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

> Lead Concentration In Drinking Water

> > At

Pocantico Hills CSD 599 Bedford Road Sleepy Hollow, NY 10591

RegCom's Project Number: PH.1135.16.IH

Date of Survey: September 26, 2016

Field Work performed by: Ernest Coon, MSc, RPIH, HEM Stephen Coon, BS

Report Written by: Ernest Coon, MSc, RPIH, HEM October 13, 2016 ABSTRACT

The Pocantico Hills retained Regulatory Compliance to test the sinks throughout the school, as identified by the district, for lead contamination. The overall objective is to determine the lead content in drinking water in the district's buildings. The District has one (1) educational building with several additions.

A total of 97 samples were collected (including a blank) and analyzed for lead contaminates.

The water fountains /sinks that were tested are in compliance with the NYS Lead testing in School Drinking Water -10 NYCRR Subpart 67-4, with the exception of the sinks/water fountains listed in the Results Section of the report.

For all outlets that exceed the NYS Action Level action is required. In accordance with the Lead testing in School Drinking Water – 10 NYCRR Subpart 67-4, if lead is detected the school is obligated to:

- Prohibit use of the outlet until a remediation plan is implemented and test results indicate that the lead levels are at or below the action level.
- Provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed.
- Report the 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.
- The school shall make available the results of all lead testing performed and remediation plans implemented on its website as soon as practicable, but no later than 6 weeks after the school received the laboratory results.

Recommendations and NYS DOH required actions:

- For all outlets that exceed the NYS Action Level action is required. In accordance with the Lead testing in School Drinking Water 10 NYCRR Subpart 67-4, if lead is detected the school is obligated to:
 - Prohibit use of the outlet until a remediation plan is implemented and test results indicate that the lead levels are at or below the action level.
 - Provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed.
 - Report the 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.

- The school shall make available the results of all lead testing performed and remediation plans implemented on its website as soon as practicable, but no later than 6 weeks after the school received the laboratory results.
- If the sink isn't used for consumption or food preparation, in accordance with the NYS DOH regulation, Lead testing in School Drinking Water 10 NYCRR Subpart 67-4 and the FAQs posted on the NYS DOH website, FAQ #16, it appears that school might meet compliance by simply posting a sign (age appropriate) stating that the water should not be used for drinking or cooking.
- If aerators are present in the affected sinks (lead sediment can build up and leach out and end up in the drinking water), they should be removed cleaned, reinstalled and the fixture should be retested.
- Install a water filter to control the lead concentration and, maintain and replace the filter in accordance with the manufactures requirements/instructions. The process should be documented. The fixture should be retested.
- If a water filter was in use and the unit's lead concentration exceeded the regulatory limit, then the filter should be replaced and the unit retested.

Reminders:

- For results of tests performed before the effective date of these regulations, notify all staff and all persons in parental relation to students within 10 business days of this regulation's effective date, unless written notification has already occurred.
- As soon as practicable but no later than November 11, 2016 schools must report all testing results (whether above or below 15 ppb) to DOH, SED, local health department through the Department's designated statewide electronic reporting system.

TABLE OF CONTENTS

ABST	RACT		2
TABL	E OF CONTENTS		4
1.0	INTRODUCTION		5
2.0	SAMPLING METH	ODOLOGY	5
3.0	RESULTS		6
4.0	4.0 10 NYCRR Subpart 67-4 REQUIREMENTS, RECOMMENDATIONS RECOMMENDATIONS & REMINDERS		6
		Appendix	
Appendix A Appendix B Laboratory Results for Lead Implementation Guidance for Subpart 67-4 Lead Testin School Drinking Water (FAQs)		ng in	

1.0 INTRODUCTION

The Pocantico Hills retained Regulatory Compliance to test the sinks in throughout the school, as identified by the district, for lead contamination. The overall objective is to determine the lead content in drinking water in the district's buildings. The District has one (1) educational building with several additions.

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.

2.0 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 was used. The water was motionless in the pipes for a minimum of 8 hours but not more than 18 hours prior to collection.

3.0 RESULTS

The water fountains /sinks that were tested are in compliance with the NYS Lead testing in School Drinking Water -10 NYCRR Subpart 67-4, with the exception of the sinks/water fountains listed in the Results Section of the report.

Table 1.0 Locations that are above the lead EPA Action Level of 0.015 mg/L:

Number	Sample ID #	Location	1 st Draw (mg/L)	Comments
1	8	Classroom 401 – Sink #1	0.021	Sink - Counting sinks from left to right
2	20	Classroom 245 – Sink	0.032	Sink
3	23	Auditorium - Sink	0.024	Sink
4	85	Classroom 116 – Sink	0.144	Sink
5	95	Classroom 113 – Sink	0.022	Sink

4.0 10 NYCRR Subpart 67-4 REQUIREMENTS, RECOMMENDATIONS & REMINDERS

10 NYCRR Subpart 67-4 Requirements:

- For all outlets that exceed the NYS Action Level action is required. In accordance with the Lead testing in School Drinking Water 10 NYCRR Subpart 67-4, if lead is detected the school is obligated to:
 - Prohibit use of the outlet until a remediation plan is implemented and test results indicate that the lead levels are at or below the action level.
 - o Provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed.
 - Report the 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.
 - The school shall make available the results of all lead testing performed and remediation plans implemented on its website as soon as practicable, but no later than 6 weeks after the school received the laboratory results.

Recommendations:

• If the sink isn't used for consumption or food preparation, in accordance with the

NYS DOH regulation, Lead testing in School Drinking Water -10 NYCRR Subpart 67-4 and the FAQs posted on the NYS DOH website, FAQ #16, it appears that school might meet compliance by simply posting a sign (age appropriate) stating that the water should not be used for drinking or cooking.

- If aerators are present in the affected sinks (lead sediment can build up and leach out and end up in the drinking water), they should be removed cleaned, reinstalled and the fixture should be retested.
- Install a water filter to control the lead concentration and, maintain and replace the filter in accordance with the manufactures requirements/instructions. The process should be documented. The fixture should be retested.
- If a water filter was in use and the unit's lead concentration exceeded the regulatory limit, then the filter should be replaced and the unit retested.

Reminders:

- For results of tests performed before the effective date of these regulations, notify all staff and all persons in parental relation to students within 10 business days of this regulation's effective date, unless written notification has already occurred.
- As soon as practicable but no later than November 11, 2016 schools must report all testing results (whether above or below 15 ppb) to DOH, SED, local health department through the Department's designated statewide electronic reporting system.

 $_{Regulatory} \, \underline{RegCom}_{\, Compliance}$

Laboratory Results for Lead in water

Implementation Guidance for Subpart 67-4 Lead Testing in School Drinking Water (FAQs)

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Client: RegCom

245 Albany Avenue

Thornwood, NY 10594

Date Collected:

09/26/2016

Collected By:

S. Coon 09/26/2016

Date Received: Date Analyzed:

10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Analyte:

Pagate

Analytical Method: EPA 200.9

Pb Water

NYS Lab Number: 10851

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
1 2456572	Room 410 - Sink	Water	0.001 mg/L
2 2456573	Bathroom 408 - Sink #1 (From Left to Right)	Water	0.001 mg/L
3 2456574	Bathroom 408 - Sink #2	Water	BDL < 0.001 mg/L
4 2456575	Bathroom 406 - Sink #1	Water	0.001 mg/L
5 2456576	Bathroom 406 - Sink #2 (From Left to Right)	Water	BDL < 0.001 mg/L
6 2456577	Bathroom 406 - Sink #3	Water	BDL < 0.001 mg/L
7 2456578	Room 405 - Sink	Water	0.003 mg/L
8 2456579	Room 401 - Sink #1	Water	0.021 mg/L
9 2456580	Room 401 - Sink #2	Water	0.001 mg/L

0.002 mg/L

Eastern Analytical Services, Inc.

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Client: RegCom

245 Albany Avenue

Thornwood, NY 10594

Date Collected:

09/26/2016

Collected By:

S. Coon 09/26/2016

Date Received: Date Analyzed:

10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Pagnete

Analyte:

Pb Water

Analytical Method: EPA 200.9 NYS Lab Number: 10851

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
10 2456581	Bathroom 307 - Sink	Water	BDL < 0.001 mg/L
11 2456582	Room 306 - Sink	Water	0.001 mg/L
12 2456583	Room 310 - Main Office - Sink	Water	0.001 mg/L
13 2456584	Room 315 Bathroom - Sink #1	Water	0.005 mg/L
14 2456585	Room 315 Bathroom - Sink #2 (From Left to Right)	Water	0.001 mg/L
15 2456586	Room 315 Bathroom - Sink #3	Water	0.001 mg/L
16 2456587	Bathroom 317 - Sink #1	Water	BDL < 0.001 mg/L
17 2456588	Bathroom 317 - Sink #2	Water	0.001 mg/L

Room 321 - Sink

18

2456589

Water

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Client: RegCom

245 Albany Avenue

Thornwood, NY 10594

Date Collected:

09/26/2016

Collected By:

S. Coon 09/26/2016

Date Received: Date Analyzed:

10/11/2016

Analyzed By: Signature:

Peter P. Argyrakis

Petrogente

Analyte:

Pb Water

Analytical Method: EPA 200.9 NYS Lab Number: 10851

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
19 2456590	Room 320 - Sink	Water	0.001 mg/L
20 2456591	Room 245 - Sink	Water	0.032 mg/L
21 2456592	Room 252 - Breakroom Bathroom - Sink	Water	BDL < 0.001 mg/L
22 2456593	Room 243 - Sink	Water	0.007 mg/L
23 2456594	Auditorium - Sink	Water	0.024 mg/L
24 2456595	Room 242 - Sink	Water	0.001 mg/L
25 2456596	Nurses Office Bathroom - Sink	Water	BDL < 0.001 mg/L
26 2456597	Room 235 - Sink - Bathroom	Water	0.002 mg/L
27 2456598	Room 235 - Sink	Water	0.002 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected: 09/26/2016

Collected By: S. Coon
Date Received: 09/26/2016
Date Analyzed: 10/11/2016
Analyzed By: Peter P. Argyrakis

Signature: Pb Water
Analytical Method: EPA 200.9

NYS Lab Number: 10851

Client:	RegCom
---------	--------

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
28 2456599	Room 236 - Sink - Bathroom	Water	BDL < 0.001 mg/L
29 2456600	Room 236 - Sink	Water	0.001 mg/L
30 2456601	Bathroom in Room 237 - Sink	Water	BDL < 0.001 mg/L
31 2456602	Room 237 - Sink	Water	0.001 mg/L
32 2456603	Room 238 Bathroom - Sink	Water	BDL < 0.001 mg/L
33 2456604	Room 238 - Sink	Water	0.003 mg/L
34 2456605	Bathroom 232 - Sink	Water	BDL < 0.001 mg/L
35 2456606	Room 230 - Sink	Water	BDL < 0.001 mg/L
36 2456607	Room 223 - Sink	Water	0.001 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected: 09/26/2016

Collected By: S. Coon Date Received: 09/26/2016 Date Analyzed: 10/11/2016 Analyzed By: Peter P. Argyrakis

Signature: PArgute Analyte: Pb Water Analytical Method: EPA 200.9 NYS Lab Number: 10851

Client: RegCom

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
37 2456608	Room 226 - Sink	Water	BDL < 0.001 mg/L
38 2456609	Room 228 - Sink	Water	BDL < 0.001 mg/L
39 2456610	Science Room 213 - Table 1 - Outlet Left	Water	0.002 mg/L
40 2456611	Science Room 213 - Table 1 - Right Outlet	Water	0.001 mg/L
41 2456612	Science Room 213 - Table 2 - Left Outlet	Water	0.001 mg/L
42 2456613	Science Room 213 - Table 2 - Right Outlet	Water	0.001 mg/L
43 2456614	Science Room 213 - Table 3 - Left Outlet	Water	0.001 mg/L
44 2456615	Science Room 213 - Table 3 - Right Outlet	Water	BDL < 0.001 mg/L
45 2456616	Science Room 213 - Table 4 - Left Outlet	Water	0.001 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected:

09/26/2016

Collected By:

S. Coon

Date Received: Date Analyzed:

09/26/2016

Analyzed By:

10/11/2016

Signature:

Peter P. Argyrakis

Patrogota

Analyte:

Pb Water

Analytical Method: EPA 200.9 NYS Lab Number: 10851

Client: RegCom

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
46 2456617	Science Room 213 - Table 4 - Right Outlet	Water	0.001 mg/L
47 2456618	Science Room 213 - Table 5 - Left Outlet	Water	BDL < 0.001 mg/L
48 2456619	Science Room 213 - Table 5 - Right Outlet	Water	BDL < 0.001 mg/L
49 2456620	Science Room 213 - Table 6 (Center) - Left Outlet	Water	0.001 mg/L
50 2456621	Science Room 213 - Table 6 (Center) - Right Outlet	Water	BDL < 0.001 mg/L
51 2456622	Room 216 - Sink #1	Water	0.006 mg/L
52 2456623	Room 216 - Sink #2	Water	0.004 mg/L
53 2456624	Room 216 - Sink #3	Water	BDL < 0.001 mg/L
54 2456625	Room 216 - Sink #4	Water	0.009 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected: 09/26/2016

Collected By: S. Coon
Date Received: 09/26/2016
Date Analyzed: 10/11/2016
Analyzed By: Peter P. Argyrakis

Signature: Pb Water
Analytical Method: EPA 200.9

NYS Lab Number: 10851

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
55 2456626	Room 214 - Sink	Water	0.003 mg/L
56 2456627	Boys Room - Adjacent to 208 - Sink 1	Water	0.001 mg/L
57 2456628	Boys Room - Adjacent to 208 - Sink 2	Water	BDL < 0.001 mg/L
58 2456629	Boys Room - Adjacent to 208 - Sink 3	Water	0.001 mg/L
59 2456630	Mens Room 208 - Sink	Water	BDL < 0.001 mg/L
60 2456631	Girls Room - Near 207 - Sink 1	Water	BDL < 0.001 mg/L
61 2456632	Girls Room - Near 207 - Sink 2	Water	0.001 mg/L
62 2456633	Girls Room - Near 207 - Sink 3	Water	BDL < 0.001 mg/L
63 2456634	Women's Room #207 - Sink	Water	0.007 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected:

09/26/2016

Collected By:

S. Coon 09/26/2016

Date Received: Date Analyzed:

10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Pagnite

Analyte:

Pb Water Analytical Method: EPA 200.9

NYS Lab Number: 10851

Client: RegCom

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
64 2456635	Women's Room Left of Room 207 - Sink	Water	BDL < 0.001 mg/L
65 2456636	Room 203 - Sink	Water	BDL < 0.001 mg/L
66 2456637	Room 204 - Sink	Water	BDL < 0.001 mg/L
67 2456638	Room 202 - Sink	Water	0.001 mg/L
68 2456639	Room 201 - Sink	Water	0.001 mg/L
69 2456640	Room 101 - Sink 1 - Bathroom	Water	0.001 mg/L
70 2456641	Room 101 - Sink 2 - Kitchen	Water	0.001 mg/L
71 2456642	Room 101 #3 - Sink	Water	0.001 mg/L
72 2456643	Room 101 #4 - Sink	Water	BDL < 0.001 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected:

09/26/2016

Collected By:

S. Coon 09/26/2016

Date Received: Date Analyzed:

10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Page 1

Analyte:

Pb Water

Analytical Method: EPA 200.9 NYS Lab Number: 10851 Client: RegCom

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
73 2456644	Room 103 - Sink #1 - Bathroom	Water	0.001 mg/L
74 2456645	Room 103 - Sink #2	Water	BDL < 0.001 mg/L
75 2456646	Room 106 Bathroom - Sink 1	Water	0.002 mg/L
76 2456647	Room 106 - Sink 2	Water	BDL < 0.001 mg/L
77 2456648	Room 105 Bathroom - Sink 1	Water	0.001 mg/L
78 2456649	Room 105 Classroom - Sink	Water	0.001 mg/L
79 2456650	Room 107 Bathroom - Sink	Water	0.002 mg/L
80 2456651	Room 107 Classroom - Sink	Water	0.005 mg/L
81 2456652	Room 108 Bathroom - Sink	Water	0.001 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Client: RegCom

245 Albany Avenue

Thornwood, NY 10594

Date Collected:

09/26/2016

Collected By:

S. Coon

Date Received: Date Analyzed:

09/26/2016 10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Analyte:

Pagnite

Analytical Method: EPA 200.9

Pb Water

NYS Lab Number: 10851

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
82 2456653	Room 109 Classroom - Sink	Water	0.001 mg/L
83 2456654	Water Fountain/Spigot by Field	Water	0.008 mg/L
84 2456655	Garage Water Outlet	Water	BDL < 0.001 mg/L
85 2456656	Room 116 - Sink	Water	0.144 mg/L
86 2456657	Bathroom 117 - Sink #1	Water	BDL < 0.001 mg/L
87 2456658	Bathroom 117 - Sink #2	Water	0.001 mg/L
88 2456659	Bathroom 118 - Sink #1	Water	BDL < 0.001 mg/L
89 2456660	Bathroom 118 - Sink #2	Water	BDL < 0.001 mg/L
90 2456661	Bathroom in Room 114 - Sink	Water	0.005 mg/L

Water Sample Report

RE: CPN PH-111X -1G-IH - Pocantico Hills

Date Collected:

09/26/2016

Collected By:

S. Coon

Date Received:
Date Analyzed:

09/26/2016 10/11/2016

Analyzed By:

Peter P. Argyrakis

Signature:

Physical

Analyte:

Pb Water

Analytical Method: EPA 200.9 NYS Lab Number: 10851

Client:	RegCom
---------	--------

Sample ID# / Lab ID#	Sample Location	Sample Notes	Concentration
91 2456662	Girls Locker Room 114A - Sink 1	Water	BDL < 0.001 mg/L
92 2456663	Girls Locker Room 114A - Sink 2	Water	BDL < 0.001 mg/L
93 2456664	Boys Locker Room 113A - Sink 1	Water	BDL < 0.001 mg/L
94 2456665	Boys Locker Room 113A - Sink 2	Water	BDL < 0.001 mg/L
95 2456666	Room 113 - Sink	Water	0.022 mg/L
96 2456667	Pool House - Sink	Water	0.002 mg/L
97 2456668	Not Applicable	Water Blank	BDL < 0.001 mg/L