

May 13, 2021

Mr. James Hart
North Tonawanda City School District
Director of Facilities
176 Walck Road
North Tonawanda, New York 14120

RE: Investigation and Sampling of Drinking Water for Lead Concentrations

Dear Mr. Hart:

Included with this letter is Stohl Environmental LLC's report for the Water Sampling performed at the educational buildings of the North Tonawanda City School District, including:

- Gilmore School – 176 Walck Road, North Tonawanda, New York

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

The Investigation and Sampling was performed on March 12, 2021. The Protocol for the Investigation followed the requirements of NYS regulations as well as USEPA Technical Guidance Document "3-T's for Reducing Lead in Drinking Water in Schools".

As detailed in Section 1.2 (*Executive Summary*) of the accompanying report, based upon the sampling and analysis performed, 16 sources of potable water in Gilmore School have been identified as having lead concentrations in water above the NYS Action Level of 15 parts per billion. To comply with NYS regulations, Response actions as identified in this report by the District are required.

Thank you for the opportunity to be of service to North Tonawanda City School District.

Sincerely,
Stohl Environmental, LLC.



Eric Henderson Jr.
Senior Project Manager

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

Prepared for:

North Tonawanda City School District

Prepared by:



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

Conditions as of March 12, 2021

Summary Tabulation

Lead in Drinking Water Investigation

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

1.1 Scope of Work and Sampling Protocol:

Stohl Environmental was retained by North Tonawanda City School District to perform sampling and analysis of potable water for elevated lead concentrations. Sampling was performed in the following buildings:

- Gilmore School – 176 Walck Road, North Tonawanda, New York

Scope of Work:

Stohl Environmental was charged with collecting first-draw water samples from outlets within Gilmore School. Outlets are defined in NYS regulations as: “a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, or faucets”.

Sampling Protocol:

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

- **First-draw samples** of 250 milliliters (mL) were collected from cold water outlets before any water was used. Sampling was coordinated with District representatives to assure that water was motionless in the pipes for a minimum of 8 hours, but not more than 18 hours before sample collection.
- **Laboratory Analysis:** Samples were submitted following strict chain-of-custody protocols to an independent laboratory approved by the NYS Department of Health’s Environmental Laboratory Approval Program (ELAP).

1.2 Executive Summary of Sampling and Analysis:

Total Number of Samples Collected by Building Classified by First Draw & Confirmatory Samples:

Building Name	Date of Sample Event	Total Number Samples Collected	First Draw Samples		Confirmatory Samples **	
			Number of Samples at or Below Action level of 15 ppb	Number of Samples Above Action Level of 15 ppb	Number of Samples at or Below Action level of 15 ppb	Number of Samples Above Action Level of 15 ppb
Gilmore School	3/12/2021	38	22	16	N/A	N/A

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

Listing of Outlets Requiring Remediation

Locations of Outlets Analyzed above the NYS Action Level of 15 parts per billion based upon Analysis of First Draw Samples:

Sample #	Classroom or other Location	Fixture/Outlet type	Laboratory Analysis in ppb
185.5-3	2 nd Floor Boys Lav Left	Sink	17.8
185.5-4	2 nd Floor Boys Lav Center	Sink	19.3
185.5-6	2 nd Floor Girls Lav Left	Sink	20.6
185.5-15	1 st Floor South Women's Staff Lav Left	Sink	33.3
185.5-17	1 st Floor South Women's Staff Lav Right	Sink	16.2
185.5-18	Room 104 Lav	Sink	38.5
185.5-27	Kitchen 3 Bay Left	Sink	35.7
185.5-29	Kitchen Hand Wash	Sink	60.2
185.5-33	Basement Faculty Room	Sink	N/A
185.5-39	Room 113	Sink	72.4
185.5-40	Room 108	Sink	35.7
185.5-42	Room 210	Sink	55.7
185.5-43	Room 209	Sink	54.4
185.5-44	Room 211 North	Sink	23.0
185.5-46	Room 208	Sink	28.7
185.5-47	Room 207	Sink	103
185.5-49	2 nd Floor Men's Staff Lav Left	Sink	22.3

N/A = Not Analyzed. The laboratory received the sample empty and was not able to be analyzed. Location should be resampled and analyzed at a later date.

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

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

- (a) Prohibit use of the outlet until:
 - (1) a lead remediation plan is implemented to mitigate the lead level of such outlet; and
 - (2) test results indicate that the lead levels are at or below the action level;
- (b) provide building occupants with an adequate supply of potable water for drinking and cooking until remediation is performed;
- (c) report the test results to the local health department as soon as practicable, but no more than 1 business day after the school received the laboratory report; and
- (d) notify all staff and all persons in parental relation to students of the test results, in writing, as soon as practicable but no more than 10 business days after the school received the laboratory report.

1.4 Laboratory Analytical Reports by Building



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

Lead in Drinking Water Analysis Report

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

Report Number: 21-03-03753

Received Date: 03/17/2021
Reported Date: 04/14/2021
Sampled By: Christine Schultz
Tech Certification #:

Project/Test Address: 2020L-185.5; Gilmore School; 176 Walck Rd; North Tonawanda, NY 14120

Client Number:
33-5980

Fax Number:
716-312-8092

Laboratory Results

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-03753-001	185.5-3	03/12/2021	2ND FLOOR BOYS LAV LEFT	17.8	04/09/2021	
21-03-03753-002	185.5-4	03/12/2021	2ND FLOOR BOYS LAV CENTER	19.3	04/09/2021	
21-03-03753-003	185.5-6	03/12/2021	2ND FLOOR GIRLS LAV LEFT	20.6	04/09/2021	
21-03-03753-004	185.5-7	03/12/2021	2ND FLOOR GIRLS LAV CENTER	2.44	04/09/2021	
21-03-03753-005	185.5-8	03/12/2021	2ND FLOOR GIRLS LAV RIGHT	7.39	04/09/2021	
21-03-03753-006	185.5-12	03/12/2021	1ST FLOOR NORTH MENS STAFF LAV LEFT	6.16	04/09/2021	
21-03-03753-007	185.5-13	03/12/2021	1ST FLOOR NORTH MENS STAFF LAV RIGHT	12.5	04/09/2021	
21-03-03753-008	185.5-14	03/12/2021	1ST FLOOR NORTH WOMENS STAFF LAV	2.88	04/09/2021	
21-03-03753-009	185.5-15	03/12/2021	1ST FLOOR SOUTH WOMENS STAFF LAV LEFT	33.3	04/09/2021	
21-03-03753-010	185.5-16	03/12/2021	1ST FLOOR SOUTH WOMENS STAFF LAV CENTER	13.1	04/09/2021	
21-03-03753-011	185.5-17	03/12/2021	1ST FLOOR SOUTH WOMENS STAFF LAV RIGHT	16.2	04/09/2021	
21-03-03753-012	185.5-18	03/12/2021	RM 104 LAV	38.5	04/09/2021	

Environmental Hazards Services, L.L.C

Client Number: 33-5980

Report Number: 21-03-03753

Project/Test Address: 2020L-185.5; Gilmore School; 176 Walck Rd; North
Tonawanda, NY 14120

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-03753-013	185.5-24	03/12/2021	RM 102	9.97	04/09/2021	
21-03-03753-014	185.5-26	03/12/2021	KITCHEN DISH SPRAYER	6.30	04/09/2021	
21-03-03753-015	185.5-27	03/12/2021	KITCHEN 3 BAY LEFT	35.7	04/09/2021	
21-03-03753-016	185.5-28	03/12/2021	KITCHEN 3 BAY RIGHT	7.41	04/09/2021	
21-03-03753-017	185.5-29	03/12/2021	KITCHEN HAND WASH	60.2	04/09/2021	
21-03-03753-018	185.5-30	03/12/2021	KITCHEN CENTER PREP NORTH	9.74	04/09/2021	
21-03-03753-019	185.5-31	03/12/2021	KITCHEN CENTER PREP SOUTH	10.2	04/09/2021	
21-03-03753-020	185.5-32	03/12/2021	BASEMENT ART ROOM	2.54	04/09/2021	
21-03-03753-021	185.5-34	03/12/2021	BASEMENT OFFICE LAV	5.93	04/09/2021	
21-03-03753-022	185.5-35	03/12/2021	RM 107	9.88	04/09/2021	
21-03-03753-023	185.5-37	03/12/2021	RM 111	1.43	04/09/2021	
21-03-03753-024	185.5-38	03/12/2021	RM 111 LAV	1.20	04/09/2021	
21-03-03753-025	185.5-39	03/12/2021	RM 113	72.4	04/09/2021	
21-03-03753-026	185.5-40	03/12/2021	RM 108	35.7	04/09/2021	
21-03-03753-027	185.5-42	03/12/2021	RM 210	55.7	04/09/2021	
21-03-03753-028	185.5-43	03/12/2021	RM 209	54.4	04/12/2021	
21-03-03753-029	185.5-44	03/12/2021	RM 211 NORTH	23.0	04/09/2021	
21-03-03753-030	185.5-46	03/12/2021	RM 208	28.7	04/09/2021	
21-03-03753-031	185.5-47	03/12/2021	RM 207	103	04/10/2021	
21-03-03753-032	185.5-48	03/12/2021	HALLWAY OUTSIDE 2ND FLOOR MENS STAFF LAV	<1.00	04/09/2021	

Environmental Hazards Services, L.L.C

Client Number: 33-5980
Project/Test Address: 2020L-185.5; Gilmore School; 176 Walck Rd; North
Tonawanda, NY 14120

Report Number: 21-03-03753

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-03753-033	185.5-49	03/12/2021	2ND FLOOR MENS STAFF LAV LEFT	22.3	04/09/2021	
21-03-03753-034	185.5-50	03/12/2021	2ND FLOOR MENS STAFF LAV RIGHT	1.80	04/09/2021	
21-03-03753-035	185.5-51	03/12/2021	2ND FLOOR WOMENS STAFF LAV LEFT	8.46	04/09/2021	
21-03-03753-036	185.5-52	03/12/2021	2ND FLOOR WOMENS STAFF LAV RIGHT	1.63	04/09/2021	
21-03-03753-037	185.5-53	03/12/2021	RM 101	2.83	04/09/2021	
21-03-03753-038	185.5-54	03/12/2021	RM 109	9.35	04/12/2021	

Method: EPA 200.8
Analyst: Anthony Dee
Accreditation #: NY 11714

Reviewed By Authorized Signatory:

Melissa Kanode

Missy Kanode

QA/QC Clerk

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

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

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

1.5 Laboratory Certifications

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER



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

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

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

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

NY Lab Id No: 11714

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

Metals I

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

NEW YORK
STATE OF
OPPORTUNITY.

Department
of Health

Serial No.: 63485

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



1.6 Chains of Custody



Chain of Custody Document

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

Submitted to: (Lab Name) EHS

STOHL Job # 2020L-185.5

Client: North Tonawanda CSD Contact: Jim Hart

Building: Gilmore School Location: 176 Walck Rd, North Tonawanda, NY 14120

LEAD

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

Turnaround

20 Days

Sample #	Location	Outlet Type	Time
185.5-3	2nd Floor Boys Lav Left	S	22:12
185.5-4	2nd Floor Boys Lav Center	S	22:14
185.5-6	2nd Floor Girls Lav Left	S	22:16
185.5-7	2nd Floor Girls Lav Center	S	22:18
185.5-8	2nd Floor Girls Lav Right	S	22:20
185.5-12	1st Floor North Mens Staff Lav Left	S	22:22
185.5-13	1st Floor North Mens Staff Lav Right	S	22:24
185.5-14	1st Floor North Womens Staff Lav	S	22:26
185.5-15	1st Floor South Womens Staff Lav Left	S	22:28
185.5-16	1st Floor South Womens Staff Lav Center	S	22:30
185.5-17	1st Floor South Womens Staff Lav Right	S	22:32
185.5-18	RM 104 Lav	S	22:34
185.5-24	RM 102	S	22:36
185.5-26	Kitchen Dish Sprayer	S	22:38
185.5-27	Kitchen 3 Bay Left	S	22:40
185.5-28	Kitchen 3 Bay Right	S	22:42
185.5-29	Kitchen Hand Wash	S	22:44
185.5-30	Kitchen Center Prep North	S	22:46

21-03-03753



Due Date:
04/14/2021
(Wednesday)
AE

Notes:

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

Sampled By: Christine Schultz Print Name Christine Schultz Date: 3/12/2021

Relinquished By: E. Henderson Jr. Print Name Eric Henderson Jr. Date: 3/15/2021

Received (Name / Lab): Aminda Lavery Date: 3.17.21 Time: 2:38 pm

Sample Login (Name / Lab): A. Lavery Date: 4/6/21 Time: 9:48 AM

Analysis (Name / Lab): Young Oei Date: 4/12/21 Time: 1:24 pm

QA/QC Review (Name / Lab): Melissa Date: 4/14/21 Time: 3pm

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

1 SAMPLE BOTTLE BROKEN / EMPTY (K&A)



Chain of Custody Document

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

Submitted to: (Lab Name) EHS

STOHL Job # 2020L-185.5

Client: North Tonawanda CSD

Contact: Jim Hart

Building: Gilmore School

Location: 176 Walck Rd, North Tonawanda, NY 14120

LEAD

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

Turnaround

20 Days

Sample #	Location	Outlet Type	Time
185.5-31	Kitchen Center Prep South	S	22:48
185.5-32	Basement Art Room	S	22:50
* 185.5-33	Basement Faculty Room	S	22:52
185.5-34	Basement Office Lav	S	22:54
185.5-35	RM 107	S	22:56
185.5-37	RM 111	S	22:58
185.5-38	RM 111 Lav	S	23:00
185.5-39	RM 113	S	23:02
185.5-40	RM 108	S	23:04
185.5-42	RM 210	S	23:06
185.5-43	RM 209	S	23:08
185.5-44	RM 211 North	S	23:10
185.5-46	RM 208	S	23:12
185.5-47	RM 207	S	23:14
185.5-48	Hallway Outside 2nd Floor Mens Staff Lav	Water Cooler	23:16
185.5-49	2nd Floor Mens Staff Lav Left	S	23:18
185.5-50	2nd Floor Mens Staff Lav Right	S	23:20
185.5-51	2nd Floor Womens Staff Lav Left	S	23:22

Notes:

Please e-mail lab results to labs@stohlenv.com

Sampled By: Christine Schultz Print Name Christine Schultz Date: 3/12/2021

Relinquished By: Eric Henderson Jr. Print Name Eric Henderson Jr. Date: 3/15/2021

Received (Name / Lab): MT Harris Date: 3/17/21 Time: 2:35 pm

Sample Login (Name / Lab): Amanda Lowery Date: 4/6/21 Time: 9:56 AM

Analysis (Name / Lab): Young Doe Date: 4/12/21 Time: 1:24 pm

QA/QC Review (Name / Lab): M. [Signature] Date: 4/14/21 Time: 3 pm

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

BLANK

BLANK



3860 California Road, Orchard Park, New York 14127

PHONE (716) 312-0070 FAX (716) 312-8092

WWW.STOHLENVIRONMENTAL.COM