Sullivan County Board of Cooperative Educational Services

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Health and Safety Report

District	Location	Project #
Fallsburg CS	Jr/ Sr. High School	036-1617
Site Visit Date(s)	**Investigation type**	**Investigator(s)**
10/6/16	Lead in water	Jesse Morrill

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Project summary

At the request of the Fallsburg Central School District, Sullivan County BOCES Health and Safety conducted testing for lead in drinking water at their Jr/Sr. 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 Protections 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 1st and 2nd draw testing process, while the NYS regulation requires only 1st 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 6th, 2016 a total of 96 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 39 fixture(s) had lead levels above the action level.

Sample ID	ppb	Bathroom sink	room sink	Hose bib	Slop sink	Cooking outlet	Lab sink
023-S1	19.3	✖					
023-S3	15.3	✖					
203-S1	26.2						✖
203-S2	17.3						✖
203-S3	24						✖
203-S4	42.4						✖
203-S5	36.9						✖
203-S6	75.9						✖
203-S7	15.6						✖
203-S8	50.8						✖
203-S9	20.1						✖
203-S10	18.1						✖

012-S1	30.1	✖					
308-S2	32.7	✖					
318-S3	106	✖					
401-S1	29.6						✖
401-S2	18.7						✖
401-S5	23.1						✖
401-S6	48.8						✖
401-S8	26.2						✖
401-S9	46.1						✖
401-S10	30.5						✖
405-S1	121						✖
405-S2	219						✖
405-S3	77.9						✖
405-S4	117						✖
405-S5	19.9						✖
405-S7	26						✖
405-S8	47.4						✖
405-S9	29.8						✖
405-S10	18.6						✖
405-S11	23.8						✖
405-S12	23.8						✖
405-S13	35.7						✖
405-S14	18.1						✖
405-S15	47.5						✖

405-S16	156						✖
HB-2	36.2			✖			
320-S1	18.9		✖				

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: 420-111451-1) 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 20th.

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
007-S1	10/6/16	6am	RM 007- LEFT SINK		LEAD
007-S2	10/6/16		RM 007- RIGHT SINK		
011-S1	10/6/16		RM 011- LEFT SINK		
011-S2	10/6/16		RM 011- RIGHT SINK		
012-S1	10/6/16		RM 012- LEFT FIXTURE		
012-S2	10/6/16		RM 012- MIDDLE LEFT FIXTURE		
012-S3	10/6/16		RM 012- MIDDLE RIGHT FIXTURE		
012-S4	10/6/16		RM 012- RIGHT FIXTURE		
GLR-S1	10/6/16		GIRLS LOCKER ROOM- LEFT SINK		
GLR-S2	10/6/16		GIRLS LOCKER ROOM- RIGHT SINK		
BLR-S1	10/6/16		BOYS LOCKER ROOM- LEFT SINK		
BLR-S2	10/6/16		BOYS LOCKER ROOM- RIGHT SINK		
023-S1	10/6/16		RM 023- LEFT SINK		
023-S2	10/6/16		RM 023- RIGHT SINK		
023-S3	10/6/16		RM 023- SINGLE SINK		
101-S1	10/6/16		RM 101- LEFT SINK		
101-S2	10/6/16		RM 101- RIGHT SINK		
104-S1	10/6/16		RM 104- LEFT SINK		
104-S2	10/6/16		RM 104- RIGHT SINK		
107-S1	10/6/16		RM 107- LEFT SINK		
107-S2	10/6/16		RM 107- MIDDLE LEFT SINK		
107-S3	10/6/16		RM 107- MIDDLE SINK		
107-S4	10/6/16		RM 107- MIDDLE RIGHT SINK		
107-S5	10/6/16		RM 107- RIGHT SINK		
GGLR-S1	10/6/16		GIRLS LOCKER (G)- COACHES OFFICE SINK		
GGLR-S2	10/6/16		GIRLS LOCKER (G)- LEFT SINK		
GGLR-S3	10/6/16		GIRLS LOCKER (G)- RIGHT SINK		
BGLR-S1	10/6/16		BOYS LOCKER (G)- COACHES OFFICE SINK		
BGLR-S2	10/6/16		BOYS LOCKER (G)- LEFT SINK		
BGLR-S3	10/6/16		BOYS LOCKER (G)- RIGHT SINK		
203-S1	10/6/16		RM 203- TEACHERS DESK SINK		
203-S2	10/6/16		RM 203- LEFT SINK - WINDOW		
203-S3	10/6/16		RM 203- LEFT SINK		
203-S4	10/6/16		RM 203- MIDDLE LEFT SINK- WINDOW		
203-S5	10/6/16		RM 203- MIDDLE LEFT SINK		
203-S6	10/6/16		RM 203- MIDDLE RIGHT SINK- WINDOW		
203-S7	10/6/16		RM 203- MIDDLE RIGHT SINK		

203-S8	10/6/16		RM 203- RIGHT SINK- WINDOW		
203-S9	10/6/16		RM 203- RIGHT SINK		
203-S10	10/6/16		RM 203- RIGHT SINGLE		
207-S1	10/6/16		RM 207- LEFT SINK		
207-S2	10/6/16		RM 207- MIDDLE LEFT SINK		
207-S3	10/6/16		RM 207- MIDDLE RIGHT SINK		
207-S4	10/6/16		RM 207- RIGHT SINK		
211-S1	10/6/16		RM 211- LEFT SINK		
211-S2	10/6/16		RM 211- RIGHT SINK		
213-S1	10/6/16		RM 213- LEFT SINK		
213-S2	10/6/16		RM 213- RIGHT SINK		
308-S1	10/6/16		RM 208- BATHROOM SINK		
308-S2	10/6/16		RM 208- SINGLE SINK		
316-S1	10/6/16		RM 316- LEFT SINK		
316-S2	10/6/16		RM 316- MIDDLE SINK		
316-S3	10/6/16		RM 316- RIGHT SINK		
318-S1	10/6/16		RM 318- LEFT SINK		
318-S2	10/6/16		RM 318- MIDDLE SINK		
318-S3	10/6/16		RM 318- RIGHT SINK		
401-S1	10/6/16		RM 401- LEFT SINK- WINDOW		
401-S2	10/6/16		RM 401- LEFT SINK		
401-S3	10/6/16		RM 401- MIDDLE LEFT SINK- WINDOW		
401-S4	10/6/16		RM 401- MIDDLE LEFT SINK		
401-S5	10/6/16		RM 401- MIDDLE SINK- WINDOW		
401-S6	10/6/16		RM 401- MIDDLE SINK		
401-S7	10/6/16		RM 401- MIDDLE RIGHT SINK- WINDOW		
401-S8	10/6/16		RM 401- MIDDLE RIGHT SINK		
401-S9	10/6/16		RM 401- RIGHT SINK- WINDOW		
401-S10	10/6/16		RM 401- RIGHT SINK		
405-S1	10/6/16		See map RM 405		
405-S2	10/6/16		See map RM 405		
405-S3	10/6/16		See map RM 405		
405-S4	10/6/16		See map RM 405		
405-S5	10/6/16		See map RM 405		
405-S6	10/6/16		See map RM 405		
405-S7	10/6/16		See map RM 405		
405-S8	10/6/16		See map RM 405		
405-S9	10/6/16		See map RM 405		
405-S10	10/6/16		See map RM 405		
405-S11	10/6/16		See map RM 405		
405-S12	10/6/16		See map RM 405		
405-S13	10/6/16		See map RM 405		
405-S14	10/6/16		See map RM 405		
405-S15	10/6/16		See map RM 405		
405-S16	10/6/16		See map RM 405		
416-S1	10/6/16		RM 416- LEFT SINK		

416-S2	10/6/16		RM 416- MIDDLE SINK		
416-S3	10/6/16		RM 416- RIGHT SINK		
418-S1	10/6/16		RM 418- LEFT SINK		
418-S2	10/6/16		RM 418- MIDDLE SINK		
418-S3	10/6/16		RM 418- RIGHT SINK		
HB-1	10/6/16	7:30AM	OUTSIDE FAUCET NEAR BUSINESS OFFICE		

Appendix B

High School room 405 sample map