

March 24, 2017

St. James the Greater School Ms. Amy Klosterman 3565 Hubble Road Cincinnati, OH 45247

Dear Ms. Klosterman:

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 St. James the Greater School and Parish 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 St. James School staff worked together to finalize a sampling plan for the school and parish. 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, seventy (70) samples were collected from drinking fountains and sinks throughout the school and parish. One additional location was not sampled (error in identifying sample location). The results show the following:

- 32 samples (45.71%), below the detection level (<1)
- 36 samples (51.43%), between 1ppb and 5ppb
- 2 samples (2.86%), between 5ppb and 10ppb

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.

- 1. One hundred percent (100%) of the sample results were below the detection level or below the federal action level. This is great news and indicates the results did not show any high lead levels throughout your school! Although already below the federal action level, consider the following suggestions to further reduce the risk of lead.
- 2. A few drinking water and cooking outlet locations had lead detections (sample locations in kitchen; drinking fountains). Although lower than the 15 ppb action level, consider flushing the lines before using the water (letting the water run). Refer to the USEPA 3Ts Guidelines for more information.

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- 3. Some sink samples had lead detections. As a precaution, consider posting signs at sink locations indicating 'hand washing only' (or other specific purposes) as these locations should not be used as drinking water or cooking outlets. Posting a sign will deter students and staff from potentially using the sink to fill a water bottle, etc. Refer to the USEPA 3Ts Guidelines for more information and suggestions on signage.
- 4. Again, the school did not have results higher than the federal action level of 15ppb. However, if desired, the school could 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 explains this in great detail. A copy can be found on our website <a href="http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf">http://www.cincinnati-oh.gov/water/assets/File/3T%20Guidance%20Manual%20for%20Schools.pdf</a>.

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. The program is open to traditional public schools, community schools, and chartered non-public schools. A detailed explanation and information can be found on the Ohio Facilities Construction Commission (OFCC) Services and Programs website <a href="http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx">http://ofcc.ohio.gov/ServicesPrograms/LeadFixtureReplacementGrants.aspx</a>.

5. 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. 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 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,

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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. James the Greater School - Lead Testing Results						
SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS
STJ1	2/8/2017	6:20	STJ-KITCHEN-3TUB-LSINK-STJ1	Lead, ppb	<1	Less than detection level
STJ2	2/8/2017	6:21	STJ-KITCHEN-3TUB-RSINK-STJ2	Lead, ppb	1.04	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ3	2/8/2017	6:22	STJ-KITCHEN-2TUB-LSINK-STJ3	Lead, ppb	1.25	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ4	2/8/2017	6:23	STJ-KITCHEN-2TUB-RSINK-STJ4	Lead, ppb	<1	Less than detection level
STJ5	2/8/2017	6:24	STJ-KITCHEN-STAFFRR-SINK-STJ5	Lead, ppb	1.73	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ6	2/8/2017	6:25	STJ-KITCHEN-NEARSTORAGE-HANDSINK-STJ6	Lead, ppb	6.24	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ7	2/8/2017	6:26	STJ-KITCHEN-WASHROOM-UTILITYSINK-STJ7	Lead, ppb	<1	Less than detection level
STJ8	2/8/2017	6:27	STJ-LL-CAFETERIA-DF-STJ8	Lead, ppb	<1	Less than detection level
STJ9	2/8/2017	6:28	STJ-LL-STAFFLOUNGE-SINK-STJ9	Lead, ppb	<1	Less than detection level
STJ10	2/8/2017	6:29	STJ-LL-KITCHENETTENEAR10-SINK-STJ10	Lead, ppb	<1	Less than detection level
STJ11	2/8/2017	6:30	STJ-LL-MSTAFFRRNEAR11-SINK-STJ11	Lead, ppb	<1	Less than detection level
STJ12	2/8/2017	6:31	STJ-LL-WSTAFFRRNEAR11-SINK-STJ12	Lead, ppb	<1	Less than detection level
STJ13	2/8/2017	6:32	STJ-LL-BOYSRRNEARPIT-LSINK-STJ13	Lead, ppb	1.02	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ14	2/8/2017	6:34	STJ-LL-BOYSRRNEARPIT-RSINK-STJ14	Lead, ppb	1.01	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ15	2/8/2017	6:35	STJ-LL-GIRLSSRRNEARPIT-LSINK-STJ15	Lead, ppb	2.35	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.



		Cinci	nnati Archdiocese- St. James the Greater	School - Lea	d Testing R	lesults
SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS
STJ16	2/8/2017	6:36	STJ-LL-GIRLSSRRNEARPIT-RSINK-STJ16	Lead, ppb	1.96	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ17	2/8/2017	6:37	STJ-LL-STAFFRRNEARNURSE-SINK-STJ17	Lead, ppb	<1	Less than detection level
STJ18	2/8/2017	6:38	STJ-LL-NURSECLINICRR-SINK-STJ18	Lead, ppb	1.24	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ19	2/8/2017	6:39	STJ-LL-HALLWAYNEARNURSE-LDF-STJ19	Lead, ppb	<1	Less than detection level
STJ20	2/8/2017	6:40	STJ-LL-HALLWAYNEARNURSE-RDF-STJ20	Lead, ppb	<1	Less than detection level
STJ21	2/8/2017	6:45	STJ-FL1-STAFFRRNEAR104-SINK-STJ21	Lead, ppb	1.03	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ22	N/A	N/A	STJ-FL1-STAFFRRNEAR105-SINK-STJ22*	Lead, ppb	N/A	This location does not exist.
STJ23	2/8/2017	6:47	STJ-FL1-HALLWAYNEARSTAFFRR-DF-STJ23	Lead, ppb	1.67	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ24	2/8/2017	6:48	STJ-FL1-STAFFWORKRMNEAR105-SINK-STJ24**	Lead, ppb	1.38	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ25	2/8/2017	6:49	STJ-FL1-GIRLSRRNEAR108-FLSINK-STJ25	Lead, ppb	2.3	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ26	2/8/2017	6:50	STJ-FL1-GIRLSRRNEAR108-LSINK-STJ26	Lead, ppb	2.09	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ27	2/8/2017	6:51	STJ-FL1-GIRLSRRNEAR108-RSINK-STJ27	Lead, ppb	1.76	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.



	Cincinnati Archdiocese- St. James the Greater School - Lead Testing Results						
SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER CODE	AMOUNT	GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING RESULTS	
STJ28	2/8/2017	6:52	STJ-FL1-GIRLSRRNEAR108-FRSINK-STJ28	Lead, ppb	1.74	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ29	2/8/2017	6:53	STJ-FL1-BOYSRRNEAR109-FLSINK-STJ29	Lead, ppb	2.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ30	2/8/2017	6:54	STJ-FL1-BOYSRRNEAR109-LSINK-STJ30	Lead, ppb	1.15	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ31	2/8/2017	6:55	STJ-FL1-BOYSRRNEAR109-RSINK-STJ31	Lead, ppb	1.72	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ32	2/8/2017	6:57	STJ-FL1-BOYSRRNEAR109-FRSINK-STJ32	Lead, ppb	<1	Less than detection level	
STJ33	2/8/2017	6:58	STJ-FL1-HALLWAYNEAR109-LDF-STJ33	Lead, ppb	1.69	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ34	2/8/2017	6:59	STJ-FL1-HALLWAYNEAR109-RDF-STJ34	Lead, ppb	<1	Less than detection level	
STJ35	2/8/2017	7:00	STJ-FL1-109WINDOWISLAND-LSINK-STJ35	Lead, ppb	6.17	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ36	2/8/2017	7:01	STJ-FL1-109WINDOWISLAND-RSINK-STJ36	Lead, ppb	4.06	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ37	2/8/2017	7:02	STJ-FL1-109BACKISLAND-LSINK-STJ37	Lead, ppb	3.48	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	
STJ38	2/8/2017	7:03	STJ-FL1-109BACKISLAND-RSINK-STJ38	Lead, ppb	4.92	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.	



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						GCWW COMMENTS/REVIEW/	
	SAMPLE	SAMPLE		PARAMETER		RECOMMENDATIONS REGARDING	
SAMPLE #	DATE	TIME	SAMPLE	CODE	AMOUNT	RESULTS	
						Lead detected; less than 15ppb action	
STJ39	2/8/2017	7:04	STJ-FL1-109LSIDEWALL-SINK-STJ39	Lead, ppb	3.06	level. Review 3Ts Guidelines to	
						understand options to further reduce the risk of lead.	
						Lead detected; less than 15ppb action	
						level. Review 3Ts Guidelines to	
STJ40	2/8/2017	7:05	STJ-FL1-110-SINK-STJ40	Lead, ppb	3.62	understand options to further reduce	
						the risk of lead.	
STJ41	2/8/2017	6:40	STJ-FL2-HALLWAYNEAR209-DF-STJ41	Lead, ppb	<1	Less than detection level	
						Lead detected; less than 15ppb action	
STJ42	2/8/2017	6:41	STJ-FL2-BOYSRRNEAR209-LSINK-STJ42	Lead, ppb	3.11	level. Review 3Ts Guidelines to	
				, [1]		understand options to further reduce	
						the risk of lead. Lead detected; less than 15ppb action	
			STJ-FL2-BOYSRRNEAR209-MSINK-STJ43	Lead, ppb	2.75	level. Review 3Ts Guidelines to	
STJ43	2/8/2017	6:42				understand options to further reduce	
						the risk of lead.	
	2/8/2017	6:43	STJ-FL2-BOYSRRNEAR209-RSINK-STJ44	Lead, ppb	1.28	Lead detected; less than 15ppb action	
STJ44						level. Review 3Ts Guidelines to	
01011						understand options to further reduce	
STJ45	2/8/2017	6:44	STJ-FL2-GIRLSRRNEAR209-LSINK-STJ45	lood ppb	<1	the risk of lead. Less than detection level	
STJ45 STJ46	2/8/2017	6:44	STJ-FL2-GIRLSRRNEAR209-LSINK-STJ45 STJ-FL2-GIRLSRRNEAR209-MSINK-STJ46	Lead, ppb	<1		
STJ46 STJ47	2/8/2017	6:45	STJ-FL2-GIRLSRRNEAR209-INSTINK-STJ46 STJ-FL2-GIRLSRRNEAR209-RSINK-STJ47	Lead, ppb Lead, ppb	<1	Less than detection level Less than detection level	
STJ47 STJ48	2/8/2017	6:40	STJ-FL2-GIRLSRRNEAR209-RSINK-STJ47 STJ-FL2-HALLWAYNEAR205-LDF-STJ48		<1	Less than detection level	
STJ48 STJ49	2/8/2017	6:50	STJ-FL2-HALLWAYNEAR205-LDF-STJ48 STJ-FL2-HALLWAYNEAR205-RDF-STJ49	Lead, ppb	<1	Less than detection level	
51J49	2/8/2017	0:50	STJ-FLZ-HALLWATINEAR203-RDF-STJ49	Lead, ppb	< 1	Lead detected; less than 15ppb action	
	2/8/2017				1.05	level. Review 3Ts Guidelines to	
STJ50		6:51	STJ-FL2-BOYSRRNEAR205-LSINK-STJ50	Lead, ppb		understand options to further reduce	
						the risk of lead.	
						Lead detected; less than 15ppb action	
STJ51	2/8/2017	6:52	STJ-FL2-BOYSRRNEAR205-MSINK-STJ51	Lead, ppb	1.57	level. Review 3Ts Guidelines to	
31331	2/0/2017	0.52	515-1 E2-D015RRREAR205-W5HVR-51551	Lead, ppb	1.57	understand options to further reduce	
						the risk of lead. Lead detected; less than 15ppb action	
STJ52	2/8/2017		STJ-FL2-BOYSRRNEAR205-RSINK-STJ52	Lead, ppb	2.39	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to	
		6:53				understand options to further reduce	
						the risk of lead.	
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	SAMPLE	SAMPLE		PARAMETER		GCWW COMMENTS/REVIEW/ RECOMMENDATIONS REGARDING
SAMPLE #	DATE	TIME	SAMPLE	CODE	AMOUNT	RESULTS
STJ53	2/8/2017	6:54	STJ-FL2-GIRLSRRNEAR204-LSINK-STJ53	Lead, ppb	3.42	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ54	2/8/2017	6:55	STJ-FL2-GIRLSRRNEAR204-MSINK-STJ54	Lead, ppb	3.44	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ55	2/8/2017	6:56	STJ-FL2-GIRLSRRNEAR204-RSINK-STJ55	Lead, ppb	1.03	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ56	2/8/2017	6:58	STJ-FL2-205ART-LSINK-STJ56	Lead, ppb	<1	Less than detection level
STJ57	2/8/2017	7:00	STJ-FL2-205ART-RSINK-STJ57	Lead, ppb	1.18	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ58	2/8/2017	8:40	STJ-GYM-DF-STJ58 (P.C. Gym)	Lead, ppb	<1	Less than detection level
STJ59	2/8/2017	8:41	STJ-GYM-BOYSRR-SINK-STJ59 (P.C. Gym)	Lead, ppb	<1	Less than detection level
STJ60	2/8/2017	8:42	STJ-GYM-GIRLSRR-SINK-STJ60 (P.C. Gym)	Lead, ppb	<1	Less than detection level
STJ61	2/8/2017	8:45	STJ-GYM-113SENIORSRM-LDF-STJ61	Lead, ppb	<1	Less than detection level
STJ62	2/8/2017	8:46	STJ-GYM-113SENIORSRM-RDF-STJ62	Lead, ppb	<1	Less than detection level
STJ63	2/8/2017	8:47	STJ-GYM-CONCESSIONS-IM-STJ63	Lead, ppb	2.97	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
STJ64	2/8/2017	8:48	STJ-GYM-STAFFRR-SINK-STJ64 (Parish Office)	Lead, ppb	<1	Less than detection level
STJ65	2/8/2017	8:48	STJ-GYM-MENSRR-LSINK-STJ65	Lead, ppb	<1	Less than detection level
STJ66	2/8/2017	8:50	STJ-GYM-MENSRR-RSINK-STJ66	Lead, ppb	<1	Less than detection level
STJ67	2/8/2017	8:53	STJ-GYM-WOMENSRR-LSINK-STJ67	Lead, ppb	<1	Less than detection level
STJ68	2/8/2017	8:55	STJ-GYM-WOMENSRR-RSINK-STJ68	Lead, ppb	<1	Less than detection level
STJ69	2/8/2017	8:58	STJ-PARISH-KITCHEN-SINK-STJ69	Lead, ppb	<1	Less than detection level
STJ70	2/8/2017	8:59	STJ-PARISH-UNIRR-SINK-STJ70	Lead, ppb	<1	Less than detection level
STJ71	2/8/2017	9:00	STJ-PARISHBASE-UNIRR-SINK-STJ71	Lead, ppb	1.01	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

\*STJ22 THIS LOCATION DOES NOT EXIST. \*\*STJ24 - THERE IS NOT A SINK IN THE WORK ROOM, THE SAMPLE TAKEN HERE IS THE RESTROOM LOCATED IN THE WORK ROOM.

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