

**Regulatory Compliance
245 Albany Avenue
Thornwood, New York 10594
(914) 439-6513**

10 NYCRR Subpart 67-4

**Lead In Drinking Water
Testing and Water Management Plan**

**For
Tuckahoe UFSD
65 Siwanoy Blvd
Eastchester, NY 10709**

**At
High School
65 Siwanoy Blvd
Eastchester, NY 10709**

Project Number: TUCK.1073.22.IH

Dates of Survey:
December 28, 2022

Field Work performed by:
Nicholas Coon, BS

Report Written by:
Ernest Coon, MS, RPIH, HEM

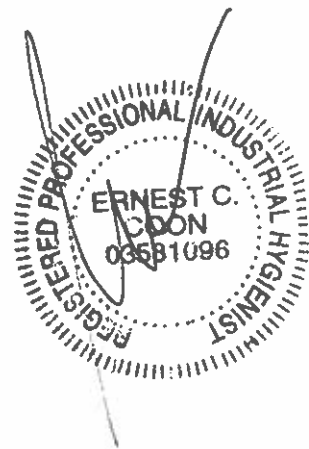


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1.0 SCOPE OF WORK

Tuckahoe UFSD retained Regulatory Compliance to test the water fountains in the high school 3rd floor hallway by the district for lead content. The overall objective is to determine the lead content in drinking water in the district's buildings.

2.0 INTRODUCTION

Lead is a toxic metal that can be harmful when ingested (or inhaled), and young children are particularly sensitive to the effects of lead. Lead can get into drinking water by being present in the source water, or by interaction of the water with plumbing materials containing lead (through corrosion). Common sources of lead in drinking water include: solder, fluxes, pipes and pipefittings, fixtures, and sediments. Thus, it is possible that different water outlets in a given building could have dissimilar concentrations of lead. Lead in drinking water is regulated under the Safe Drinking Water Act (1974) as amended. The Lead Contamination Control Act (LCCA) amended the Safe Drinking Water Act and is aimed at identifying and reducing lead in drinking water in schools (and day care facilities). In April 1994, EPA prepared two guidance documents to assist municipalities in meeting the requirements of the LCCA. On September 6, 2016 the Department of Health DOH issued emergency regulations for the implementation of the new law, *Lead Testing in School Drinking Water*, the regulations became Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rule and Regulations of the State of New York.

The following information is provided in sections 3-11 are taken from 10 NYCRR Subpart 67-4 and the NYSDOH slide presentation "Lead Testing in School Drinking Water 2020 Compliance Requirements," from November 2020 and updated 2022.

3.0 RECOMMENDED/REQUIRED SAMPLING LOCATIONS

Outlets that should be sampled may be located anywhere on school property including external outlets (hose bibs) if the outlet may be used for drinking or cooking (including food preparation).

Samples must be collected at all outlets used or potentially used for drinking or cooking, including but not limited to:

- bubblers/drinking fountains
- classroom sinks
- classroom combination sinks and drinking fountains
- kitchen sinks
- kitchen kettle filler outlets
- bathroom sinks
- family and consumer sciences room sinks
- teachers' lounge sinks
- nurse's office sinks
- athletic field outlets and any other sink known to be or potentially used for consumption (e.g., coffeemaker or cups are nearby)

Applicable VS. Non-Applicable Outlets

Superintendents or their designees have the responsibility to identify which outlets on a school property meet the regulation requirements for sampling (“applicable outlets”).

If a Superintendent or their designee determines that they have outlets that fall outside of the scope of the regulation (outlets not used or potentially used for drinking or cooking), the school must have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes (“non- applicable outlets”).

- Food washing sinks: Food washing faucets must be sampled as they are used for cooking (including food preparation) and potentially for drinking.
- Ice machines: The ice made in an ice machine should be sampled for lead.
- Combination bottle fill station and drinking fountain: A sample should be collected from both outlets. The Department recommends sampling the outlet that is most frequently used first.
- Hand washing outlets: In general, all hand washing outlets in a bathroom should be sampled as bathroom outlets may be used to obtain water for drinking and/or food preparation.
- Foot level operated multi-outlet gang sink: In general, samples should be collected from each outlet of a gang sink, however, if the gang sink design does not allow sample collection from each outlet, the schools should contact the local health department or the Department to discuss.
- Traditional outlet with hot and cold-water handle: Samples must be collected from each outlet but only the cold water should be turned on for sampling

Non-Applicable Outlets

In general, any outlet in a room or office within a school that is not used by students (pre-kindergarten through grade 12) and does not provide water for drinking or cooking does not require sampling.

- Dishwashing sinks: If an outlet is designated for dish washing only and involves no opportunity for drinking or cooking (including food preparation), the outlet does not require sampling
- Point of entry: Samples from the point of entry are not required under Subpart 67-4. Point of entry is the location where water enters the building from the distribution system of a public water system.
- Science/Art room outlets: Typically, classrooms in these settings prohibit eating and/or drinking. The school Superintendent has the authority to determine whether these outlets may be used for drinking or cooking and whether they require sampling.

- **Tempered outlets:** The Department and the US EPA recommend that hot or tempered water not be used for drinking or cooking as warm or hot water increase the leaching of lead into the water.
- **Bus garage:** Outlets in bus garage buildings do not require sampling unless the building is occupied by students (e.g., BOCES classes).
- **Custodial closet outlets:** If the outlet is only used for custodial purposes and not for drinking, then the outlet does not need to be sampled.
- Any outlet excluded from sampling should be documented in the Remedial Action Plan (and consider additional controls such locks, signs, and education).

4.0 SAMPLING METHODOLOGY

Samples were collected in accordance with the *Lead Testing in School Drinking Water* – 10 NYCRR Subpart 67-4.3. A first-draw sample was collected in a wide mouth 250 mL bottle and collected from a cold water outlet before the water is used. The water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours prior to collection.

Sampling Collection Guidance:

- **Pre-stagnation flushing:** The Department does not allow for pre-stagnation flushing prior to sampling unless a school is directed to do so by the Department or local health department.
- **Aerators:** Aerators should not be removed prior to sampling

5.0 SAMPLING LOCATIONS, OBSERVATIONS AND DISCUSSION

December 28, 2022

The following water fixtures were tested: water fountains (bubblers/bottle fillers).

Sampling was conducted at the high school. A total of four (4) samples (including one blank) were collected and analyzed for lead contaminants. All of the samples collected were within NYSDOH compliance. The sample results for all water fixtures tested are located in Appendix A.

For all outlets not used or potentially used for drinking or cooking, the school must have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes (“non- applicable outlets”).

If any inoperable water fixtures during the time of the survey are made operable in the future or new water fixtures are installed, they must be tested prior to use and incorporated into the Water Management Plan.

6.0 RESPONSE AND CORRECTIVE ACTIONS

Steps following an Action Level Exceedance Immediate Response

- Prohibit the use of the outlet immediately (take outlet out of service or turn off) until:
(1) A lead remedial action plan is implemented to mitigate the lead level at the outlet, and
(2) Post-remediation test results indicate that the lead levels are at or below the action level;
- Provide building occupants with an adequate supply of water for drinking and cooking until remediation is performed;
- Report the test results to the local health department as soon as practicable, but no more than 1 business day after the school received the laboratory report;
- Notify all staff and all persons in parental relation to students of the test results, in writing, as soon as practicable but no more than 10 business days after the School received the laboratory report.

Corrective Actions / Remediation Options

- Permanent removal of an outlet
- Outlet replacement with “lead-free” plumbing materials
- Pipe replacement with “lead-free” plumbing materials
- Remove other sources of lead (lead pipe, lead solder joints, and brass plumbing components with “lead-free” materials)
- Flushing (systematic flushing program)
- Point of Use (POU) Filters
- Supervision
- Engineering controls
- Education
- Signage

Signage Options:



7.0 Post-Remediation Testing

- Follow-up samples collected after an outlet has been remediated must also be “first-draw” samples. Schools may choose to perform additional sampling (i.e., 30-second flush, etc.) to determine the contribution of lead from plumbing to guide remediation decisions.
- Only those outlets that exceed the action level need to be resampled (following remediation).
- All remediated outlets will likely require flushing prior to being placed back into service.
- Post-remediation tests results need to be reported:
 - in the Department’s HERDS application on HCS, and
 - on the school’s website within the same reporting timeframes/requirements as specified for the initial sampling (addressed in next section).

8.0 Public Notification Requirements

- Within 1 business day of receipt of laboratory reports:
 - Report any and all exceedances (lead result greater than 5 ppb) to the local health department
- Within 10 business days of receipt of laboratory reports:

- Report all exceedances to all staff, parents, and guardians in writing school. A physical written notification is required.
- Report test results (including post-remediation results) in the Department's electronic reporting system, HERDS accessed through HCS. This information is posted on the Department's website for the public
- Within 6 weeks of receipt of laboratory reports:
 - Post numeric test results of all lead testing and information about remediation actions taken to address outlets where lead exceeded the action level on the school's website. This should remain posted on the school's website for the duration of the compliance period (i.e. 2020-2024)
- Report any lead-free buildings on the school's website
- Within 6 weeks of receipt of laboratory reports:
 - Post numeric test results of all lead testing and information about remediation actions taken to address outlets where lead exceeded the action level on the school's website. Laboratory reports must be included. This should remain posted on the school's website for the duration of the compliance period (i.e., 2023-2026)

9.0 Electronic Reporting in HCS/HERDS

- Within 10 business days of receipt of laboratory reports: Summary data must be reported in the Department's electronic reporting system, HERDS accessed through HCS.
Summary data includes:
 - General information (lead-free status, website address)
 - Sampling information
 - Lead analysis results
 - Response and remediation
- Do not submit laboratory reports directly to the Department or local health department unless otherwise directed.

10.0 Recordkeeping Requirements

- Schools must retain all records of:
 - Test results
 - Remedial action plans
 - Determinations that a building is lead-free; and
 - Waiver requests (only applicable to compliance year 2016)
- Per Subpart 67-4, schools must retain records for 10 years following document creation (Note: other agencies may have additional records retention requirements, i.e., NYS Department of Labor)
- Copies of documents must be provided to the Department, the NY State Education Department, or the local health department upon request
- Department recommends that all records be kept in a centrally located and accessible repository for each school building

11.0 Best Management Practices to Reduce Lead in Drinking Water

- Aerator cleaning
- Routine flushing practices (after vacations and long weekends)
- Use only certified lead-free materials when performing plumbing work
- Follow the manufacturer's recommendations for water softener settings to ensure an appropriate level of hardness
- Temperature control
- Educating staff and students of the benefits of running water at a tap briefly prior to using it for drinking or food preparation. Letting the water run for 30- 60 seconds or until the water feels cold can reduce the potential levels of lead in the drinking water

12.0 Lead in Drinking Water Survey Fact Sheet

Name and Address of Building/Structure Owner:

Tuckahoe UFSD
65 Siwanoy Blvd
Eastchester, NY 10709

Name and Address of Buildings/Structures Surveyed:

Greenburgh Eleven UFSD
High School
Tuckahoe UFSD
65 Siwanoy Blvd
Eastchester, NY 10709

Name of the Firm & Person Conducting the Survey:

Regulatory Compliance
Nicholas Coon
PO Box 132
Thornwood, New York 10594

Date Survey Was Conducted:

December 28, 2022

Tabulated Results

Tuckahoe UFSD						
High School						
Sample ID #	Sample Location	Type of Fixture	Date Sampled	Results (mg/L)	Compliant (Y/N)	Remedial Action Required
1	Hallway Near Room 308	Water Fountain	12.28.22	BDL < 0.001	Y	NA
2	Hallway Near Room 314	Water Fountain	12.28.22	0.001	Y	NA
3	Hallway Near Room 302	Water Fountain	12.28.22	0.001	Y	NA
4	Blank	NA	12.28.22	BDL < 0.001	Y	NA

NA = Not Applicable


NYS Lead Action Level 0.005 mg/L

Sinks are counted from Left to Right

Laboratory Data Sheets

Eastern Analytical Services, Inc.**Water Sample Report**

RE: CPN TUCK-10-73-22-IH - Tuckahoe High School

Date Collected: 12/28/2022
Collected By: Nicholas Coon
Date Received: 12/28/2022
Date Analyzed: 01/04/2023
Analyzed By: Ernest Sanchez
Signature: 
Analyte: Pb Water
Analytical Method: EPA 200.9
NYS Lab Number: 10851

Client: RegCom
245 Albany Avenue
Thornwood, NY 10594

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
1 2885733	Hallway by Room 308	Water Fountain	BDL < 0.001 mg/L
2 2885734	Hallway by Room 314	Water Fountain	0.001 mg/L
3 2885735	Hallway by Room 302	Water Fountain	0.001 mg/L
Blank 2885736	Not Applicable	Field Blank	BDL < 0.001 mg/L

BDL = Below Detectable Limits

Liability Limited to Cost of Analysis

Results Applicable to Those Items Tested

Rhode Island DOH No. LA000107 Massachusetts DOL No. A A 000072 Connecticut DOH No. PH-0622 Maine DEP No. LA-024 Vermont DOH No. AL-709936

Eastern Analytical Services, Inc.

4 Westchester Plaza - Elmsford, NY 10523

www.EASInc.com

914-592-8380

CHAIN OF CUSTODY

EAS Client: Key Com
24 S Albany Ave
Westwood NJ 08594

No. of Samples: 3 710 mg

Analyte: **Asbestos** **Lead** **Fungi**
☐ PLM ☐ Solid ☐ Spore Trap
☐ NOB PLM Only ☐ Dust ☐ Tape Lift
☐ NOB TEM Only ☐ Air
☐ NOB PLM/TEM ☒ Water **Other**
☐ NOB TEM/PLM ☐ Other **Analyte**
☐ Air 7400 (PCM)
☐ Air AHERA (TEM)
☐ Air 7402 (TEM) **TCLP**
☐ Water (TEM) ☐ Pb Only
☐ Other ☐ 8 RCRA

Turn-Around ☐ 03Hr ☐ 06Hr ☐ 12Hr ☐ 24Hr ☐ 30Hr
☐ 48Hr ☐ 72Hr ☐ 96Hr ☐ 5Day ☒ Other 2 weeks (10 days)

Shipped Via: ☐ US Mail ☒ Walk In
☐ FedEx ☐ US Exp
☐ UPS ☐ Courier
☐ Drop Box ☐ Other

State of ☒ NY ☐ CT ☐ NJ ☐ PA ☐ MA
 Origin: ☐ RI ☐ ME ☐ VT ☐ Other

Sample Disposition ☒ (Std.) ☐ (Return)

Client Project Name/Number: TUCK-1073-22-IH

Sampled By: Nicholas Coon
Name (Print or Type)

Nicholas Coon
Signature

12/28/22
Date

Submitted By: Nicholas Coon
Name (Print or Type)

Nicholas Coon
Signature

12/28/22
Date

Comments:

FOR LABORATORY USE ONLY

Account Number: _____

Received By: [Signature]

[Signature] DEC 28 '22 17:08

EASTERN ANALYTICAL SERVICES, INC.

BULK SAMPLE DATA SHEET

Page 1 of 1

Date Collected: 12/28/20
 Collected By: P. Coon
 Date Received: _____
 Date Analyzed: _____
 Analyzed By: _____
 Time: _____
 Signature: _____

EAS Client: Reg Com
 Address: _____

Client Project Number/Name
 RE: Tuckahoe H5

Turn-Around
☐ 03 Hr
☐ 12 Hr
☐ 30 Hr
☐ 72 Hr
☐ 5 Day
☐ 06 Hr
☐ 24 Hr
☐ 48 Hr
☐ 96 Hr
☒ Other (6 days)
 (6 weeks)

Sample Number	Sample Location	Sample Description	Result
2885733	Hallway by Room 308	Water Fountain	
2885734	Hallway by Room 314	Water Fountain	
2885735	Hallway by Room 302	Water Fountain	
2885736	Blank		

Comments:

DEC 28 '22 17:09

* as shown on Bottle MKR 12282022