



Sullivan County Board of Cooperative Educational Services

6 Wierk Avenue • Liberty, NY 12754-2116

Tel 845-295-4000 • Fax 845-292-8694

Health and Safety Report

District	Location	Project #
Fallsburg	Elementary, Jr./ Sr. High Schools	071-1617
Site Visit Date(s)	Investigation type	Investigator(s)
5/3/17	Lead in water re-test	Jesse Morrill

Table of Contents

Project summary	2-3
Results	3-4
Recommendations	4
Reporting/ Record Keeping	4-5

Project summary

At the request of the Fallsburg Central School District, Sullivan County BOCES Health and Safety conducted re-testing for lead in drinking water at their Elementary and Jr./Sr. High schools 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 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 May 3rd, 2017 a total of 38 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).

FIXTURE ID	PPB/ INITIAL TEST	DATE OF INITIAL TEST	*CORRECTIVE ACTION	DATE OF RETEST	PPB/ 2 ND TEST (1 ST DRAW)
012-S1	30.1	10/31/16	REPLACEMENT	5/3/17	49.1
023-S1	19.3	10/31/16	REMOVED	5/3/17	N/A
023-S3	15.3	10/31/16	REMOVED	5/3/17	N/A
203-S1	26.2	10/31/16	REPLACEMENT		
203-S2	17.3	10/31/16	REPLACEMENT	5/3/17	1.58
203-S3	24	10/31/16	REPLACEMENT	5/3/17	3.84
203-S4	42.4	10/31/16	REPLACEMENT	5/3/17	<1
203-S5	36.9	10/31/16	REPLACEMENT	5/3/17	2.47
203-S6	75.9	10/31/16	REPLACEMENT	5/3/17	2.19
203-S7	15.6	10/31/16	REPLACEMENT	5/3/17	376
203-S8	50.8	10/31/16	REPLACEMENT	5/3/17	2.16
203-S9	20.1	10/31/16	REPLACEMENT	5/3/17	1.88
203-S10	18.1	10/31/16	REPLACEMENT	5/3/17	22.9
308-S2	32.7	10/31/16	REPLACEMENT	5/3/17	2.59
318-S3	106	10/31/16	REPLACEMENT	5/3/17	433
401-S1	29.6	10/31/16	REPLACEMENT	5/3/17	3.05
401-S2	18.7	10/31/16	REPLACEMENT	5/3/17	2.91
401-S5	23.1	10/31/16	REPLACEMENT	5/3/17	3.22

401-S6	48.8	10/31/16	REPLACEMENT	5/3/17	4.5
401-S8	26.2	10/31/16	REPLACEMENT	5/3/17	37.3
401-S9	46.1	10/31/16	REPLACEMENT	5/3/17	1.73
401-S10	30.5	10/31/16	REPLACEMENT	5/3/17	12.4
405-S1	121	10/31/16	REPLACEMENT	5/3/17	4.7
405-S2	219	10/31/16	REPLACEMENT	5/3/17	10.1
405-S3	77.9	10/31/16	REPLACEMENT	5/3/17	6.66
405-S4	117	10/31/16	REPLACEMENT	5/3/17	2.47
405-S5	19.9	10/31/16	REPLACEMENT	5/3/17	9.37
405-S6	2.82	10/31/16	REPLACEMENT	5/3/17	<1
405-S7	26	10/31/16	REPLACEMENT	5/3/17	<1
405-S8	47.4	10/31/16	REPLACEMENT	5/3/17	<1
405-S9	29.8	10/31/16	REPLACEMENT	5/3/17	<1
405-S10	18.6	10/31/16	REPLACEMENT	5/3/17	3.55
405-S11	23.8	10/31/16	REPLACEMENT	5/3/17	2.47
405-S12	16.3	10/31/16	REPLACEMENT	5/3/17	8.54
405-S13	35.7	10/31/16	REPLACEMENT	5/3/17	2.09
405-S14	18.1	10/31/16	REPLACEMENT	5/3/17	4.04
405-S15	47.5	10/31/16	REPLACEMENT	5/3/17	12
405-S16	156	10/31/16	REPLACEMENT	5/3/17	5.49
320-S1	18.9	10/31/16	(NO SAMPLE- LEAKING)		
HB-1	6.78	10/31/16	REPLACEMENT	5/3/17	4.19
HB-2	36.2	10/31/16	REPLACEMENT		
BB5-1 (ES)	29.1	9/28/16	REPLACEMENT	5/3/17	1.21

*maintenance- cleaning or replacement of aerators and/or screens
replacement- plumbing components changed (faucets, valves, fittings, etc.)
removed- plumbing fixture has been eliminated

See attached document from EnviroTest Laboratories titled *Analytical Report* (job number: 420-120335-1) 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.