

May 30, 2017

St. Antoninus School Michael Simonson 5425 Julmar Drive Cincinnati, OH 45238

Dear Mr. Simonson:

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 St. Antoninus School 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.

## 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 March, seventy-two (72) samples were collected from drinking fountains, cooking outlets and sinks throughout the school. The results show the following:

- 54 samples (75%), below the detection level (<1)
- 15 samples (20.83%), between 1ppb and 5ppb
- 0 samples (0%), between 5ppb and 10ppb
- 0 samples (0%), between 10ppb and 15ppb
- 3 samples (0%) greater than 15ppb.

Nearly ninety-six percent (95.8%) 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 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. The majority of the drinking fountains (8 out of 11) had results less than the detection level (<1). No further action is needed for these locations. Three locations had low lead values. To further

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reduce the risk of lead at these locations, consider flushing the line (letting the water run) before use. Other than flushing, no further action is suggested.

- 2. Two (2) of the four (4) kitchen samples had low lead detections; consider flushing these lines as well before use. Other than flushing, no further action is suggested.
- 3. Three sample locations had results greater than 15ppb. Based on the sample names, it is assumed these are not drinking water or cooking outlets (various sinks). Although the locations are not used for these purposes, consider immediate remedies such as taking the sample locations out of service until a more defined plan can be created OR post a sign above the locations limiting the purpose of these sinks ('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. For more information, refer to the 3Ts Guidelines that suggest shutting off or disconnecting problem outlets until the problem is resolved.
- 4. Regarding the locations identified in the preschool, five (5) sinks had low lead detections. It is not known how these sinks are used. Lead is not an issue for body contact such as bathing, showering, and washing hands. However, it is assumed that the school wants to identify ways to further reduce the risk of lead at all locations. Again, the results at these locations are low levels of lead. If the locations are used in any way to prepare drinks or as cooking outlets, as suggested before, flush the line (let the water run) before use. This action should further reduce the lead levels and no further action is suggested.
- 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. This might be the case in the Science Room (sample # 41). Signage at this location may be helpful (hand washing only, for class purposes only, not for drinking water, etc.).
- 6. <u>You might want to consider this for the three results greater than 15ppb (but see #7 first)</u>. 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 <u>http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf</u>.

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 Programs website and http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx.

7. 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 completing a plumbing profile. Follow-up sampling can occur at these locations; 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.mygcww.org website with other school sampling results.

Overall, nearly 96% of the results were below the detection level or below the federal action level of 15ppb. Flushing the line before use for the low lead detections should prove to be helpful in further reducing the risk of lead. For the 3 results greater than 15ppb, cleaning the faucet and aerator may help; consider this first and other options afterwards. GCWW is available to assist with testing after the cleaning.

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. 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 building. Your extra steps and care to keep the children in our community safe are appreciated!

Sincerely,

Atty fr. frailer

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 - St. Antoninus School - Lead Testing Results						
SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS
STA1	3/21/2017	8:14	STA-LL-GIRLSRRNEAR103-FLSINK-STA1	Lead, ppb	<1	Less than detection level
STA2	3/21/2017	8:14	STA-LL-GIRLSRRNEAR103-LSINK-STA2	Lead, ppb	<1	Less than detection level
STA3	3/21/2017	8:14	STA-LL-GIRLSRRNEAR103-RSINK-STA3	Lead, ppb	<1	Less than detection level
STA4	3/21/2017	8:14	STA-LL-GIRLSRRNEAR103-FRSINK-STA4	Lead, ppb	<1	Less than detection level
STA5	3/21/2017	8:16	STA-LL-BOYSRRNEAR103-LSINK-STA5	Lead, ppb	<1	Less than detection level
STA6	3/21/2017	8:16	STA-LL-BOYSRRNEAR103-MSINK-STA6	Lead, ppb	3.83	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA7	3/21/2017	8:16	STA-LL-BOYSRRNEAR103-RSINK-STA7	Lead, ppb	18.2	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).
STA8	3/21/2017	8:16	STA-LL-HALLWAYNEAR102-DFF-STA8	Lead, ppb	<1	Less than detection level
STA9	3/22/2017	6:25	STA-LL-104-SINK-STA9	Lead, ppb	<1	Less than detection level
STA10	3/22/2017	6:19	STA-LL-PEOFFRR-SINK-STA10	Lead, ppb	2.15	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA11	3/21/2017	7:45	STA-LL-HALLWAYNEAR19-LDF-STA11	Lead, ppb	<1	Less than detection level
STA12	3/21/2017	7:49	STA-LL-HALLWAYNEAR19-RDF-STA12	Lead, ppb	<1	Less than detection level
STA13	3/22/2017	6:12	STA-LL-GIRLSRRNEARGYM-LSINK-STA13	Lead, ppb	<1	Less than detection level
STA14	3/22/2017	6:11	STA-LL-GIRLSRRNEARGYM-MSINK-STA14	Lead, ppb	<1	Less than detection level
STA15	3/22/2017	6:11	STA-LL-GIRLSRRNEARGYM-RSINK-STA15	Lead, ppb	<1	Less than detection level
STA16	3/22/2017	6:15	STA-LL-BOYSRRNEARGYM-LSINK-STA16	Lead, ppb	<1	Less than detection level
STA17	3/22/2017	6:15	STA-LL-BOYSRRNEARGYM-MSINK-STA17	Lead, ppb	<1	Less than detection level
STA18	3/22/2017	6:16	STA-LL-BOYSRRNEARGYM-RSINK-STA18	Lead, ppb	<1	Less than detection level

Greater Cincinnati Water Works - Enhanced Lead Program - Understanding Water Quality within Schools



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STA19	3/22/2017	6:21	STA-LL-HALLWAYNEARGYM-DF-STA19	Lead, ppb	<1	Less than detection level
STA20	3/21/2017	7:45	STA-LL-HALLWAYNEAR16-DF-STA20	Lead, ppb	1.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA21	3/21/2017	7:34	STA-LL-CAFE-SINK-STA21	Lead, ppb	<1	Less than detection level
STA22	3/21/2017	7:32	STA-LL-CAFE-DF-STA22	Lead, ppb	<1	Less than detection level
STA23	3/21/2017	7:23	STA-LL-GIRLSRRNEARCAFE-FLSINK-STA23	Lead, ppb	<1	Less than detection level
STA24	3/21/2017	7:24	STA-LL-GIRLSRRNEARCAFE-LSINK-STA24	Lead, ppb	<1	Less than detection level
STA25	3/21/2017	7:25	STA-LL-GIRLSRRNEARCAFE-RSINK-STA25	Lead, ppb	<1	Less than detection level
STA26	3/21/2017	7:25	STA-LL-GIRLSRRNEARCAFE-FRSINK-STA26	Lead, ppb	1.45	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA27	3/21/2017	7:30	STA-LL-BOYSRRNEARCAFE-FLSINK-STA27	Lead, ppb	<1	Less than detection level
STA28	3/21/2017	7:51	STA-LL-BOYSRRNEARCAFE-LSINK-STA28	Lead, ppb	<1	Less than detection level
STA29	3/21/2017	7:29	STA-LL-BOYSRRNEARCAFE-RSINK-STA29	Lead, ppb	<1	Less than detection level
STA30	3/21/2017	7:28	STA-LL-BOYSRRNEARCAFE-FRSINK-STA30	Lead, ppb	<1	Less than detection level
STA31	3/23/2017	8:10	STA-LL-KIT3TUB-SINK-STA31	Lead, ppb	<1	Less than detection level
STA32	3/22/2017	8:41	STA-LL-KIT2TUB-SINK-STA32	Lead, ppb	1.97	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA33	3/22/2017	8:41	STA-LL-KITISLAND-SINK-STA33	Lead, ppb	<1	Less than detection level
STA34	3/23/2017	8:32	STA-LL-RRNEARKIT-SINK-STA34	Lead, ppb	1.44	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
STA35	3/23/2017	8:33	STA-LL-RRNEARSTAIRS-LSINK-STA35	Lead, ppb	<1	Less than detection level
STA36	3/23/2017	8:33	STA-LL-RRNEARSTAIRS-MSINK-STA36	Lead, ppb	<1	Less than detection level
STA37	3/23/2017	8:33	STA-LL-RRNEARSTAIRS-RSINK-STA37	Lead, ppb	<1	Less than detection level
STA38	3/21/2017	8:03	STA-FL1-PSYCHOFFRR-SINK-STA38	Lead, ppb	1.51	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA39	3/21/2017	7:21	STA-FL1-HALLWAYNEAR10-LDF-STA39	Lead, ppb	<1	Less than detection level
STA40	3/21/2017	6:47	STA-FL1-HALLWAYNEAR10-RDF-STA40	Lead, ppb	<1	Less than detection level
STA41	3/22/2017	6:43	STA-FL1-204FRONTDESK-SINK-STA41	Lead, ppb	19.6	Science Room. 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).
STA42	3/22/2017	6:46	STA-FL1-PRINCIPALOFFRR-SINK-STA42	Lead, ppb	<1	Less than detection level
STA43	3/21/2017	6:59	STA-FL1-HEALTHRR-SINK-STA43	Lead, ppb	<1	Less than detection level
STA44	3/21/2017	6:53	STA-FL1-HALLWAYNEAR202-DF-STA44	Lead, ppb	<1	Less than detection level
STA45	3/21/2017	6:54	STA-FL1-BOYSRRNEAR202-LSINK-STA45	Lead, ppb	<1	Less than detection level
STA46	3/21/2017	6:56	STA-FL1-BOYSRRNEAR202-MSINK-STA46	Lead, ppb	<1	Less than detection level
STA47	3/21/2017	6:55	STA-FL1-BOYSRRNEAR202-RSINK-STA47	Lead, ppb	<1	Less than detection level
STA48	3/21/2017	6:51	STA-FL1-GIRLSRRNEAR203-FLSINK-STA48	Lead, ppb	<1	Less than detection level
STA49	3/21/2017	6:19	STA-FL1-GIRLSRRNEAR203-LSINK-STA49	Lead, ppb	<1	Less than detection level
STA50	3/21/2017	6:50	STA-FL1-GIRLSRRNEAR203-RSINK-STA50	Lead, ppb	<1	Less than detection level
STA51	3/22/2017	6:48	STA-FL1-GIRLSRRNEAR203-FRSINK-STA51	Lead, ppb	<1	Less than detection level
STA52	3/22/2017	6:41	STA-FL1-HALLWAYNEAR6-DF-STA52	Lead, ppb	1.74	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.



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STA53	3/22/2017	6:32	STA-FL1-COPYRMRR-SINK-STA53	Lead, ppb	1.34	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA54	3/22/2017	6:34	STA-FL1-READINGRMRR-SINK-STA54	Lead, ppb	<1	Less than detection level
STA55	3/22/2017	6:36	STA-FL1-STAFFLOUNGE-SINK-STA55	Lead, ppb	<1	Less than detection level
STA56	3/22/2017	6:37	STA-FL1-STAFFLOUNGERR-SINK-STA56	Lead, ppb	18.7	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).
STA57	3/22/2017	6:39	STA-FL1-HALLWAYNEAR3-DF-STA57	Lead, ppb	2.54	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA58	3/23/2017	8:40	STA-FL1-3-SINK-STA58	Lead, ppb	<1	Less than detection level
STA59	3/23/2017	8:12	STA-FL1-RRNEAR3-SINK-STA59	Lead, ppb	<1	Less than detection level
STA60	3/23/2017	8:41	STA-FL1-2-SINK-STA60	Lead, ppb	<1	Less than detection level
STA61	3/23/2017	8:28	STA-FL1-1-SINK-STA61	Lead, ppb	<1	Less than detection level
STA62	3/23/2017	8:07	STA-FL1-1RR-SINK-STA62	Lead, ppb	2.07	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA63	3/23/2017	8:17	STA-UL-11-SINK-STA63	Lead, ppb	<1	Less than detection level



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STA64	3/23/2017	8:18	STA-UL-10-SINK-STA64	Lead, ppb	1.02	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA65	3/23/2017	8:19	STA-UL-9-SINK-STA65	Lead, ppb	2.14	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA66	3/23/2017	8:20	STA-UL-8-SINK-STA66	Lead, ppb	2.69	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA67	3/23/2017	8:14	STA-UL-PINKRR-SINK-STA67	Lead, ppb	<1	Less than detection level
STA68	3/23/2017	8:15	STA-UL-GREENRR-SINK-STA68	Lead, ppb	1.23	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STA69	3/23/2017	8:23	STA-UL-CONFRMNEAR5-SINK-STA69	Lead, ppb	<1	Less than detection level
STA70	3/23/2017	8:22	STA-UL-5-SINK-STA70	Lead, ppb	<1	Less than detection level
STA71	3/23/2017	8:25	STA-UL-6-SINK-STA71	Lead, ppb	<1	Less than detection level
STA72	3/23/2017	8:26	STA-UL-7-SINK-STA72	Lead, ppb	<1	Less than detection level

Highlighted in orange is a preschool. - "A Child's Garden" Ages from 30 months to 6 years old. Around 200 kids with a staff of 21 and holds a 5 Star rating.