



June 30, 2017

St. Vincent Ferrer School  
Kathy Abele  
7754 Montgomery Road  
Cincinnati, OH 45236

Dear Ms. Abele,

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. Vincent Ferrer School and Church 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 April, fifty-eight (58) samples were collected from drinking fountains, cooking outlets and sinks throughout the school. Three additional sample locations were not included in the process. The results show the following:

- 21 samples (34.43%), below the detection level (<1)
- 23 samples (37.7%), between 1ppb and 5ppb
- 7 samples (11.47%), between 5ppb and 10ppb
- 4 samples (6.56%), between 10ppb and 15ppb
- 3 samples (4.9%) greater than 15ppb.

Nearly ninety-five percent (94.83%) 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 (7 out of 11) had results less than the detection level (<1). No further action is needed for these locations. Four locations had low lead values. To further



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. Three (3) of the five (5) kitchen samples had lead detections; consider flushing these lines as well before use. One sink had a value of 8.32 while another sink had a value of 6.3 . Work to understand how these sinks are being used and identify ways to reduce the lead. If the sinks are not used on a regular basis, the infrequent use may be contributing to the lead detection.
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 sinks 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. Overall, 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.
5. 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 (listed below). Follow-up sampling can occur at these locations; GCWW can assist with this.
6. *You might want to consider this for the three results greater than 15ppb.* 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. 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](http://lead.mycgww.org) website with other school sampling results.

Overall, nearly 95% 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,

A handwritten signature in black ink that reads "Cathy B. Bailey". The signature is written in a cursive, flowing style.

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. Vincent Ferrer School and Church- Lead Testing Results

SAMPLE #	SAMPLE DATE	SAMPLE TIME	SAMPLE	PARAMETER, CODE	AMOUNT	GCWW COMMENTS/REVIEW/RECOMMENDATIONS REGARDING RESULTS
SVF1	4/25/2017	6:21	SVF-FL1-KIT3TUB-LSINK-SVF1	Lead, ppb	<1	Less than detection level
SVF2	4/25/2017	6:20	SVF-FL1-KIT3TUB-MSINK-SVF2	Lead, ppb	2.6	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF3	4/25/2017	6:19	SVF-FL1-KIT3TUB-RSINK-SVF3	Lead, ppb	8.32	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF4	4/25/2017	6:18	SVF-FL1-KITCHEN-HANDSINK-SVF4	Lead, ppb	6.3	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF5	4/24/2017	7:25	SVF-FL1-KITCHEN-IM-SVF5	Lead, ppb	<1	Less than detection level
SVF6	4/25/2017	6:22	SVF-FL1-PARISHOFFRR-SINK-SVF6	Lead, ppb	1.42	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF7	4/25/2017	6:11	SVF-FL1-GIRLSRRNEARPARISH-FLSINK-SVF7	Lead, ppb	1.91	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SVF8	4/25/2017	6:12	SVF-FL1-GIRLSRRNEARPARISH-LSINK-SVF8	Lead, ppb	2.02	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF9	4/25/2017	6:13	SVF-FL1-GIRLSRRNEARPARISH-RSINK-SVF9	Lead, ppb	2.85	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF10	4/25/2017	6:14	SVF-FL1-GIRLSRRNEARPARISH-FRSINK-SVF10	Lead, ppb	5.23	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF11	4/25/2017	6:15	SVF-FL1-HALLWAYNEARPARISH-DF-SVF11	Lead, ppb	<1	Less than detection level
SVF12	4/26/2017	5:55	SVF-FL1-BOYSRRNEARPARISH-LSINK-SVF12	Lead, ppb	3.84	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF13	4/26/2017	5:54	SVF-FL1-BOYSRRNEARPARISH-MSINK-SVF13	Lead, ppb	2.26	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF14	4/26/2017	5:53	SVF-FL1-BOYSRRNEARPARISH-RSINK-SVF14	Lead, ppb	1.46	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SVF15	4/26/2017	5:59	SVF-FL1-CHAPLE-SINK-SVF15	Lead, ppb	24.3	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).
SVF16	4/26/2017	6:10	SVF-FL1-GYMBOYSLOCK-SINK-SVF16	Lead, ppb	7.87	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF17	4/26/2017	6:08	SVF-FL1-GYMGIRLSLOCK-SINK-SVF17	Lead, ppb	1.32	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF18	4/26/2017	6:06	SVF-FL1-GYM-DF-SVF18	Lead, ppb	<1	Less than detection level
SVF19	4/26/2017	6:03	SVF-FL2-WORKRM-SINK-SVF19	Lead, ppb	2.41	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF20	4/26/2017	6:02	SVF-FL2-STAFFWRR-SINK-SVF20	Lead, ppb	13.4	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SVF21	4/26/2017	6:01	SVF-FL2-STAFFMRR-SINK-SVF21	Lead, ppb	12.1	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF22	4/25/2017	5:42	SVF-FL1-140ART-LSINK-SVF22	Lead, ppb	<1	Less than detection level
SVF23	4/25/2017	5:43	SVF-FL1-140ART-RSINK-SVF23	Lead, ppb	<1	Less than detection level
SVF24	4/25/2017	5:41	SVF-FL1-HALLWAYNEAR140-DF-SVF24	Lead, ppb	<1	Less than detection level
SVF25	4/25/2017	5:45	SVF-FL1-131NURSERR-SINK-SVF25	Lead, ppb	<1	Less than detection level
SVF26	4/25/2017	5:48	SVF-FL1-103STAFFRR-SINK-SVF26	Lead, ppb	<1	Less than detection level
SVF27	4/25/2017	5:47	SVF-FL1-104STAFFRR-SINK-SVF27	Lead, ppb	<1	Less than detection level
SVF28	4/25/2017	5:49	SVF-FL1-HALLWAYNEAR124-DF-SVF28	Lead, ppb	2.73	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF29	4/25/2017	5:50	SVF-FL1-111SCIENCE-SINK-SVF29	Lead, ppb	<1	Less than detection level
SVF30	4/25/2017	5:51	SVF-FL1-123LOUNGE-SINK-SVF30	Lead, ppb	1.24	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF31	4/25/2017	5:52	SVF-FL1-121BOYSRR-FLSINK-SVF31	Lead, ppb	3.42	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SVF32	4/25/2017	5:53	SVF-FL1-121BOYSRR-LSINK-SVF32	Lead, ppb	1.25	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF33	4/25/2017	5:54	SVF-FL1-121BOYSRR-MSINK-SVF33	Lead, ppb	<1	Less than detection level
SVF34	4/25/2017	5:55	SVF-FL1-121BOYSRR-RSINK-SVF34	Lead, ppb	<1	Less than detection level
SVF35	4/25/2017	5:56	SVF-FL1-121BOYSRR-FRSINK-SVF35	Lead, ppb	1.1	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF36	4/25/2017	5:57	SVF-HALLWAYNEAR122-DF-SVF36	Lead, ppb	<1	Less than detection level
SVF37	4/25/2017	5:58	SVF-FL1-121GIRLSRR-FLSINK-SVF37	Lead, ppb	1.27	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF38	4/25/2017	5:59	SVF-FL1-121GIRLSRR-LSINK-SVF38	Lead, ppb	<1	Less than detection level
SVF39	4/25/2017	6:00	SVF-FL1-121GIRLSRR-MSINK-SVF39	Lead, ppb	<1	Less than detection level
SVF40	4/25/2017	6:01	SVF-FL1-121GIRLSRR-RSINK-SVF40	Lead, ppb	1.22	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF41	N/A	N/A	SVF-FL1-121GIRLSRR-FRSINK-SVF41	Lead, ppb	N/A	Not in service.
SVF42	4/25/2017	6:01	SVF-FL1-HALLWAYNEAR120-DF-SVF42	Lead, ppb	1.95	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.



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SVF43	4/25/2017	6:02	SVF-FL1-HALLWAYNEAR114-DF-SVF43	Lead, ppb	2.6	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF44	4/25/2017	6:03	SVF-FL1-115-LSINK-SVF44	Lead, ppb	<1	Less than detection level
SVF45	4/25/2017	6:04	SVF-FL1-115-LDF-SVF45	Lead, ppb	<1	Less than detection level
SVF46	4/25/2017	6:06	SVF-FL1-115-RSINK-SVF46	Lead, ppb	<1	Less than detection level
SVF47	4/25/2017	6:05	SVF-FL1-115-RDF-SVF47	Lead, ppb	<1	Less than detection level
SVF48	4/25/2017	6:10	SVF-FL1-127STAFFRR-SINK-SVF48	Lead, ppb	13.8	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF49	4/23/2017	20:01	SVF-CHURCH-WRR-LSINK-SVF49	Lead, ppb	1.49	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF50	4/23/2017	20:02	SVF-CHURCH-WRR-RSINK-SVF50	Lead, ppb	1.54	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF51	4/23/2017	20:03	SVF-CHURCH-WRR-DF-SVF51	Lead, ppb	<1	Less than detection level

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SVF52	4/23/2017	20:04	SVF-CHURCH-USHERSRM-SINK-SVF52	Lead, ppb	17.7	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).
SVF53	4/23/2017	20:06	SVF-CHURCH-USHERSRMRR-SINK-SVF53	Lead, ppb	5.25	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF54	4/23/2017	20:08	SVF-CHURCH-SACRISTY-SINK-SVF54	Lead, ppb	11.4	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF55	4/23/2017	20:10	SVF-CHURCH-SACRISTYRR-SINK-SVF55	Lead, ppb	25.7	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).
SVF56	4/23/2017	20:14	SVF-CHURCH-MRR-LSINK-SVF56	Lead, ppb	1.7	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.

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SVF57	4/23/2017	20:13	SVF-CHURCH-MRR-RSINK-SVF57	Lead, ppb	5.03	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF58	4/23/2017	20:11	SVF-CHURCH-MRR-DF-SVF58	Lead, ppb	3.34	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF59	4/23/2017	20:00	SVF-CHURCH-WORKSACRISTY-SINK-SVF59	Lead, ppb	5.71	Lead detected; less than 15ppb action level. Review 3Ts Guidelines to understand options to further reduce the risk of lead.
SVF60	N/A	N/A	SVF-RECTORY-KITCHEN-SINK-SVF60	Lead, ppb	N/A	Did not Sample.
SVF61	N/A	N/A	SVF-RECTORY-PRIESTRR-SINK-SVF61	Lead, ppb	N/A	Did not Sample.