



## Sullivan County Board of Cooperative Educational Services

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### Health and Safety Report

District	Location	Project #
Sullivan West CS	High School	037-1617
Site Visit Date(s)	Investigation type	Investigator(s)
10/8/16-10/13/16	Lead in water	Jesse Morrill

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## **Project summary**

At the request of the Sullivan West Central School District, Sullivan County BOCES Health and Safety conducted testing for lead in drinking water at their High School buildings in accordance with emergency regulation titled: *Lead Testing in School Drinking Water* 10 NYCRR Subpart 67-4.

This regulation requires school districts and boards of cooperative education services (BOCES) with municipal water supplies, and those classified as *public water systems under* 10 NYCRR Subpart 5-1, to test potable water outlets for the presence of lead contamination. This regulation is largely consistent with the Environmental Protection Agency's (EPA's) existing guidelines titled: *3Ts for Reducing Lead in Drinking Water in Schools* however there are some important differences. The EPA's guidance document recommends a 1<sup>st</sup> and 2<sup>nd</sup> draw testing process, while the NYS regulation requires only 1<sup>st</sup> draw sample collection. The *action level* falls from 20 parts per billion (ppb) to 15 ppb under the NYS regulation. Additionally, the EPA guideline states that "if possible, every outlet used for drinking or cooking should be sampled" (Agency, 2006). The NYS regulation requires testing at "potable water fixtures currently or potentially used for drinking or cooking purposes" (Official Compilation of Codes, 2016). This has been interpreted by the NYS Dept of Health to include water outlets such as bathroom handwashing sink and outside faucets.

On October 8<sup>th</sup>, 2016 a total of 181 samples were collected from potable water outlets. In order to ensure samples are representative of the water that building occupants would typically consume, the district made arrangement for water to be motionless in the building's plumbing system for a period of time no less than 8 hours or more than 18 hours. Samples were collected in wide mouth 250 ml

containers provided by EnviroTest Laboratories in Newburgh, NY, and all samples were delivered to the lab on the date of collection. EnviroTest Laboratories is NYS ELAP-approved (#10142) for potable and non-potable water analysis.

## **Results**

Subpart 67-4 requires a response for any plumbing outlet that exceeds the *action level of 15 micrograms per liter (mcg/L) or 15 part per billion (ppb)*. Lab results indicated that 38 fixture(s) had lead levels above the action level.

Sample ID	ppb	Restroom sink	Classroom sink	fountain	Slop sink	Outside faucet	Hand wash
009	24.2				✗		
158	41	✗					
114	19.5	✗					
115	16.2	✗					
116	39.2	✗					
130	25.3		✗				
140	15.1	✗					
130A	73.5		✗				
130B	39.9		✗				
004B	151						✗
053	32.8		✗				
052	22.2		✗				
051	18.1		✗				
050	42.1		✗				

049	60.3		×				
046	046		×				
045	17.2		×				
044	25.8		×				
041	46.5		×				
064	18.4		×				
058	16.7		×				
025	76.5			×			
023	33.8	×					
022	34.7	×					
021	33.7	×					
020	38.2	×					
019	53.2	×					
018	66.8	×					
094	60.9		×				
093	22.2		×				
089	17		×				
087	294		×				
086	15.8		×				
083	28.2		×				
081	62.1		×				
169	51.2					×	
170	28					×	
171	21.8					×	

This was reported to the district as soon as the lab results became available. See attached document from EnviroTest Laboratories titled *Analytical Report* (job number: 420-111608-1, 420-111818-1) for the full lab results.

### **Recommendations**

Approved *response actions* for outlets exceeding the *action level* under Subpart 67-4 includes taking the outlet out of service while a remediation plan is implemented and follow up testing is conducted to ensure lead levels are below the action level. When a drinking or cooking outlet is taken out of service, the district shall provide an alternative water source while remedial actions are taking place.

The NYS Department of Health allows outlets used for cleaning and handwashing to remain in service provided that a sign be posed indicating that the outlet is not to be used for drinking water. The signage should include a picture and staff should be informed to enforce the restriction. This is considered a short term solution and corrective action will still need to be taken.

### **Reporting/ record keeping requirements provided by NYS Dept. of Health**

Posting lab results on school website:

- Schools must post their lab results on their school website as soon as practical, but within 6 weeks of receiving the lab reports. We encourage schools to provide as much detail information as they can on their website, regarding the test results.

Reporting result information in the statewide electronic reporting system (SERS):

- Schools must report *data relating to test results* in the SERS as soon as practical, but within 10 business days of receiving the lab reports

When an action level is exceeded:

- Schools must notify the local health department within 1 business day after receiving lab report.
- School must notify all school community (staff, parents/guardians) IN WRITING within 10 business days of receiving lab reports

If the school performed testing/remediation prior to Sept. 6, 2016:

- School must provide written notification of the results/remediation within 10 business days of the effective date (9/6/2016) –which was September 20<sup>th</sup>.

Record Retention: 10 years

- Schools must retain on site records of test results; lead remediation plans, “lead-free” plumbing determinations and waiver requests and approvals for 10 years following document creation.

(Health, September 23, 2016)

## References:

Agency, U. E. (2006). *3T,s for Reducing Lead in Drinking Water in School*. Washington DC: United States Environmental Protection Agency.

Health, N. D. (September 23, 2016). *Lead Testing in School Drinking Water*. Albany, NY: NYS Dept of Health.

Official Compilation of Codes, R. a. (2016). *Lead Testing in School Drinking Water*. Albany, NY: Commissioner of Health.

## Appendix A

Sample #	Date	Time	AREA	250 ml HNO3	Analysis Requested
001	10/8/16	9AM	Kitchen- hands free sink by storage closet		LEAD
002	10/8/16		Kitchen- sink between coolers		
003	10/8/16		Kitchen- sink by faculty door		
004	10/8/16		Kitchen-sink by dish washer		
004A	10/8/16		Kitchen- hand wash sink near dishwasher		
004B	10/8/16		Kitchen- hand wash sink near icemaker		
004C	10/8/16		Kitchen- pot fill outlet (right side)		
004D	10/8/16		Kitchen- pot fill outlet (left side)		
004E	10/8/16		Kitchen- island sink near stove		
004F	10/8/16		Kitchen- island sink near serving line		
005	10/8/16		Kitchen- icemaker		
006	10/8/16		151 faculty dining off of café		
007A	10/8/16		Cafeteria- men's restroom left sink		
007B	10/8/16		Cafeteria- men's restroom right sink		
008A	10/8/16		Cafeteria- girls restroom left sink		
008B	10/8/16		Cafeteria- girls restroom right sink		
009	10/8/16		Cafeteria- j102 janitor's sink		
009A	10/8/16		Cafeteria- left side water fountain		
009B	10/8/16		Cafeteria- right side water fountain		
010	10/8/16		Kitchen- restroom sink		
011	10/8/16		Kitchen- janitor's sink		
011A	10/8/16		Loading dock spigot		
012	10/8/16		Men's restroom sink- counseling wing		
013	10/8/16		Women's restroom sink- counseling wing		
015	10/8/16		Teacher's lounge main office wing		
016	10/8/16		Nurse's sink room 120		
017	10/8/16		Nurse's bathroom sink room 120		
018	10/8/16		Boys lobby restroom right sink		
019	10/8/16		Boys lobby restroom middle sink		
020	10/8/16		Boys lobby restroom left sink		
021	10/8/16		Girls lobby restroom right sink		
022	10/8/16		Girls lobby restroom middle sink		
023	10/8/16		Girls lobby restroom left sink		
024	10/8/16		1 <sup>st</sup> floor lobby- right side water fountain		
025	10/8/16		1 <sup>st</sup> floor lobby- left side water fountain		
026	10/8/16		Faculty restroom sink right- across from room 120		
028	10/8/16		Faculty restroom sink left- across from room 120		
029	10/8/16		J101 janitor's sink		
030	10/8/16		J102 janitor's sink		
031	10/8/16		Teacher's lounge room 133		
032	10/8/16		Boys restroom near room 133- right sink		
033	10/8/16		Boys restroom near room 133- middle sink		

034	10/8/16		Boys restroom near room 133- left sink		
035	10/8/16		Girls restroom near room 133- left sink		
035A	10/8/16		Girls restroom near room 133- middle sink		
035B	10/8/16		Girls restroom near room 133- right sink		
036	10/8/16		1 <sup>st</sup> floor- right fountain across from room 133		
037	10/8/16		1 <sup>st</sup> floor- left fountain across from room 133		
038	10/8/16		1 <sup>st</sup> floor faculty restroom right sink		
039	10/8/16		1 <sup>st</sup> floor faculty restroom left sink		
040	10/8/16		Room 135- sink		
041	10/8/16		Room 137- back row hall side right sink		
042	10/8/16		Room 137- back row hall side left sink		
043	10/8/16		Room 137- middle back row right side		
044	10/8/16		Room 137- middle back row left sink		
045	10/8/16		Room 137- back row window side right sink		
046	10/8/16		Room 137- back row window side left sink		
047	10/8/16		Room 137- front row hall side right sink		
048	10/8/16		Room 137- front row hall side left sink		
049	10/8/16		Room 137- middle front row right sink		
050	10/8/16		Room 137- middle front row left sink		
051	10/8/16		Room 137- front row window side right sink		
052	10/8/16		Room 137- front row window side left sink		
053	10/8/16		Room 137- sink near teacher's desk		
054	10/8/16		Room 138- back row window side right sink		
055	10/8/16		Room 138- back row window side left sink		
056	10/8/16		Room 138- back middle row right side sink		
057	10/8/16		Room 138- back middle row left side sink		
058	10/8/16		Room 138- back row hall side right sink		
059	10/8/16		Room 138- back row hall side left sink		
060	10/8/16		Room 138- first row window side right sink		
061	10/8/16		Room 138- first row window side left sink		
062	10/8/16		Room 138- first row middle right sink		
063	10/8/16		Room 138- first row middle left sink		
064	10/8/16		Room 138- first row hall side right sink		
065	10/8/16		Room 138- first row hall side left sink		
066	10/8/16		Room 138- teacher's desk sink		
067	10/8/16		Room 139- sink		
068	10/8/16		Room 140- sink		
069	10/8/16		Room 142- back row right side right sink		
070	10/8/16		Room 142- back row right side left sink		
071	10/8/16		Room 142- back row middle right sink		
072	10/8/16		Room 142- back row middle left sink		
073	10/8/16		Room 142- back row left side- right sink by window		
074	10/8/16		Room 142- back row left side- left sink by window		
075	10/8/16		Room 142- front row right side- right sink		
076	10/8/16		Room 142- front row right side- left sink		



077	10/8/16		Room 142- front row middle- right sink		
078	10/8/16		Room 142- front row middle- left sink		
079	10/8/16		Room 142- window side right sink		
080	10/8/16		Room 142- window side left sink		
081	10/8/16		Room 142- teacher's desk		
082	10/8/16		Room 141- back row window side-right sink		
083	10/8/16		Room 141- back row window side-left sink		
084	10/8/16		Room 141- middle back row-right sink		
085	10/8/16		Room 141- middle back row-left sink		
086	10/8/16		Room 141- back row hallway side- right sink		
087	10/8/16		Room 141- back row hallway side-left sink		
088	10/8/16		Room 141- first row by window right side		
089	10/8/16		Room 141- first row by window left side		
091	10/8/16		Room 141- first row middle-left side sink		
092	10/8/16		Room 141- first row right side sink		
093	10/8/16		Room 141- first row left side sink		
094	10/8/16		Room 141- teacher's desk sink		
095	10/8/16		Room 255- library break room sink		
096	10/8/16		Boys restroom near room 223- left sink		
097	10/8/16		Boys restroom near room 223- middle sink		
098	10/8/16		Boys restroom near room 223- right sink		
099	10/8/16		Girls restroom near room 223- left sink		
100	10/8/16		Girls restroom near room 223- middle sink		
101	10/8/16		Girls restroom near room 223- right sink		
102	10/8/16		Water fountain across from room 223- left side		
103	10/8/16		Water fountain across from room 223- right side		
104	10/8/16		Faculty restroom across from room 223- right sink		
105	10/8/16		Faculty restroom across from room 223- left sink		
106	10/8/16		2 <sup>nd</sup> floor janitor's sink		
107	10/8/16		Room 224- classroom sink		
108	10/8/16		Room 224- bathroom sink		
109	10/8/16		Room 231- island sink		
110	10/8/16		Room 231- hall side- left sink		
111	10/8/16		Room 231- 2 <sup>nd</sup> sink in from hall side		
112	10/8/16		Room 231- 2 <sup>nd</sup> sink in from window side		
113	10/8/16	1PM	Room 231- sink by window		
114	10/8/16		Superintendent's office- restroom left side sink		
115	10/8/16		Superintendent's office- restroom middle sink		
116	10/8/16		Superintendent's office- restroom right side sink		
120	10/8/16		Superintendent's office sink		
121	10/8/16		Faculty restroom next to superintendent's office- right side sink		
122	10/8/16		Faculty restroom next to superintendent's office- left side sink		
123	10/8/16		Room 236 hall side- sink facing left side		
124	10/8/16		Room 236 hall side- sink facing right side		

125	10/8/16		Room 236 window side- sink facing right side		
126	10/8/16		Room 236 window side- sink facing left side		
127	10/8/16		Room 235- sink facing left		
128	10/8/16		Room 235- sink facing right		
130	10/8/16		Room 235- darkroom right sink		
130A	10/8/16		Room 235- darkroom left sink		
130B	10/8/16		Room 235- darkroom middle sink		
131	10/8/16		Concession stand sink- by girls locker room		
132	10/8/16		Concession stand by girls locker room- restroom left sink		
133	10/8/16		Concession stand by girls locker room- restroom right sink		
135	10/8/16		Room 288- restroom sink		
136	10/8/16		Girls locker room right side- left sink		
137	10/8/16		Girls locker room right side- middle sink		
138	10/8/16		Girls locker room right side- right sink		
139	10/8/16		Girls locker room left side- left side		
140	10/8/16		Girls locker room left side- middle sink		
141	10/8/16		Girls locker room left side- right sink		
142	10/8/16		Ice machine by locker rooms		
142A	10/8/16		Slop sink near ice machine		
143	10/8/16		Room 284- restroom sink		
144	10/8/16		Boys locker room right side- left sink		
145	10/8/16		Boys locker room right side- right sink		
146	10/8/16		Boys locker room left side- right sink		
147	10/8/16		Boys locker room left side- left sink		
148	10/8/16		Room 283- restroom sink		
150	10/8/16		Water fountain outside weight room- left side		
151	10/8/16		Water fountain outside weight room- right side		
152	10/8/16		Water fountain outside of gym- left side		
153	10/8/16		Water fountain outside of gym- right side		
154	10/8/16		Girls auditorium restroom- left sink		
155	10/8/16		Girls auditorium restroom- middle sink		
156	10/8/16		Girls auditorium restroom- right sink		
157	10/8/16		Boys auditorium restroom- left sink		
158	10/8/16		Boys auditorium restroom- middle sink		
159	10/8/16		Boys auditorium restroom- right sink		
160	10/8/16		Janitor's sink near shop		
161	10/8/16		Room 272 shop sink		
162	10/8/16		Water fountain outside of shop- left side		
163	10/8/16		Water fountain outside of shop- right side		
164	10/8/16		Room 272 sink		
165	10/8/16		Room 272 restroom sink		
166	10/8/16		Restroom sink outside of room 272		

Sample #	Date	Time	AREA	250 ml HNO3	Analysis Requested
167	10/13/16	10:45	Outside faucet by door #20 (next to band room)		LEAD
168	10/13/16	10:48	Outside faucet by door #16 (next to first floor conference room)		
169	10/13/16	10:50	Outside faucet in front of cafeteria (front of school)		
170	10/13/16	10:51	Outside faucet by door #3 (side of cafeteria)		
171	10/13/16	10:55	Outside faucet by door #11 (by first floor science labs)		
172	10/13/16	10:57	Outside faucet by door #36 (outside concession stand)		
173	10/13/16	10:59	Outside faucet by door #28 (by weight room entry)		
174	10/13/16	11:03	Sink inside concession stand by auditorium		