October 14, 2025

Mr. Brad Kennedy
Director of Facilities
Croton-Harmon Union Free School District
8 Gerstein Street
Croton-on-Hudson, NY 10520

Subject: **Lead Testing of School Drinking Water at Carrie E. Tompkins Elementary School (Spencer Field)**
Project Number: US0049328.0702

Dear Mr. Kennedy:

At your request on behalf of the Croton-Harmon Union Free School District, WSP USA Inc. (WSP) has conducted a testing program for lead in water. WSP's industrial hygienist performed water sampling on October 1, 2025, at the renovated Spencer Field concession stand. In addition to this final report, WSP has provided the following New York State Department of Health (NYS DOH) required documentation: Laboratory Results, Exceedance Table when exceedances occurred, and when applicable a draft Parents Notification Letter and Notification of exceedances to the County Department of Health. As requested by the district, WSP completed the required reporting into the NYS Health Electronic Response Data System (HERDS).

The sampling was performed at the renovated Spencer Field Concession building. Sampling was previously performed at Spencer Field in September of 2022 and January 2023. Since then, reconstruction and renovations have been completed and follow-up lead water sampling was performed on October 1, 2025. The previous report issued on February 2, 2023 is included as Appendix B for reference.

BACKGROUND

On September 6, 2016, the Governor signed legislation requiring all school districts in NYS to test potable water systems for lead contamination and to take responsive actions. To implement this new law, the DOH issued emergency regulations, titled Lead Testing in School Drinking Water. On May 9, 2018, the Lead Testing in School Drinking Water final regulation was published in the State Register, replacing the emergency regulation. This law was amended and signed into law on December 23, 2021, requiring significant changes to Subpart 67-4 Public Health Law PHL §1110. The following revisions went into effect on December 22, 2022:

- All school buildings serving children in pre-K through grade 12 are required to collect a sample from each applicable outlet for testing every 3 years.
- Previously deemed "lead-free" buildings are no longer exempt.
- Schools must complete initial first-draw sampling for Compliance Period January 1, 2023-December 31, 2025.
- **Action Level** was lowered from 15 ppb to **5 ppb**.
- All water provided to staff/students in response to an outlet being taken out of service must be free of charge.
- Schools must now include copies of lab reports of the lead testing results on their websites and every 3 years thereafter or at an earlier time as determined by the Commissioner of Health.
- Compliance testing will occur on a triennial (every 3 years) schedule.

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KEY DEFINITIONS IN THE LAW/REGULATIONS

- Outlet means a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, hose bib, sinks or faucets.
  "Applicable" outlets: Outlets that should be sampled may be located anywhere on school property including external outlets (hose bibs) if the outlet may be used for drinking or cooking (including food preparation). Superintendents or their designees have the responsibility to identify which outlets on a school property meet the regulation requirements for sampling ("applicable outlets"). If a Superintendent or their designee determines that they have outlets that fall outside of the scope of the regulation (outlets not used or potentially used for drinking or cooking), the school must remediate or/and have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes ("non-applicable outlets").
- "Non-applicable" outlets: The Rule of Thumb is that generally, any outlet in a room or office within a school that is not used by students (pre-kindergarten through grade 12) and does not provide water for drinking or cooking does not require sampling. This includes dishwashing sinks; bus garage; point of entry; science/art sink; hot, tempered, or bathroom outlets designated non-applicable with education and signage.
- "First-draw" sample is defined as a sample taken from a cold water outlet before any water is used from that outlet and in which water is motionless in pipes for a minimum of 8-18 hours before sample collection.
- Action level means 5 parts per billion (ppb). Lead test results greater than 5 ppb exceeds the lead action level and requires the outlet to be taken out of service and a remediation action plan be implemented.

  For additional guidance regarding applicable vs. non-applicable outlets, and other requirements please see the Appendices for NYS DOH Lead Testing in School Drinking Water Program Updates 2023 and NYS Senate Law https://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm https://www.nysenate.gov/legislation/laws/PBH/1110.

SAMPLING METHODOLOGY

1 The NYS DOH Emergency Regulation, Section 67-4.3 – Monitoring states:
- First-draw samples shall be collected from all "applicable" outlets. A first-draw sample volume shall be 250 milliliters (mL), collected from a cold-water outlet before any water is used. The water shall be motionless in the pipes for a minimum of 8 hours, but no more than 18 hours, before sample collection. Note: The NYS DOH requires that for outlets which do not have regular use and water remains motionless in the pipes for greater than 18 hours, the outlets were to be sampled as well (to represent "normal use patterns").
- All first-draw samples shall be analyzed by a laboratory approved to perform such analyses by the Department's Environmental Laboratory Approval Program (ELAP).

Although not required by the NYS DOH Emergency Regulation, WSP also followed additional methodologies included in Environmental Protection Agency (EPA) document entitled "3Ts for Reducing Lead in Drinking Water in Schools".

2 Sampling Plan
- In developing a sampling plan before sample collection took place at the School, WSP determined the location of the water service line. Sampling at the School started from a location closest to the service line entrance and proceeded outwards from that point.
- A map, depicting the location of the service line entrance, and arrows indicating the direction of sampling was provided to and used by the sampling team. The sampling team verified the location of the service line entrance prior to sampling.

3 Laboratory Analysis: Samples were submitted to York Analytical (Stratford, CT) and/or EMSL (Cinnaminson, NJ) for analysis under chain-of-custody. The laboratories are certified through the NYS DOH Environmental Laboratory Approval Program (ELAP) and are approved for analysis of lead in potable water.

4 Re-sampling can be performed provided corrective action or remediation options, as reviewed in the Recommendation section, are complete. Proper flushing of new equipment (e.g. pipes, faucets etc.) is recommended.

5 Flushing Program and Resampling: when routine flushing programs are implemented, the school plumbing system should be flushed according to an establish protocol. After flushing and before sampling or resampling, a period of 3-4

days of normal use is recommended. First-draw lead water sampling can be performed after the required hold time of 8-18 hours is completed.

6 In accordance with the NYS DOH, the following post-remediation testing requirements apply:

- Follow-up samples collected after an outlet has been remediated must also be "first-draw" samples. Schools may choose to perform additional sampling (i.e., 30-second flush, etc.) to determine the contribution of lead from plumbing to guide remediation decisions.
- Only those outlets that exceed the Action Level need to be resampled (following remediation).
- All remediated outlets will likely require flushing before being placed back into service.
- Post-remediation tests results need to be reported in the Department's HERDS application on HCS, and on the school website within the same reporting timeframes/requirements as specified for the initial sampling.

RESULTS DISCUSSION

A copy of the full laboratory results, chain of custody, floor plan and sample locations are presented at the end of this report in Appendix A.

Of the **8** samples collected at Carrie E. Tompkins Elementary School – Spencer Field, none had lead concentrations that exceeded 5 ppb. **No further action is required at this time.**

RECOMMENDATIONS

If lead concentrations exceeded 5 ppb, WSP offers the following recommendations for remediation:

In accordance with Subpart 67-4, Section 67-4.4 Response, the following immediate Response Actions are necessary:

- Prohibit the use of the outlet immediately (take outlet out of service or turn off) until:
  1. A lead remedial action plan is implemented to mitigate the lead level at the outlet, and
  2. Post-remediation test results indicate that the lead levels are at or below the action level;
- Provide building occupants with an adequate supply of water for drinking and cooking until remediation is performed;
- 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 **(Notification issued by WSP);**
- 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 **(See Attached Draft Letter for issuance by District).**

If an outlet tested above the "action level", it can still be used for cleaning and handwashing. However, please note:

- Signage must be placed at such outlets stating that the water should not be used for drinking (only handwashing and cleaning).
- Pictures should be used if there are small children using the water outlets, and staff should ensure the children understand what the signs mean and monitor the outlets to ensure they are not used for drinking.

Corrective Actions / Remediation Options

- Permanent removal of an outlet
- Outlet replacement with "lead-free" plumbing materials
- Pipe replacement with "lead-free" plumbing materials
- Remove other sources of lead (lead pipe, lead solder joints, and brass plumbing components with "lead-free" materials)
- Flushing (systematic flushing program)
- Point of Use (POU) Filters*
- Supervision
- Engineering controls
- Education

- Signage. Signage used at outlets are considered to be a temporary measure and cannot be used as a permanent measure.
- Install Tempered outlets*

Non-applicable Outlets

- Tempered Outlets. These outlets are not required to be sampled. However, all tempered water outlets should be clearly posted with signs ("Do Not Drink" or equivalent), provide awareness education to students and staff and implement appropriate remedial actions to prevent drinking from these outlets.
- Science/Art sinks: as noted by NYSDOL, typically these classroom settings prohibit eating and/or drinking. The school Superintendent has the authority to determine whether these outlets may be used for drinking or cooking or whether they require sampling. Management controls such as restricted/secured access (e.g., locked doors), signage, required supervision and other management controls are part of the overall safety and health program elements that should be in place.

LIMITATIONS, EXCEPTIONS AND ASSUMPTIONS

Opinions and recommendations presented in this report apply to site conditions and features as they existed at the time of WSP's site visits, and those reasonably foreseeable. They cannot necessarily apply to conditions and features of which WSP is unaware and has not had the opportunity to evaluate. The conclusions presented in this report are professional opinions based solely upon WSP's visual observations of accessible areas and sampling data. These conclusions are intended exclusively for the purpose state herein, at the sites indicated, and for the project indicated. No expressed or implied representation or warranty is included or intended in our reports, except that our services were performed, within the limits prescribed by our client, with the customary thoroughness and competence of our profession.

If you have any questions concerning this information, please feel free to contact us at 212-465-5000. We look forward to working with you in the future.

Report Completed by:

Ivan Grujovic

Ivan Grujovic
Associate Consultant

Report Completed by:

Joseph Kapp

Joseph Kapp, CIH, CSP
Assistant Vice President

Appendix A – Laboratory Results & Chain of Custody
Appendix B – Previous Water Sampling Report-January 2023
Appendix C - Laboratory ELAP Certifications
Appendix D - NYS DOH Lead Testing in School Drinking Water Program Review and Updates 2023

CC: Alexander Smolyar

APPENDIX A

Laboratory Results

Chain of Custody
&
Floor Plan

Technical Report

prepared for:

WSP USA (New York, NY)
One Penn Plaza, 4th Floor
New York NY, 10119
Attention: Joseph Kapp

Report Date: 10/03/2025
Client Project ID: US0049328.0702 Carrie E Tompkins Elementary School -Spencer Field
York Project (SDG) No.: 25J0010

Revision No. **2.0**

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Report Date: 10/03/2025
Client Project ID: US0049328.0702 Carrie E Tompkins Elementary School -Spencer Field
York Project (SDG) No.: 25J0010

WSP USA (New York, NY)
One Penn Plaza, 4th Floor
New York NY, 10119
Attention: Joseph Kapp

Purpose and Results

This report contains the analytical data for the sample(s) identified on the attached chain-of-custody received in our laboratory on October 01, 2025 and listed below. The project was identified as your project: **US0049328.0702 Carrie E Tompkins Elementary School -Spencer Field**.

The analyses were conducted utilizing appropriate EPA, Standard Methods, and ASTM methods as detailed in the data summary tables.

All samples were received in proper condition meeting the customary acceptance requirements for environmental samples except those indicated under the Sample and Analysis Qualifiers section of this report.

All analyses met the method and laboratory standard operating procedure requirements except as indicated by any data flags, the meaning of which are explained in the Sample and Data Qualifiers Relating to This Work Order section of this report and case narrative if applicable.

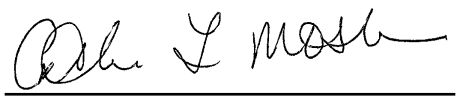
The results of the analyses, which are all reported on dry weight basis (soils) unless otherwise noted, are detailed in the following pages.

Please contact Client Services at 203.325.1371 with any questions regarding this report.

York Sample ID	Client Sample ID	Matrix	Date Collected	Date Received
25J0010-01	SF-CONC-DW-P-01	Drinking Water	10/01/2025	10/01/2025
25J0010-02	SF-CONC-WB-P-01	Drinking Water	10/01/2025	10/01/2025
25J0010-03	SF-CONC-DW-P-02	Drinking Water	10/01/2025	10/01/2025
25J0010-04	SF-CONC-HB-P-01	Drinking Water	10/01/2025	10/01/2025
25J0010-05	SF-CONC-KF-P-01	Drinking Water	10/01/2025	10/01/2025
25J0010-06	SF-CONC-KF-P-02	Drinking Water	10/01/2025	10/01/2025
25J0010-07	SF-CONC-HB-P-02	Drinking Water	10/01/2025	10/01/2025
25J0010-08	SF-CONC-ICE-P-01	Drinking Water	10/01/2025	10/01/2025

General Notes for York Project (SDG) No.: 25J0010

1. The RLs and MDLs (Reporting Limit and Method Detection Limit respectively) reported are adjusted for any dilution necessary due to the levels of target and/or non-target analytes and matrix interference. The RL(REPORTING LIMIT) is based upon the lowest standard utilized for the calibration where applicable.
2. Samples are retained for a period of thirty days after submittal of report, unless other arrangements are made.
3. York's liability for the above data is limited to the dollar value paid to York for the referenced project.
4. This report shall not be reproduced without the written approval of York Analytical Laboratories, Inc.
5. All analyses conducted met method or Laboratory SOP requirements. See the Sample and Data Qualifiers Section for further information.
6. It is noted that no analyses reported herein were subcontracted to another laboratory, unless noted in the report.
7. This report reflects results that relate only to the samples submitted on the attached chain-of-custody form(s) received by York.
8. Analyses conducted at York Analytical Laboratories, Inc. Stratford, CT are indicated by NYDOH-NY10854, NJDEP-CT005, PADEP-68-04440, CTDPH-PH0840; those conducted at York Analytical Laboratories, Inc., Richmond Hill, NY are indicated by NYDOH-NY12058, NJDEP-NY037, CTDPH-PH0837, NHDES-NH2097, MDDEP-375, PADEP-68-06231.

Approved By: 

Cassie Mosher
Laboratory Manager Stratford

Date: 10/03/2025

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-01
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-01**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-DW-P-01
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:19

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	**1.22**		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:19	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-02
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-02**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-WB-P-01
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:25

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	ND		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:24	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-03
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-03**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-DW-P-02
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:30

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	**1.10**		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:26	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-04
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-04**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-HB-P-01
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:33

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	**1.72**		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:27	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-04
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-05
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-05**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-KF-P-01
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:42

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	ND		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:28	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-06
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-06**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-KF-P-02
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:45

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	ND		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:30	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-07
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-07**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-HB-P-02
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:56

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	ND		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:34	JWT

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-08
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Client:	WSP USA (New York, NY)	**York Sample ID:**	25J0010-08
Client Project:	US0049328.0702 Carrie E Tompkins Elementary School -Spencer Fiel	**Date Received:**	10/01/2025

Lab ID:	**25J0010-08**	**Laboratory:**	York Analytical Laboratories, Inc.
Analysis:	**Metals by ICP/MS**	**Matrix:**	Drinking Water
Prep Method:	Sample Prepared by Method: EPA 200.8	**Client ID:**	SF-CONC-ICE-P-01
Reference Method:	EPA 200.8	**Collection Date/Time:**	10/1/25 7:59

Parameter	Result	Flag	RL	Dilution	Units	Extracted	Analyzed	Analyst
Lead	ND		1.00	1	ug/L	10/02/25 8:38	10/ 2/25 11:35	JWT

Cassie L. Mosher
Laboratory Manager

Certified Analyses included in this Report

Analyte	CAS #	Certifications
EPA 200.8 in Drinking Water		
Lead	7439-92-1	CTDPH-PH-0840,NYSDOH-NY10854,NJDEP-CT005,PADEP-68-04440

List of Certifications

Code	Description	Number	Expires
CTDPH-PH-0840	CTDPH - Stratford	PH-0840	06/30/2027
NJDEP-CT005	NJDEP Certification - Stratford	CT005	06/30/2026
NYSDOH-NY10854	NYSDOH NELAC/ELAP Program - Stratford	NY ELAP-10854	04/01/2026
PADEP-68-04440	PADEP Registration - Stratford	68-04440	09/30/2025

Sample and Data Qualifiers Relating to This Work Order

Definitions and Other Explanations

*	Analyte is not certified or the state of the samples origination does not offer certification for the Analyte.
ND	NOT DETECTED - the analyte is not detected at the Reported to level (LOQ/RL or LOD/MDL)
RL	REPORTING LIMIT - the minimum reportable value based upon the lowest point in the analyte calibration curve.
LOQ	LIMIT OF QUANTITATION - the minimum concentration of a target analyte that can be reported within a specified degree of confidence. This is the lowest point in an analyte calibration curve that has been subjected to all steps of the processing/analysis and verified to meet defined criteria. This is based upon current NELAC/TNI Standards and applies to all analyses.
LOD	LIMIT OF DETECTION - a verified estimate of the minimum concentration of a substance in a given matrix that an analytical process can reliably detect. This is based upon NELAC 2009 Standards and applies to all analyses conducted under the auspices of EPA SW-846.
MDL	METHOD DETECTION LIMIT - a statistically derived estimate of the minimum amount of a substance an analytical system can reliably detect with a 99% confidence that the concentration of the substance is greater than zero. This is based upon 40 CFR Part 136 Appendix B and applies only to EPA 600 and 200 series methods.
Reported to	This indicates that the data for a particular analysis is reported to either the LOD/MDL, or the LOQ/RL. In cases where the "Reported to" is located above the LOD/MDL, any value between this and the LOQ represents an estimated value which is "J" flagged accordingly. This applies to volatile and semi-volatile target compounds only.
NR	Not reported
RPD	Relative Percent Difference
Wet	The data has been reported on an as-received (wet weight) basis
Low Bias	Low Bias flag indicates that the recovery of the flagged analyte is below the laboratory or regulatory lower control limit. The data user should take note that this analyte may be biased low but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
High Bias	High Bias flag indicates that the recovery of the flagged analyte is above the laboratory or regulatory upper control limit. The data user should take note that this analyte may be biased high but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
Non-Dir.	Non-dir. flag (Non-Directional Bias) indicates that the Relative Percent Difference (RPD) (a measure of precision) among the MS and MSD data is outside the laboratory or regulatory control limit. This alerts the data user where the MS and MSD are from site-specific samples that the RPD is high due to either non-homogeneous distribution of target analyte between the MS/MSD or indicates poor reproducibility for other reasons.

If EPA SW-846 method 8270 is included herein it is noted that the target compound N-nitrosodiphenylamine (NDPA) decomposes in the gas chromatographic inlet and cannot be separated from diphenylamine (DPA). These results could actually represent 100% DPA, 100% NDPA or some combination of the two. For this reason, York reports the combined result for n-nitrosodiphenylamine and diphenylamine for either of these compounds as a combined concentration as Diphenylamine.

If Total PCBs are detected and the target aroclors reported are "Not detected", the Total PCB value is reported due to the presence of either or both Aroclors 1262 and 1268 which are non-target aroclors for some regulatory lists.

2-chloroethylvinyl ether readily breaks down under acidic conditions. Samples that are acid preserved, including standards will exhibit breakdown. The data user should take note.

Certification for pH is no longer offered by NYDOH ELAP.

Semi-Volatile and Volatile analyses are reported down to the LOD/MDL, with values between the LOD/MDL and the LOQ being "J" flagged as estimated results.

For analyses by EPA SW-846-8270D, the Limit of Quantitation (LOQ) reported for benzidine is based upon the lowest standard used for calibration and is not a verified LOQ due to this compound's propensity for oxidative losses during extraction/concentration procedures and non-reproducible chromatographic performance.

Revision Description: This report has been revised to update the project name.

25J0010

Lead (Pb) Chain of Custody

Client: Croton-Harmon Union Free School District – Carrie E. Tompkins Elementary School

Location Sampled: Carrie E. Tompkins Elementary School – Spencer Field

Date: 10 / 1 / 2025 **Address:** 10 Gerstein St, Croton-On-Hudson, NY 10520

Report To (Name): Joseph Kapp **Sampled By:** Ivan Grujovic

Email Address: Joseph.Kapp@wsp.com; LB.LabResults@wsp.com; Ivan.Grujovic@wsp.com

Project Number: US0049328.0702

Turnaround Time (TAT) Options* - Please Check

3 Hour	6 Hour	24 Hour	48 Hour	72 Hour	120 Hour	X 1 Week	2 Week

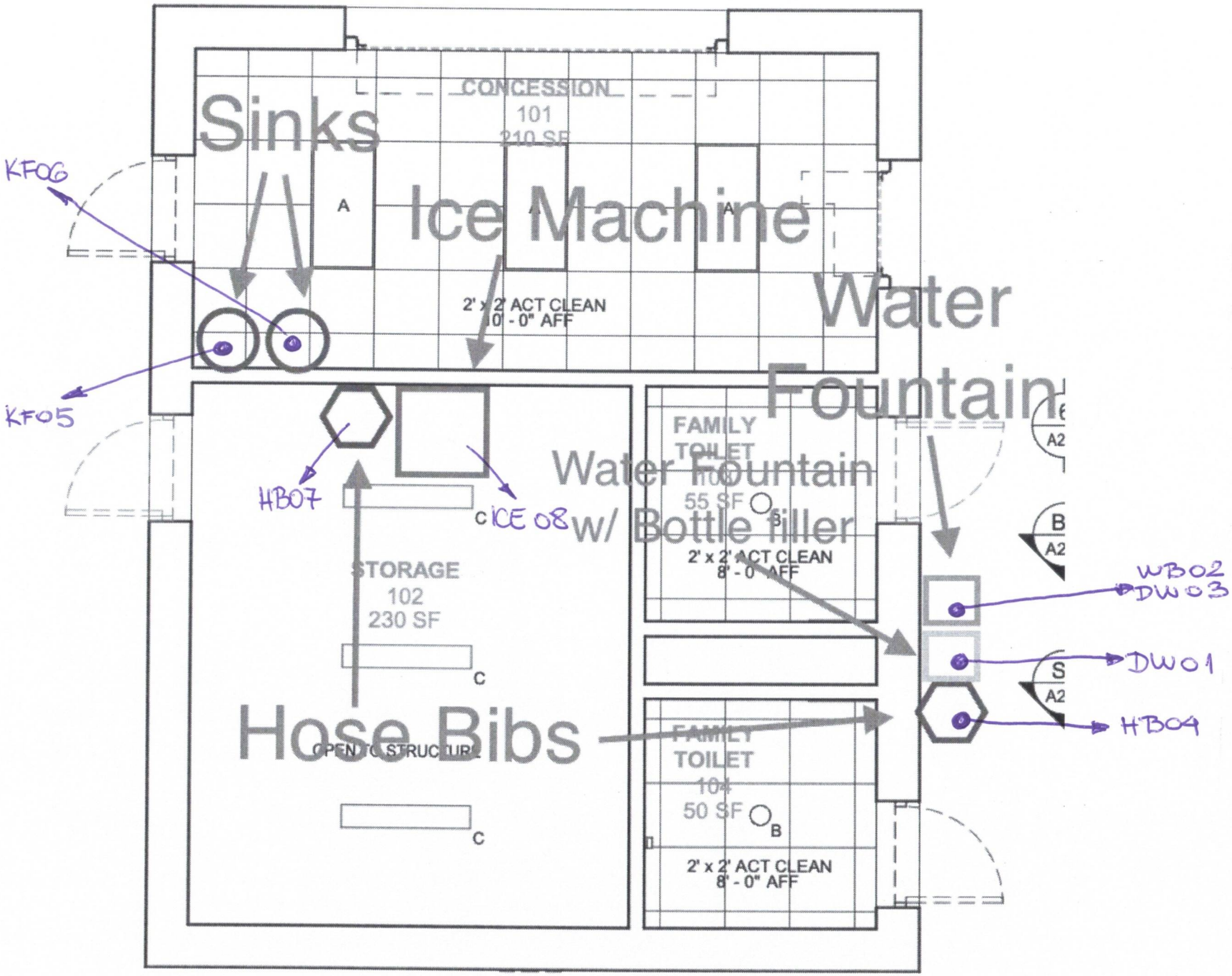
Drinking Water Preserved with HNO_3 pH < 2

Sample ID	Lab ID	Sample Description	Volume	Date/Time Sampled
Ex. 003-312-DW-P-015		Floor, Room Name, Room Number, Type, Type Number	250 mL	
SF-CONC-DW-P-01	P1	Spencer Field, Conc. stand, Outdoor-left, DW, 01	250 mL	10/1/25 07:19
SF-CONC-WB-P-01	P2	Spencer Field, Conc. stand, Outdoor, WB, 01	250 mL	07:25
SF-CONC-DW-P-02	P3	Spencer Field, Conc. stand, outdoor-right, DW, 02	250 mL	07:30
SF-CONC-HB-P-01	P4	Spencer Field, Conc. stand, outdoor, Hose Bibb, 01	250 mL	07:33
SF-CONC-KF-P-01	P5	Spencer Field, Conc. stand kitchen, closer to door, KF, 01	250 mL	07:42
SF-CONC-KF-P-02	P6	Spencer Field, Conc. stand kitchen, further, KF, 02	250 mL	07:45
SF-CONC-HB-P-02	P7	Spencer Field, Conc. stand Storage, Hose Bibb, 02	250 mL	07:56
SF-CONC-ICE-P-01	P8	Spencer Field, Conc. stand Storage, Ice Machine, 01	250 mL	07:59
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
		REC- 10/1/25 9:50 11.4	250 mL	
		REL-	250 mL	
		Rec: 10/1/25 18:56 Rel 10/1/25 21:38	250 mL	

Relinquished by:	Ivan Grujovic	**Date:**	10/1/2025	**Time:**	09:50
Received by:		**Date:**	10/1/25	**Time:**	21:38

Comments: A first draw sample (P) was taken at a drinking water fountain (DW) on the 3rd floor (003) outside of room 312 (312) and is the 15th outlet counted (015). DW= drinking water fountain. WB= Water Bottle Filler. CF= Classroom Sink Faucet. KF= Kitchen Faucet. BF= Bathroom Sink Faucet. NS= Nurse's Office Faucet.

16.0


Sinks
Ice Machine
Water Fountain
Water Fountain w/ Bottle filler
Hose Bibs
KF06
KF05
HB07
ICE 08
WB02
DW03
DW01
HB04
CONCESSION
101
210 SF
2' x 2' ACT CLEAN
10' - 0" AFF
FAMILY TOILET
100
55 SF
2' x 2' ACT CLEAN
8' - 0" AFF
STORAGE
102
230 SF
OPEN TO STRUCTURE
FAMILY TOILET
104
50 SF
2' x 2' ACT CLEAN
8' - 0" AFF

APPENDIX B

Previous Water Sampling Report
January 2023

February 2, 2023

Mr. Paul Gibbons
Director of Facilities
Croton-Harmon Union Free School District
8 Gerstein Street
Croton-on-Hudson, NY 10520

Subject: **Follow-up Lead Testing of School Drinking Water at Carrie E. Tompkins Elementary School**
Project Number: 31405320.032
Survey Date: January 20, 2023

Dear Mr. Gibbons:

At your request on behalf of the Croton-Harmon Union Free School District, WSP USA Inc. (WSP) conducted a testing program for lead in water. WSP's team of industrial hygienists performed water sampling on September 14, 2022, September 30, 2022, and on January 20, 2023. On the initial sampling event, September 14, samples were collected at the following locations: twenty-four water fountains that were taken out of service during the pandemic, one replacement sink faucet (Project Room 108), and one new bottle filler and one hose bibb at Spencer Field.

We subsequently collected follow-up samples (first-draw and 30-second draw) on September 30, 2022, to investigate an exceedance at the replacement sink faucet (Project Room 108) and a near-exceedance at the Spencer Field hose bibb. In addition to resampling the hose bibb, we collected first-draw and 30-second draw samples from the bottle filler, the reduced-pressure-zone valve in the village water supply pit for Spencer Field, and the lower hose bibb in the Booster Shack at Spencer Field. Finally, we conducted a second round of resampling on January 20, 2023, to further investigate a second exceedance at the replacement sink faucet (Project Room 108).

In addition to this final report, where applicable WSP has provided the following New York State Department of Health (NYS DOH) required documentation: Laboratory Results, Exceedance Table, a draft Parents Notification Letter and notification to the local department of health of exceedances. When requested by the district, WSP completed required reporting into the NYS Health Electronic Response Data System (HERDS).

The school district had sampling performed to evaluate the water supplied through the water fountains that are now operational and several outlets that were remediated, added or modified. The initial Lead Testing, outlined in the Background section below, was completed in May 2021 as part of the initial 5-year sampling requirement.

BACKGROUND

As of December 22, 2022, the State of New York enacted amendments to Section 1110 of the public health law 1.110 (2016) regarding school potable water testing and standard. The amendments require every school district and BOCES to conduct triennial first-draw tap testing of potable water systems to monitor for lead contamination in each occupied school building. The amendments also specify that the lead action level is exceeded if the concentration of lead is greater than 0.005 milligrams per liter (5 parts per billion). These amendments reduce the sampling period from 5 years to 3 years, and the action level is reduced from 15 ppb to 5 ppb. There are other amendments to the law. We have attached a copy of the amendments in the Appendix for review.

The sampling performed and discussed in this report does not apply to the triennial sampling event specified in the new amendment. These results are associated with remediation and corrective measures based on the 2020 sampling program. The NYS DOH is developing resources and plans to update the department webpage with the current regulations and is developing an updated Guidance

WSP USA
One Penn Plaza, 4th Floor
New York, NY 10119

Tel.: +1 212 465-5000

Tel.: wsp.com

Manual. WSP is developing a sampling program guide based on the amended law, which we will provide and update as the NYS DOH guidance is developed and made available to the public.

On September 6, 2016, the Governor signed legislation requiring all school districts in NYS to test potable water systems for lead contamination and to take responsive actions. To implement this new law, the DOH issued emergency regulations, titled Lead Testing in School Drinking Water. On May 9, 2018, the Lead Testing in School Drinking Water final regulation was published in the State Register, replacing the emergency regulation:

- By September 30, 2016, all school buildings serving children in pre-K through grade 5 were required to collect a sample from each outlet for testing.
- By October 31, 2016, all school buildings serving children in grades 6 through 12 were required to collect a sample from each outlet for testing.
- Schools must complete initial first-draw sampling for Compliance Year 2020 between January 1, 2020 – December 31, 2020, and every 5 years thereafter or at an earlier time as determined by the Commissioner of Health. On October 13, 2020, NYS DOH provided an Extension of School Lead Testing Requirements to June 30, 2021.

KEY DEFINITIONS IN THE LAW/REGULATIONS

- Outlet means a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, hose bibb, sink or faucet.
- "Applicable" outlets: Outlets that should be sampled may be located anywhere on school property, including external outlets (hose bibbs), if the outlet may be used for drinking or cooking (including food preparation). Superintendents or their designees have the responsibility to identify which outlets on a school property meet the regulation requirements for sampling ("applicable outlets"). If a Superintendent or their designee determines that they have outlets that fall outside of the scope of the regulation (outlets not used or potentially used for drinking or cooking), the school must remediate or/and have a remedial action plan that includes details on how those outlets will not be accessed and/or utilized for drinking or cooking purposes ("non-applicable outlets").
- "Non-applicable" outlets: The Rule of Thumb is that, generally, any outlet in a room or office within a school that is not used by students (pre-kindergarten through grade 12) and does not provide water for drinking or cooking does not require sampling.
- Action level means 15 parts per billion (ppb). Lead test results greater than 15 ppb exceed the lead action level and require the outlet be taken out of service and a remediation action plan implemented.
- For additional guidance regarding applicable vs. non-applicable outlets and other requirements, please see the Appendices for NYS DOH Lead Testing in School Drinking Water 2020 Compliance Requirements and NYS DOH Frequently Asked Questions (FAQs).

SAMPLING METHODOLOGY

1 The NYS DOH Emergency Regulation, Section 67-4.3 – Monitoring states:

- First-draw samples shall be collected from all "applicable" outlets. A first-draw sample volume shall be 250 milliliters (mL), collected from a cold-water outlet before any water is used. The water shall be motionless in the pipes for a minimum of 8 hours, but no more than 18 hours, before sample collection. Note: The NYS DOH requires that for outlets which do not have regular use and water remains motionless in the pipes for greater than 18 hours, the outlets were to be sampled as well (to represent "normal use patterns").
- All first-draw samples shall be analyzed by a laboratory approved to perform such analyses by the Department's Environmental Laboratory Approval Program (ELAP).

Although not required by the NYS DOH Emergency Regulation during the initial sampling in May 2021, WSP also followed additional methodologies included in Environmental Protection Agency (EPA) document entitled "3Ts for Reducing Lead in Drinking Water in Schools."

2 Sampling Plan

September 2022:

- WSP was accompanied by the custodian and sampling was performed following the floor plan layout to accommodate efficient and timely access.

May 2021:

- In developing a sampling plan before sample collection took place at the School, WSP determined the location of the water service line. Sampling at the School started from a location closest to the service line entrance and proceeded outwards from that point.
- A map depicting the location of the service line entrance and arrows indicating the direction of sampling was provided and used by the sampling team. The sampling team verified the location of the service line entrance prior to sampling.

3 Laboratory Analysis : Samples were submitted to York Analytical (Stratford, CT) and/or EMSL (Cinnaminson, NJ) for analysis under chain-of-custody. The laboratories are certified through ELAP and approved for analysis of lead in potable water.

4 Re-sampling can be performed provided corrective action or remediation options, as reviewed in the Recommendation section, are complete. Proper flushing of new equipment (e.g., pipes, faucets etc.) is recommended.

5 Flushing Program and Resampling: when routine flushing programs are implemented, the school plumbing system should be flushed according to an establish protocol. After flushing and before sampling or resampling, a period of 3-4 days of normal use is recommended. First-draw lead water sampling can be performed after the required hold time of 8-18 hours is completed.

6 In accordance with the NYS DOH, the following post-remediation testing requirements apply:

- Follow-up samples collected after an outlet has been remediated must also be "first-draw" samples. Schools may choose to perform additional sampling (i.e., 30-second flush, etc.) to determine the contribution of lead from plumbing to guide remediation decisions.
- Only those outlets that exceed the action level need to be resampled (following remediation).
- All remediated outlets will likely require flushing before being placed back into service.
- Post-remediation test results need to be reported in the Department's HERDS application on the Health Commerce System (HCS) and on the school website within the same reporting timeframes/requirements as specified for the initial sampling.

RESULTS DISCUSSION

Based on the most recent laboratory results, all outlet results were below the newly amended (12/22/2022) Action Level of 5 ppb. A copy of the full laboratory results and the chain of custody are presented at the end of this report in Appendix A. Laboratory approvals can be found in Appendix B.

- Of the 27 samples collected on 9/14/22, **1** sample (3.7%) had a lead concentration that exceeded 15 ppb. The table below details the sample location and the laboratory result for the Exceedance sample.
- Of the 10 samples collected on 9/30/22 (first resampling), **1** sample (10%) had a lead concentration that exceeded 15 ppb. For this event, we sampled at 5 locations and collected a "first-draw" and a "30-second draw" at each location, for a total of 10 samples.
- Of the 2 samples collected on 1/20/23 (second resampling), **all** sample results were below the amended action level of 5 ppb. For this event, we sampled at 1 location and collected a "first draw" and a "30-second draw" sample. Results for both samples were below the 1 ppb limit of detection.
- The 2 exceedance samples listed below were collected at the same faucet during September 2022.

Carrie E. Tompkins Elementary School – Croton-Harmon Union Free School District				
Date	**Sample ID**	**Floor**	**Location**	**Lead Level (ppb)**
9/14/2022	LL-PR-CF-P-26	Lower Level	Project Room (Classroom 108) - Sink Faucet	20
9/30/2022	LL-PR-CF-P-03	Lower Level	Project Room (Classroom 108) - Sink Faucet	22.2

Upon receipt of the September 2022 results, WSP made the following recommendations to the district as required by Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rules and Regulations of the State of New York:

- Review the Exceedance Table and Laboratory Results indicating lead water sample results exceeded the NYSDOH Action Level of 15 ppb and require the outlet to be taken out of service and a remediation action plan be implemented. Please see Lead Testing in School Drinking Water, 10 NYCRR Subpart 67-4, adopted May 9, 2018, for applicable requirements (https://www.health.ny.gov/environmental/water/drinking/lead/lead_testing_of_school_drinking_water.htm).

POST-REMEDIATION

The district will perform remediation actions, which may include installing a tempered faucet and/or replacement of piping leading to the sink for the outlet which exceeded the Action Level of 15 ppb. No further sampling is required for outlets which will be replaced with tempered faucets.

RECOMMENDATIONS

Return the Project Room faucet to normal service. No other recommendations are issued at this time.

LIMITATIONS, EXCEPTIONS AND ASSUMPTIONS

Opinions and recommendations presented in this report apply to site conditions and features as they existed at the time of WSP's site visits, and those reasonably foreseeable. They cannot necessarily apply to conditions and features of which WSP is unaware and has not had the opportunity to evaluate. The conclusions presented in this report are professional opinions based solely upon WSP's visual observations of accessible areas and sampling data. These conclusions are intended exclusively for the purpose state herein, at the sites indicated, and for the project indicated. No expressed or implied representation or warranty is included or intended in our reports, except that our services were performed, within the limits prescribed by our client, with the customary thoroughness and competence of our profession.

If you have any questions concerning this information, please feel free to contact us at 212-465-5000. We look forward to working with you in the future.

Report Completed by:

Steve Tochilin, CIH
Senior Industrial Hygienist

Report Completed by:

Joseph Kapp

Joseph Kapp, CIH
Assistant Vice President
Industrial Hygiene & Hazmat Service, Earth+Environment

Appendix A – Laboratory Results & Chain of Custody
Appendix B - Laboratory ELAP Certifications
Appendix C - NYS DOH Lead Testing in School Drinking Water 2020 Compliance Requirements
Appendix D – NYS Amended Law, Senate Bill S2122A-December 22, 2022

CC : Alexander Smolyar

APPENDIX A

Laboratory Results & Chain of Custody

Technical Report

prepared for:

WSP USA (New York, NY)
One Penn Plaza, 2nd Floor
New York NY, 10119
Attention: Joseph Kapp

Report Date: 01/30/2023
Client Project ID: 31405320.032 Carrie E.Tompkins Elementary School
York Project (SDG) No.: 23A1092

CT Cert. No. PH-0723 New Jersey Cert. No. CT005 and NY037 New York Cert. Nos. 10854 and 12058 PA Cert. No. 68-04440

120 RESEARCH DRIVE STRATFORD, CT 06615 ■ 132-02 89th AVENUE RICHMOND HILL, NY 11418
www.YORKLAB.com (203) 325-1371 FAX (203) 357-0166 ClientServices@yorklab.com

Report Date: 01/30/2023
Client Project ID: 31405320.032 Carrie E.Tompkins Elementary School
York Project (SDG) No.: 23A1092

WSP USA (New York, NY)
One Penn Plaza, 2nd Floor
New York NY, 10119
Attention: Joseph Kapp

Purpose and Results

This report contains the analytical data for the sample(s) identified on the attached chain-of-custody received in our laboratory on January 23, 2023 and listed below. The project was identified as your project: **31405320.032 Carrie E.Tompkins Elementary School**.

The analyses were conducted utilizing appropriate EPA, Standard Methods, and ASTM methods as detailed in the data summary tables.

All samples were received in proper condition meeting the customary acceptance requirements for environmental samples except those indicated under the Sample and Analysis Qualifiers section of this report.

All analyses met the method and laboratory standard operating procedure requirements except as indicated by any data flags, the meaning of which are explained in the Sample and Data Qualifiers Relating to This Work Order section of this report and case narrative if applicable.

The results of the analyses, which are all reported on dry weight basis (soils) unless otherwise noted, are detailed in the following pages.

Please contact Client Services at 203.325.1371 with any questions regarding this report.

York Sample ID	Client Sample ID	Matrix	Date Collected	Date Received
23A1092-01	LL-PR-CF-P-03	Drinking Water	01/20/2023	01/23/2023
23A1092-02	LL-PR-CF-30S-04	Drinking Water	01/20/2023	01/23/2023

General Notes for York Project (SDG) No.: 23A1092

1. The RLs and MDLs (Reporting Limit and Method Detection Limit respectively) reported are adjusted for any dilution necessary due to the levels of target and/or non-target analytes and matrix interference. The RL(REPORTING LIMIT) is based upon the lowest standard utilized for the calibration where applicable.
2. Samples are retained for a period of thirty days after submittal of report, unless other arrangements are made.
3. York's liability for the above data is limited to the dollar value paid to York for the referenced project.
4. This report shall not be reproduced without the written approval of York Analytical Laboratories, Inc.
5. All analyses conducted met method or Laboratory SOP requirements. See the Sample and Data Qualifiers Section for further information.
6. It is noted that no analyses reported herein were subcontracted to another laboratory, unless noted in the report.
7. This report reflects results that relate only to the samples submitted on the attached chain-of-custody form(s) received by York.
8. Analyses conducted at York Analytical Laboratories, Inc. Stratford, CT are indicated by NY Cert. No. 10854; those conducted at York Analytical Laboratories, Inc., Richmond Hill, NY are indicated by NY Cert. No. 12058.

Approved By:  **Date:** 01/30/2023

Cassie L. Mosher
Laboratory Manager

Sample Information

Client Sample ID: **LL-PR-CF-P-03** **York Sample ID:** **23A1092-01**

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
23A1092	31405320.032 Carrie E.Tompkins Elementary School	Drinking Water	January 20, 2023 5:55 am	01/23/2023

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	01/26/2023 14:45	01/30/2023 12:38	AJL
							Certifications:	CTDOH-PH-0723,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: **LL-PR-CF-30S-04** **York Sample ID:** **23A1092-02**

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
23A1092	31405320.032 Carrie E.Tompkins Elementary School	Drinking Water	January 20, 2023 5:55 am	01/23/2023

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	01/26/2023 14:45	01/30/2023 12:39	AJL
							Certifications:	CTDOH-PH-0723,NELAC-NY10854,NJDEP,PADEP		

Analytical Batch Summary

Batch ID: BA31415 **Preparation Method:** EPA 200.8 **Prepared By:** AJL

YORK Sample ID	Client Sample ID	Preparation Date
23A1092-01	LL-PR-CF-P-03	01/26/23
23A1092-02	LL-PR-CF-30S-04	01/26/23
BA31415-BLK1	Blank	01/26/23
BA31415-BS1	LCS	01/26/23
BA31415-DUP1	Duplicate	01/26/23
BA31415-MS1	Matrix Spike	01/26/23

Metals by ICP/MS - Quality Control Data

York Analytical Laboratories, Inc. - Stratford

Analyte	Result	Reporting Limit	Units	Spike Level	Source* Result	%REC	%REC Limits	Flag	RPD	RPD Limit	Flag
Batch BA31415 - EPA 200.8											
Blank (BA31415-BLK1)									Prepared: 01/26/2023 Analyzed: 01/30/2023		
Lead	ND	1.00	ug/L								
LCS (BA31415-BS1)									Prepared: 01/26/2023 Analyzed: 01/30/2023		
Lead	50.5		ug/L	50.0		101	85-115				
Duplicate (BA31415-DUP1)	*Source sample: 23A1317-04 (Duplicate)								Prepared: 01/26/2023 Analyzed: 01/30/2023		
Lead	ND	1.00	ug/L		ND					20	
Matrix Spike (BA31415-MS1)	*Source sample: 23A1317-04 (Matrix Spike)								Prepared: 01/26/2023 Analyzed: 01/30/2023		
Lead	50.1		ug/L	50.0	-0.074	100	75-125				

Sample and Data Qualifiers Relating to This Work Order

Definitions and Other Explanations

*	Analyte is not certified or the state of the samples origination does not offer certification for the Analyte.
ND	NOT DETECTED - the analyte is not detected at the Reported to level (LOQ/RL or LOD/MDL)
RL	REPORTING LIMIT - the minimum reportable value based upon the lowest point in the analyte calibration curve.
LOQ	LIMIT OF QUANTITATION - the minimum concentration of a target analyte that can be reported within a specified degree of confidence. This is the lowest point in an analyte calibration curve that has been subjected to all steps of the processing/analysis and verified to meet defined criteria. This is based upon NELAC 2009 Standards and applies to all analyses.
LOD	LIMIT OF DETECTION - a verified estimate of the minimum concentration of a substance in a given matrix that an analytical process can reliably detect. This is based upon NELAC 2009 Standards and applies to all analyses conducted under the auspices of EPA SW-846.
MDL	METHOD DETECTION LIMIT - a statistically derived estimate of the minimum amount of a substance an analytical system can reliably detect with a 99% confidence that the concentration of the substance is greater than zero. This is based upon 40 CFR Part 136 Appendix B and applies only to EPA 600 and 200 series methods.
Reported to	This indicates that the data for a particular analysis is reported to either the LOD/MDL, or the LOQ/RL. In cases where the "Reported to" is located above the LOD/MDL, any value between this and the LOQ represents an estimated value which is "J" flagged accordingly. This applies to volatile and semi-volatile target compounds only.
NR	Not reported
RPD	Relative Percent Difference
Wet	The data has been reported on an as-received (wet weight) basis
Low Bias	Low Bias flag indicates that the recovery of the flagged analyte is below the laboratory or regulatory lower control limit. The data user should take note that this analyte may be biased low but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
High Bias	High Bias flag indicates that the recovery of the flagged analyte is above the laboratory or regulatory upper control limit. The data user should take note that this analyte may be biased high but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
Non-Dir.	Non-dir. flag (Non-Directional Bias) indicates that the Relative Percent Difference (RPD) (a measure of precision) among the MS and MSD data is outside the laboratory or regulatory control limit. This alerts the data user where the MS and MSD are from site-specific samples that the RPD is high due to either non-homogeneous distribution of target analyte between the MS/MSD or indicates poor reproducibility for other reasons.

If EPA SW-846 method 8270 is included herein it is noted that the target compound N-nitrosodiphenylamine (NDPA) decomposes in the gas chromatographic inlet and cannot be separated from diphenylamine (DPA). These results could actually represent 100% DPA, 100% NDPA or some combination of the two. For this reason, York reports the combined result for n-nitrosodiphenylamine and diphenylamine for either of these compounds as a combined concentration as Diphenylamine.

If Total PCBs are detected and the target aroclors reported are "Not detected", the Total PCB value is reported due to the presence of either or both Aroclors 1262 and 1268 which are non-target aroclors for some regulatory lists.

2-chloroethylvinyl ether readily breaks down under acidic conditions. Samples that are acid preserved, including standards will exhibit breakdown. The data user should take note.

Certification for pH is no longer offered by NYDOH ELAP.

Semi-Volatile and Volatile analyses are reported down to the LOD/MDL, with values between the LOD/MDL and the LOQ being "J" flagged as estimated results.

For analyses by EPA SW-846-8270D, the Limit of Quantitation (LOQ) reported for benzidine is based upon the lowest standard used for calibration and is not a verified LOQ due to this compound's propensity for oxidative losses during extraction/concentration procedures and non-reproducible chromatographic performance.

23A1092

Lead (Pb) Chain of Custody

Client: Croton-Harmon Union Free School District

Location Sampled: Carrie E. Tompkins Elementary School

Date: January 20, 2023 | Address: 8 Gerstein Street, Croton-on-Hudson, NY 10520

Report To (Name): Joseph Kapp | Sampled By:

Email Address: Joseph.Kapp@wsp.com; LB.LabResults@wsp.com

Project Number: 31405320.032

Turnaround Time (TAT) Options* - Please Check

3 Hour	6 Hour	24 Hour	48 Hour	72 Hour	X 120 Hour	1 Week	2 Wee

Drinking Water Preserved with HNO_3 pH < 2

Sample ID	Lab ID	Sample Description	Volume	Date/Tin Sample
Ex. 03-312-DW-P-015		Floor, Room Name, Room Number, Type, Type Number	250 mL	
L-PR-CF-P-03		Project Room (Classroom 108), Sink Faucet (cold tap, first draw)	250 mL	1-20-2 0555
L-PR-CF-30S-04		Project Room (Classroom 108), Sink Faucet (cold tap, 30-sec flush)	250 mL	1-20-2 0555
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
		Rec: [initials] for Andrew Sherpa 1/23/23 1140	250 mL	
		Rel: [initials] for Andrew Sherpa 1/23/23 1435	250 mL	
			250 mL	
			250 mL	

Relinquished by:	[signature]	Date:	1-20-23	Time: 9 AM
Received by:	[signature]	Date:	1-23-23	Time: 1435

Comments: A first draw sample (P) was taken at a drinking water fountain (DW) on the 3rd floor (003) outside of room 312 (3 and is the 15th outlet counted (015). DW= drinking water fountain. WB= Water Bottle Filler. CF= Classroom Sink Faucet. KF= Kitchen Faucet. BF= Bathroom Sink Faucet. NS= Nurse's Office Faucet.

0.9°C

Technical Report

prepared for:

WSP USA (New York, NY)
One Penn Plaza, 2nd Floor
New York NY, 10119
Attention: Joseph Kapp

Report Date: 10/11/2022
Client Project ID: 31402629.070.02.00 Carrie E. Tompkins ES
York Project (SDG) No.: 22I1613

Report Date: 10/11/2022
Client Project ID: 31402629.070.02.00 Carrie E. Tompkins ES
York Project (SDG) No.: 22I1613

WSP USA (New York, NY)
One Penn Plaza, 2nd Floor
New York NY, 10119
Attention: Joseph Kapp

Purpose and Results

This report contains the analytical data for the sample(s) identified on the attached chain-of-custody received in our laboratory on September 30, 2022 and listed below. The project was identified as your project: **31402629.070.02.00 Carrie E. Tompkins ES**.

The analyses were conducted utilizing appropriate EPA, Standard Methods, and ASTM methods as detailed in the data summary tables.

All samples were received in proper condition meeting the customary acceptance requirements for environmental samples except those indicated under the Sample and Analysis Qualifiers section of this report.

All analyses met the method and laboratory standard operating procedure requirements except as indicated by any data flags, the meaning of which are explained in the Sample and Data Qualifiers Relating to This Work Order section of this report and case narrative if applicable.

The results of the analyses, which are all reported on dry weight basis (soils) unless otherwise noted, are detailed in the following pages.

Please contact Client Services at 203.325.1371 with any questions regarding this report.

York Sample ID	Client Sample ID	Matrix	Date Collected	Date Received
22I1613-01	LL-PR-CF-P-03	Drinking Water	09/30/2022	09/30/2022
22I1613-02	LL-PR-CF-30S-04	Drinking Water	09/30/2022	09/30/2022
22I1613-03	OD-RPZ-VS-P-05	Drinking Water	09/30/2022	09/30/2022
22I1613-04	OD-RPZ-VS-30S-06	Drinking Water	09/30/2022	09/30/2022
22I1613-05	SF-FIELD-WB-P-07	Drinking Water	09/30/2022	09/30/2022
22I1613-06	SF-FIELD-WB-30S-08	Drinking Water	09/30/2022	09/30/2022
22I1613-07	SF-FIELD-HB-P-09	Drinking Water	09/30/2022	09/30/2022
22I1613-08	SF-FIELD-HB-30S-10	Drinking Water	09/30/2022	09/30/2022
22I1613-09	SF-BS-HB-P-11	Drinking Water	09/30/2022	09/30/2022
22I1613-10	SF-BS-HB-30S-12	Drinking Water	09/30/2022	09/30/2022

General Notes for York Project (SDG) No.: 22I1613

1. The RLs and MDLs (Reporting Limit and Method Detection Limit respectively) reported are adjusted for any dilution necessary due to the levels of target and/or non-target analytes and matrix interference. The RL(REPORTING LIMIT) is based upon the lowest standard utilized for the calibration where applicable.
2. Samples are retained for a period of thirty days after submittal of report, unless other arrangements are made.
3. York's liability for the above data is limited to the dollar value paid to York for the referenced project.
4. This report shall not be reproduced without the written approval of York Analytical Laboratories, Inc.
5. All analyses conducted met method or Laboratory SOP requirements. See the Sample and Data Qualifiers Section for further information.
6. It is noted that no analyses reported herein were subcontracted to another laboratory, unless noted in the report.
7. This report reflects results that relate only to the samples submitted on the attached chain-of-custody form(s) received by York.
8. Analyses conducted at York Analytical Laboratories, Inc. Stratford, CT are indicated by NY Cert. No. 10854; those conducted at York Analytical Laboratories, Inc., Richmond Hill, NY are indicated by NY Cert. No. 12058.

Approved By:  **Date:** 10/11/2022

Cassie L. Mosher
Laboratory Manager

Sample Information

Client Sample ID: LL-PR-CF-P-03 **York Sample ID:** 22I1613-01

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:18 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**22.2**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:34	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: LL-PR-CF-30S-04 **York Sample ID:** 22I1613-02

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:19 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**1.57**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:37	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: OD-RPZ-VS-P-05 **York Sample ID:** 22I1613-03

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:34 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:38	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: OD-RPZ-VS-30S-06 **York Sample ID:** 22I1613-04

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:35 am	09/30/2022

Sample Information

Client Sample ID: OD-RPZ-VS-30S-06 **York Sample ID:** 22I1613-04

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:35 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:39	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-FIELD-WB-P-07 **York Sample ID:** 22I1613-05

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:43 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**4.27**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:41	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-FIELD-WB-30S-08 **York Sample ID:** 22I1613-06

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:44 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:42	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-FIELD-HB-P-09 **York Sample ID:** 22I1613-07

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:46 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Information

Client Sample ID: SF-FIELD-HB-P-09 **York Sample ID:** 22I1613-07

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:46 am	09/30/2022

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**1.90**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:43	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-FIELD-HB-30S-10 **York Sample ID:** 22I1613-08

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:47 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	Lead	ND		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:47	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-BS-HB-P-11 **York Sample ID:** 22I1613-09

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:51 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**2.07**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:49	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Sample Information

Client Sample ID: SF-BS-HB-30S-12 **York Sample ID:** 22I1613-10

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:52 am	09/30/2022

Lead by EPA 200.8 **Log-in Notes:** **Sample Notes:**

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst

Sample Information

Client Sample ID: SF-BS-HB-30S-12 **York Sample ID:** 22I1613-10

York Project (SDG) No.	Client Project ID	Matrix	Collection Date/Time	Date Received
22I1613	31402629.070.02.00 Carrie E. Tompkins ES	Drinking Water	September 30, 2022 6:52 am	09/30/2022

Lead by EPA 200.8

Log-in Notes:

Sample Notes:

Sample Prepared by Method: EPA 200.8

CAS No.	Parameter	Result	Flag	Units	Reported to LOQ	Dilution	Reference Method	Date/Time Prepared	Date/Time Analyzed	Analyst
7439-92-1	**Lead**	**5.97**		ug/L	1.00	1	EPA 200.8	10/04/2022 12:11	10/04/2022 17:50	KT
							Certifications:	CTDOH,NELAC-NY10854,NJDEP,PADEP		

Analytical Batch Summary

Batch ID: BJ20148 **Preparation Method:** EPA 200.8 **Prepared By:** K T

YORK Sample ID	Client Sample ID	Preparation Date
22I1613-01	LL-PR-CF-P-03	10/04/22
22I1613-02	LL-PR-CF-30S-04	10/04/22
22I1613-03	OD-RPZ-VS-P-05	10/04/22
22I1613-04	OD-RPZ-VS-30S-06	10/04/22
22I1613-05	SF-FIELD-WB-P-07	10/04/22
22I1613-06	SF-FIELD-WB-30S-08	10/04/22
22I1613-07	SF-FIELD-HB-P-09	10/04/22
22I1613-08	SF-FIELD-HB-30S-10	10/04/22
22I1613-09	SF-BS-HB-P-11	10/04/22
22I1613-10	SF-BS-HB-30S-12	10/04/22
BJ20148-BLK1	Blank	10/04/22
BJ20148-BS1	LCS	10/04/22
BJ20148-DUP1	Duplicate	10/04/22
BJ20148-MS1	Matrix Spike	10/04/22
BJ20148-MS2	Matrix Spike	10/04/22

Metals by ICP/MS - Quality Control Data

York Analytical Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source* Result	%REC	%REC Limits	Flag	RPD	RPD Limit	Flag
Batch BJ20148 - EPA 200.8											
Blank (BJ20148-BLK1)								Prepared & Analyzed: 10/04/2022			
Lead	ND	1.00	ug/L								
LCS (BJ20148-BS1)								Prepared & Analyzed: 10/04/2022			
Lead	48.2		ug/L	50.0		96.3	85-115				
Duplicate (BJ20148-DUP1)	*Source sample: 22I1619-05 (Duplicate)							Prepared & Analyzed: 10/04/2022			
Lead	ND	1.00	ug/L		ND					20	
Matrix Spike (BJ20148-MS1)	*Source sample: 22I1619-05 (Matrix Spike)							Prepared & Analyzed: 10/04/2022			
Lead	47.8		ug/L	50.0	0.244	95.0	75-125				
Matrix Spike (BJ20148-MS2)	*Source sample: 22I1613-01 (LL-PR-CF-P-03)							Prepared & Analyzed: 10/04/2022			
Lead	68.7		ug/L	50.0	22.2	92.9	75-125				

Sample and Data Qualifiers Relating to This Work Order

Definitions and Other Explanations

*	Analyte is not certified or the state of the samples origination does not offer certification for the Analyte.
ND	NOT DETECTED - the analyte is not detected at the Reported to level (LOQ/RL or LOD/MDL)
RL	REPORTING LIMIT - the minimum reportable value based upon the lowest point in the analyte calibration curve.
LOQ	LIMIT OF QUANTITATION - the minimum concentration of a target analyte that can be reported within a specified degree of confidence. This is the lowest point in an analyte calibration curve that has been subjected to all steps of the processing/analysis and verified to meet defined criteria. This is based upon NELAC 2009 Standards and applies to all analyses.
LOD	LIMIT OF DETECTION - a verified estimate of the minimum concentration of a substance in a given matrix that an analytical process can reliably detect. This is based upon NELAC 2009 Standards and applies to all analyses conducted under the auspices of EPA SW-846.
MDL	METHOD DETECTION LIMIT - a statistically derived estimate of the minimum amount of a substance an analytical system can reliably detect with a 99% confidence that the concentration of the substance is greater than zero. This is based upon 40 CFR Part 136 Appendix B and applies only to EPA 600 and 200 series methods.
Reported to	This indicates that the data for a particular analysis is reported to either the LOD/MDL, or the LOQ/RL. In cases where the "Reported to" is located above the LOD/MDL, any value between this and the LOQ represents an estimated value which is "J" flagged accordingly. This applies to volatile and semi-volatile target compounds only.
NR	Not reported
RPD	Relative Percent Difference
Wet	The data has been reported on an as-received (wet weight) basis
Low Bias	Low Bias flag indicates that the recovery of the flagged analyte is below the laboratory or regulatory lower control limit. The data user should take note that this analyte may be biased low but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
High Bias	High Bias flag indicates that the recovery of the flagged analyte is above the laboratory or regulatory upper control limit. The data user should take note that this analyte may be biased high but should evaluate multiple lines of evidence including the LCS and site-specific MS/MSD data to draw bias conclusions. In cases where no site-specific MS/MSD was requested, only the LCS data can be used to evaluate such bias.
Non-Dir.	Non-dir. flag (Non-Directional Bias) indicates that the Relative Percent Difference (RPD) (a measure of precision) among the MS and MSD data is outside the laboratory or regulatory control limit. This alerts the data user where the MS and MSD are from site-specific samples that the RPD is high due to either non-homogeneous distribution of target analyte between the MS/MSD or indicates poor reproducibility for other reasons.

If EPA SW-846 method 8270 is included herein it is noted that the target compound N-nitrosodiphenylamine (NDPA) decomposes in the gas chromatographic inlet and cannot be separated from diphenylamine (DPA). These results could actually represent 100% DPA, 100% NDPA or some combination of the two. For this reason, York reports the combined result for n-nitrosodiphenylamine and diphenylamine for either of these compounds as a combined concentration as Diphenylamine.

If Total PCBs are detected and the target aroclors reported are "Not detected", the Total PCB value is reported due to the presence of either or both Aroclors 1262 and 1268 which are non-target aroclors for some regulatory lists.

2-chloroethylvinyl ether readily breaks down under acidic conditions. Samples that are acid preserved, including standards will exhibit breakdown. The data user should take note.

Certification for pH is no longer offered by NYDOH ELAP.

Semi-Volatile and Volatile analyses are reported down to the LOD/MDL, with values between the LOD/MDL and the LOQ being "J" flagged as estimated results.

For analyses by EPA SW-846-8270D, the Limit of Quantitation (LOQ) reported for benzidine is based upon the lowest standard used for calibration and is not a verified LOQ due to this compound's propensity for oxidative losses during extraction/concentration procedures and non-reproducible chromatographic performance.

22 I 613

Lead (Pb) Chain of Custody

Client: Croton-Harmon Union Free School District

Location Sampled: Carrie E. Tompkins Elementary School

Date: Sept. 30, 2022 | **Address:** 8 Gerstein Street, Croton-on-Hudson, NY 10520

Report To (Name): Joseph Kapp | **Sampled By:** Steve Tochilin

Email Address: Joseph.Kapp@wsp.com; LB.LabResults@wsp.com

Project Number: 31402629.070.02.00

Turnaround Time (TAT) Options* - Please Check

3 Hour	6 Hour	24 Hour	48 Hour	72 Hour	X 120 Hour	1 Week	2 Week

Drinking Water Preserved with HNO_3 pH < 2

Sample ID	Lab ID	Sample Description	Volume	Date/Time Sampled
Ex. 003-312-DW-P-015		Floor, Room Name, Room Number, Type, Type Number	250 mL	
LL-PR-CF-P-03		Projects Room (Room 108) - Sink Faucet – First Draw	250 mL	9/30/2022 6:18
LL-PR-CF-30S-04		Projects Room (Room 108) - Sink Faucet – 30-second Flush	250 mL	9/30/2022 6:19
OD-RPZ-VS-P-05		Outdoors – Reduced Pressure Zone Valve – Village Supply Pit – First Draw	250 mL	9/30/2022 6:34
OD-RPZ-VS-30S-06		Outdoors – Reduced Pressure Zone Valve – Village Supply Pit – 30-second Flush	250 mL	9/30/2022 6:35
SF-FIELD-WB-P-07		Spencer Field – Water Bottle Filler – First Draw	250 mL	9/30/2022 6:43
SF-FIELD-WB-30S-08		Spencer Field – Water Bottle Filler – 30-second Flush	250 mL	9/30/2022 6:44
SF-FIELD-HB-P-09		Spencer Field – Hose Bibb – First Draw	250 mL	9/30/2022 6:46
SF-FIELD-HB-30S-10		Spencer Field – Hose Bibb – 30-second Flush	250 mL	9/30/2022 6:47
SF-BS-HB-P-11		Spencer Field – Booster Shack – Hose Bibb (lower) – First Draw	250 mL	9/30/2022 6:51
SF-BS-HB-30S-12		Spencer Field – Booster Shack – Hose Bibb (lower) – 30-second Flush	250 mL	9/30/2022 6:52
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	
			250 mL	

Relinquished by:	Steve Tochilin	**Date:**	9/30/2022	**Time:**	9:20 AM
Received by:	Chris York	**Date:**	9-30-22	**Time:**	13:18

Comments: A first draw sample (P) was taken at a drinking water fountain (DW) on the 3rd floor (003) outside of room 312 (312) and is the 15th outlet counted (015). DW= drinking water fountain. WB= Water Bottle Filler. CF= Classroom Sink Faucet. KF= Kitchen Faucet. BF= Bathroom Sink Faucet. NS= Nurse's Office Faucet.

Rel: Chris York 9-30-22 1514 Rec: [signature] 9/30/22 1514

3-8c

APPENDIX C

Laboratory ELAP Certifications

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2026
Issued April 01, 2025

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

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

MS. CATHERINE L. MOSHER
YORK ANALYTICAL LABORATORIES INC
120 RESEARCH DRIVE
STRATFORD, CT 06615

NY Lab Id No: 10854

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

Acrylates

Acrolein (Propenal)	EPA 8260D
	EPA 8260C
Acrylonitrile	EPA 8260D
	EPA 8260C
Methyl methacrylate	EPA 8260D
	EPA 8260C

Amines

1,2-Diphenylhydrazine	EPA 8270D
	EPA 8270E
2-Nitroaniline	EPA 8270D
	EPA 8270E
3-Nitroaniline	EPA 8270D
	EPA 8270E
4-Chloroaniline	EPA 8270D
	EPA 8270E
4-Nitroaniline	EPA 8270D
	EPA 8270E
Aniline	EPA 8270D
	EPA 8270E
Carbazole	EPA 8270D
	EPA 8270E
Diphenylamine	EPA 8270D
	EPA 8270E

Benzidines

3,3'-Dichlorobenzidine	EPA 8270D
	EPA 8270E

Serial No.: 70286

Property of the New York State Department of Health. Certificates are valid only at the address shown and must be conspicuously posted by the laboratory. Continued accreditation depends on the laboratory's successful ongoing participation in the Program. Consumers may verify a laboratory's accreditation status online at https://apps.health.ny.gov/pubdoh/applinks/wc/elappublicweb/, by phone (518) 485-5570 or by email to elap@health.ny.gov.

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All approved analytes are listed below:

Benzidines

Benzidine	EPA 8270D
	EPA 8270E

Characteristic Testing

Corrosivity (pH)	EPA 9045D
Free Liquids	EPA 9095B
Ignitability	EPA 1010A
Synthetic Precipitation Leaching Proc.	EPA 1312
TCLP	EPA 1311

Chlorinated Hydrocarbon Pesticides

4,4'-DDD	EPA 8081B
4,4'-DDE	EPA 8081B
4,4'-DDT	EPA 8081B
Aldrin	EPA 8081B
alpha-BHC	EPA 8081B
alpha-Chlordane	EPA 8081B
Atrazine	EPA 8270D
	EPA 8270E
beta-BHC	EPA 8081B
Chlordane Total	EPA 8081B
delta-BHC	EPA 8081B
Dieldrin	EPA 8081B
Endosulfan I	EPA 8081B
Endosulfan II	EPA 8081B
Endosulfan sulfate	EPA 8081B
Endrin	EPA 8081B
Endrin aldehyde	EPA 8081B

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All approved analytes are listed below:

Chlorinated Hydrocarbon Pesticides

Endrin Ketone	EPA 8081B
gamma-Chlordane	EPA 8081B
Heptachlor	EPA 8081B
Heptachlor epoxide	EPA 8081B
Lindane	EPA 8081B
Methoxychlor	EPA 8081B
Mirex	EPA 8081B
Toxaphene	EPA 8081B

Chlorinated Hydrocarbons

1,2,3-Trichlorobenzene	EPA 8260D
	EPA 8260C
1,2,4,5-Tetrachlorobenzene	EPA 8270D
	EPA 8270E
1,2,4-Trichlorobenzene	EPA 8270D
	EPA 8270E
2-Chloronaphthalene	EPA 8270D
	EPA 8270E
Hexachlorobenzene	EPA 8270D
	EPA 8270E
Hexachlorobutadiene	EPA 8270D
	EPA 8270E
Hexachlorocyclopentadiene	EPA 8270D
	EPA 8270E
Hexachloroethane	EPA 8270D
	EPA 8270E

Serial No.: 70286

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All approved analytes are listed below:

Chlorophenoxy Acid Pesticides

2,4,5-T	EPA 8151A
2,4,5-TP (Silvex)	EPA 8151A
2,4-D	EPA 8151A
Dicamba	EPA 8151A

Haloethers

2,2'-Oxybis(1-chloropropane)	EPA 8270D
	EPA 8270E
4-Bromophenylphenyl ether	EPA 8270D
	EPA 8270E
4-Chlorophenylphenyl ether	EPA 8270D
	EPA 8270E
Bis(2-chloroethoxy)methane	EPA 8270D
	EPA 8270E
Bis(2-chloroethyl)ether	EPA 8270D
	EPA 8270E

Metals I

Barium, Total	EPA 6010C
	EPA 6010D
Cadmium, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Calcium, Total	EPA 6010C
	EPA 6010D
Chromium, Total	EPA 6010C
	EPA 6010D

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NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2026
Issued April 01, 2025

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

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

MS. CATHERINE L. MOSHER
YORK ANALYTICAL LABORATORIES INC
120 RESEARCH DRIVE
STRATFORD, CT 06615

NY Lab Id No: 10854

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Metals I

Chromium, Total	EPA 6020A
	EPA 6020B
Copper, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Iron, Total	EPA 6010C
	EPA 6010D
Lead, Total	EPA 6010C
	EPA 6010D
Magnesium, Total	EPA 6010C
	EPA 6010D
Manganese, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Nickel, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Potassium, Total	EPA 6010C
	EPA 6010D
Silver, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Sodium, Total	EPA 6010C

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Metals I

Sodium, Total	EPA 6010D

Metals II

Aluminum, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Antimony, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Arsenic, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Beryllium, Total	EPA 6010C
	EPA 6010D
Chromium VI	EPA 7196A
Mercury, Total	EPA 7471B
	EPA 7473
Selenium, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Vanadium, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B

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Metals II

Zinc, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B

Metals III

Cobalt, Total	EPA 6010C
	EPA 6010D
	EPA 6020A
	EPA 6020B
Thallium, Total	EPA 6010C
	EPA 6010D
Tin, Total	EPA 6020A
	EPA 6020B
Titanium, Total	EPA 6020A

Miscellaneous

Cyanide, Total	EPA 9014
Extractable Organic Halides	EPA 9023

Nitroaromatics and Isophorone

2,4-Dinitrotoluene	EPA 8270D
	EPA 8270E
2,6-Dinitrotoluene	EPA 8270D
	EPA 8270E
Isophorone	EPA 8270D
	EPA 8270E
Nitrobenzene	EPA 8270D
	EPA 8270E

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Nitroaromatics and Isophorone	
Pyridine	EPA 8270D
	EPA 8270E
Nitrosoamines	
N-Nitrosodimethylamine	EPA 8270D
	EPA 8270E
N-Nitrosodi-n-propylamine	EPA 8270D
	EPA 8270E
N-Nitrosodiphenylamine	EPA 8270D
	EPA 8270E
Organophosphate Pesticides	
Parathion ethyl	EPA 8270D
	EPA 8270E
Petroleum Hydrocarbons	
Diesel Range Organics	EPA 8015D
Gasoline Range Organics	EPA 8015D
Phthalate Esters	
Benzyl butyl phthalate	EPA 8270D
	EPA 8270E
Bis(2-ethylhexyl) phthalate	EPA 8270D
	EPA 8270E
Diethyl phthalate	EPA 8270D
	EPA 8270E
Dimethyl phthalate	EPA 8270D
	EPA 8270E
Di-n-butyl phthalate	EPA 8270D
	EPA 8270E

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Phthalate Esters

Di-n-octyl phthalate	EPA 8270D
	EPA 8270E

Polychlorinated Biphenyls

Aroclor 1016 (PCB-1016)	EPA 8082A
Aroclor 1016 (PCB-1016) in Oil	EPA 8082A
Aroclor 1221 (PCB-1221)	EPA 8082A
Aroclor 1221 (PCB-1221) in Oil	EPA 8082A
Aroclor 1232 (PCB-1232)	EPA 8082A
Aroclor 1232 (PCB-1232) in Oil	EPA 8082A
Aroclor 1242 (PCB-1242)	EPA 8082A
Aroclor 1242 (PCB-1242) in Oil	EPA 8082A
Aroclor 1248 (PCB-1248)	EPA 8082A
Aroclor 1248 (PCB-1248) in Oil	EPA 8082A
Aroclor 1254 (PCB-1254)	EPA 8082A
Aroclor 1254 (PCB-1254) in Oil	EPA 8082A
Aroclor 1260 (PCB-1260)	EPA 8082A
Aroclor 1260 (PCB-1260) in Oil	EPA 8082A
Aroclor 1262 (PCB-1262)	EPA 8082A
Aroclor 1262 (PCB-1262) in Oil	EPA 8082A
Aroclor 1268 (PCB-1268)	EPA 8082A
Aroclor 1268 (PCB-1268) in Oil	EPA 8082A

Polynuclear Aromatic Hydrocarbons

Acenaphthene	EPA 8270D
	EPA 8270E
Acenaphthylene	EPA 8270D
	EPA 8270E

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Polynuclear Aromatic Hydrocarbons

Anthracene	EPA 8270D
	EPA 8270E
Benzo(a)anthracene	EPA 8270D
	EPA 8270E
Benzo(a)pyrene	EPA 8270D
	EPA 8270E
Benzo(b)fluoranthene	EPA 8270D
	EPA 8270E
Benzo(g,h,i)perylene	EPA 8270D
	EPA 8270E
Benzo(k)fluoranthene	EPA 8270D
	EPA 8270E
Chrysene	EPA 8270D
	EPA 8270E
Dibenzo(a,h)anthracene	EPA 8270D
	EPA 8270E
Fluoranthene	EPA 8270D
	EPA 8270E
Fluorene	EPA 8270D
	EPA 8270E
Naphthalene	EPA 8270D
	EPA 8270E
Phenanthrene	EPA 8270D
	EPA 8270E
Pyrene	EPA 8270D
	EPA 8270E

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Priority Pollutant Phenols

2,3,4,6 Tetrachlorophenol	EPA 8270D
	EPA 8270E
2,4,5-Trichlorophenol	EPA 8270D
	EPA 8270E
2,4,6-Trichlorophenol	EPA 8270D
	EPA 8270E
2,4-Dichlorophenol	EPA 8270D
	EPA 8270E
2,4-Dimethylphenol	EPA 8270D
	EPA 8270E
2,4-Dinitrophenol	EPA 8270D
	EPA 8270E
2-Chlorophenol	EPA 8270D
	EPA 8270E
2-Methyl-4,6-dinitrophenol	EPA 8270D
	EPA 8270E
2-Methylphenol	EPA 8270D
	EPA 8270E
2-Nitrophenol	EPA 8270D
	EPA 8270E
4-Chloro-3-methylphenol	EPA 8270D
	EPA 8270E
4-Methylphenol	EPA 8270D
	EPA 8270E
4-Nitrophenol	EPA 8270D
	EPA 8270E
Pentachlorophenol	EPA 8270D

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Priority Pollutant Phenols

Pentachlorophenol	EPA 8270E
Phenol	EPA 8270D
	EPA 8270E

Semi-Volatile Organics

1,1'-Biphenyl	EPA 8270D
	EPA 8270E
1,2-Dichlorobenzene, Semi-volatile	EPA 8270D
	EPA 8270E
1,3-Dichlorobenzene, Semi-volatile	EPA 8270D
	EPA 8270E
1,4-Dichlorobenzene, Semi-volatile	EPA 8270D
	EPA 8270E
2-Methylnaphthalene	EPA 8270D
	EPA 8270E
Acetophenone	EPA 8270D
	EPA 8270E
Benzaldehyde	EPA 8270D
	EPA 8270E
Benzoic Acid	EPA 8270D
	EPA 8270E
Benzyl alcohol	EPA 8270D
	EPA 8270E
Caprolactam	EPA 8270D
	EPA 8270E
Dibenzofuran	EPA 8270D
	EPA 8270E

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Volatile Aromatics

1,2,4-Trichlorobenzene, Volatile	EPA 8260D
	EPA 8260C
1,2,4-Trimethylbenzene	EPA 8260D
	EPA 8260C
1,2-Dichlorobenzene	EPA 8260D
	EPA 8260C
1,3,5-Trimethylbenzene	EPA 8260D
	EPA 8260C
1,3-Dichlorobenzene	EPA 8260D
	EPA 8260C
1,4-Dichlorobenzene	EPA 8260D
	EPA 8260C
2-Chlorotoluene	EPA 8260D
	EPA 8260C
4-Chlorotoluene	EPA 8260D
	EPA 8260C
Benzene	EPA 8260D
	EPA 8260C
Bromobenzene	EPA 8260D
	EPA 8260C
Chlorobenzene	EPA 8260D
	EPA 8260C
Ethyl benzene	EPA 8260D
	EPA 8260C
Isopropylbenzene	EPA 8260D
	EPA 8260C
m/p-Xylenes	EPA 8260D

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Volatile Aromatics

m/p-Xylenes	EPA 8260C
Naphthalene, Volatile	EPA 8260D
	EPA 8260C
n-Butylbenzene	EPA 8260D
	EPA 8260C
n-Propylbenzene	EPA 8260D
	EPA 8260C
o-Xylene	EPA 8260D
	EPA 8260C
p-Isopropyltoluene (P-Cymene)	EPA 8260D
	EPA 8260C
sec-Butylbenzene	EPA 8260D
	EPA 8260C
Styrene	EPA 8260D
	EPA 8260C
tert-Butylbenzene	EPA 8260D
	EPA 8260C
Toluene	EPA 8260D
	EPA 8260C
Total Xylenes	EPA 8260D
	EPA 8260C

Volatile Halocarbons

1,1,1,2-Tetrachloroethane	EPA 8260D
	EPA 8260C
1,1,1-Trichloroethane	EPA 8260D
	EPA 8260C
1,1,2,2-Tetrachloroethane	EPA 8260D

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Volatile Halocarbons

1,1,2,2-Tetrachloroethane	EPA 8260C
1,1,2-Trichloro-1,2,2-Trifluoroethane	EPA 8260D
	EPA 8260C
1,1,2-Trichloroethane	EPA 8260D
	EPA 8260C
1,1-Dichloroethene	EPA 8260D
	EPA 8260C
1,1-Dichloropropene	EPA 8260D
	EPA 8260C
1,2,3-Trichloropropane	EPA 8260D
	EPA 8260C
1,2-Dibromo-3-chloropropane	EPA 8260D
	EPA 8260C
1,2-Dibromoethane	EPA 8260D
	EPA 8260C
1,2-Dichloroethane	EPA 8260D
	EPA 8260C
1,2-Dichloropropane	EPA 8260D
	EPA 8260C
1,3-Dichloropropane	EPA 8260D
	EPA 8260C
2,2-Dichloropropane	EPA 8260D
	EPA 8260C
2-Chloroethylvinyl ether	EPA 8260D
	EPA 8260C
Bromochloromethane	EPA 8260D
	EPA 8260C

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Volatile Halocarbons

Bromodichloromethane	EPA 8260D
	EPA 8260C
Bromoform	EPA 8260D
	EPA 8260C
Bromomethane	EPA 8260D
	EPA 8260C
Carbon tetrachloride	EPA 8260D
	EPA 8260C
Chloroethane	EPA 8260D
	EPA 8260C
Chloroform	EPA 8260D
	EPA 8260C
Chloromethane	EPA 8260D
	EPA 8260C
cis-1,2-Dichloroethene	EPA 8260D
	EPA 8260C
cis-1,3-Dichloropropene	EPA 8260D
	EPA 8260C
Dibromochloromethane	EPA 8260D
	EPA 8260C
Dibromomethane	EPA 8260D
	EPA 8260C
Dichlorodifluoromethane	EPA 8260D
	EPA 8260C
Hexachlorobutadiene, Volatile	EPA 8260D
	EPA 8260C
Methylene chloride	EPA 8260D

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

Volatile Halocarbons

Methylene chloride	EPA 8260C
Tetrachloroethene	EPA 8260D
	EPA 8260C
trans-1,2-Dichloroethene	EPA 8260D
	EPA 8260C
trans-1,3-Dichloropropene	EPA 8260D
	EPA 8260C
Trichloroethene	EPA 8260D
	EPA 8260C
Trichlorofluoromethane	EPA 8260D
	EPA 8260C
Vinyl chloride	EPA 8260D
	EPA 8260C

Volatile Organics

1,4-Dioxane	EPA 8260D
	EPA 8260C
	EPA 8270D SIM
	EPA 8270E
	EPA 8270E SIM
2-Butanone (Methylethyl ketone)	EPA 8260D
	EPA 8260C
2-Hexanone	EPA 8260D
	EPA 8260C
4-Methyl-2-Pentanone	EPA 8260D
	EPA 8260C
Acetone	EPA 8260D
	EPA 8260C

Serial No.: 70286

Property of the New York State Department of Health. Certificates are valid only at the address shown and must be conspicuously posted by the laboratory. Continued accreditation depends on the laboratory's successful ongoing participation in the Program. Consumers may verify a laboratory's accreditation status online at https://apps.health.ny.gov/pubdoh/applinks/wc/elappublicweb/, by phone (518) 485-5570 or by email to elap@health.ny.gov.

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2026
Issued April 01, 2025

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

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

MS. CATHERINE L. MOSHER
YORK ANALYTICAL LABORATORIES INC
120 RESEARCH DRIVE
STRATFORD, CT 06615

NY Lab Id No: 10854

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

Volatile Organics

Carbon Disulfide	EPA 8260D
	EPA 8260C
Cyclohexane	EPA 8260D
	EPA 8260C
Methyl acetate	EPA 8260D
	EPA 8260C
Methyl cyclohexane	EPA 8260D
	EPA 8260C
Methyl tert-butyl ether	EPA 8260D
	EPA 8260C
tert-butyl alcohol	EPA 8260D
	EPA 8260C
Vinyl acetate	EPA 8260D
	EPA 8260C

Sample Preparation Methods

EPA 5035A-L
EPA 5035A-H
EPA 3580A
EPA 3010A
EPA 3050B
EPA 3550C
EPA 3546
EPA 3545A
EPA 9010C

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ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:

Miscellaneous

Lead in Dust Wipes	EPA 6010C
Lead in Paint	EPA 6010C

Sample Preparation Methods

	EPA 3050B

Serial No.: 70287

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APPENDIX D

NYS DOH Lead Testing in School Drinking Water Program Reviews and Updates 2023

New York State Department of Health Lead Testing in School Drinking Water Program

Guidance Manual



November 2023

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Purpose of this Guidance Manual

10 NYCRR Subpart 67-4 requires all school districts and boards of cooperative educational services (schools) in New York State to test potable water for lead contamination and to develop and implement a lead remediation plan where applicable. This guidance manual provides information that schools can use for developing and implementing their plans to fulfill compliance requirements.This guidance manual also provides examples of best management practices to minimize the potential for exposure to lead in school drinking water. Additional resources, including suggested templates, can be found on the Department's website at Lead Testing of School Drinking Water.

Background

Lead is a common metal found in the environment which is toxic and harmful to human health. The greatest risk of harm from lead exposure is to infants, young children, and pregnant women. Children and adults can be exposed to lead from lead paint, lead in products and toys, lead in drinking water from plumbing materials, and other sources.

Plumbing materials, including pipes, new brass faucets, fittings, and valves, including those advertised as *lead-free*, may contribute lead to drinking water.[1] The "on-again, off-again" nature of water use at most schools can raise lead levels in school drinking water. Water that remains in pipes overnight, over a weekend, or over vacation periods stays in contact with lead pipes and/or lead solder and may accumulate and contain higher levels of lead. It is important to identify and address elevated levels of lead in drinking water in schools as part of reducing a child's overall exposure to lead in the environment.

On September 6, 2016, Chapter 296 of the Laws of 2016, was signed into law adding section 1110 to Public Health Law (PHL § 1110). The new law required all public school districts and Boards of Cooperative Educational Services (BOCES)(referred to as "schools" herein) in New York State (NYS) to test drinking water for lead and to take remedial action if lead exceeded the actionable threshold. Only those public schools and BOCES buildings with internal plumbing meeting the definition of lead-free as defined by the federal Reduction of Lead in Drinking Water Act were exempt

All outlets used, or that could potentially be used, for drinking or cooking must be tested for lead per Subpart 67-4.

[1] Lead pipes and lead solder used on non-lead pipes were common in construction until their use was banned in 1986. Since then, the federal government required that only "lead-free" materials be used in new plumbing and plumbing fixtures. The Federal Law, however, still allowed pipes and certain fixtures with up to eight percent lead to be labeled as "lead-free." In 2011, the Reduction of Lead in Drinking Water Act, an amendment to the federal Safe Drinking Water Act, re-defined "lead-free" to mean no more than a weighted average of 0.25 percent lead for wetted surfaces of plumbing products and retained a 0.20% lead limit for solder and flux (effective January 4, 2014). The Act also created exemptions from the lead-free requirements for plumbing products used exclusively for non-potable services as well as for other specified products.

from testing (changes to this provision discussed below; see 2022 Revisions to Public Health Law (PHL)).

The NYS Department of Health (NYS DOH) issued regulations, Subpart 67-4 of Title 10 of the Codes, Rules, and Regulations of the State of New York to conform with PHL §1110.

All buildings owned or leased by a public school district or BOCES must be assessed for compliance with Subpart 67-4. While private, charter, or Native American schools are not required to conduct lead testing under this regulation, the NYS DOH encourages these schools and all daycare facilities to voluntarily test outlets used for drinking or cooking and take appropriate action where necessary to reduce lead exposure.

2022 Revisions to Public Health Law (PHL)

Revisions to PHL §1110 were finalized on March 4, 2022, with an effective date of December 22, 2022. The key revisions to the law include:

1. Lead action level in drinking water has been reduced from 15 parts per billion (ppb) to **5 ppb**.

2. School buildings previously deemed "lead-free" are no longer exempt from testing requirements. All buildings, to which PHL §1110 applies, that house or provide instructional services to students are required to test for lead in drinking water.

3. Should it be necessary to provide potable water to school occupants following an outlet being taken out of service due to an action level exceedance, the potable water must be provided free of charge.

4. Copies of lead results including lab reports and any lead remediation plans must be made available to the public and posted on the school's website.

5. Compliance testing will occur on a triennial (every 3 years) schedule.

The first compliance testing period is 2023-2025 under the revised PHL. Schools must conduct first-draw tap testing at all applicable outlets between January 1, 2023, and December 31, 2025. Schools shall continue to collect compliance samples at least every 3 years thereafter or at an earlier time as determined by the Commissioner.

Sampling at outlets from past compliance testing (prior to December 22, 2022) with results that exceed 5 ppb should be a priority. First-draw tap testing at these outlets shall be completed as soon as practicable, and appropriate remedial actions commenced where levels are detected above the new action level of 5 ppb.

Planning Your Sampling Program

Review Records

Before a school develops a sampling plan, review records from past sampling and remedial activities. If current staff are not familiar with past program activities, or records are incomplete or absent, consider contacting individuals who may have been involved in the sampling and/or

remediation. This information may help inform future efforts.

Identifying Key Stakeholders

Key stakeholders are critical to ensuring that your lead testing in school drinking water program (hereafter referred to as the program) is successful. Key stakeholders may include, but are not limited to:

- **Superintendent/Principal**: These individuals provide oversight of the program.
- **Custodial and facilities staff**: These individuals will have in-depth knowledge about plumbing and building history and may assist with implementing the program.
- **School board**: These individuals are responsible for developing budgets and recommending district-wide initiatives.
- **School nurse**: This individual may assist with or support reporting test results in the NYSDOH electronic reporting system.
- **Cafeteria staff**: These individuals are aware of water use for food preparation. They can identify the faucets that are regularly used in food or drink preparation, as well as any unused faucets.
- **Athletics staff**: These individuals will know the sources of water used to fill water jugs or those used when teams are practicing or playing games.
- **Students**: The students should be informed and educated on drinking water and know whom to go to if they notice an issue (lack of access to water or removal of signage).
- **Teachers**: Teachers can assist with the program as they are aware of the faucets used for drinking and can assist with enforcing institutional controls as part of remediation including ensuring students are not drinking from faucets with "Do Not Drink" signs.
- **Parents**: Parents should be made aware of the sampling, the test results, and remedial actions.
- **Parent Teacher Associations** (PTAs): These individuals can be a conduit of information between the school and the parents/guardians. They can share parent/guardian concerns with the school representatives and provide information and education to respond to those concerns.
- **Local plumbing and construction contractors, or environmental consultants**.

Assigning Roles

Identify specific program roles and responsibilities and assign them to individuals as appropriate. When assigning roles, ask the following questions:

- Who will be the main contact for the program?
- Who will create the sampling plan?

- Who will collect the samples?
- Who will coordinate with the laboratory and manage the test results?
- Who will perform remediation?
- Who will communicate the results to the public?
- Who will report the data and information to the local health department and enter it into the NYS DOH reporting application (HERDS)?
- Who will keep records?

A *Template for Assigning Roles*, which is useful for documenting roles and responsibilities, can be found at Lead Testing of School Drinking Water.

Developing a Sampling Plan

To develop a sampling plan, schools must identify all outlets that are or may be used for drinking or cooking; these will be targeted for sampling. The school must then understand how water flows through the building to develop a stepwise outlet-by-outlet and floor-by-floor sampling plan. The comprehensive list below provides various infrastructure features and considerations that schools should explore when developing the sampling plan.

- Review records from past sampling and remedial activities as described in the Review Records section.
- Conduct a walkthrough of the building and create an inventory of outlets. Take note of all outlets (sinks, fountains, bubblers, filling stations, etc.) that are used, or may potentially be used for drinking or cooking. Also, take note of those outlets not used for drinking or cooking. It may be helpful to take pictures when conducting the walkthrough.
- Understand how water enters and flows through the building. Note the areas of the building that receive water first, and which areas receive water last.
- Determine if the building has a lead service line. A service line is the piping that connects the water main to the building inlet.
- Create a map or diagram of the school building and note the location of all outlets and the direction/flow of water through the building. This could assist with understanding future analysis of lead sample results. Assign each outlet that will be sampled with a unique sample identifier and record the information on the map or diagram.
- Document whether faucets have mixing valves, aerators, filters, or other notable features.
- Identify any outlet/water fountain noted as having lead-lined storage tanks or lead parts listed in US Environmental Protection Agency's (EPA) 3Ts. These should be removed from service immediately. A list of lead water coolers banned in 1988 can be found in Module 4 of the EPA 3Ts for Reducing Lead in Drinking Water Toolkit at: Module 4: Developing a Sampling Plan - Leaded Water Coolers Banned in 1988 (epa.gov)

- Note the locations of any tanks and any available information about the tank (e.g., manufacturer, date of installation, maintenance schedule, inspection history, etc.). Some older tanks may contain coatings that are high in lead content. Tanks may accumulate sediment that could be flushed back into the plumbing system under certain circumstances. Schools should consider contacting the tank supplier or manufacturer to obtain information about coatings and hiring a plumber or tank service contractor to inspect the tanks for sediment accumulation and integrity of internal coatings, especially gravity storage tanks that are located outside of the building.

- Look for other potential sources of lead and note their locations including copper pipes; high-lead solder and flux[2]; brass fittings, faucets, and valves; and plastic pipes (especially those manufactured abroad).

Did you know? Copper pipes are red-brown in color and corroded portions may show green deposits. Copper pipe joints were typically joined together with lead solders until the lead-free requirements of the 1986 Safe Drinking Water Act Amendments.

Did you know? Brass fittings, faucets, and valves are golden yellow in color, similar to copper in appearance, or are plated with chrome. Most faucets contain brass, an alloy that contains varying percentages of copper, zinc, and lead.

Identifying Sampling Locations

Samples must be collected at all outlets used or potentially used for drinking or cooking.

Outlets may be located anywhere in or around the school building, including external outlets (hose bibs) if the outlet may be used for drinking. Superintendents, or their designees, have the responsibility to identify which outlets meet the regulation requirements for testing ("applicable outlets"). If a Superintendent or their designee determines that a school has outlets that fall outside the scope of the regulation (outlets not used or potentially used for drinking or cooking ("nonapplicable outlets"), the school should account for these outlets in their Remedial Action Plan, including details on how those outlets will not be accessed and utilized for drinking or cooking purposes.

Additional Guidance on Sampling Locations:

- **Combination bottle fill station and drinking fountain/combination sink and drinking fountains:** A sample - must be collected from both fixtures if they are used or have the potential to be used for drinking or cooking. The fixture that is most frequently used should

[2] The 1986 Safe Drinking Water Act Amendments banned plumbing components that contained high levels of lead. It is likely that high-lead solder and fluxes continued to be used even later. The local plumbing code authority or building inspector may be able to provide guidance regarding when high-lead solder was last used on a regular basis in the area. Note that the Reduction of Lead in Drinking Water Act did not revise the lead-free definition for solder and flux.

be sampled first.

- **Ice machines:** The ice made in an ice machine must be sampled for lead. Follow these instructions to collect a sample from an ice machine:

  Collecting Samples from Ice Making Machines

  - Fill a suitable container (250 mL [or larger with a line denoting 250 mL], wide-mouthed bottle, or other container) provided by the laboratory at least three-quarters full of ice.
  - Do not touch the ice with your hands.
  - Use a non-metal scoop or disposable plastic gloves (provided by the laboratory) to place the ice in the container.

- **Dishwashing outlets:** If an outlet is designated for dishwashing only and involves no opportunity for drinking or cooking including food preparation, the outlet does not require sampling. Any outlet excluded from sampling should be documented in the Remedial Action Plan (and consider additional controls such as signs and education). If the outlet may be used for drinking or cooking, the outlet must be sampled.

- **Food washing outlets:** Food washing faucets must be sampled as they are used for food preparation and potentially for drinking. Only the cold water should be turned on for sampling.

- **Lavatory Sinks:** Toilet rooms and bathrooms are building environments that can present unique challenges to water potability. These challenges are reflected in various code provisions that prohibit the installation of drinking facilities, drinking fountains, water coolers, and water dispensers within toilet rooms and bathrooms. NYS DOH would not object to designating these outlets nonapplicable where controls (e.g., education and signage) exist to prevent the consumption of water. The school should include these outlets in the Remedial Action Plan with details on how their potential use will be mitigated.

- **Classroom sinks**: If the outlet is used for drinking and/or cooking, it must be sampled. However, if the school has controls in place to prevent the consumption of water, Superintendents or their designees have the discretion to exclude these outlets from sampling and include them in the Remedial Action Plan.

- **Tempered water outlets**: The EPA and NYS DOH recommend that hot or tempered water not be used for drinking or cooking as hot or warm water increases the leaching of lead into the water. As such, tempered water outlets do not require sampling. The National Plumbing Code defines tempered water as water having a temperature range between 85 degrees Fahrenheit and 110 degrees Fahrenheit, and hot water as water at a temperature greater than or equal to 110 degrees Fahrenheit. Cold water is considered water at the temperature at which it is delivered to the service connection. For the purpose of this program, tempered outlets are any outlets that convey water that is heated for the purpose of providing water that is warmer than what is supplied at the service connection, but not hot water. This is typically achieved through the use of mixing valves to blend water from both hot and cold-water supply lines, in accordance with applicable plumbing standards. However, tempered outlet configurations that allow for easy temperature adjustment at the

point of use to provide water, which is supplied solely from the cold-water line, are an exception and should be sampled. Tempered water outlets that are not subject to sampling should be clearly posted with signs ("Do Not Drink" or equivalent), education should be provided to the students and staff to ensure awareness that they should refrain from using the outlets for consumption, and the outlets should be documented in the Remedial Action Plan.

- **Science/Art room outlets**: If the outlet may be used for drinking or cooking, the outlet must be sampled. However, some schools have controls in place including restrictions on food or drink consumption in science classrooms and laboratories and teacher supervision. In such cases, the Superintendent or their designee has the discretion to exclude these outlets from sampling and include them in the Remedial Action Plan.

- **Custodial closet outlets**: If the outlet is only used for custodial purposes and not for drinking, then the outlet does not need to be sampled. Any outlet excluded from sampling should be documented in the Remedial Action Plan (and consider additional controls such as locks, signs, and education).

- **Point of entry**: The location where water enters the building (point of entry) from the distribution system of a public water system does not require sampling under Subpart 67-4.

- **Bus garage**: Outlets in bus garage buildings do not require sampling unless the building is occupied by students (e.g., BOCES classes).

Selecting a Laboratory

All water samples must be analyzed by an environmental laboratory certified by the NYS DOH Environmental Laboratory Approval Program (ELAP) to conduct lead testing in drinking water.

A list of ELAP-approved laboratories can be found at:

https://apps.health.ny.gov/pubdoh/applinks/wc/elappublicweb/

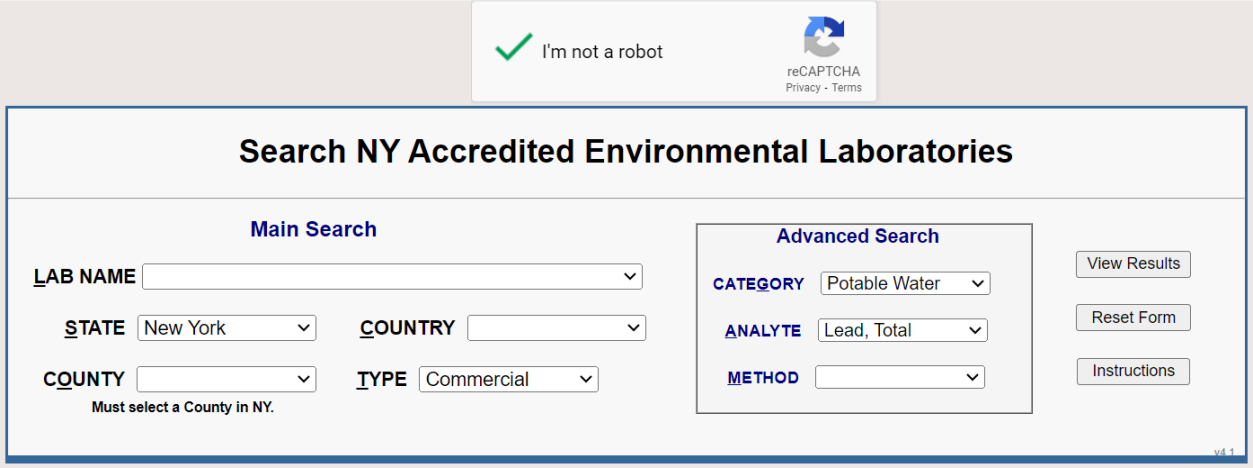
1. From the link above, follow these directions:

   - Check the box: "I am not a robot"
   - State: select "New York" from the drop-down
   - County: select the county of interest
   - Type: select "Commercial"

2. In the "Advanced Search" box:

   - Category: select "Potable Water"
   - Analyte: select "Lead, Total

3. Click on "View Results"



When choosing a laboratory, consider the following:

- **Do you want the laboratory to conduct the sampling in addition to the analyses?** If yes, let the laboratory know that samples will likely need to be collected between 5:30 a.m. and 7:30 a.m. Sampling services outside of business hours may influence the cost.
- **What is the cost of the laboratory's services, and what is included in that cost?** Costs will vary between laboratories and depending upon the extent of the services needed. Some laboratories may offer bulk analysis rates for handling a large number of samples.
- **What is the laboratory's turnaround time for providing sample results?**

Once a laboratory is selected, schools are advised to establish a written agreement or contract with the laboratory for the services to be provided.

Sampling Protocol

Sample Containers

The required sample volume for analysis of lead in school drinking water is 250 milliliters (mL). NYS DOH recommends the use of wide-mouth 250 mL plastic containers for this program.

Samples collected using 1-liter sample containers (as used for the Lead and Copper Rule testing) do NOT meet the requirements of Subpart 67-4. Schools should contact their ELAP-approved laboratory to obtain the appropriate 250 mL plastic bottles for sampling and the laboratory chain of custody forms.

Nitric Acid preservative

Some laboratories may add nitric acid, a sample preservative, to sample containers prior to container shipment. Avoid direct contact with nitric acid as it can burn skin and damage clothing. As a safety precaution, schools may request their laboratory send sample containers without nitric acid and request that the laboratory add the nitric acid upon receipt of the samples. In such cases, schools must ship the samples as soon as possible so the laboratory can add nitric acid in time.

Prior to container shipment, schools should contact their laboratory to discuss such options and costs.

Sample Requirements

All samples collected for lead testing as part of Subpart 67-4 must be "first-draw" samples. A "first-draw" sample is a water sample collected from an outlet early in the morning before any water is used from that outlet. The water shall be motionless in the pipes for a minimum of 8 hours, but not more than 18 hours, prior to first-draw sample collection.

Sample Collector Requirement

Any individual who understands the Subpart 67-4 requirements and is familiar with first-draw sampling protocols may collect samples. This includes, but is not limited to, a school staff member, a laboratory representative, or a consultant. The individual collecting the samples must be able to maintain quality assurance and control over the sampling and assure the chain of custody of the water samples is maintained during the sampling process.

Sampling Instructions

Recommended Sampling Instructions:

1. Ensure all items needed to collect the samples are available. This includes the appropriate number and size (250 mL) of sample bottles, labels, waterproof pens for labeling the sample bottles, and the laboratory chain of custody form.

2. Do not open any sample container until you are ready to collect the sample. Do not touch the interior surfaces of the bottle or cap. Keep food and drink away from the sampling area.

3. First-draw samples should be collected early in the morning before any water has been used in the building (this includes water for janitorial sinks, toilets, outside hoses, and irrigation systems (unless the irrigation system is served by its own service line)). Water must be motionless between 8 and 18 hours prior to sampling. To ensure water is not used, schools may secure outlets or hang "Do Not Use" signs.

    a. Avoid collecting samples in the mornings after vacations, weekends, or holidays unless specifically directed to do so.

    b. If a school has instituted a formal routine flushing program as part of their Remedial Action Plan to address lead levels in water, the school should contact the NYS DOH or their local health department for guidance on when to perform the sampling.

4. On the morning of the sampling, perform a quick walk-through of the facility to ensure no outlets were left running overnight.

5. Make sure no water has been drawn from the outlet before you collect the sample.

6. Follow the sampling plan. Begin sampling at the outlet closest to the Point of Entry (where the water enters the building) and continue to progress toward the outlet farthest from the point of entry. If there are multiple floors, it is typically recommended to sample from the

bottom floor and continue up.

7. If a drinking water fountain is being sampled, angle the container's mouth in a way that it willcapture the entire flow of water from the bubbler.

8. If the outlet is a motion-sensor or metered faucet, collect the sample as you would under normaluse conditions.

9. Do not remove aerators or screens prior to sampling. Potential sources of lead may be missed if aerators are removed since debris trapped in the aerator screen could be contributing to the lead in drinking water.

10. Place the container under the outlet that is being sampled and turn on the cold water tap at the same rate that would be used under normal use for filling a glass of water, taking precautions to not allow any water to run down the drain.

11. Securely cap the container and follow the instructions provided by the certified laboratory.

12. Label the sample bottle with the same information (unique sample identifier, date, time, location, etc.) as on the Chain of Custody form.

13. Record any observations that may impact the samples' results (e.g., leaking outlets, discoloredwater, or low water pressure) on the chain of custody form.

14. Prepare the container for shipping according to the certified laboratory's instructions.

15. Ship the sample according to the certified laboratory's instructions and within the timeframe recommended by the laboratory.

Interpreting Laboratory Results

Lead Action Level

The action level for lead in school drinking water is **5 micrograms per liter (mcg/L) or parts per billion(ppb)**, which is also equivalent to 0.005 milligrams per liter (mg/L) or parts per million (ppm).

For the purposes of comparing laboratory test results to the lead action level under Subpart 67-4, the following applies:

- Lead results equal to or less than 5 mcg/L (≤ 5 ppb) do *not* exceed the lead action level and, therefore, do not require further sampling or remediation.

- Lead results greater than 5 mcg/L (> 5 ppb) *exceed* the lead action level and, therefore, require the outlet to be taken out of service and a Remedial Action Plan to be implemented.

Response to an Action Level Exceedance

Immediate Response

If the lead test result for an outlet exceeds the action level (5 mcg/L, or ppb), the school must do the following:

1. Prohibit the use of the outlet (remove from service) until:

    a. A Remedial Action Plan is implemented to mitigate the lead level at the outlet, and

    b. Post-remediation test results indicate that the lead levels are at or below the action level;

2. Provide building occupants with an adequate supply of water **free of charge** for drinking and cooking until post-remediation lead test results are at or below the action level;

3. Report the test results to the local health department as soon as practicable, but no more than one (**1) business day after** the school received the laboratory report; and

4. Notify all staff and all persons in parental relation to students of the test results, in writing, as soonas practicable but no more than **10 business days** after the school received the laboratory report.

Refer to the **Reporting Requirements of All Test Results** section for additional reporting details and more information concerning reporting deadlines.

Corrective Actions / Remediation

The school may choose to obtain professional services or utilize internal staff to support and perform remediation activities. Schools should consider the following remedial options for addressing outlets that exceed theaction level:

- **Permanent outlet removal**. If the outlet is seldom used, it may be disconnected or removed from the water supply line. Prior to removing the outlet, verify that the outlet is not required for compliance with the local building code or NYS Education Department requirements for access to potable water within the building. To ensure that an outlet is permanently taken out of service, the NYS DOH recommends removing the outlet (fixture) and capping the supply line with plumbing materials that are lead-free.
- **Outlet and/or Pipe replacement** with lead-free plumbing materials. If the existing outlet and/or plumbing is suspected tobe the source of the contamination, replace it with a new product that meets the Safe Drinking Water Act

Schools must ensure that students have adequate access to drinking water. If a school is contemplating permanent outlet removal, signage, and/orengineering controls, the school must evaluate whether alternate options to attain drinkingwater are readily accessible. If alternate options are not readily available, a school should consider other remedial options to ensure access to drinking water. Further, NYS codes, regulations, and standards prescribe minimum requirements for drinking fountains and outlets based on thedate of building construction, number of occupants, number of floors, and other attributes that must be complied with.

Section 1417 (a)(4) definition of lead-free (effective January 4, 2014).[3]

- For an increased level of confidence, consider purchasing products that have received National Sanitation Foundation Standard (NSF)/American National Standards Institute (ANSI) 61 (for leaching of contaminants) and ANSI 372 (for the weighted average of lead on wetted surfaces) certification from an ANSI accredited third-party certification body. As such, consider including a copy of the NSF/ANSI 61, 372 certificates as a requirement on the purchase orders. The distributor or manufacturer can provide a list of certified products.

- See EPA's 2015 guidance, *How to Identify Lead-Free Certification Marks for Drinking Water System & Plumbing Products* for additional information.

- **Flushing**. Schools may consider developing a systematic flushing program to implement routinely (at a specified frequency). Flushing is generally used as a short-term measure and paired with permanent remediation like replacement or removal of an outlet. See the EPA's *3Ts Flushing Best Practices* factsheet for additional information.

- **Point of Use (POU) Filters**. POU filters are filters installed at individual outlets. They are commercially available and can be effective in removing lead. Schools may choose to use certified lead-reducing filters as a long-term or permanent control measure with proper maintenance. To select a lead-reducing POU filter, check with the manufacturer or a third-party website (such as www.nsf.org or www.wqa.org) to verify the product was tested and certified against NSF/ANSI Standard 53 (for lead removal). For additional protection for particulate lead, look for a POU filter that is also certified against NSF/ANSI Standard 42 (for class I particulate reduction, 0.5 µm to <1 µm). Filters require routine maintenance (e.g., cartridge filter units need to be replaced periodically) to remain effective. Be sure to follow the filter manufacturer's instructions for maintenance and replacement. If POU filters are being considered, be sure to factor in the cost of the filters and long-term maintenance and replacement costs.

- "Do Not Drink" Signage. In general, posting "Do Not Drink" or equivalent signs at outlets is considered a temporary measure. However, some outlets (e.g., science laboratories and lavatory sink outlets) may have signs posted long-term if the school has also instituted other controls including supervision and education to ensure the outlets are not used for consumption. Example signage can be found on NYS DOH's website at:

  https://www.health.ny.gov/environmental/water/drinking/lead/docs/donotdrinksigns_lead

  - Schools may develop their own signs and consideration should be given to the age of the children, as pictures may be more appropriate for younger children.

  - Signs must be clearly visible and in close proximity to the affected outlets. Placing a sign at a room entrance (e.g., a lavatory entrance) is not acceptable.

- **Supervision of Outlet Use as a Control Measure:** In areas where supervision is present and there are policies to prevent the use of water for consumption purposes (e.g., no

[3] Safe Drinking Water Act Section 1417 (a) (4) defines lead-free as not containing more than 0.2 percent lead when used with respect to solder and flux and not more than a weighted average of 0.25 percent lead when used with respect to the wetted surfaces of pipes, pipe fittings, plumbing fittings, and fixtures.

drinking or eating in science laboratory classrooms), supervision may be used as a remedial action. Supervision should be used in combination with other controls.

- **Engineering controls.** Engineering controls may be implemented to prevent the consumption of water from specific outlets. Engineering controls include locked doors to janitor's closets, special keys to operate an outside hose bib, and other controls. Engineering controls should be combined with continued education of reminding staff and students not to consume water from these outlets and with signs as needed.

- **Education**. Educate the school community (students, parents, teachers, and staff) to reinforce understanding and compliance with engineering controls, supervision controls, and signage.

Post-remediation Testing

Flushing

Only those outlets that exceeded the action level need to be resampled following remediation, including outlet or pipe replacement, filter installation, implementation of a flushing program, or other measures. Post-remediation samples must be collected, and the test results must be at or below the lead action level before an outlet may be returned to service. Schools should adhere to the following when preparing for or performing post-remediation sampling:

- All remediated outlets should be flushed following remediation and in advance of sampling. Remediation can introduce lead particulates into the drinking water that should be removed through flushing. The duration of the flushing varies depending on the type and extent of remediation performed. Large-scale pipe replacement should be flushed longer than a single outlet replacement. Schools should follow manufacturer/industry recommendations or consult with a professional (e.g., plumber or engineer) for additional guidance as needed.

- Following flushing, water shall remain motionless in the pipes for a minimum of 8 hours, but not more than 18 hours, prior to sample collection. Post-remediation samples must be "first-draw" samples. It is important to note that "first-draw" sampling is designed to provide information on the contribution of lead from an outlet. Schools may choose to perform additional sampling (e.g., 30-second flush samples) to determine the contribution of lead from plumbing that provides water to an outlet to guide remediation decisions. In addition, several **rounds** of post-remediation sampling may be necessary prior to obtaining results that meet the action level requirement. Additional flushing may be performed between sampling rounds. A school that has performed repeated efforts to remediate an outlet(s) but cannot achieve the lead action level is encouraged to contact the NYS DOH or its local health department.

Remedial Action Plan

A Remedial Action Plan is a detailed summary of the actions implemented to mitigate sources of lead that had exceeded the action level and to minimize exposure to lead in drinking water. The Remedial Action Plan should be updated anytime conditions change – including when new test results become available, additional remediation is planned or completed, engineering controls are modified, or when other related actions occur.

The Remedial Action Plan should include the following:

1. A summary of all outlets that exceeded the lead action level and the remedial actions that were/are implemented.

2. A summary of any outlet that is not used for drinking or cooking (e.g., locked custodial closetoutlet) determined to be outside the scope of the regulation. This summary should include a description of the controls in place to ensure the outlet is not used for drinking or cooking.

The Remedial Action Plan should be retained in a central repository at the school and made available for review upon request. *A Template for Documenting and Tracking Remedial Actions* can be found at Lead Testing of School Drinking Water.

Maintenance and Monitoring Schedules and Documentation

For outlets, which exceeded the lead action level but are not permanently removed from service or replaced with an outlet that achieved the lead action level, the Remedial Action Plan should describe the maintenance efforts to be performed to ensure the remedial actions are effective for each outlet. This may be captured in a Maintenance and Monitoring Schedules and Documentation ("Maintenance and Monitoring") section of the Remedial Action Plan. Outlets may be grouped if the controls instituted are the same. For example*:*

- If signs and supervision are instituted as a control, the Maintenance and Monitoring section should describe the controls, their location, the frequency of inspection, and the individual(s) responsible for inspection.

- If filters are installed, the Maintenance and Monitoring section should describe the minimum requirements prescribed by the manufacturer, the inspection schedule, and the individual(s) responsible.

- If a flushing program is instituted, the Maintenance and Monitoring section should describe the flushing plan including the flushing frequency (day/time), duration, and the individual(s) responsible.

All remedial measures employed should be described in the Remedial Action Plan. *A Template for Maintenance Recordkeeping* can be found at Lead Testing of School Drinking Water

Reporting Requirements for All Test Results

Schools must report the following information per Subpart 67-4:

- **Within 1 business day of receipt of laboratory reports**: Report any exceedances(lead result greater than 5 ppb) to the local health department.

- **Within 10 business days of receipt of laboratory reports:**

    - Report any exceedances (lead results greater than 5 ppb) to all staff, parents, and guardians in writing. Physical written notification should be distributedto all staff and persons in parental relation to the child. *A Template Parent Letter* for communicating the test results to parents/guardians can be found at Lead Testing of School Drinking Water. Posting the information on the school website or through

social media does not constitute written notification.

- Report *current* test results (including post-remediation results) and other required information in the NYS DOH's electronic reporting application, HERDS.

- **Within 6 weeks of receipt of laboratory reports**: Post numeric test results of all lead testing, including lab reports, and information about remedial actions taken on the school's website. Schools should provide a narrative describing the test results to help parents and guardians understand the results. The posting should be readily visible on the school's website and must remain posted for the duration of the compliance period. For example, test results for the 2020 compliance period should remain on the school's website until the 2023 - 2025 compliance results are available, at which time the 2020 results may be removed. *A Template for Posting Lead Results on School Website* can be found at Lead Testing of School Drinking Water.

Recordkeeping Guidance and Templates

The school must retain all records of lead test results, remediation actions, and historical determinations that a building is lead-free (if applicable) for ten years following the creation of such documentation, in accordance with Subpart 67-4. Copies of such documentation shall be available to provide immediately to the NYS DOH, NYS Education Department, and applicable local health department, upon request.

It is recommended that all such records be kept on-site in a centrally accessible repository, for each school. The following are examples of those records:

- Names and contact information for all the program partners
- Map or diagram of the building identifying all outlets
- Sampling plan
- Copies of laboratory reports
- Copies of all communication records with staff, parents, and guardians
- Remedial Action Plan

Electronic Reporting Requirements

Schools must report the required information using the NYS DOH's statewide electronic reporting application, HERDS, accessed through the NYS Health Commerce System (HCS). The Health Commerce System is a secure online communications system. *Health Commerce System Account Management and Access Information*, as well as *How to Access the 2023-2025 HERDS Reporting Form on Health Commerce System Information*, can be found at Lead Testing of School Drinking Water.

The information provided on the HERDS reporting form is made available to the public on Health Data NY (State of New York | Open Data Health | State of New York). The data displayed on

Health Data NY is updated regularly.

Establishing Routine Practices

Schools can promote compliance and take steps to further reduce the potential for exposures to lead and other environmental hazards such as bacteria in drinking water by implementing various routine practices. Schools are encouraged to adopt one or more of the following practices as part of the school's overall watermanagement program. Please note, **these practices should not be conducted *immediately* prior to collecting water samples as part of Subpart 67-4**. If a school has questions about when to perform water sampling in relation to performing one or more of the practices below, they may contact the NYS DOH or their local health department for guidance.

Clean Drinking Water Fountains

- Clean drinking water fountains regularly, including the aerator(faucet screen) and water fountain strainer.
- Create a cleaning schedule for drinking water fountains and establish a record to document when the fountains are cleaned.
- Consider posting the cleaning record by the drinking waterfountains to allow the cleaning dates/times to be recorded.

Did you know? The aerator also known as the faucet screen can act as a filter, catching small particles of dirt and other debris, whichmay contain lead that can leach into the drinking water.

Aerator Cleaning

Clean outlet aerators regularly. If debris buildup is observed, more frequent cleaning is recommended.

Temperature Control

- Use only cold water for food and beverage preparation.
- Consider replacing tempered outlets with non-tempered outlets.

Did you know? Hot water dissolves lead more quickly than cold water and may contain higher lead levels.

Routine Flushing Practices

- Regularly flush all water outlets used for drinking or food preparation, particularly after weekends and long vacations when water may have been stagnant for a long period of time.
- To flush, open valves and faucets and let the water run to remove standing water in the interior pipes and/or the outlets. Flushing time varies depending on plumping configuration such as the length and diameter of pipes and the type of outlet.
- Be careful not to flush too many outlets at once. This could dislodge sediments that might create further lead problems, or it could reduce pressure. If the flow from outlets is reduced noticeably during flushing, too many outlets have likely been turned on at once.

- For additional information about EPA's Best Flush Practices (Module 6), refer to 3Ts for Reducing Lead in Drinking Water | US EPA.

Education

Educate the students and staff about ways they can reduce their exposure to lead in drinking water both at school and at home, including:

- ***Use only cold water for drinking and food preparation.*** If hot water is needed, it should be taken from the cold water faucet and heated on a stove or in a microwave. Consider creating notices that can be posted near outlets used for drinking water or in food preparation areas to advise students and staff to use cold water for consumption.

- ***Let it run before use.*** Running water at a tap, prior to using it for drinking or food preparation, will typically help reduce lead in the water. This works by removing the water that has been in the longest contact with the plumbing materials. Let the water run for 30-60 seconds or until the water feels cold before using it for drinking or cooking.

Other Routine Maintenance

- Use only NSF/ANSI 61 certified lead-free materials when performing plumbing work.

- If the school has any treatment system installed, e.g., a softener or filter, follow the manufacturer's instructions for routine maintenance.

Lead and Copper Rule for Public Water Systems

NYS drinking water regulations, Subpart 5-1, establishes an action level of 15 mcg/L (or 15 ppb) for lead in drinking water for public water supplies. This action level does not apply to outlet-specific lead result, but rather is applied to a 90th percentile calculation using results from multiple samples taken from within a public water system's distribution system.

Schools that serve as a public water system (schools with private wells serving 25 or more students and staff) are required to comply with the requirements of Subpart 5-1 as well as with Subpart 67-4. Subpart 5-1 and Subpart 67-4 are two distinct regulatory programs with different sampling requirements and action levels. Results for compliance with Subpart 5-1 should be reported to the NYS DOH per the local health department's reporting requirements, while results for Subpart 67-4 must be reported through the NYS DOH's electronic reporting application, HERDS on the Health Commerce System.

More Resources

NYS DOH Lead Testing in School Drinking Water website: Lead Testing of School Drinking Water (ny.gov)

EPA's 2018 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities, Revised Manual: 3Ts for Reducing Lead in Drinking Water | US EPA

Reduction of Lead in Drinking Water Act: Use of Lead-Free Pipes, Fittings, Fixtures, Solder,

and Flux for Drinking Water | US EPA

How to Identify Lead-Free Certification Marks for Drinking Water System & Plumbing Products. Latham, M., M. Schock, AND E. Nauman. US EPA Office of Research and Development, Washington, DC, EPA/600/F-13/153c, 2015. This publication provides information to identify lead-free certified products. How to Identify Lead Free Certification Marks for Drinking Water System & Plumbing Products | Science Inventory | US EPA

3Ts Flushing Best Practices. US EPA Office of Water, EPA 815-F-18-027, 2018: Module 6: Remediation and Establishing Routine Practices - Flushing Best Practices Factsheet (epa.gov)

The Lead Contamination and Control Act (LCCA) Text - H.R.4939 - 100th Congress (1987-1988): Lead Contamination Control Act of 1988 | Congress.gov | Library of Congress

Public Law 100-572 was passed in 1988 and applies to all schools. The intent of the LCCA is to identify and reduce lead in drinking water at schools and relies on voluntary compliance by individual schools and school districts. It focuses on certain models of watercoolers, while also addressing lead risk reduction generally. Although compliance with the LCCA is voluntary, schools are encouraged to review its recommendations and consider implementation where appropriate.https://www.epa.gov/sites/production/files/2015-09/documents/epalccapamphlet1989.pdf

For a list of water coolers banned in 1988, water coolers with lead components, and lead-lined tanks, go to EPA's 3Ts for Reducing Lead in Drinking Water Toolkit, Module 4, at: Module 4: Developing a Sampling Plan - Leaded Water Coolers Banned in 1988 (epa.gov)

Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead: A Consumer Tool for Identifying Point of Use (POU) Drinking Water Filters Certified to Reduce Lead (epa.gov)