	4/3/2018	10:37	HHE-FL1-KITDISPOSAL-SPRAY-HHE63	Lead, ppb	<1	Less than detection level
HHE64	4/3/2018	10:37	HHE-FL1-KITNEARPREP-HANDSINK-HHE64	Lead, ppb	1.3	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE65	4/3/2018	10:37	HHE-FL1-KITNEARSERVE-HANDSINK-HHE65	Lead, ppb	6.39	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE66	4/3/2018	10:37	HHE-FL1-KITSTAFRR-SINK-HHE66	Lead, ppb	<1	Less than detection level
HHE67	4/3/2018	10:32	HHE-FL1-KIT-IM-HHE67	Lead, ppb	1.98	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE68	4/3/2018	10:37	HHE-FL1-HALLNEAR150-LDF-HHE68	Lead, ppb	<1	Less than detection level
HHE69	4/3/2018	10:36	HHE-FL1-HALLNEAR150-RDF-HHE69	Lead, ppb	<1	Less than detection level
HHE70	4/3/2018	10:36	HHE-FL1-STAFFRRNEAR124-SINK-HHE70	Lead, ppb	<1	Less than detection level
HHE71	4/3/2018	10:38	HHE-FL1-125STAFFWORK-SINK-HHE71	Lead, ppb	<1	Less than detection level
HHE72	4/3/2018	10:38	HHE-FL1-127NURSE-SINK-HHE72	Lead, ppb	<1	Less than detection level
HHE73	4/3/2018	10:38	HHE-FL1-127NURSERR-SINK-HHE73	Lead, ppb	<1	Less than detection level
HHE74	4/3/2018	10:46	HHE-FL2-201LWALL-LSINK-HHE74	Lead, ppb	<1	Less than detection level
HHE75	4/3/2018	9:56	HHE-FL2-201LWALL-RSINK-HHE75	Lead, ppb	1.16	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS
HHE76	4/3/2018	9:56	HHE-FL2-201RWALL-LSINK-HHE76	Lead, ppb	2.16	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE77	4/3/2018	9:56	HHE-FL2-201RWALL-RSINK-HHE77	Lead, ppb	<1	Less than detection level
HHE78	4/3/2018	9:56	HHE-FL2-201BWALL-SINK-HHE78	Lead, ppb	<1	Less than detection level
HHE79	4/3/2018	9:56	HHE-FL2-201BWALL-DF-HHE79	Lead, ppb	<1	Less than detection level
HHE80	4/3/2018	9:56	HHE-FL2-200-SINK-HHE80	Lead, ppb	<1	Less than detection level
HHE81	4/3/2018	9:56	HHE-FL2-200-DF-HHE81	Lead, ppb	<1	Less than detection level
HHE82	4/3/2018	9:57	HHE-FL2-202-SINK-HHE82	Lead, ppb	<1	Less than detection level
HHE83	4/3/2018	9:57	HHE-FL2-202-DF-HHE83	Lead, ppb	<1	Less than detection level
HHE84	4/3/2018	10:03	HHE-FL2-HALLNEAR203-LDF-HHE84	Lead, ppb	<1	Less than detection level
HHE85	4/3/2018	10:03	HHE-FL2-HALLNEAR203-RDF-HHE85	Lead, ppb	<1	Less than detection level
HHE86	4/3/2018	10:04	HHE-FL2-GIRLSRRNEAR203-LSINK-HHE86	Lead, ppb	<1	Less than detection level
HHE87	4/3/2018	10:04	HHE-FL2-GIRLSRRNEAR203-MSINK-HHE87	Lead, ppb	<1	Less than detection level
HHE88	4/3/2018	10:04	HHE-FL2-GIRLSRRNEAR203-RSINK-HHE88	Lead, ppb	<1	Less than detection level
HHE89	4/3/2018	10:04	HHE-FL2-BOYSRRNEAR203-LSINK-HHE89	Lead, ppb	<1	Less than detection level
HHE90	4/3/2018	10:04	HHE-FL2-BOYSRRNEAR203-MSINK-HHE90	Lead, ppb	<1	Less than detection level
HHE91	4/3/2018	10:07	HHE-FL2-BOYSRRNEAR203-RSINK-HHE91	Lead, ppb	2.4	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE92	4/3/2018	10:07	HHE-FL2-204-SINK-HHE92	Lead, ppb	<1	Less than detection level
HHE93	4/3/2018	10:07	HHE-FL2-204-DF-HHE93	Lead, ppb	<1	Less than detection level
HHE94	4/3/2018	10:07	HHE-FL2-206-SINK-HHE94	Lead, ppb	<1	Less than detection level
HHE95	4/3/2018	10:07	HHE-FL2-206-DF-HHE95	Lead, ppb	<1	Less than detection level
HHE96	4/3/2018	10:10	HHE-FL2-208LWALL-LSINK-HHE96	Lead, ppb	<1	Less than detection level
HHE97	4/3/2018	10:10	HHE-FL2-208LWALL-RSINK-HHE97	Lead, ppb	<1	Less than detection level
HHE98	4/3/2018	10:10	HHE-FL2-208RWALL-LSINK-HHE98	Lead, ppb	<1	Less than detection level
HHE99	4/3/2018	10:10	HHE-FL2-208RWALL-RSINK-HHE99	Lead, ppb	1.15	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE100	4/3/2018	10:10	HHE-FL2-208BWALL-SINK-HHE100	Lead, ppb	<1	Less than detection level

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HHE101	4/3/2018	10:10	HHE-FL2-208BWALL-DF-HHE101	Lead, ppb	5.27	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE102	4/3/2018	10:11	HHE-FL2-209LWALL-LSINK-HHE102	Lead, ppb	<1	Less than detection level
HHE103	4/3/2018	10:11	HHE-FL2-209LWALL-RSINK-HHE103	Lead, ppb	2.75	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE104	4/3/2018	10:11	HHE-FL2-209RWALL-LSINK-HHE104	Lead, ppb	5.12	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE105	4/3/2018	10:11	HHE-FL2-209RWALL-RSINK-HHE105	Lead, ppb	<1	Less than detection level
HHE106	4/3/2018	10:11	HHE-FL2-209BWALL-SINK-HHE106	Lead, ppb	1.14	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE107	4/3/2018	10:11	HHE-FL2-209BWALL-DF-HHE107	Lead, ppb	<1	Less than detection level
HHE108	4/3/2018	10:13	HHE-FL2-207-SINK-HHE108	Lead, ppb	<1	Less than detection level
HHE109	4/3/2018	10:13	HHE-FL2-207-DF-HHE109	Lead, ppb	<1	Less than detection level
HHE110	4/3/2018	10:16	HHE-FL2-205-SINK-HHE110	Lead, ppb	<1	Less than detection level
HHE111	4/3/2018	10:16	HHE-FL2-205-DF-HHE111	Lead, ppb	1.47	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE112	4/3/2018	10:05	HHE-FL2-203B-SINK-HHE112	Lead, ppb	<1	Less than detection level
HHE113	4/3/2018	10:05	HHE-FL2-203B-DF-HHE113	Lead, ppb	<1	Less than detection level
HHE114	4/3/2018	10:05	HHE-FL2-203A-SINK-HHE114	Lead, ppb	1.56	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
HHE115	4/3/2018	10:05	HHE-FL2-203A-DF-HHE115	Lead, ppb	<1	Less than detection level