



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

August 3, 2021

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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 and June 2021, 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 Woodlands Soccer Facility 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 June 23, 2021 at the following buildings:

- Woodlands Soccer Facility – Soccer Field Trail, Holley, NY 14470



III. SAMPLING PROCEDURES AND SUMMARY OF RESULTS

During the morning of June 23, 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.

Woodlands Soccer Facility 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)
Woodlands	2	2	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). In previous testing, the left outdoor hose bib exceeded the action level. This outlet was not retested as it has been decommissioned and is no longer available for use. 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

Woodlands Soccer Facility Lead Results By Fixture			
Sample ID	Description	Time Sampled	Lead Level (ug/L)
WL-01-RM-IN-KT-T1	Sink In Kitchen	1130	<5.00
WL-01-RM-IN-KT-T2	Coffee Pot Feed Line in Kitchen	1132	<5.00

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

Order #: 426440

Matrix Drinking Water
Received 06/25/21
Reported 06/28/21

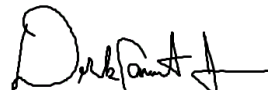
Attn:

Project: Woodlands LIDW Retesting
Location: 3800 N Main Street Rd Holley
Number: 2202182

PO Number:

Sample ID	Cust. Sample ID	Location	Result	RL*	Units	Analysis Date	Analyst
Parameter		Method					
426440-001	RM-IN-KT-T1	Sink Tap In Kitchen					
Metals Analysis							
Lead		EPA 200.9 Rev 2.2	<5.00	5.00	µg/L	06/26/21	HI
426440-002	RM-IN-KT-T2	Coffee Pot Tap In Kitchen					
Metals Analysis							
Lead		EPA 200.9 Rev 2.2	<5.00	5.00	µg/L	06/26/21	HI

426440-06/28/21 05:12 PM


Reviewed By: **Derek Jackson**
Analyst

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 63556		
Virginia	VELAP 11259		

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.

SLG

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

426440

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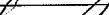
fghraizi
LPS

6/25/2021 9:58:06 AM
1Z153E790358455629

Submitting Co.	LaBella Associates, D.P.C.	Lab WO#		Phone	585-295-6240
	300 State Street	Acct #	1126	Fax / Email	dburgess@labellapc.com
	Rochester, New York 14614	**State of Collection	NY	**Cert. Required	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Project Name:	Woodlands LIDW Retesting		Special Instructions [include requests for special reporting or data packages]		
Project Location:	3800 N Main Street Rd, Holley, NY 14470		By EPA Method 200.9		
Project Number:	2202182				
PQ Number:					

Turn Around Time	Matrix / Sample Type (Select ONE)	Tests / Analytes (Select ALL that Apply)		
<input type="checkbox"/> 2 hours* <input type="checkbox"/> Same day* <input type="checkbox"/> 1 business day* <input type="checkbox"/> 2 business day* <input type="checkbox"/> 3 business days* <input checked="" type="checkbox"/> 5 business days* <input type="checkbox"/> Full TCLP (10d) <input type="checkbox"/> Weekend* * not available for all tests Schedule rush organics, multi-metals & weekend tests in advance	<i>All samples on form should be of SAME matrix type. Use additional forms as needed.</i> <div> <input type="checkbox"/> Air <input type="checkbox"/> Solid </div> <div> <input type="checkbox"/> Aqueous <input type="checkbox"/> Waste </div> <div> <input type="checkbox"/> Bulk <input type="checkbox"/> Wastewater </div> <div> <input type="checkbox"/> Hi-Vol Filter (PM10) <input checked="" type="checkbox"/> Water, Drinking </div> <div> <input type="checkbox"/> Hi-Vol Filter (TSP) <input type="checkbox"/> Compliance </div> <div> <input type="checkbox"/> Oil <input type="checkbox"/> Wipe </div> <div> <input type="checkbox"/> Paint <input type="checkbox"/> Wipe, Composite </div> <div> <input type="checkbox"/> Sludge <input type="checkbox"/> _____ </div> <div> <input type="checkbox"/> Soil <input type="checkbox"/> _____ </div>	Asbestos Air / Fiber Counts <input type="checkbox"/> PCM (NIOSH 7400) <input type="checkbox"/> TEM (AHERA) <input type="checkbox"/> TEM (EPA Level II) <input type="checkbox"/> _____ Miscellaneous Tests <input type="checkbox"/> Total Dust (NIOSH 0500) <input type="checkbox"/> Resp. Dust (NIOSH 0600) <input type="checkbox"/> Silica - FTIR (NIOSH 7602) <input type="checkbox"/> Silica - XRD (NIOSH 7500) <input type="checkbox"/> Mold Direct Exam	Asbestos Bulk / Asb ID <input type="checkbox"/> PLM (EPA 600/R-93/116) <input type="checkbox"/> PLM (EPA Point Count) <input type="checkbox"/> PLM (Qualitative only) <input type="checkbox"/> NYELAP 198.1/4.6 <input type="checkbox"/> CAELAP (EPA Interim) <input type="checkbox"/> TEM (Chatfield) <input type="checkbox"/> _____ FOR ASBESTOS AIR: TYPE OF RESPIRATOR _____ USED: _____	Metals-Total Conc. <input checked="" type="checkbox"/> Lead <input type="checkbox"/> RCRA Metals <input type="checkbox"/> _____ <input type="checkbox"/> _____ Metals-Extract <input type="checkbox"/> TCLP / Lead <input type="checkbox"/> TCLP / RCRA Metals <input type="checkbox"/> TCLP / Full (w/ organics) Others <input type="checkbox"/> _____

[illegible]

1Type: A=area B=blank P=personal E=excursion		2Beginning/End of Sample Period		3Pump Calibration in Liters/Minute		4Volume in Liters [time in min * flow in L/min]	
Sampled by NAME <u>Cory Stamp</u> SIGNATURE <u></u> DATE/TIME <u>6/23/2021 1200</u>		Relinquished to lab by NAME <u>Cory Stamp</u> SIGNATURE <u></u> DATE/TIME <u>6/23/2021 1500</u>		<input type="checkbox"/> Return to Sender (Shipping fees) <input type="checkbox"/> Disposal by lab (\$50 fee)		Sample Disposal If samples over req. weight (Refer to Fee Schedule)	
<input type="checkbox"/> Sample return requested <input type="checkbox"/> Ambient temp <input type="checkbox"/> Ice <input type="checkbox"/> Cl <input type="checkbox"/> R <input type="checkbox"/> S <input type="checkbox"/> X		<input type="checkbox"/> Receive a physical copy of report.				Shipping Methods <input type="checkbox"/> FX <input type="checkbox"/> UPS <input type="checkbox"/> USM <input type="checkbox"/> HD <input type="checkbox"/> DB WB: _____	

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



Serial No.: 61370

Property of the New York State Department of Health. Certificates are valid only at the address shown, must be conspicuously posted, and are printed on secure paper. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (518) 485-5570 to verify the laboratory's accreditation status.





Department of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

LISA J. PINO, M.A., J.D.
Executive Deputy Commissioner

March 31, 2021

ELAP ID 11413
SCHNEIDER LABORATORIES GLOBAL, INC
MR. FAYEZ ABOUZAKI
2512 WEST CARY STREET
RICHMOND, VA 23220-5117
ifaszewski@slabinc.com

Certified Mail & Email

Dear Mr. Abouzaki,

The review of your laboratory's renewal application through the New York State (NYS) Department of Health's Environmental Laboratory Approval Program (ELAP) for a certificate of approval will require the evaluation of additional information, and therefore has not been completed. Please note that Article 4, Section 401, and Subsection 2 of the State Administrative Procedure Act states:

"When a licensee has made timely and sufficient application for a renewal of a license or a new license with the reference to any activity of a continuing nature, the existing license does not expire until the application has been finally determined by the agency ..."

The 2020-2021 NYS ELAP certificate of approval issued to your laboratory remains in effect, without regard to the expiration date of April 1, 2021, printed on the certificate. A copy of this letter may be provided to any person inquiring as to the status of your certificate.

If you have any questions, please contact ELAP at the New York State Department of Health, Wadsworth Center, Empire State Plaza, Albany, NY 12237; by phone at (518) 485-5570; or by email at elap@health.ny.gov.

Sincerely,

Victoria A. Pretti
Director and QA Officer

cc. L. McNaughton