



August 24, 2017

Our Lady of Lourdes School and Church
Mr. Patrick Morgan
5835 Glenway Avenue
Cincinnati, OH 45238

Dear Mr. Morgan,

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 Our Lady of Lourdes 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 and church.

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. This same process was used to test the locations in the church.

SCHOOL

In May, fifty-six (56) samples were collected from drinking fountains, cooking outlets and sinks throughout the school. The results show the following:

- 51 samples (91.07%), below the detection level (<1)
- 5 samples (8.93%), between 1ppb and 5ppb
- 0 samples (1.61%), between 5ppb and 10ppb
- 0 samples (3.23%), between 10ppb and 15ppb
- 0 samples (8.06%) greater than 15ppb.

Great news! One hundred percent (100%) 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 for School

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



1. Great news! No lead was detected in any drinking fountains in the school. No further action is needed at these locations.
2. Two sinks in the kitchen had low lead detections. If these locations are used for preparing drinks or foods, consider flushing the line (letting the water run) before use. No further action is suggested for these locations.
3. A few other locations had low 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. 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. Consider cleaning the aerator (screen) and flushing after cleaning. This cleaning may help to reduce the risk of lead at these locations.
4. *You shouldn't need this program, given that you had minimal lead detections in the school. However, we wanted to share this information in case something changed and to make you aware of the program.* 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>.

CHURCH

When samples were collected for the school, additional samples were collected in the church. Results show the following for Church:

- 7 samples (24.14%), below the detection level (<1)
- 13 samples (44.83%), between 1ppb and 5ppb
- 3 samples (10.34%), between 5ppb and 10ppb
- 2 samples (6.90%), between 10ppb and 15ppb
- 4 samples (13.79%) greater than 15ppb.

Eighty-six percent (86.2%) of the church sample results were below the detection level or below the federal action level.

Next Steps for Church

1. The following locations all had lead results greater than the federal action level of 15ppb:
 - a. Bride restroom (sample OLLP-CHURCH-WRRBRIDERM-SINK-OLLP7) = 22.1ppb
 - b. Annex staff restroom (sample OLLP-ANEX-STAFFWKRRNEAR2-SINK-OLLP16) = 45.4ppb.
 - c. Annex Girls restroom (sample OLLP-ANEX-GIRLSRR-RSINK-OLLP23) = 65.2ppb
 - d. A sink in the chapel (sample OLLP-PAROFFFL1-CHAPEL-SINK-OLLP24) = 20.4.

- e. Two restroom sinks in the church has results close to 15ppb: OLLP-CHURCH-WRR-LSINK-OLLP8 (14.6ppb) and OLLP-CHURCH-WRR-RSINK-OLLP9 (13.4ppb).
2. These samples (4) had lead levels greater than the federal action level of 15ppb and greater than the trigger level of 20ppb as suggested by the 3Ts Guidelines for schools to take action. 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.
3. It is not known if these locations (4 explained above) are used on a regular basis. If not, then the infrequent use may be contributing to these lead levels.
4. Consider posting a sign above the location 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.
5. A drinking fountain in the hallway near a restroom (OLLP-CHURCH-HALLWAYNEARRR-DF-OLLP12) had a low lead level. Flush the line (let the water run) before use. No lead was detected at the other fountains; no further action is suggested.
6. Most of the sinks in the church had lead detections. As mentioned before, lead is not an issue for body contact such as bathing, showering, and washing hands. However, it is assumed that the school wants to further reduce all lead detections identified. 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. Consider removing the aerators and cleaning them as part of a plan to reduce the risk of lead. Resampling and retesting can occur after cleaning; GCWW can assist with this.

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.mycgww.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. 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

Cincinnati Archdiocese - Our Lady of Lourdes Church and School - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
OLL1	5/6/2017	12:34	OLL-BASE-BOYSRRNEAR9-LSINK-OLL1	Lead, ppb	<1	Less than detection level
OLL2	5/6/2017	12:35	OLL-BASE-BOYSRRNEAR9-RSINK-OLL2	Lead, ppb	<1	Less than detection level
OLL3	5/6/2017	12:35	OLL-BASE-HALLWAYNEAR9-DF-OLL3	Lead, ppb	<1	Less than detection level
OLL4	5/6/2017	12:35	OLL-BASE-10-SINK-OLL4	Lead, ppb	<1	Less than detection level
OLL5	5/6/2017	12:36	OLL-BASE-11-SINK-OLL5	Lead, ppb	<1	Less than detection level
OLL6	5/6/2017	12:37	OLL-BASE-HALLWAYNEAR11-DF-OLL6	Lead, ppb	<1	Less than detection level
OLL7	5/6/2017	12:40	OLL-BASE-GIRLSRRNEAR11-LSINK-OLL7	Lead, ppb	<1	Less than detection level
OLL8	5/6/2017	12:41	OLL-BASE-GIRLSRRNEAR11-RSINK-OLL8	Lead, ppb	<1	Less than detection level
OLL9	5/6/2017	12:46	OLL-BASE-BOYSRRNEARCAFE-SINK-OLL9	Lead, ppb	<1	Less than detection level
OLL10	5/6/2017	12:46	OLL-BASE-GIRLSRRNEARCAFE-SINK-OLL10	Lead, ppb	1.29	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLL11	5/6/2017	12:48	OLL-BASE-CAFE-LDF-OLL11	Lead, ppb	<1	Less than detection level
OLL12	5/6/2017	12:48	OLL-BASE-CAFE-RDF-OLL12	Lead, ppb	<1	Less than detection level
OLL13	5/6/2017	12:51	OLL-BASE-KITLEFT2TUB-SINK-OLL13	Lead, ppb	2.66	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLL14	5/6/2017	12:51	OLL-BASE-KITRIGHT2TUB-SINK-OLL14	Lead, ppb	3.36	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLL15	5/6/2017	12:51	OLL-BASE-KITSTAFFRR-SINK-OLL15	Lead, ppb	2.08	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLL16	5/6/2017	12:52	OLL-BASE-KIT-IM-OLL16	Lead, ppb	<1	Less than detection level
OLL17	5/6/2017	12:32	OLL-FL1-MUSICRM-SINK-OLL17	Lead, ppb	<1	Less than detection level
OLL18	5/6/2017	12:30	OLL-FL1-107-SINK-OLL18	Lead, ppb	<1	Less than detection level
OLL19	5/6/2017	12:30	OLL-FL1-GIRLSRRNEAR107-LSINK-OLL19	Lead, ppb	<1	Less than detection level
OLL20	5/6/2017	12:30	OLL-FL1-GIRLSRRNEAR107-RSINK-OLL20	Lead, ppb	<1	Less than detection level
OLL21	5/6/2017	12:28	OLL-FL1-HALLWAYNEAR105-DF-OLL21	Lead, ppb	<1	Less than detection level
OLL22	5/6/2017	12:27	OLL-FL1-BOYSRRNEARNURSE-LSINK-OLL22	Lead, ppb	<1	Less than detection level
OLL23	5/6/2017	12:27	OLL-FL1-BOYSRRNEARNURSE-RSINK-OLL23	Lead, ppb	<1	Less than detection level
OLL24	5/6/2017	12:26	OLL-FL1-HALLWAYNEARNURSE-DF-OLL24	Lead, ppb	<1	Less than detection level

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OLL25	5/6/2017	12:26	OLL-FL1-NURSE-SINK-OLL25	Lead, ppb	<1	Less than detection level
OLL26	5/6/2017	12:55	OLL-FL1-OLDGYMSTAGE-DF-OLL26	Lead, ppb	<1	Less than detection level
OLL27	5/6/2017	12:55	OLL-FL1-OLDGYMSTAGERR-SINK-OLL27	Lead, ppb	2.58	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLL28	5/6/2017	12:23	OLL-FL2-HALLWAYNEAR201-DF-OLL28	Lead, ppb	<1	Less than detection level
OLL29	5/6/2017	12:23	OLL-FL2-BOYSRRNEAR201-LSINK-OLL29	Lead, ppb	<1	Less than detection level
OLL30	5/6/2017	12:23	OLL-FL2-BOYSRRNEAR201-RSINK-OLL30	Lead, ppb	<1	Less than detection level
OLL31	5/6/2017	12:22	OLL-FL2-UNIRRNEAR201-SINK-OLL31	Lead, ppb	<1	Less than detection level
OLL32	5/6/2017	12:21	OLL-FL2-STAFFLOUNGE-SINK-OLL32	Lead, ppb	<1	Less than detection level
OLL33	5/6/2017	12:18	OLL-FL2-HALLWAYNEAR207-DF-OLL33	Lead, ppb	<1	Less than detection level
OLL34	5/6/2017	12:17	OLL-FL2-GIRLSRRNEAR207-LSINK-OLL34	Lead, ppb	<1	Less than detection level
OLL35	5/6/2017	12:17	OLL-FL2-GIRLSRRNEAR207-RSINK-OLL35	Lead, ppb	<1	Less than detection level
OLL36	5/6/2017	12:16	OLL-FL2-209-LSINK-OLL36	Lead, ppb	<1	Less than detection level
OLL37	5/6/2017	12:16	OLL-FL2-209-RSINK-OLL37	Lead, ppb	<1	Less than detection level
OLL38	5/6/2017	12:12	OLL-TENSING-200KIT-SINK-OLL38	Lead, ppb	<1	Less than detection level
OLL39	5/6/2017	12:10	OLL-TENSING-HALLWAYLUNIRR-SINK-OLL39	Lead, ppb	<1	Less than detection level
OLL40	5/6/2017	12:10	OLL-TENSING-HALLWAYRUNIRR-SINK-OLL40	Lead, ppb	<1	Less than detection level
OLL41	5/6/2017	12:00	OLL-NEWGYMUL-CONCESSION-SINK-OLL41	Lead, ppb	<1	Less than detection level
OLL42	5/6/2017	12:03	OLL-NEWGYMUL-HALLWAY-LDF-OLL42	Lead, ppb	<1	Less than detection level
OLL43	5/6/2017	12:03	OLL-NEWGYMUL-HALLWAY-RDF-OLL43	Lead, ppb	<1	Less than detection level
OLL44	5/6/2017	12:04	OLL-NEWGYMUL-BOYSRR-LSINK-OLL44	Lead, ppb	<1	Less than detection level
OLL45	5/6/2017	12:04	OLL-NEWGYMUL-BOYSRR-RSINK-OLL45	Lead, ppb	<1	Less than detection level
OLL46	5/6/2017	12:04	OLL-NEWGYMUL-GIRLSRR-LSINK-OLL46	Lead, ppb	<1	Less than detection level
OLL47	5/6/2017	12:05	OLL-NEWGYMUL-GIRLSRR-RSINK-OLL47	Lead, ppb	<1	Less than detection level
OLL48	5/6/2017	12:05	OLL-NEWGYMMLL-GIRLSRR-FLSINK-OLL48	Lead, ppb	<1	Less than detection level
OLL49	5/6/2017	12:05	OLL-NEWGYMMLL-GIRLSRR-LSINK-OLL49	Lead, ppb	<1	Less than detection level
OLL50	5/6/2017	12:05	OLL-NEWGYMMLL-GIRLSRR-RSINK-OLL50	Lead, ppb	<1	Less than detection level
OLL51	5/6/2017	12:05	OLL-NEWGYMMLL-GIRLSRR-FRSINK-OLL51	Lead, ppb	<1	Less than detection level
OLL52	5/6/2017	12:06	OLL-NEWGYMMLL-BOYSRR-LSINK-OLL52	Lead, ppb	<1	Less than detection level
OLL53	5/6/2017	12:06	OLL-NEWGYMMLL-BOYSRR-MSINK-OLL53	Lead, ppb	<1	Less than detection level
OLL54	5/6/2017	12:06	OLL-NEWGYMMLL-BOYSRR-RSINK-OLL54	Lead, ppb	<1	Less than detection level
OLL55	5/6/2017	12:07	OLL-NEWGYMMLL-HALLWAYNEARLOUNGE-DF-OLL55	Lead, ppb	<1	Less than detection level
OLL56	5/6/2017	12:07	OLL-NEWGYMMLL-STAFFLOUNGE-SINK-OLL56	Lead, ppb	<1	Less than detection level

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Parish/Church						
OLLP1	5/6/2017	11:45	OLLP-TRINITY-HALLWAY-DF-OLLP1	Lead, ppb	<1	Less than detection level
OLLP2	5/6/2017	11:47	OLLP-TRINITY-MRR-LSINK-OLLP2	Lead, ppb	<1	Less than detection level
OLLP3	5/6/2017	11:47	OLLP-TRINITY-MRR-RSINK-OLLP3	Lead, ppb	<1	Less than detection level
OLLP4	5/6/2017	11:49	OLLP-TRINITY-WRR-LSINK-OLLP4	Lead, ppb	<1	Less than detection level
OLLP5	5/6/2017	11:49	OLLP-TRINITY-WRR-RSINK-OLLP5	Lead, ppb	<1	Less than detection level
OLLP6	5/6/2017	11:49	OLLP-TRINITY-KITCHEN-SINK-OLLP6	Lead, ppb	1.01	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP7	5/7/2017	21:36	OLLP-CHURCH-WRRBRIDERM-SINK-OLLP7	Lead, ppb	22.1	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).
OLLP8	5/7/2017	21:37	OLLP-CHURCH-WRR-LSINK-OLLP8	Lead, ppb	14.6	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP9	5/7/2017	21:36	OLLP-CHURCH-WRR-RSINK-OLLP9	Lead, ppb	13.4	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP10	5/7/2017	21:34	OLLP-CHURCH-MRR-LSINK-OLLP10	Lead, ppb	2.79	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP11	5/7/2017	21:34	OLLP-CHURCH-MRR-RSINK-OLLP11	Lead, ppb	1.55	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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OLLP12	5/7/2017	21:35	OLLP-CHURCH-HALLWAYNEARRR-DF-OLLP12	Lead, ppb	3.3	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP13	5/7/2017	21:30	OLLP-CHURCH-SACRISTY-SINK-OLLP13	Lead, ppb	3.77	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP14	5/7/2017	21:30	OLLP-CHURCH-SACRISTYRR-SINK-OLLP14	Lead, ppb	4.31	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP15	5/6/2017	13:10	OLLP-ANEX-STAFFLOUNGERR-SINK-OLLP15	Lead, ppb	4.08	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP16	5/6/2017	13:11	OLLP-ANEX-STAFFWKRRNEAR2-SINK-OLLP16	Lead, ppb	45.4	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).
OLLP17	5/6/2017	13:12	OLLP-ANEX-BOYSRR-LSINK-OLLP17	Lead, ppb	5.86	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP18	5/6/2017	13:12	OLLP-ANEX-BOYSRR-RSINK-OLLP18	Lead, ppb	3.07	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP19	5/6/2017	13:14	OLLP-ANEX-HALLWAYNEAR4-LDF-OLLP19	Lead, ppb	<1	Less than detection level
OLLP20	5/6/2017	13:14	OLLP-ANEX-HALLWAYNEAR4-RDF-OLLP20	Lead, ppb	<1	Less than detection level
OLLP21	5/6/2017	13:17	OLLP-ANEX-GIRLSRR-LSINK-OLLP21	Lead, ppb	1.12	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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OLLP22	5/6/2017	13:17	OLLP-ANEX-GIRLSRR-MSINK-OLLP22	Lead, ppb	1.56	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP23	5/6/2017	13:17	OLLP-ANEX-GIRLSRR-RSINK-OLLP23	Lead, ppb	65.2	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).
OLLP24	5/7/2017	21:22	OLLP-PAROFFFL1-CHAPEL-SINK-OLLP24	Lead, ppb	20.4	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).
OLLP25	5/7/2017	21:21	OLLP-PAROFFFL1-RR-SINK-OLLP25	Lead, ppb	1.89	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP26	5/7/2017	21:15	OLLP-PAROFFBASE-LEFTKIT-SINK-OLLP26	Lead, ppb	1.84	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP27	5/7/2017	21:16	OLLP-PAROFFBASE-RIGHTKIT-SINK-OLLP27	Lead, ppb	6.73	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
OLLP28	5/7/2017	21:15	OLLP-PAROFFBASE-RR-SINK-OLLP28	Lead, ppb	3.81	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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OLLP29	5/7/2017	21:25	OLLP-PAROFFFL2-RR-SINK-OLLP29	Lead, ppb	6.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.