Lead Testing in School Drinking Water

Location:

Holley Central School District
Middle / High School
Elementary School
Woodlands Soccer Facility
Holley, New York 14470

Prepared for:

Holley Central School District
3800 North Main Street
Holley, New York 14470

LaBella Project No. 2202182

January 22, 2021

300 State Street, Suite 201 | Rochester, NY 14614 | p (585) 454-6110 | f (585) 454-3066
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I. Background

Under Subpart 67-4 of the New York Codes, Rules and Regulations, Title X, "all school districts and boards of cooperative educational services are required to test potable water for lead contamination, and to develop and implement a lead remediation plan, where applicable."

The Subpart 67-4 testing requirement was first promulgated under emergency legislation in 2016, and was subsequently signed into permanent law. The regulation requires that testing be performed again in 2020, and every five years thereafter.

Lead is a toxic metal that can be harmful to human health when ingested. Young children, especially those 6 years and younger, are at particular risk for lead exposure because they have frequent hand-to-mouth activity and absorb lead more easily than do adults. Children's nervous systems are still undergoing development and thus are more susceptible to the effects of toxicants. Therefore, emphasis may be placed on assessment of lead exposure in schools and early childhood education facilities, where concentrations of a vulnerable population are regularly congregated.

Lead can be introduced into potable water by being present in the source water or, more commonly, by interaction of the water with fixtures and plumbing materials containing lead. Common sources of lead in potable water include solder, fluxes, pipes and pipe fittings, fixtures, and sediments. It is possible that different water outlets in a given building could have dissimilar concentrations of lead. It is also possible that, due to temporal fluctuations in water chemistry and physical conditions that may affect the integrity of the plumbing and the water being conveyed, the result obtained from a test at a given time may differ from the result obtained from a test at another time, even if the sampling procedures are identical.

II. Project Description

As previously reported, multiple sampling events at Holley Central School District, during the months of October, November, and December 2020, were completed in accordance with Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rules and Regulations of the State of New York (NYCRR). Fixtures from the Elementary School and Middle School/High School that returned lead level results above the 15 ug/L action level during 2020 testing events were subsequently taken out of service, permanent corrective actions were completed, and retesting occurred. The results of those retests are included in this report.

In accordance with sections 1370-a and 1110, Subpart 67-4 of Title 10 (Health) of the NYCRR and US EPA Guidelines, LaBella Associates performed resampling of potable water for lead contaminants for the Holley Central School District. Sampling was conducted on January 15, 2021 at the following buildings:

- Holley Middle School/High School – 16848 Lynch Road, Holley NY 14470
- Holley Elementary School – 3800 N Main Street Rd, Holley, NY 14470

III. Sampling Procedures and Summary of Results

During the morning of January 15, 2021, LaBella staff conducted sampling of target outlets prior to facilities opening and before any water was used. The water conditions were reported to be representative of normal consumption patterns (given current occupancy rates) with building occupancy controlled during stagnation and sampling periods.

In accordance with Subpart 67-4 requirements, sampling was limited to "first-draw" samples. A volume of the first 250 mL of water was taken from each cold water outlet in the inventory.

The samples were then promptly packaged and shipped to a NYS Department of Health Environmental Laboratory Approval Program (ELAP) accredited laboratory. Samples were analyzed utilizing EPA environmental analysis method 200.9 Rev 2.2 for lead in potable water. Results of the laboratory analyses, field testing and the visual on-site inspection were compiled and summarized.

Holley Middle School/High School Sampling Summary			
Building	Total Number of Outlet Tests	Total number of outlet tests at or below EPA action level (15ppb)	Total number of outlet tests above EPA action level (15ppb)
Middle/High School	1	1	0

Holley Elementary School Sampling Summary			
Building	Total Number of Outlet Tests	Total number of outlet tests at or below EPA action level (15ppb)	Total number of outlet tests above EPA action level (15ppb)
Elementary School	3	3	0

Based on laboratory analyses of the samples collected, none of the outlets tested were determined to exceed the NYS Action level of 15 parts per billion (ppb) or equivalent 15 micrograms per liter (µg/L). For full detail of the results, see Appendix A immediately following this report.

IV. Response and Recommendations

According to section Subpart 67-4.4 "Response" of the regulation, school districts shall prohibit the use of all outlets which exceed the 15 ppb action level. Because laboratory results indicated lead levels below the action level following permanent remedial activities, the tested fixtures may be placed back into service. No further corrective action is needed at this time.

V. Reporting and Record Keeping

In accordance with Subpart 67-4 the district shall:

- The school shall make available, on the school's website, the results of all lead testing performed and lead remediation plans implemented pursuant to this Subpart, as soon as practicable, but no more than 6 weeks after the school received the laboratory reports.

- As soon as practicable, but no more than 10 business days after the school received the laboratory reports, the school shall report data relating to test results to the Department, local health department, and State Education Department, through the Department's designated statewide electronic reporting system.

- The school shall retain all records of test results, lead remediation plans, determinations that a building is lead-free, and waiver requests, for ten years following the creation of such documentation. Copies of such documentation shall be immediately provided to the Department, local health department, or State Education Department, upon request.

Appendix A
Detailed Results Spreadsheets

Holley Middle/High School Lead Results By Fixture			
Sample ID	Description	Time Sampled	Lead Level (ug/L)
HHS-01-SP-BY-REC-T	Outside Spigot Near Receiving Dock Retest	535	11.6

Holley Elementary School Lead Results By Fixture			
Sample ID	Description	Time Sampled	Lead Level (ug/L)
HES-01-CR-IN-043-T	Classroom 43 Tap	525	<5.00
HES-01-CR-IN-037-T	Classroom 37 Tap	527	<5.00
HES-01-FAC-IN-155-T	Administrative Offices Break Room (155) Tap	531	13.6

Appendix B
Laboratory Analytical Results

Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer: Labella Associates (1126)
Address: 300 State Street
Rochester, NY 14614-1098

Attn:

Project: Holley CSD LIDW January
Location: 3800 N Main Street Rd Holley
Number: 2202182

Order #: 401420

Matrix Drinking Water
Received 01/19/21
Reported 01/20/21

PO Number:

Sample ID / Parameter	Cust. Sample ID / Method	Result	RL*	Units	Analysis Date	Analyst
401420-001	CR-IN-043-T / Classroom 43 Tap					
Metals Analysis						
Lead	EPA 200.9 Rev 2.2	**<5.00**	5.00	µg/L	01/20/21	DLJ
401420-002	CR-IN-037-T / Classroom 37 Tap					
Metals Analysis						
Lead	EPA 200.9 Rev 2.2	**<5.00**	5.00	µg/L	01/20/21	DLJ
401420-003	FAC-IN-155-T / Administrative Offices					
Metals Analysis						
Lead	EPA 200.9 Rev 2.2	**13.6**	5.00	µg/L	01/20/21	DLJ
401420-004	SP-BY-REC-T / Outside Spigot Near					
Metals Analysis						
Lead	EPA 200.9 Rev 2.2	**11.6**	5.00	µg/L	01/20/21	DLJ

401420-01/20/21 02:34 PM

Reviewed By: **Jennifer Lee**
Manager

EPA Regulatory Limits

Parameter	Reg. Limit	Unit
Lead	15.0	µg/L

State Certifications

Method	Parameter	New York	Virginia
EPA 200.9 Rev 2.2	Lead	ELAP Certified	VELAP Certified

State	Certificate Number
New York	ELAP 61370
Virginia	VELAP 11110

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. Solid PPM = mg/kg | PPB = µg/kg and Water PPM = mg/L | PPB = µg/L. The test results reported relate only to the samples submitted.

SCHNEIDER LABORATORIES GLOBAL, INC.

2512 West Cary Street, Richmond, Virginia 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475
www.slabinc.com e-mail: info@slabinc.com

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UPS 1Z153E790358790427

Submitting Co.	LaBella Associates, D.P.C.	Lab WO#		Phon	
	300 State Street	Acct #	1126	Fax / Email	dburgess@labellapc.com
	Rochester, New York 14614	**State of Collection	NY	**Cert. Required	☒ Yes ☐ No
Project Name:	Holley CSD LIDW January Testing	Special Instructions [include requests for special reporting or data packages]			
Project Location:	3800 N Main Street Rd, Holley, NY 14470	EPA Method 200.9			
Project Number:	2202182				
PO Number:					

Turn Around Time

- ☐ 2 hours*
- ☐ Same day*
- ☐ 1 business day*
- ☐ 2 business day*
- ☐ 3 business days*
- ☒ 5 business days*
- ☐ Full TCLP (10d)
- ☐ Weekend*

* not available for all tests

Schedule rush organics, multi-metals & weekend tests in advance.

Matrix / Sample Type (Select ONE)

All samples on form should be of SAME matrix type. Use additional forms as needed.

- ☐ Air
- ☐ Aqueous
- ☐ Bulk
- ☐ Hi-Vol Filter (PM10)
- ☐ Hi-Vol Filter (TSP)
- ☐ Oil
- ☐ Paint
- ☐ Sludge
- ☐ Soil
- ☐ Solid
- ☐ Waste
- ☐ Wastewater
- ☒ Water,Drinking
- ☐ Compliance
- ☐ Wipe
- ☐ Wipe, Composite
- ☐ _____
- ☐ _____

Tests / Analytes (Select ALL that Apply)

Asbestos Air / Fiber Counts

- ☐ PCM (NIOSH 7400)
- ☐ TEM (AHERA)
- ☐ TEM (EPA Level II)
- ☐ _____

Miscellaneous Tests

- ☐ Total Dust (NIOSH 0500)
- ☐ Resp. Dust (NIOSH 0600)
- ☐ Silica - FTIR (NIOSH 7602)
- ☐ Silica - XRD (NIOSH 7500)
- ☐ Mold Direct Exam

Asbestos Bulk / Asb ID

- ☐ PLM (EPA 600/R-93/116)
- ☐ PLM (EPA Point Count)
- ☐ PLM (Qualitative only)
- ☐ NYELAP 198.1/.4/.6
- ☐ CAELAP (EPA Interim)
- ☐ TEM (Chatfield)
- ☐ _____

FOR ASBESTOS AIR:

TYPE OF RESPIRATOR USED: _____

Metals-Total Conc.

- ☒ Lead
- ☐ RCRA Metals
- ☐ _____
- ☐ _____

Metals-Extract

- ☐ TCLP / Lead
- ☐ TCLP / RCRA Metals
- ☐ TCLP / Full (w/ organics)

Others

- ☐ _____

Sample #	Date Sampled**	Time Sampled**	Sample Identification (Employee, SSN, Bldg, Material, Type[1])	Wiped Area (ft^2)	pH / Temp *	Time[2] Start	Time[2] Stop	Flow Rate[3] Start	Flow Rate[3] Stop	Total[4] Air
CR-IN-043-T	1/15/21	0525	Classroom 43 Tap							
CR-IN-037-T	1/15/21	0527	Classroom 37 Tap							
FAC-IN-155-T	1/15/21	0531	Administrative Offices Break Room (155) Tap							
SP-BY-REC-T	1/15/21	0535	Outside Spigot Near Receiving Dock							

[1]Type: A=area B=blank P=personal E=excursion [2]Beginning/End of Sample Period [3]Pump Calibration in Liters/Minute [4]Volume in Liters [time in min * flow in L/min]

Sampled by

NAME Derrick Burgess

SIGNATURE _____

DATE/TIME 1/15/21 0530

Relinquished to lab by

NAME Derrick Burgess

SIGNATURE _____

DATE/TIME 1/15/21 0800

Sample Disposal

If samples over req. weight (Refer to Fee Schedule)

- ☐ Return to Sender (Shipping fees)
- ☐ Disposal by lab ($50 fee)

Shipping Methods

- ☐ FX ☐ UPS ☐ USM
- ☐ HD ☐ DB

WB: _____

☐ Sample return requested ☐ Ambient temp ☐ Ice Cl _____ ☐R ☐S ☐X ☐ Receive a physical copy of report.

* Temperature taken with IR Gun A. **Required.

Chain-of-Custody documentation continued internally within lab. Terms and conditions page 2.

Appendix C
Laboratory Certification

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2021
Issued April 01, 2020

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. FAYEZ ABOUZAKI
SCHNEIDER LABORATORIES GLOBAL, INC
2512 WEST CARY STREET
RICHMOND, VA 23220-5117

NY Lab Id No: 11413

is hereby APPROVED as an Environmental Laboratory in conformance with the National Environmental Laboratory Accreditation Conference Standards (2003) for the category ENVIRONMENTAL ANALYSES POTABLE WATER
All approved analytes are listed below:

Metals I

Lead, Total	EPA 200.9 Rev. 2.2

NEW YORK STATE | Department of Health

Serial No.: 61370

NELAP RECOGNIZED TNI ACCREDITATION BODY