



July 17, 2017

McNicholas School
Mike Woodruff
6536 Beechmont Avenue
Cincinnati, OH 45230

Dear Mr. Woodruff:

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 McNicholas High School-Paradise Concessions 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.

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.

In May, sixteen (16) samples were collected from outlets in the Paradise Concessions Complex. These samples were turned off for the season during the first round of sampling. The results show the following:

- 10 samples (62.50%), below the detection level (<1)
- 3 samples (18.75%), between 1ppb and 5ppb
- 0 samples (0%), between 5ppb and 10ppb
- 1 sample (6.25%), between 10ppb and 15ppb
- 2 samples (12.50%) greater than 15ppb

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 at drinking water and cooking outlets.

Next steps

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

1. Three locations in Paradise Concessions/Complex were identified as drinking water sources and had lead detections:



- § MCN-PARCONOUTSIDE-LEFTSIDE-HB-MCN185 (13.8ppb)
- § MCN-PARFBFIELD-FRONTBLEACHER-HB-MCN186 (2.85ppb)
- § MCN-PARBASEFIELD-BEHINDRUGOUT-HB-MCN187 (4.11ppb)

- a) For the sample location close to 15ppb, consider immediate remedies such as taking the sample location out of service until a more defined plan can be created OR post a sign above the location limiting the purpose of this hose bib ('facility work only', 'for watering the grounds only'). Posting a sign will deter students and staff from potentially using the sink to fill a water bottle, especially if this has been the habit in the past.
 - b) If this location cannot be removed from service, extensive flushing is suggested before use.
 - c) Consider flushing the other two locations before using them as a drinking water outlet.
 - d) Review how water is being used at these locations. If it is not used regularly, the infrequent use may be contributing to the lead detections.
 - e) Until the lead level can be reduced, consider other options to provide water, particularly at the hose bib with a detection level of 13.8ppb.
2. A fourth hose bib had a high lead detection (MCN-PARFBFIELD-LSIDEFIELD-LHB-MCN188). Although not identified as being used as a drinking water outlet, consider taking this location out of service as well until a more defined plan can be created to reduce the risk of lead OR post signs limiting the use.
 3. A hand sink in the serving area of the concessions facility had a lead detection above 15ppb (MCN-PARCON1FL-SERVAREA-HANDSINK-MCN183). Lead is not an issue for body contact such as bathing, showering, and washing hands. If the school is interested in reducing lead at all locations, then consider flushing the line before use (let the water run).
 4. 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. Again, signage at these locations may be helpful (hand washing only, water the grounds only, etc.).
 5. **This may help with the hose bibs.** 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. Continue communicating the results with your school community. 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. 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. Please contact Jim Nelson at 591-6869 if you have any questions.

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".

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

Cincinnati Archdiocese - McNicholas High School Paradise Concessions - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
MCN174	5/19/2017	4:53:00	MCN-PARCONLL-WRR-FLSINK-MCN174	Lead, ppb	<1	Less than detection level
MCN175	5/19/2017	4:53:00	MCN-PARCONLL-WRR-LSINK-MCN175	Lead, ppb	<1	Less than detection level
MCN176	5/19/2017	4:54:00	MCN-PARCONLL-WRR-RSINK-MCN176	Lead, ppb	<1	Less than detection level
MCN177	5/19/2017	4:54:00	MCN-PARCONLL-WRR-FRSINK-MCN177	Lead, ppb	<1	Less than detection level
MCN178	5/19/2017	4:58:00	MCN-PARCONLL-MRR-FLSINK-MCN178	Lead, ppb	<1	Less than detection level
MCN179	5/19/2017	4:58:00	MCN-PARCONLL-MRR-LSINK-MCN179	Lead, ppb	<1	Less than detection level
MCN180	5/19/2017	4:59:00	MCN-PARCONLL-MRR-RSINK-MCN180	Lead, ppb	3.61	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
MCN181	5/19/2017	4:59:00	MCN-PARCONLL-MRR-FRSINK-MCN181	Lead, ppb	<1	Less than detection level
MCN182	5/19/2017	5:04:00	MCN-PARCON1FL-KIT3TUB-SINK-MCN182	Lead, ppb	<1	Less than detection level
MCN183	5/19/2017	5:05:00	MCN-PARCON1FL-SERVAREA-HANDSINK-MCN183	Lead, ppb	16.8	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).
MCN184	5/19/2017	5:06:00	MCN-PARCON1FL-STORAGE-IM-MCN184	Lead, ppb	<1	Less than detection level
MCN185	5/19/2017	6:03:00	MCN-PARCONOUTSIDE-LEFTSIDE-HB-MCN185	Lead, ppb	13.8	Used as a source for drinking. Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
MCN186	5/19/2017	6:08:00	MCN-PARFBFIELD-FRONTBLEACHER-HB-MCN186	Lead, ppb	2.85	Used as a source for drinking. 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
MCN187	5/19/2017	6:11:00	MCN-PARBASEFIELD-BEHINDRDUGOUT-HB-MCN187	Lead, ppb	4.11	Used as a source for drinking. Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
MCN188	5/19/2017	6:16:00	MCN-PARFBFIELD-LSIDFIELD-LHB-MCN188	Lead, ppb	33.8	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
MCN189	5/19/2017	6:18:00	MCN-PARFBFIELD-LSIDFIELD-RHB-MCN189	Lead, ppb	<1	Less than detection level