

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:

- Bus Garage – 100 Ridge 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 9, 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, 1 source of potable water in the Bus Garage has 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 9, 2021

Summary Tabulation

Lead in Drinking Water Investigation

- 1.1. Scope of Work and Sampling Protocol
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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:

- Bus Garage – 100 Ridge Road, North Tonawanda, New York.

Scope of Work:

Stohl Environmental was charged with collecting first-draw water samples from outlets within the Bus Garage. 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
Bus Garage	3/9/2021	7	6	1	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
185.8-8	Men's Lav Near Main Entrance Left	Sink	16.2

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: 21-03-03527
Received Date: 03/16/2021
Reported Date: 04/09/2021
Sampled By: Christine Schultz
Tech Certification #:

Project/Test Address: 2020L-185.8; North Tonawanda Bus Garage; 100 Ridge Road; North
Tonawanda, NY

Client Number:
33-5980

Laboratory Results

Fax Number:
716-312-8092

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
21-03-03527-001	185.8-4	03/09/2021	WOMEN'S LAV NEAR MAIN ENTRANCE LEFT	5.04	04/07/2021	
21-03-03527-002	185.8-5	03/09/2021	WOMEN'S LAV NEAR MAIN ENTRANCE CENTER	4.15	04/07/2021	
21-03-03527-003	185.8-6	03/09/2021	WOMEN'S LAV NEAR MAIN ENTRANCE RIGHT	4.24	04/07/2021	
21-03-03527-004	185.8-8	03/09/2021	MEN'S LAV NEAR MAIN ENTRANCE LEFT	16.2	04/07/2021	
21-03-03527-005	185.8-9	03/09/2021	MEN'S LAV NEAR MAIN ENTRANCE CENTER	7.92	04/07/2021	
21-03-03527-006	185.8-10	03/09/2021	MEN'S LAV NEAR MAIN ENTRANCE RIGHT	4.05	04/07/2021	
21-03-03527-007	185.8-11	03/09/2021	BREAK ROOM	<1.00	04/07/2021	

Environmental Hazards Services, L.L.C

Client Number: 33-5980

Report Number: 21-03-03527

Project/Test Address: 2020L-185.8; North Tonawanda Bus Garage; 100 Ridge Road; North Tonawanda, NY

Lab Sample Number	Client Sample ID	Collection Date	Collection Location	Concentration ug/L (ppb)	Analysis Date	Narrative ID
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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

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