



October 16, 2018

St. William School and Church  
Mr. Tim Brockmann  
4125 St. William Avenue  
Cincinnati, OH 45205

Dear Mr. Brockmann,

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

Attached please find the results of the lead analyses performed for St. William School and Church 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.

In June 2018 forty-six (46) samples were collected from drinking fountains, cooking outlets and sinks throughout the school; twenty-five (25) samples were collected in the church. The results for the school and church show the following:

School	Church
31 samples (67.39%), below the detection level (<1)	11 samples (44.00%), below the detection level (<1)
11 samples (23.91%), between 1ppb and 5ppb	11 samples (44.00%), between 1ppb and 5ppb
2 samples (4.35%), between 5ppb and 10ppb	1 samples (4.00%), between 5ppb and 10ppb
1 samples (2.17%), between 10ppb and 15ppb	0 samples (0.00%), between 10ppb and 15ppb
1 samples (2.17%) greater than 15ppb	2 samples (8.00%) greater than 15ppb
1 sample not collected.	1 sample not collected.



Overall, nearly ninety-six percent (95.77%) of the seventy-one (71) school and church sample results were below the detection level or below the federal action level.

- For the school, nearly ninety-eight percent (97.83%) of the samples are below the detection level or below the federal action level.
- In the church ninety-two percent (92.00%) of the samples are 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! All the drinking fountains had no lead detections except for one location, STW-ANNEXML-HALLWAY-DF-STW45. This location had a trace amount of lead. The amount is very low (1.06ppb), flushing the line before use (letting the water run) will reduce the risk of lead. No further action is suggested.
2. One (1) location had a lead detection greater than 15ppb, STW-ML-105LOUNGE-SINK-STW29. This location is a sink and it is assumed by the name that it is not used as a drinking water or cooking outlet. However, consider an immediate remedy such as taking the sample location out of service until a more defined plan can be created or post a sign limiting the use at this location. Refer to the USEPA 3Ts Guidelines for more information and suggestions on signage. After the location is out of service, work to reduce the lead level by first removing and cleaning the aerator as particles may be trapped on the aerator and contributing to the lead detection. Consider resampling after the cleaning.
3. In the kitchen, four (4) of the five (5) sample locations had lead detections. It is assumed these locations are used for food or drink preparation. Consider flushing the line (letting the water run) before use to reduce the risk of lead.
4. Other sinks had 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. Cleaning the aerators at these locations may lower the lead levels.
  - c. If the locations with lead detections are not used on a regular basis, then the infrequent use may be contributing to the lead detections.
5. Bottom-line, almost all of the sample results were below the federal action level or below the 3Ts guidelines trigger level for schools to take action. After removing one location from service, cleaning the aerator and posting a sign should be the initial steps to consider before faucets are replaced, etc. We can work quickly with your team to resample and retest the out of service location.

### Next steps for Church

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

1. Four (4) of the eight (8) sample locations in kitchens throughout the church had lead detections. Although the lead levels are low, it is assumed these locations are used for food or drink preparation. Consider flushing the line (letting the water run) before use to reduce the risk of lead.
2. Two (2) sample locations (STW68, and STW71) had lead detection results above the federal action level of 15ppb or above the 3Ts Guidelines trigger of 20ppb for schools to take action.
  - a. 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.
  - b. After posting a sign to immediately limit use or removing the location from service, consider cleaning the aerator (screen) and flushing the location after cleaning. This cleaning may help to reduce the risk of lead at these locations. GCWW can assist with resampling and retesting these locations after cleaning aerators.
  - c. If the locations are not used on a regular basis, then the infrequent use may be contributing to the lead detections.
  - d. If lead detections still occur after resampling or if the locations are used infrequently, consider posting a sign above the locations 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. Other suggestions can be provided once we have the results from retesting.
3. Other sinks had 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. Cleaning the aerators at these locations may lower the lead levels.
  - c. If the locations with lead detections are not used on a regular basis, then the infrequent use may be contributing to the lead detections.
4. Bottom-line, the majority of the sample results were below the federal action level or below the 3Ts guidelines trigger level for schools to take action. After removing two locations from service, cleaning aerators and posting signs should be the initial steps to consider before faucets are replaced, etc. We can work quickly with your team to resample and retest the out of service locations.

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 and church community of the sampling work you have done to date and the steps you will take to correct any issues discovered. GCWW employees can assist with this plan and are available to attend any meetings to help explain our lead program, the sample results and our partnership with your school and church. 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

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. 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.

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Thanks again for your partnership with Greater Cincinnati Water Works and your work to further understand the water quality within your school. 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" and "B".

Cathy B. Bailey

Director/Greater Cincinnati Water Works

Cc: Melba Moore, Cincinnati Health Department  
Dr. Camille Jones, Cincinnati Health Department  
Chuck DeJonckheere, Hamilton County Public Health  
Verna Arnette, Greater Cincinnati Water Works  
Jeff Swertfeger, Greater Cincinnati Water Works  
Jason DeLaet, Greater Cincinnati Water Works  
James Nelson, Greater Cincinnati Water Works

**Cincinnati Archdiocese - St. William School & Church - Lead Testing Results**

SAMPLE #	SAMPLE DATE	SAMPLE TIME	LOCATION	PARAMETER CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
<b>School</b>						
STW1	6/1/2018	5:38	STW-LL-BOYSRRNEARCAFE-LSINK-STW1	Lead, ppb	<1	Less than detection level
STW2	6/1/2018	5:38	STW-LL-BOYSRRNEARCAFE-RSINK-STW2	Lead, ppb	1.55	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW3	6/1/2018	5:40	STW-LL-HALLWAYNORTHLANDING-DF-STW3	Lead, ppb	<1	Less than detection level
STW4	6/1/2018	5:41	STW-LL-HALLWAYNEAR14-DF-STW4	Lead, ppb	<1	Less than detection level
STW5	6/1/2018	5:42	STW-LL-14ART-SINK-STW5	Lead, ppb	1.63	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW6	6/1/2018	5:45	STW-LL-BOYSRRNEAR14-FLSINK-STW6	Lead, ppb	<1	Less than detection level
STW7	6/1/2018	5:45	STW-LL-BOYSRRNEAR14-LSINK-STW7	Lead, ppb	<1	Less than detection level
STW8	6/1/2018	5:45	STW-LL-BOYSRRNEAR14-RSINK-STW8	Lead, ppb	<1	Less than detection level
STW9	6/1/2018	5:45	STW-LL-BOYSRRNEAR14-FRSINK-STW9	Lead, ppb	<1	Less than detection level
STW10	6/1/2018	5:48	STW-LL-8-SINK-STW10	Lead, ppb	1.57	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW11	N/A	N/A	STW-LL-18BOOKROOM-SINK-STW11	Lead, ppb	N/A	Water turned off
STW12	6/1/2018	5:50	STW-LL-GIRLSRRNEAR17-FLSINK-STW12	Lead, ppb	<1	Less than detection level
STW13	6/1/2018	5:50	STW-LL-GIRLSRRNEAR17-LSINK-STW13	Lead, ppb	<1	Less than detection level
STW14	6/1/2018	5:50	STW-LL-GIRLSRRNEAR17-RSINK-STW14	Lead, ppb	<1	Less than detection level
STW15	6/1/2018	5:50	STW-LL-GIRLSRRNEAR17-FRSINK-STW15	Lead, ppb	<1	Less than detection level
STW16	6/1/2018	5:53	STW-LL-HALLWAYNEAR17-DF-STW16	Lead, ppb	<1	Less than detection level
STW17	6/1/2018	5:56	STW-LL-GIRLSRRNEARCAFE-LSINK-STW17	Lead, ppb	<1	Less than detection level
STW18	6/1/2018	5:56	STW-LL-GIRLSRRNEARCAFE-RSINK-STW18	Lead, ppb	<1	Less than detection level
STW19	6/1/2018	5:57	STW-LL-HALLWAYSOUTHLANDING-DF-STW19	Lead, ppb	<1	Less than detection level
STW20	6/1/2018	6:00	STW-LL-KIT1TUB-SINK-STW20	Lead, ppb	2.02	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW21	6/1/2018	6:00	STW-LL-KIT-HANDSINK-STW21	Lead, ppb	<1	Less than detection level

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STW22	6/1/2018	6:01	STW-LL-KIT3TUB-LSINK-STW22	Lead, ppb	2.66	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW23	6/1/2018	6:01	STW-LL-KIT3TUB-MSINK-STW23	Lead, ppb	3.17	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW24	6/1/2018	6:01	STW-LL-KIT3TUB-RSINK-STW24	Lead, ppb	2.48	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW25	6/1/2018	6:04	STW-ML-102-SINK-STW25	Lead, ppb	2.13	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW26	6/1/2018	6:04	STW-ML-HALLWAYNEAR102-DF-STW26	Lead, ppb	<1	Less than detection level
STW27	6/1/2018	6:05	STW-ML-NURSERR-SINK-STW27	Lead, ppb	1.1	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW28	6/1/2018	6:06	STW-ML-HALLWAYNEAR106-DF-STW28	Lead, ppb	<1	Less than detection level
STW29	6/1/2018	6:07	STW-ML-105LOUNGE-SINK-STW29	Lead, ppb	92.8	Above 15ppb federal action level and 20ppb level identified by USEPA to trigger schools to take action to reduce lead. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
STW30	6/1/2018	6:09	STW-UL-HALLWAYNEAR209-DF-STW30	Lead, ppb	<1	Less than detection level
STW31	6/1/2018	6:09	STW-UL-NORTHSTAFFRR-UTILITYSINK-STW31	Lead, ppb	<1	Less than detection level
STW32	6/1/2018	6:11	STW-UL-216SCIENCE-FLSINK-STW32	Lead, ppb	8.71	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW33	6/1/2018	6:11	STW-UL-216SCIENCE-LSINK-STW33	Lead, ppb	<1	Less than detection level
STW34	6/1/2018	6:11	STW-UL-216SCIENCE-RSINK-STW34	Lead, ppb	<1	Less than detection level

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STW35	6/1/2018	6:11	STW-UL-216SCIENCE-FRSINK-STW35	Lead, ppb	8.45	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW36	6/1/2018	6:13	STW-UL-HALLWAYNEAR214-DF-STW36	Lead, ppb	<1	Less than detection level
STW37	6/1/2018	6:13	STW-UL-SOUTHSTAFFRR-UTILITYSINK-STW37	Lead, ppb	<1	Less than detection level
STW38	6/1/2018	6:18	STW-ANNEXLL-STAFFRR-HANDSINK-STW38	Lead, ppb	11.4	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW39	6/1/2018	6:18	STW-ANNEXLL-STAFFRR-SINK-STW39	Lead, ppb	4.09	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW40	6/1/2018	6:19	STW-ANNEXLL-GIRLSRR-LSINK-STW40	Lead, ppb	<1	Less than detection level
STW41	6/1/2018	6:19	STW-ANNEXLL-GIRLSRR-RSINK-STW41	Lead, ppb	<1	Less than detection level
STW42	6/1/2018	6:20	STW-ANNEXLL-BOYSRR-LSINK-STW42	Lead, ppb	<1	Less than detection level
STW43	6/1/2018	6:20	STW-ANNEXLL-BOYSRR-RSINK-STW43	Lead, ppb	<1	Less than detection level
STW44	6/1/2018	6:21	STW-ANNEXLL-HALLWAY-DF-STW44	Lead, ppb	<1	Less than detection level
STW45	6/1/2018	6:22	STW-ANNEXML-HALLWAY-DF-STW45	Lead, ppb	1.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW46	6/1/2018	6:25	STW-ANNEXML-123-UTILITYSINK-STW46	Lead, ppb	<1	Less than detection level
STW47	6/1/2018	6:25	STW-ANNEXUL-HALLWAY-DF-STW47	Lead, ppb	<1	Less than detection level
<b>CHURCH</b>						
STW48	6/1/2018	6:33	STW-CHUL-RR-SINK-STW48	Lead, ppb	<1	Less than detection level
STW49	6/1/2018	6:34	STW-CHUL-SACRISTY-SINK-STW49	Lead, ppb	<1	Less than detection level
STW50	6/1/2018	6:35	STW-CHML-RR-SINK-STW50	Lead, ppb	<1	Less than detection level
STW51	6/1/2018	6:50	STW-CHLL-BAR2TUB-LSINK-STW51	Lead, ppb	1.77	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW52	6/1/2018	6:50	STW-CHLL-BAR2TUB-RSINK-STW52	Lead, ppb	2.63	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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STW53	6/1/2018	6:50	STW-CHLL-BAR-IM-STW53	Lead, ppb	<1	Less than detection level
STW54	6/1/2018	6:51	STW-CHLL-KIT2TUB-LSINK-STW54	Lead, ppb	<1	Less than detection level
STW55	6/1/2018	6:51	STW-CHLL-KIT2TUB-RSINK-STW55	Lead, ppb	1.44	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW56	6/1/2018	6:40	STW-CHLL-MRR-LSINK-STW56	Lead, ppb	3.41	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW57	6/1/2018	6:40	STW-CHLL-MRR-RSINK-STW57	Lead, ppb	3.35	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW58	6/1/2018	6:50	STW-CHLL-WRR-LSINK-STW58	Lead, ppb	<1	Less than detection level
STW59	6/1/2018	6:50	STW-CHLL-WRR-RSINK-STW59	Lead, ppb	<1	Less than detection level
STW60	6/2/2018	7:22	STW-RECTORY-BASEMENT-UTILITYSINK-STW60	Lead, ppb	2.29	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW61	6/2/2018	7:22	STW-RECTORYML-KIT-SINK-STW61	Lead, ppb	1.04	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW62	6/2/2018	7:23	STW-RECTORYML-KITFRIDGE-IM-STW62	Lead, ppb	<1	Less than detection level
STW63	6/2/2018	7:25	STW-RECTORYML-RR-SINK-STW63	Lead, ppb	5.64	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW64	6/2/2018	7:25	STW-RECTORYUL-HKRR-SINK-STW64	Lead, ppb	<1	Less than detection level
STW65	6/2/2018	7:27	STW-RECTORYUL-RR#1-SINK-STW65	Lead, ppb	3.09	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW66	6/2/2018	7:29	STW-RECTORYUL-RR#2-SINK-STW66	Lead, ppb	<1	Less than detection level
STW67	6/2/2018	7:29	STW-RECTORYUL-RR#3-SINK-STW67	Lead, ppb	1.16	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.



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STW68	6/2/2018	7:06	STW-PAC-BASEMENT-UTILITYSINK-STW68	Lead, ppb	108	Above 15ppb federal action level and 20ppb level identified by USEPA to trigger schools to take action to reduce lead. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
STW69	6/2/2018	7:06	STW-PACML-KIT-SINK-STW69	Lead, ppb	<1	Less than detection level
STW70	6/2/2018	7:09	STW-PACML-RRNEARKITRR-SINK-STW70	Lead, ppb	1.81	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW71	6/2/2018	7:09	STW-PACML-OFFRR-SINK-STW71	Lead, ppb	22.2	Above 15ppb federal action level and 20ppb level identified by USEPA to trigger schools to take action to reduce lead. Until a defined remediation plan is created, immediately remove from service (tag out of service and/or disconnect the water supply to this location).
STW72	6/2/2018	7:11	STW-PACUL-RR-LSINK-STW72	Lead, ppb	1.14	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STW73	N/A	N/A	STW-PACUL-RR-RSINK-STW73	Lead, ppb	N/A	No sink