



April 17, 2017

Cincinnati Public Schools
Cynthia Eghbalnia
2651 Burnet Avenue
Cincinnati, OH 45219

Rising Stars

Academy at Vine

Dear Cynthia:

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 Rising Stars Academy at Vine 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 Cincinnati Public Schools (CPS) 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 February, fifty-three (53) samples were collected from drinking fountains, sinks and cooking outlets throughout the school. Multiple sinks within the schools were not initially considered for testing, however, key nearby indicators (coffee makers, drinking cups, plates, utensils, etc.) prompted additional locations to be tested in the schools. Including these sampling locations speaks to the proactive approach CPS continues to have towards understanding the water quality within the schools. The results show the following:

- 27 samples (50.94%), below the detection level (<1)
- 21 samples (39.63%), between 1ppb and 5ppb
- 2 samples (3.77%), between 5ppb and 10ppb
- 0 samples (0%) between 10ppb and 15ppb
- 3 samples (5.66%) greater than 15ppb.

Ninety-four percent (94.33%) of the 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 GCWW's 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.

1. Six (6) of the seven (7) samples in the kitchen had lead detections. Two of the samples were greater than 15ppb. If these locations are used as cooking outlets, consider taking the sample locations out of service until the problem can be resolved. For the other locations with lead levels below 15ppb, consider flushing the line (letting the water run) before use. For more information, refer to the 3Ts Guidelines that suggests shutting off or disconnecting problem outlets until the problem is resolved.
2. A third sample location in a restroom (sink) had a lead level greater than 15ppb. Assuming by the name that this is not a drinking water or cooking outlet, 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.
3. Although below the federal action level of 15ppb, five (5) drinking fountains had lead detections. These values were low; consider flushing the line (letting the water run) before use.
4. For all other samples 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. Refer to the USEPA 3Ts Guidelines for more information and suggestions on signage.
5. 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, 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. A number of the lead detections were low detections. For the 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 a complete plumbing profile. Follow-up sampling at these locations can occur if you choose to clean the faucet and aerator. GCWW can assist with this.

8. 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.mycww.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 building. 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 Public Schools- Rising Stars Academy at Vine - Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
RSA1	2/17/2017	5:10:00	RSA-KIT-2TUBPRODUCE-SINK-RSA1	Lead, ppb	4.01	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA2	2/17/2017	5:10:00	RSA-KIT-NEAR2TUBPRODUCE-HANDSINK-RSA2	Lead, ppb	33.7	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).
RSA3	2/17/2017	5:12:00	RSA-KIT-3TUB-LSINK-RSA3	Lead, ppb	2.66	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA4	2/17/2017	5:12:00	RSA-KIT-3TUB-RSINK-RSA4	Lead, ppb	<1	Less than detection level
RSA5	2/17/2017	5:14:00	RSA-KIT-STOCKPOT-FILLER-RSA5	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).

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RSA6	2/17/2017	5:15:00	RSA-KIT-NEARSERVLIN-HANDSINK-RSA6	Lead, ppb	1.48	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA7	2/17/2017	5:16:00	RSA-KIT-STAFFRR-SINK-RSA7	Lead, ppb	9.03	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA8	2/17/2017	5:20:00	RSA-FL1-1001RR-SINK-RSA8	Lead, ppb	5.21	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA9	2/17/2017	5:21:00	RSA-FL1-1012LOCKRR-SINK-RSA9	Lead, ppb	<1	Less than detection level
RSA10	2/17/2017	5:21:00	RSA-FL1-1013LOCKRR-SINK-RSA10	Lead, ppb	<1	Less than detection level
RSA11	2/17/2017	5:21:00	RSA-FL1-1014STAFFRR-SINK-RSA11	Lead, ppb	1.44	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA12	2/17/2017	5:24:00	RSA-FL1-HALLWAYNEAR1009-DF-RSA12	Lead, ppb	1.93	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA13	2/17/2017	5:24:00	RSA-FL1-MAINOFFRR-SINK-RSA13	Lead, ppb	19.1	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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RSA14	2/17/2017	5:26:00	RSA-FL1-1009GIRLSRR-LSINK-RSA14	Lead, ppb	<1	Less than detection level
RSA15	2/17/2017	5:26:00	RSA-FL1-1009GIRLSRR-RSINK-RSA15	Lead, ppb	<1	Less than detection level
RSA16	2/17/2017	5:27:00	RSA-FL1-1016RR-SINK-RSA16	Lead, ppb	<1	Less than detection level
RSA17	2/17/2017	5:29:00	RSA-FL1-1018-LSINK-RSA17	Lead, ppb	1.22	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA18	2/17/2017	5:29:00	RSA-FL1-1018-RSINK-RSA18	Lead, ppb	1.01	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA19	2/17/2017	5:31:00	RSA-FL1-1019-SINK-RSA19	Lead, ppb	<1	Less than detection level
RSA20	2/17/2017	5:31:00	RSA-FL1-1019-DF-RSA20	Lead, ppb	<1	Less than detection level
RSA21	2/17/2017	5:31:00	RSA-FL1-1020BOYSRR-LSINK-RSA21	Lead, ppb	<1	Less than detection level
RSA22	2/17/2017	5:31:00	RSA-FL1-1020BOYSRR-RSINK-RSA22	Lead, ppb	<1	Less than detection level
RSA23	2/17/2017	5:32:00	RSA-FL1-1023ARR-SINK-RSA23	Lead, ppb	<1	Less than detection level
RSA24	2/17/2017	5:32:00	RSA-FL1-1022-SINK-RSA24	Lead, ppb	2.14	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA25	2/17/2017	5:32:00	RSA-FL1-1022-DF-RSA25	Lead, ppb	1.03	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA26	2/17/2017	5:36:00	RSA-FL1-1025PLAYRM-SINK-RSA26	Lead, ppb	2.89	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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RSA27	2/17/2017	5:36:00	RSA-FL1-1025PLAYRM-DF-RSA27	Lead, ppb	1.38	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA28	2/17/2017	5:38:00	RSA-FL1-1024-SINK-RSA28	Lead, ppb	1.27	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA29	2/17/2017	5:38:00	RSA-FL1-1024-DF-RSA29	Lead, ppb	<1	Less than detection level
RSA30	2/17/2017	5:39:00	RSA-FL1-1026-SINK-RSA30	Lead, ppb	1.07	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA31	2/17/2017	5:39:00	RSA-FL1-1026-DF-RSA31	Lead, ppb	<1	Less than detection level
RSA32	2/17/2017	5:40:00	RSA-FL1-1027-SINK-RSA32	Lead, ppb	1.44	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA33	2/17/2017	5:40:00	RSA-FL1-1027-DF-RSA33	Lead, ppb	1.13	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA34	2/17/2017	5:41:00	RSA-FL1-1028-SINK-RSA34	Lead, ppb	<1	Less than detection level
RSA35	2/17/2017	5:41:00	RSA-FL1-1028-DF-RSA35	Lead, ppb	<1	Less than detection level
RSA36	2/17/2017	5:42:00	RSA-FL1-1030RR-SINK-RSA36	Lead, ppb	1.02	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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RSA37	2/17/2017	5:44:00	RSA-FL1-1029-SINK-RSA37	Lead, ppb	1.27	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA38	2/17/2017	5:44:00	RSA-FL1-1029-DF-RSA38	Lead, ppb	<1	Less than detection level
RSA39	2/17/2017	5:57:00	RSA-BASE-0002-SINK-RSA39	Lead, ppb	3.93	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA40	2/17/2017	5:57:00	RSA-BASE-0002-DF-RSA40	Lead, ppb	2.11	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA41	2/17/2017	5:56:00	RSA-BASE-0003-SINK-RSA41	Lead, ppb	1.78	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA42	2/17/2017	5:56:00	RSA-BASE-0003-DF-RSA42	Lead, ppb	<1	Less than detection level
RSA43	2/17/2017	5:55:00	RSA-BASE-0006GIRLSRR-LSINK-RSA43	Lead, ppb	<1	Less than detection level
RSA44	2/17/2017	5:55:00	RSA-BASE-0006GIRLSRR-MSINK-RSA44	Lead, ppb	<1	Less than detection level
RSA45	2/17/2017	5:55:00	RSA-BASE-0006GIRLSRR-RSINK-RSA45	Lead, ppb	<1	Less than detection level
RSA46	2/17/2017	5:53:00	RSA-BASE-0008BOYSRR-LSINK-RSA46	Lead, ppb	<1	Less than detection level
RSA47	2/17/2017	5:53:00	RSA-BASE-0008BOYSRR-MSINK-RSA47	Lead, ppb	<1	Less than detection level
RSA48	2/17/2017	5:53:00	RSA-BASE-0008BOYSRR-RSINK-RSA48	Lead, ppb	<1	Less than detection level
RSA49	2/17/2017	5:33:00	RSA-BASE-STAFFRREAR0008-SINK-RSA49	Lead, ppb	<1	Less than detection level
RSA50	2/17/2017	5:33:00	RSA-BASE-0004-SINK-RSA50	Lead, ppb	<1	Less than detection level
RSA51	2/17/2017	5:52:00	RSA-BASE-0004-DF-RSA51	Lead, ppb	<1	Less than detection level

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RSA52	2/17/2017	5:52:00	RSA-BASE-0010-SINK-RSA52	Lead, ppb	1.47	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
RSA53	2/17/2017	5:51:00	RSA-BASE-0010-DF-RSA53	Lead, ppb	<1	Less than detection level