

May 14, 2021

Mr. Jerome Lee Yaw
Frewsburg Central School District
Business Manager
26 Institute Street
Frewsburg, New York 14738

RE: Follow-Up Sampling of Drinking Water for Lead Concentrations

Dear Mr. Lee Yaw:

Included with this letter is Stohl Environmental LLC's report for the follow-up Water Sampling performed at the educational buildings of the Frewsburg Central School District, including:

- Middle & High School – 26 Institute Street, Frewsburg, New York.

This report is prepared to assist the District in complying with the requirements of NYS regulations, *SUBPART 67-4: Lead Testing in School Drinking Water*, by identifying the sources of potable water with lead concentrations greater than the NYS "Action Level of 15 parts per billion (ppb)".

Recap of Initial Sampling and Analysis: In Compliance with NYS regulations, initial first draw water sampling was completed on October 19, 2020 and a total of 23 samples were identified as containing lead concentrations above the NYS Action Level of 15 ppb.

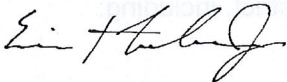
Mitigation by District and Follow-up Sampling by Stohl Environmental LLC:

- Following the receipt of initial sampling results, in accordance with guidance received from NYS, the District is reported to have prohibited use of the outlets analyzed as above the NYS Action Level of 15 ppb "(1) a lead remediation plan is implemented... and (2) test results indicate that the lead levels are at or below the action level".
- Subsequent to reported mitigation by the District, Stohl Environmental LLC was requested to perform follow-up sampling and laboratory analysis.
- Follow-up sampling was performed by Stohl Environmental LLC in accordance with the requirements and protocols outlined in NYS regulations, as well as USEPA Technical Guidance Document "3-T's for Reducing Lead in Drinking Water in Schools".
- Results of Follow-up Sampling: As detailed in Section 1.2 (*Executive Summary*) of the accompanying report, based upon the follow-up sampling and analysis performed, the following is reported:
 - Of the 23 outlets identified as above the action level in the initial investigation report dated November 30, 2021:

- 13 outlets were re-sampled on February, 27, 2021 and analyzed by a certified and independent laboratory as at or below the action level; thus cleared for use.
- 11 outlets were re-sampled on February, 27, 2021 and analyzed by a certified and independent laboratory as above action level; therefore, it is recommended that the District continue to prohibit use of the outlet until further mitigation and additional sampling and analysis is performed.

Thank you for the opportunity to be of service to Frewsburg Central School District.

Sincerely,
Stohl Environmental, LLC.



Eric Henderson Jr.
Senior Project Manager

**Follow-Up Investigation and Sampling
Of Sources of Potable Water
For Lead Concentrations**

Prepared for:

Frewsburg Central School District

Prepared by:



3860 California Road, Orchard Park, New York 14127
PHONE (716) 312-0070 FAX (716) 312-8092
WWW.STOHLENVIRONMENTAL.COM

Middle School/High School

Conditions as of February 27, 2021

Summary Tabulation

Lead in Drinking Water Investigation

- 1.1. Scope of Work and Sampling Protocol
- 1.2. Executive Summary of Sampling and Analysis
- 1.3. Response Actions Required Under NYS Regulations
- 1.4. Laboratory Analytical Reports by Building
- 1.5. Laboratory Certifications
- 1.6. Chains of Custody

1.1 Sampling Protocol and Summary of Results:

Stohl Environmental was retained by Frewsburg Central School District to perform follow-up sampling and analysis of potable water outlets that were identified in report dated November 30, 2020 as having lead concentrations greater than the NYS action level of 15 ppb. Sampling was performed in the following buildings:

- Middle & High School – 26 Institute Street, Frewsburg, New York.

Scope of Work:

Stohl Environmental was charged with collecting follow-up water samples from outlets which previously were analyzed as having lead concentrations above 15 ppb in the Middle & High School. Outlets are defined in NYS regulations as: “a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, or faucets”.

Sampling Protocol:

In accordance with NYS regulations, *Subpart 67-4: Lead Testing in School Drinking Water*, and the EPA guidance document, *‘3Ts for Reducing Lead in Drinking Water in Schools’*, Stohl Environmental’s protocol can be summarized as follows:

- **Follow-up Samples** were collected to verify initial findings of lead contaminations, to assist in problem assessment to determine remediation, and/or verify that lead levels are at or below action level post-remediation. Confirmatory samples were collected as follows:
 - **Follow-up First-Draw samples** of 250 milliliters (mL) were collected from cold water outlets before any water was used. Sampling was coordinated with District representatives to assure that water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours before sample collection.
 - **To supplement follow-up first draw samples, in some instances, Flush samples** of 250 mL were collected from cold water outlets after the outlet was run for 30 seconds before any water was used or following a second first-draw sample at the same outlet. Sampling was coordinated with District representatives to assure that water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours before sample collection.
 - **Laboratory Analysis:** Samples were submitted following strict chain-of-custody protocols to an independent laboratory approved by the NYS Department of Health’s Environmental Laboratory Approval Program (ELAP).

1.2 Executive Summary of Sampling and Analysis:

Total Number of Samples Collected by Building Classified by First Draw & Follow-up Samples:

Building Name	Date of Sample Events	Total Number Samples Collected	Initial First Draw Samples		Follow-up Samples	
			First Draw Samples			
			Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb	Analyzed at or Below Action Level of 15 ppb	Analyzed Above Action Level of 15 ppb
Middle & High School	10/19/2020	78	56	23	N/A	N/A
	2/27/2021	24	N/A	N/A	13	11
Grand Total:		102				

** Follow-up samples are samples collected subsequent to "Step 1" First Draw samples to verify initial findings of lead contamination, to assist in problem assessment to determine remediation and/or verify that lead levels are at or below action level post-remediation.

Sample Results: Initial First Draw and Follow-up First Draw:

Sample #	Classroom or other Location	Fixture/Outlet type	Date Sampled	Laboratory Analysis in ppb
103.2-1	Science Lab Office Sink Left	Sink	10/19/2020	30.1
			2/27/2021	27.0
103.2-2	Science Lab Office Sink Right	Sink	10/19/2020	29.4
			2/27/2021	14.0
103.2-6	Outside 132 Men's Faculty Bathroom	Sink	10/19/2020	16.4
			2/27/2021	6.30
103.2-12	Credit Union	Sink	10/19/2020	183
			2/27/2021	34.1
103.2-13	Room 104	Sink	10/19/2020	29.8
			2/27/2021	30.0
103.2-15	Men's Restroom Outside Pool	Sink	10/19/2020	16.3
			2/27/2021	8.95
103.2-17	Boys Locker Room Left Sink	Sink	10/19/2020	19.4
			2/27/2021	7.63
103.2-19	Pool Coaches Office	Sink	10/19/2020	22.9
			2/27/2021	30.7
103.2-23	Home Ec Around Clockwise	Sink	10/19/2020	19.1
			2/27/2021	17.9
103.2-24	Home Ec	Sink	10/19/2020	26.1
			2/27/2021	8.26
103.2-25	Home Ec	Sink	10/19/2020	40.8
			2/27/2021	16.9
103.2-26	Home Ec	Sink	10/19/2020	35.2
			2/27/2021	18.9
103.2-27	Home Ec	Sink	10/19/2020	29.6
			2/27/2021	17.8
103.2-31	Kitchen Kettle Fill	Sink	10/19/2020	25.6
			2/27/2021	6.40
103.2-36	Kitchen Back Handwash	Sink	10/19/2020	35.0
			2/27/2021	1.66
103.2-37	Old Girls Locker Room	Sink	10/19/2020	N/A
			2/27/2021	1.69
103.2-39	Nurse Main	Sink	10/19/2020	234
			2/27/2021	7.39

Sample #	Classroom or other Location	Fixture/Outlet type	Date Sampled	Laboratory Analysis in ppb
103.2-40	Nurse Bathroom	Sink	10/19/2020	20.2
			2/27/2021	4.29
103.2-41	Nurse Exam Room	Sink	10/19/2020	495
			2/27/2021	33.0
103.2-46	Coaches Office	Sink	10/19/2020	16.9
			2/27/2021	6.86
103.2-52	Band Room Sink	Sink	10/19/2020	27.0
			2/27/2021	15.7
103.2-61	Boys Team Room	Sink	10/19/2020	18.1
			2/27/2021	8.39
103.2-62	Girls Bathroom by 120	Sink	10/19/2020	36.8
			2/27/2021	17.9
103.2-74	Women's Bathroom Near Concession Middle	Sink	10/19/2020	18.3
			2/27/2021	6.04

Note: It is recommended that the District continue to prohibit use of any outlet identified above the action level until further mitigation and additional sampling and analysis is performed.

1.3 Response Actions Required Under NYS Regulations, Section 67-4.4:

For outlets analyzed with a lead concentration in excess of the NYS Action Level, regulations require:

- (a) Prohibit use of the outlet until:
 - (1) a lead remediation plan is implemented to mitigate the lead level of such outlet; and
 - (2) test results indicate that the lead levels are at or below the action level;
- (b) provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed;
- (c) 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; and
- (d) 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.

1.4 Laboratory Analytical Reports by Building



Environmental Hazards Services, L.L.C.
 7469 Whitepine Rd
 Richmond, VA 23237
 Telephone: 800.347.4010

Lead in Drinking Water Analysis Report

Report Number: 21-03-00572

Client: Stohl Environmental
 3860 California Road
 Orchard Park, NY 14127

Received Date: 03/03/2021
 Reported Date: 03/31/2021
 Sampled By: Andrew Theal
 Tech Certification #:

Project/Test Address: 2020L-103.2; Frewsburg, MS/HS; 26 Institute Street; Frewsburg, NY

Client Number:
 33-5980

Fax Number:
 716-312-8092

Laboratory Results

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-00572-001	103.2-1	02/27/2021	SCIENCE LAB OFFICE SINK LEFT	27.0	03/16/2021	
21-03-00572-002	103.2-2	02/27/2021	SCIENCE LAB OFFICE SINK RIGHT	14.0	03/16/2021	
21-03-00572-003	103.2-6	02/27/2021	OUTSIDE 132 MENS FACULTY BATHROOM	6.31	03/16/2021	
21-03-00572-004	103.2-12	02/27/2021	CREDIT UNION	34.1	03/16/2021	
21-03-00572-005	103.2-13	02/27/2021	ROOM 104	30.0	03/16/2021	
21-03-00572-006	103.2-15	02/27/2021	MENS RESTROOM OUTSIDE POOL	8.95	03/16/2021	
21-03-00572-007	103.2-17	02/27/2021	BOYS LOCKER ROOM LEFT SINK	7.63	03/16/2021	
21-03-00572-008	103.2-19	02/27/2021	POOL COACHES OFFICE	30.7	03/16/2021	
21-03-00572-009	103.2-23	02/27/2021	HOME EC AROUND CLOCKWISE	17.9	03/16/2021	
21-03-00572-010	103.2-24	02/27/2021	HOME EC	8.26	03/16/2021	
21-03-00572-011	103.2-25	02/27/2021	HOME EC	16.9	03/16/2021	
21-03-00572-012	103.2-26	02/27/2021	HOME EC	18.9	03/16/2021	
21-03-00572-013	103.2-27	02/27/2021	HOME EC	17.8	03/16/2021	

Environmental Hazards Services, L.L.C

Client Number: 33-5980
 Project/Test Address: 2020L-103.2; Frewsburg, MS/HS; 26 Institute Street;
 Frewsburg, NY

Report Number: 21-03-00572

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-00572-014	103.2-31	02/27/2021	KITCHEN KETTLE FILL	6.41	03/16/2021	
21-03-00572-015	103.2-36	02/27/2021	KITCHEN BACK HAND WASH	1.66	03/16/2021	
21-03-00572-016	103.2-37	02/27/2021	OLD GIRLS LOCKER ROOM	1.69	03/16/2021	
21-03-00572-017	103.2-39	02/27/2021	NURSE MAIN	7.39	03/16/2021	
21-03-00572-018	103.2-40	02/27/2021	NURSE BATH	4.29	03/16/2021	
21-03-00572-019	103.2-41	02/27/2021	NURSE EXAM ROOM	33.0	03/17/2021	
21-03-00572-020	103.2-46	02/27/2021	COACHES OFFICE	6.86	03/16/2021	
21-03-00572-021	103.2-52	02/27/2021	BAND ROOM SINK	15.7	03/17/2021	
21-03-00572-022	103.2-61	02/27/2021	BOYS TEAM ROOM	8.39	03/17/2021	
21-03-00572-023	103.2-62	02/27/2021	GIRLS BATH BY 120	17.9	03/16/2021	
21-03-00572-024	103.2-74	02/27/2021	WOMENS BATH NEAR CONCESSIONS MIDDLE	6.04	03/16/2021	

Method: SM 3113B-2010
 Analyst: Jennalee Hertzler
 Accreditation #: NY 11714

Reviewed By Authorized Signatory:



Tasha Eaddy
 QA/QC Clerk

Sample Results denoted with a "less than" (<) sign contain less than the reporting limit which is 1 ppb.

The EPA Maximum Contaminant Level for Lead in Drinking Water is 15 ppb. The results herein conform to NELAC standards, where applicable, unless otherwise narrated on this report. Results represent the analysis of samples submitted by the client. Sample location, description, field parameter results, etc., were provided by the client. This report cannot be reproduced, except in full, without written approval from Environmental Hazards Services, L.L.C.

LEGEND ug/L= micrograms per liter ppb = parts per billion

1.5 Laboratory Certifications

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER



Expires 12:01 AM April 01, 2022
Issued April 01, 2021
Revised April 02, 2021

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502-Public Health Law of New York State

MS. JULIE DICKERSON
ENVIRONMENTAL HAZARDS SERVICES, LLC
7469 WHITEPINE ROAD
N. CHESTERFIELD, VA 23237

NY Lab Id No: 11714

is hereby APPROVED as an Environmental Laboratory in conformance with the
National Environmental Laboratory Accreditation Conference Standards (2016) for the category
ENVIRONMENTAL ANALYSES POTABLE WATER
All approved analytes are listed below:

Metals I

Arsenic, Total	EPA 200.8 Rev. 5.4
Copper, Total	SM 19, 21-23 3113B (-04,-10) EPA 200.8 Rev. 5.4
Lead, Total	SM 19, 21-23 3113B (-04,-10) EPA 200.8 Rev. 5.4
Manganese, Total	EPA 200.8 Rev. 5.4

NEW YORK
DEPARTMENT OF
HEALTH
Department
of Health

Serial No.: 63485

Property of the New York State Department of Health. Certificates are valid only at the address shown, must be conspicuously posted, and are printed on secure paper. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (518) 485-5570 to verify the laboratory's accreditation status.



1.6 Chains of Custody

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Stohl ENVIRONMENTAL

3860 California Road, Orchard Park, New York 14127
PHONE (716) 312-0070 FAX (716) 312-8092
WWW.STOHLENVIRONMENTAL.COM

Chain of Custody Document


Submitted to: (Lab Name) EHS
STOHL Job # 2020L-103.2

Client: Frewsburg CSD Contact: Jerome Lee Yaw
Building: Frewsburg MS/HS Location: 26 Institute Street, Frewsburg NY

LEAD
Water by SM 19, 21 - 23 3113B (-04, -10) X Turnaround 20 Days

Sample #	Location	Outlet Type	Time
103.2-1	Science lab office sink left	Sink	12:00
103.2-2	Science lab office sink right	Sink	12:02
103.2-6	Outside 132 men's faculty bathroom	Sink	12:04
103.2-12	Credit union	Sink	12:06
103.2-13	Room 104	Sink	12:08
103.2-15	Men's restroom outside pool	Sink	12:10
103.2-17	Boys locker room left sink	Sink	12:12
103.2-19	Pool coaches office	Sink	12:14
103.2-23	Home Ec around clockwise	Sink	12:16
103.2-24	Home ec	Sink	12:18
103.2-25	Home ec	Sink	12:20
103.2-26	Home ec	Sink	12:22
103.2-27	Home ec	Sink	12:24
103.2-31	Kitchen kettle fill	Sink	12:26
103.2-36	Kitchen back hand wash	Sink	12:28
103.2-37	Old girls locker room	Sink	12:30
103.2-39	Nurse main	Sink	12:32
103.2-40	Nurse bath	Sink	12:34

21-03-00572



Due Date:
03/31/2021
(Wednesday)
AE

Notes:
Please e-mail lab results to labs@stohlenv.com If checked, also e-mail results to: Ehenderson@StohlEnv.com

Sampled By: Andrew Theal Print Name Andrew Theal Stohl Env: Andrew Theal Date: 2/27/2021

Relinquished By: E. Henderson Jr. Print Name Eric Henderson Jr. Stohl Env: Eric Henderson Jr. Date: 3/1/2021

Received (Name / Lab): R. THARRIS K. Slawson Date: 3.3.21 Time: 11:28 AM

Sample Login (Name / Lab): Diane Stone Date: 3/14/21 Time: 1:43 am

Analysis (Name / Lab): G. Hertler Date: 3/16/21 Time: 4:16 pm

QA/QC Review (Name / Lab): D. Kiddy Date: 3/31/21 Time: 9:40 am

Archived / Released: _____ QA/QC InterLAB Use: _____ Date: _____ Time: _____

Stohl ENVIRONMENTAL

3860 California Road, Orchard Park, New York 14127
PHONE (716) 312-0070 FAX (716) 312-8092
WWW.STOHLENVIRONMENTAL.COM

Chain of Custody Document

Submitted to: (Lab Name) EHS

STOHL Job # 2020L-103.2

L
27

Client: Frewsburg CSD Contact: Jerome Lee Yaw

Building: Frewsburg MS/HS Location: 26 Institute Street, Frewsburg NY

LEAD

Water by SM 19, 21 - 23 3113B (-04, -10) X

Turnaround
20 Days

Sample #	Location	Outlet Type	Time
103.2-41	Nurse exam room	Sink	12:36
103.2-46	Coaches office	Sink	12:38
103.2-52	Band room sink	Sink	12:40
103.2-61	Boys team room	Sink	12:42
103.2-62	Girls Bath by 120	Sink	12:44
103.2-74	Women's Bath near concessions middle	Sink	12:46

Notes:
Please e-mail lab results to labs@stohlenv.com Ehenderson@StohlEnv.com

Sampled By: Andrew Theal Print Name Andrew Theal Stohl Env: Andrew Theal Date: 2/27/2021

Relinquished By: E. Henderson Jr. Print Name Eric Henderson Jr. Stohl Env: Eric Henderson Jr. Date: 3/1/2021

Received (Name / Lab): K. HARRIS Date: 3.3.21 Time: 11:28 AM
K. Harris

Sample Login (Name / Lab): Stone Stow Date: 3/14/21 Time: 1:43 PM

Analysis (Name / Lab): J. Hertzler Date: 3/16/21 Time: 4:10 PM

QA/QC Review (Name / Lab): J. Cuddy Date: 3/31/21 Time: 9:40 AM

Archived / Released: _____ QA/QC InterLAB Use: _____ Date: _____ Time: _____

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BLANK

Stohl
ENVIRONMENTAL

3860 California Road, Orchard Park, New York 14127
PHONE (716) 312-0070 FAX (716) 312-8092
WWW.STOHLENVIRONMENTAL.COM