



March 16, 2017

Nativity of Our Lord Church and School
Rudy Gruenke IV
5935 Pandora Avenue
Cincinnati, OH 45213

Dear Mr. Gruenke:

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

Attached please find the results of the lead analyses performed for the Nativity of Our Lord Church and 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 Nativity Church/School staff worked together to finalize a sampling plan for the church and 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 February, samples were collected from drinking fountains, cooking outlets and sinks throughout the church, parish and school. Fifty-nine (59) samples were collected and analyzed.

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 GCWW' 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 in your school.

Next steps

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

CHURCH

All samples in the church were collected at sinks and had results below the detection level or below the federal action level of 15ppb. Three (3) of the nine (9) samples had minimal lead detections; no further action is needed. If desired to further reduce the low lead levels, consider flushing the line (letting the water run) before use.

PARISH

Six (6) of the nine (9) samples had lead detections, 5 of these samples were greater than 15ppb.

1. If any of the sinks are used as drinking water or cooking outlets, consider immediate remedies such as taking the sample location out of service OR flushing the line (letting the water run)



before use. For more information, refer to the 3Ts Guidelines that suggest shutting off or disconnecting problem outlets until the problem is resolved. Additional sampling may be needed at these locations.

2. If the sinks are not used for drinking water or cooking purposes, consider posting a sign above the location limiting the purpose of the sink ('hand washing only', 'work sink only'). Posting a sign will deter students and staff from potentially using the sink to fill a water bottle, etc.

SCHOOL

1. For the school samples, the results show the following:
 - 34 samples (82.93%), below the detection level (<1)
 - 3 samples (7.31%), between 1ppb and 5ppb
 - 4 samples (9.76%), between 5ppb and 10ppb

One hundred percent (100%) of the sample results were below the detection level or below the federal action level. This is great news; minimal improvements are suggested below.

2. One sample location was identified during the walkthrough as a drinking fountain (DF) that gets used a lot, even in the winter time. This location, NATIVITY-OUTSIDE-COURTYD-DF-NSCH1, had a lead level of 9.91ppb. This is a high lead level for this location if it is used on a regular basis (it is expected that a lower lead level might be detected, given there is frequent use). Work to understand what might be causing this lead detection and put solutions in place to further reduce the risk of lead. Consider immediate remedies such as flushing the line (letting the water run) before using the drinking fountain.
3. Two other drinking fountains had results below the detection level; no lead was detected. No further action is needed for drinking fountains.
4. For all other sample locations with lead detections, as an added precaution, consider posting signs at sink locations indicating 'hand washing only' (or other specific purposes) as these locations should not to be used as drinking water or cooking outlets. Again, posting a sign will deter students and staff from potentially using the sink to fill a water bottle, etc.
5. Review how water is being used within your facilities (church, parish, school). 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, etc.).
6. 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>.

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.

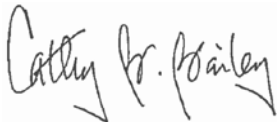
SUMMARY for all 3 Locations

Overall, one drinking fountain, NATIVITY-OUTSIDE-COURTYD-DF-NSCH1, although lower than 15ppb, warrants further attention. Additional sampling at this location may provide the information needed to properly resolve this problem; GCWW can assist with this. If samples with high lead levels in the parish are used for drinking water or cooking purposes, remove the location from service until the problem can be resolved. For other locations with lead detections, posting signs at the various sinks will help limit the purpose of the sink and deter students and staff from using these locations as drinking water or cooking outlets.

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. 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 buildings. 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: 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

Nativity of Our Lord Church and School - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
NCH1	2/17/2017	7:06:00	NATIVITY-CHURCH-MENSRR-LSINK-NCH1	Lead, ppb	1.08	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NCH2	2/17/2017	7:06:00	NATIVITY-CHURCH-MENSRR-RSINK-NCH2	Lead, ppb	<1	Less than detection level
NCH3	2/17/2017	7:03:00	NATIVITY-CHURCH-WOMENSRR-LSINK-NCH3	Lead, ppb	<1	Less than detection level
NCH4	2/17/2017	7:05:00	NATIVITY-CHURCH-WOMENSRR-MSINK-NCH4	Lead, ppb	<1	Less than detection level
NCH5	2/17/2017	7:05:00	NATIVITY-CHURCH-WOMENSRR-RSINK-NCH5	Lead, ppb	1.53	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NCH6	2/17/2017	7:07:00	NATIVITY-CHURCH-CONFESSONAL-SINK-NCH6	Lead, ppb	1.32	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NCH7	2/17/2017	7:00:00	NATIVITY-CHURCH-SACRISTYPREIST-SINK-NCH7	Lead, ppb	<1	Less than detection level
NCH8	2/17/2017	7:00:00	NATIVITY-CHURCH-SACRISTYMUSIC-SINK-NCH8	Lead, ppb	<1	Less than detection level
NCH9	2/17/2017	6:59:00	NATIVITY-CHURCHBASE-PREISTR-R-SINK-NCH9	Lead, ppb	<1	Less than detection level
NPO1	2/17/2017	6:52:00	NATIVITY-PARISHLL-RR-SINK-NPO1	Lead, ppb	<1	Less than detection level
NPO2	2/17/2017	6:41:00	NATIVITY-PARISHFL1-MAINRR-SINK-NPO2	Lead, ppb	1.19	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NPO3	2/17/2017	6:42:00	NATIVITY-PARISHFL1-HALLWAYKIT-SINK-NPO3	Lead, ppb	73.6	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).
NPO4	2/17/2017	6:43:00	NATIVITY-PARISHFL1-KITCHEN-SINK-NPO4	Lead, ppb	<1	Less than detection level
NPO5	2/17/2017	6:43:00	NATIVITY-PARISHFL1-SVDPRR-SINK-NPO5	Lead, ppb	19.4	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).

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NPO6	2/17/2017	6:47:00	NATIVITY-PARISHFL2-COP-SINK-NPO6	Lead, ppb	110	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).
NPO7	2/17/2017	6:47:00	NATIVITY-PARISHFL2-PSYCH-SINK-NPO7	Lead, ppb	21.9	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).
NPO8	2/17/2017	6:49:00	NATIVITY-PARISHFL2-DEVELOPMENT-SINK-NPO8	Lead, ppb	137	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).
NPO9	2/17/2017	6:48:00	NATIVITY-PARISHFL2-HALLWAYRR-SINK-NPO9	Lead, ppb	<1	Less than detection level
NSCH1	2/17/2017	6:00:00	NATIVITY-OUTSIDE-COURTYD-DF-NSCH1	Lead, ppb	9.91	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH2	2/17/2017	6:00:00	NATIVITY-SCHFL1-TECH-SINK-NSCH2	Lead, ppb	5.78	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH3	2/17/2017	6:02:00	NATIVITY-SCHFL1-RM7RRKINDER-SINK-NSCH3	Lead, ppb	<1	Less than detection level
NSCH4	2/17/2017	6:02:00	NATIVITY-SCHFL1-RM7KINDER-UTILITYSINK-NSCH4	Lead, ppb	9.75	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH5	2/17/2017	6:04:00	NATIVITY-SCHFL1-GIRLSRR-FLSINK-NSCH5	Lead, ppb	<1	Less than detection level
NSCH6	2/17/2017	6:04:00	NATIVITY-SCHFL1-GIRLSRR-LSINK-NSCH6	Lead, ppb	<1	Less than detection level

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NSCH7	2/17/2017	6:04:00	NATIVITY-SCHFL1-GIRLSRR-RSINK-NSCH7	Lead, ppb	<1	Less than detection level
NSCH8	2/17/2017	6:04:00	NATIVITY-SCHFL1-GIRLSRR-FRSINK-NSCH8	Lead, ppb	<1	Less than detection level
NSCH9	2/17/2017	6:04:00	NATIVITY-SCHFL1-HALLWAYNEAR4-DF-NSCH9	Lead, ppb	<1	Less than detection level
NSCH10	2/17/2017	6:08:00	NATIVITY-SCHFL1-BOYSRR-FLSINK-NSCH10	Lead, ppb	<1	Less than detection level
NSCH11	2/17/2017	6:08:00	NATIVITY-SCHFL1-BOYSRR-LSINK-NSCH11	Lead, ppb	<1	Less than detection level
NSCH12	2/17/2017	6:08:00	NATIVITY-SCHFL1-BOYSRR-RSINK-NSCH12	Lead, ppb	<1	Less than detection level
NSCH13	2/17/2017	6:08:00	NATIVITY-SCHFL1-BOYSRR-FRSINK-NSCH13	Lead, ppb	<1	Less than detection level
NSCH14	2/17/2017	6:10:00	NATIVITY-SCHFL1-KIT-HANDSINK-NSCH14	Lead, ppb	<1	Less than detection level
NSCH15	2/17/2017	6:10:00	NATIVITY-SCHFL1-KIT3TUB-SINK-NSCH15	Lead, ppb	3.51	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH16	2/17/2017	6:10:00	NATIVITY-SCHFL1-KITPREP-SINK-NSCH16	Lead, ppb	<1	Less than detection level
NSCH17	2/17/2017	6:12:00	NATIVITY-SCHFL1-MILKRM-SINK-NSCH17	Lead, ppb	6.83	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH18	2/17/2017	6:12:00	NATIVITY-SCHFL1-BOILER-HOSE-NSCH18	Lead, ppb	<1	Less than detection level
NSCH19	2/17/2017	6:12:00	NATIVITY-SCHFL1-BOILER-HB-NSCH19	Lead, ppb	4.61	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH20	2/17/2017	6:19:00	NATIVITY-SCHFL2-102ART-LSINK-NSCH20	Lead, ppb	<1	Less than detection level
NSCH21	2/17/2017	6:19:00	NATIVITY-SCHFL2-102ART-MSINK-NSCH21	Lead, ppb	<1	Less than detection level
NSCH22	2/17/2017	6:19:00	NATIVITY-SCHFL2-102ART-RSINK-NSCH22	Lead, ppb	<1	Less than detection level
NSCH23	2/17/2017	6:21:00	NATIVITY-SCHFL2-103NURSE-SINK-NSCH23	Lead, ppb	<1	Less than detection level
NSCH24	2/17/2017	6:22:00	NATIVITY-SCHFL2-HALLWAYNEAR104-DF-NSCH24	Lead, ppb	<1	Less than detection level
NSCH25	2/17/2017	6:23:00	NATIVITY-SCHFL2-HALLWAYNEAR107-DF-NSCH25	Lead, ppb	<1	Less than detection level
NSCH26	2/17/2017	6:24:00	NATIVITY-SCHFL2-GIRLSRR-LSINK-NSCH26	Lead, ppb	<1	Less than detection level
NSCH27	2/17/2017	6:24:00	NATIVITY-SCHFL2-GIRLSRR-RSINK-NSCH27	Lead, ppb	<1	Less than detection level
NSCH28	2/17/2017	6:27:00	NATIVITY-SCHFL3-SCIFRONTDESK-SINK-NSCH28	Lead, ppb	<1	Less than detection level
NSCH29	2/17/2017	6:28:00	NATIVITY-SCHFL3-HALLWAYNEAR204-DF-NSCH29	Lead, ppb	<1	Less than detection level
NSCH30	2/17/2017	6:29:00	NATIVITY-SCHFL3-HALLWAYNEAR207-DF-NSCH30	Lead, ppb	<1	Less than detection level
NSCH31	2/17/2017	6:29:00	NATIVITY-SCHFL3-STAFFRRSPECILIST-SINK-NSCH31	Lead, ppb	<1	Less than detection level
NSCH32	2/17/2017	6:30:00	NATIVITY-SCHFL3-BOYSRR-LSINK-NSCH32	Lead, ppb	<1	Less than detection level
NSCH33	2/17/2017	6:30:00	NATIVITY-SCHFL3-BOYSRR-RSINK-NSCH33	Lead, ppb	<1	Less than detection level

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NSCH34	2/17/2017	6:32:00	NATIVITY-GYM-CONSESSIONS-SINK-NSCH34	Lead, ppb	1.07	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
NSCH35	2/17/2017	6:33:00	NATIVITY-GYM-MENSRR-LSINK-NSCH35	Lead, ppb	<1	Less than detection level
NSCH36	2/17/2017	6:33:00	NATIVITY-GYM-MENSRR-RSINK-NSCH36	Lead, ppb	<1	Less than detection level
NSCH37	2/17/2017	6:37:00	NATIVITY-GYM-HALLWAY-LDF-NSCH37	Lead, ppb	<1	Less than detection level
NSCH38	2/17/2017	6:37:00	NATIVITY-GYM-HALLWAY-RDF-NSCH38	Lead, ppb	<1	Less than detection level
NSCH39	2/17/2017	6:38:00	NATIVITY-GYM-WOMENSRR-LSINK-NSCH39	Lead, ppb	<1	Less than detection level
NSCH40	2/17/2017	6:38:00	NATIVITY-GYM-WOMENSRR-MSINK-NSCH40	Lead, ppb	<1	Less than detection level
NSCH41	2/17/2017	6:35:00	NATIVITY-GYM-WOMENSRR-RSINK-NSCH41	Lead, ppb	<1	Less than detection level