SIENNA
ENVIRONMENTAL TECHNOLOGIES

350 Elmwood Ave. • Buffalo, NY 14222
Ⓟ 716.332.3134 Ⓕ 716.332.3136

November 8, 2016

Mr. Timothy Ames
Kenmore Tonawanda CSD
1500 Colvin Boulevard
Buffalo, NY 14223

Re: Lead in Water Sampling Report
Kenmore Tonawanda CSD
Hoover Middle School

Dear Mr. Timothy Ames:

At your request, Sienna Environmental Technologies conducted water sampling, screening for lead contaminants at the above referenced property in accordance with 1370-a and 1110, Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rules and Regulations of the State of New York, and US EPA guidelines.

If you have any questions, or if we can be of assistance in any other way, please do not hesitate to call. Thank you for the opportunity to be of service to Kenmore Tonawanda CSD.

Sincerely,
Sienna Environmental Technologies, LLC

Raymond Cich
Operations Manager

Lead in Water Sampling
In Accordance with
NYCRR Title 10, Subpart 67-4

OF THE:

Kenmore Tonawanda CSD
Hoover Middle School

PREPARED BY:

SIENNA
ENVIRONMENTAL TECHNOLOGIES
350 Elmwood Avenue Buffalo, New York 14222
ph: 716.332.3134 www.siennaet.com

PREPARED FOR:

Kenmore Tonawanda CSD
1500 Colvin Boulevard
Buffalo, NY 14223

CONDITIONS AS OF:

September 29, 2016

SIENNA
ENVIRONMENTAL TECHNOLOGIES

Summary Tabulation

SIENNA
ENVIRONMENTAL TECHNOLOGIES

1. Lead in Water Sampling

1.1 Introduction

Sienna Environmental Technologies performed client directed sampling of potable water outlets. The sampling event was conducted on September 29, 2016 prior to the facilities opening in the morning and before any water was used; known as a “first-draw” sample. The outlets tested were reported to be out of service for a minimum of 8 hours, but not more than 18 hours, prior to sample collection. Sampling was conducted at outlets specified by the client at the following school:

- Hoover Middle School

Sienna Environmental Technologies was charged with:

1. Collecting a “first-draw” sample volume of 250 milliliters (mL), collected from cold water outlets after not being used for 8-18 hours. Sample locations were client directed.
2. Sending samples to an independent laboratory for lead analysis by ICP Method 200.8 in conformance with NYS and US EPA guidelines.
3. Providing a report of the sampling and analysis of the potable water for lead contamination to the School District.

1.2 Summary of Non-Compliant Water Analysis

NYCRR Title 10, Subpart 67-4 recommends that any water fountains and/or outlets be taken out of service if analysis indicates lead levels which exceed 15 parts per billion (ppb) based on a 250 mL first-draw sample. 15 ppb is equivalent to 15 micrograms per liter (µg/L). The following is a list of outlets in excess of 15 ppb. For a comprehensive list of outlets sampled, see appendix B.

Sample Date	Client ID Sample No.	Sample Description		Result (µg/L)
		Location of Outlet	Type of Outlet	
NAME OF SCHOOL				
9-29-2016	HOM-CFC-119-81	Room 119	Classroom Faucet Cold	28
9-29-2016	HOM-DW-119-83	Room 119	Drinking Water Bubbler	27
9-29-2016	HOM-BFC-127-84	Room 127	Bathroom Faucet Cold	18
9-29-2016	HOM-CFC-207A-99	Room 207B	Classroom Faucet Cold	88
9-29-2016	HOM-CFC-204-100	Room 204	Classroom Faucet Cold	23
9-29-2016	HOM-CFC-206-101	Room 206	Classroom Faucet Cold	34
9-29-2016	HOM-CFC-210-109	Room 210	Classroom Faucet Cold	38
9-29-2016	HOM-CFC-250-110	Room 250	Classroom Faucet Cold	330
9-29-2016	HOM-CFC-250-111	Room 250	Classroom Faucet Cold	33
9-29-2016	HOM-CFC-211-117	Room 211	Classroom Faucet Cold	49
9-29-2016	HOM-CFC-211-118	Room 211	Classroom Faucet Cold	16
9-29-2016	HOM-CFC-213-119	Room 213	Classroom Faucet Cold	22
9-29-2016	HOM-CFC-215-122	Room 215	Classroom Faucet Cold	67
9-29-2016	HOM-CFC-217-124	Room 217	Classroom Faucet Cold	39
9-29-2016	HOM-CFC-217-125	Room 217	Classroom Faucet Cold	39
9-29-2016	HOM-CFC-217-126	Room 217	Classroom Faucet Cold	64

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ENVIRONMENTAL TECHNOLOGIES

Sample Date	Client ID Sample No.	Sample Description		Result (µg/L)
		Location of Outlet	Type of Outlet	
9-29-2016	HOM-CFC-217-127	Room 217	Classroom Faucet Cold	29
9-29-2016	HOM-CFC-216-130	Room 216	Classroom Faucet Cold	27
9-29-2016	HOM-CFC-219-134	Room 219	Classroom Faucet Cold	21
9-29-2016	HOM-CFC-219-134	Room 219	Classroom Faucet Cold	20
9-29-2016	HOM-CFC-219-135	Room 219	Classroom Faucet Cold	18
9-29-2016	HOM-CFC-219-136	Room 219	Classroom Faucet Cold	28
9-29-2016	HOM-BFC-212B-138	Room 212B	Bathroom Faucet Cold	50
9-29-2016	HOM-BFC-214A-139	Room 214A	Bathroom Faucet Cold	34
9-29-2016	HOM-BFC-214B-142	Room 214B	Bathroom Faucet Cold	17
9-29-2016	HOM-BFC-382A-157	Room 382A	Bathroom Faucet Cold	18
9-29-2016	HOM-BFC-382A-158	Room 382A	Bathroom Faucet Cold	37
9-29-2016	HOM-CFC-348-164	Room 348	Classroom Faucet Cold	56
9-29-2016	HOM-CFC-379-166	Room 379	Classroom Faucet Cold	110
9-29-2016	HOM-CFC-379-168	Room 379	Classroom Faucet Cold	110
9-29-2016	HOM-CFC-378-169	Room 378	Classroom Faucet Cold	17
9-29-2016	HOM-CFC-378-171	Room 378	Classroom Faucet Cold	120
9-29-2016	HOM-CFC-377-172	Room 377	Classroom Faucet Cold	56
9-29-2016	HOM-CFC-314-173	Room 314	Classroom Faucet Cold	31
9-29-2016	HOM-CFC-314-174	Room 314	Classroom Faucet Cold	52
9-29-2016	HOM-CFC-375-175	Room 375	Classroom Faucet Cold	490
9-29-2016	HOM-CFC-375-176	Room 375	Classroom Faucet Cold	38
9-29-2016	HOM-CFC-316-177	Room 316	Classroom Faucet Cold	88
9-29-2016	HOM-CFC-316-178	Room 316	Classroom Faucet Cold	36
9-29-2016	HOM-CFC-318-180	Room 318	Classroom Faucet Cold	67
9-29-2016	HOM-CFC-318-181	Room 318	Classroom Faucet Cold	93
9-29-2016	HOM-CFC-318-182	Room 318	Classroom Faucet Cold	57
9-29-2016	HOM-CFC-319-183	Room 319	Classroom Faucet Cold	52
9-29-2016	HOM-CFC-319-184	Room 319	Classroom Faucet Cold	36
9-29-2016	HOM-CFC-319-185	Room 319	Classroom Faucet Cold	88

1.3 Discussion and Recommendations

The testing provided is representative of the water that may be consumed at the beginning of the day or after infrequent use. It consists of water that has been in contact with the fixture and the plumbing connecting the faucet or the lateral pipes. Section 67-4.4 “Response” should be followed as your next steps to comply with NYCRR Title 10, Subpart 67-4.

Once section 67-4.4 has been completed, Sienna recommends the following actions for samples that exceed the action limit:

- Collect an additional first draw sample for analysis.
- Collect a follow-up flush sample. This sample is collected after the first draw sample is collected and the faucet is allowed to run for 30 seconds and is representative of the water that is in the plumbing upstream from the faucet.

This testing protocol will aid in identifying the potential source of the elevated lead level. If the lead level in the first draw sample is higher than that in the follow-up flush sample, the source of lead is the water faucet and/or the plumbing upstream from the faucet. If the lead level in follow-up flush sample is very low, i.e. close to 5 ppb, very little lead is coming from the plumbing upstream from the faucet. The majority or all of the lead in the water is from the faucet and/or the plumbing connecting the faucet to the lateral. If the lead level in the follow-up flush sample significantly exceeds 5 ppb (i.e. close to 10 ppb), lead from the plumbing upstream from the faucet may be contributing to these results.

In Addition, NYCRR Title 10, Subpart 67-4 states that you may find the United States Environmental Protection Agency’s guidance document helpful, titled “3Ts for Reducing Lead in Drinking Water in Schools, Revised Technical Guidance”.

https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf

This document includes sample notifications letters, press releases, and provides guidance through the process of reducing lead exposure.

Appendix A General Conditions of Sampling

1. Sienna Environmental Technologies, LLC neither accepts nor implies any liability for the implementation of the recommendations found within this report.

2. The results of the laboratory analytical reports that may be contained herein are the product of the knowledge, experience and expertise of the laboratory retained to perform such services. Sienna Environmental Technologies neither accepts nor implies any liability for sample analysis reports compiled by others.

3. This report is based on the condition and contents present at the site on the day of the inspection. Sienna Environmental Technologies, LLC is not liable for materials, chemicals or other substances of concern that may have been removed or introduced to the site, prior to the inspection date or subsequent to that date.

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Appendix B Chains of Custody and Laboratory Reports

AMA Analytical Services, Inc.

A Specialized Environmental Laboratory

CERTIFICATE OF ANALYSIS

Maryland Water Quality Lab #262W

NY ELAP 10920

Client:	Environmental Hazards Services, LLC	**Job Name:**	KenTon CSD - Hoover Middle School	**Chain Of Custody:**	536988
Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011421	HOM-CFC-119-81	9/29/2016	5:26:00 AM	119 North Wall Left	Furnace	Lead Water	1	µg/L	28	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011422	HOM-CFC-119-82	9/29/2016	5:26:00 AM	119 North Wall Middle	Furnace	Lead Water	1	µg/L	9.7	µg/L	
17011423	HOM-DW-119-83	9/29/2016	5:27:00 AM	119 North Wall Right	Furnace	Lead Water	1	µg/L	27	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011424	HOM-BFC-127-84	9/29/2016	5:32:00 AM	127 South Wall	Furnace	Lead Water	1	µg/L	18	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011425	HOM-BFC-128-85	9/29/2016	5:32:00 AM	128 South Wall	Furnace	Lead Water	1	µg/L	6.4	µg/L	
17011426	HOM-BFC-120A-86	9/29/2016	5:34:00 AM	120A East Wall Left	Furnace	Lead Water	1	µg/L	13	µg/L	
17011427	HOM-BFC-120A-87	9/29/2016	5:35:00 AM	120A East Wall Middle	Furnace	Lead Water	1	µg/L	12	µg/L	
17011428	HOM-BFC-120A-88	9/29/2016	5:36:00 AM	120A East Wall Right	Furnace	Lead Water	1	µg/L	5.9	µg/L	
17011429	HOM-BFC-120B-89	9/29/2016	5:33:00 AM	120B East Wall Left	Furnace	Lead Water	1	µg/L	3.3	µg/L	

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Attention:	Kathy Tyler				

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		Date	Time	Location							
17011430	HOM-BFC-120B-90	9/29/2016	5:34:00 AM	120B East Wall Right	Furnace	Lead Water	1	µg/L	14	µg/L	
17011431	HOM-WC-A120-91	9/29/2016	5:34:00 AM	A120 West Wall	Furnace	Lead Water	1	µg/L	9	µg/L	
17011432	HOM-WC-A209-92	9/29/2016	5:47:00 AM	A209 East Wall	Furnace	Lead Water	1	µg/L	3.6	µg/L	
17011433	HOM-BFC-209C-93	9/29/2016	5:49:00 AM	209C South Wall Far Left	Furnace	Lead Water	1	µg/L	5.3	µg/L	
17011434	HOM-BFC-209C-94	9/29/2016	5:50:00 AM	209C South Wall 2nd from Left	Furnace	Lead Water	1	µg/L	5.9	µg/L	
17011435	HOM-BFC-209C-95	9/29/2016	5:51:00 AM	209C South Wall 3rd from Left	Furnace	Lead Water	1	µg/L	2.6	µg/L	
17011436	HOM-BFC-209C-96	9/29/2016	5:49:00 AM	209C South Wall 4th from Left	Furnace	Lead Water	1	µg/L	4.1	µg/L	
17011437	HOM-BFC-209C-97	9/29/2016	5:50:00 AM	209C South Wall 5th from Left	Furnace	Lead Water	1	µg/L	6	µg/L	
17011438	HOM-BFC-209C-98	9/29/2016	5:51:00 AM	209C South Wall Far Right	Furnace	Lead Water	1	µg/L	5.5	µg/L	
17011439	HOM-CFC-207A-99	9/29/2016	5:54:00 AM	207A East Wall	Furnace	Lead Water	1	µg/L	88	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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		Date	Time	Location							
17011440	HOM-CFC-204-100	9/29/2016	5:54:00 AM	204 South Wall	Furnace	Lead Water	1	µg/L	23	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011441	HOM-CFC-206-101	9/29/2016	5:53:00 AM	206 South Wall	Furnace	Lead Water	1	µg/L	34	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011442	HOM-WC-A207-102	9/29/2016	5:56:00 AM	A207 North Wall	Furnace	Lead Water	1	µg/L	5.2	µg/L	
17011443	HOM-BFC-208A-103	9/29/2016	5:57:00 AM	208A South Wall Left	Furnace	Lead Water	1	µg/L	4.6	µg/L	
17011444	HOM-BFC-208A-104	9/29/2016	5:58:00 AM	208A South Wall 2nd from Left	Furnace	Lead Water	1	µg/L	3.6	µg/L	
17011445	HOM-BFC-208A-105	9/29/2016	5:59:00 AM	208A South Wall 3rd from Left	Furnace	Lead Water	1	µg/L	3.7	µg/L	
17011446	HOM-BFC-208A-106	9/29/2016	5:57:00 AM	208A South Wall 4th from Left	Furnace	Lead Water	1	µg/L	3.3	µg/L	
17011447	HOM-BFC-208A-107	9/29/2016	5:58:00 AM	208A South Wall 5th from Left	Furnace	Lead Water	1	µg/L	5.5	µg/L	
17011448	HOM-BFC-208A-108	9/29/2016	5:59:00 AM	208A South Wall Right	Furnace	Lead Water	1	µg/L	4.3	µg/L	

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		Date	Time	Location							
17011449	HOM-CFC-210-109	9/29/2016	5:58:00 AM	210 North Wall	Furnace	Lead Water	1	µg/L	38	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011450	HOM-CFC-250-110	9/29/2016	6:00:00 AM	250 South Wall	Furnace	Lead Water	1	µg/L	330	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011451	HOM-CFC-250-111	9/29/2016	6:01:00 AM	250 Center Island	Furnace	Lead Water	1	µg/L	33	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011452	HOM-WC-A208-112	9/29/2016	6:01:00 AM	A208 East Wall	Furnace	Lead Water	1	µg/L	2.8	µg/L	
17011453	HOM-CFC-255-113	9/29/2016	6:04:00 AM	255 South Wall	Furnace	Lead Water	1	µg/L	12	µg/L	
17011454	HOM-WC-A210-114	9/29/2016	6:05:00 AM	A210 South Wall Left	Furnace	Lead Water	1	µg/L	1.1	µg/L	
17011455	HOM-CFC-211-115	9/29/2016	6:07:00 AM	211 North Wall Left	Furnace	Lead Water	1	µg/L	9.8	µg/L	
17011456	HOM-CFC-211-116	9/29/2016	6:08:00 AM	211 North Wall Right	Furnace	Lead Water	1	µg/L	6.7	µg/L	

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		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

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		Date	Time	Location							
17011457	HOM-CFC-211-117	9/29/2016	6:07:00 AM	211 East Wall	Furnace	Lead Water	1	µg/L	49	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011458	HOM-CFC-211-118	9/29/2016	6:09:00 AM	211 South Wall	Furnace	Lead Water	1	µg/L	16	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011459	HOM-CFC-213-119	9/29/2016	6:11:00 AM	213 East Wall	Furnace	Lead Water	1	µg/L	22	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011460	HOM-CFC-214-120	9/29/2016	6:11:00 AM	214 South Wall	Furnace	Lead Water	1	µg/L	11	µg/L	
17011461	HOM-CFC-214-121	9/29/2016	6:12:00 AM	214 West Wall	Furnace	Lead Water	1	µg/L	13	µg/L	
17011462	HOM-CFC-215-122	9/29/2016	6:13:00 AM	215 West Wall	Furnace	Lead Water	1	µg/L	67	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011463	HOM-CFC-217-123	9/29/2016	6:14:00 AM	217 North Wall Left	Furnace	Lead Water	1	µg/L	12	µg/L	

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Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011464	HOM-CFC-217-124	9/29/2016	6:15:00 AM	217 North Wall Right	Furnace	Lead Water	1	µg/L	39	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011465	HOM-CFC-217-125	9/29/2016	6:15:00 AM	217 West Wall	Furnace	Lead Water	1	µg/L	39	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011466	HOM-CFC-217-126	9/29/2016	6:15:00 AM	217 South Wall Left	Furnace	Lead Water	1	µg/L	64	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011467	HOM-CFC-217-127	9/29/2016	6:15:00 AM	217 South Wall Right	Furnace	Lead Water	1	µg/L	29	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011468	HOM-WC-A210-128	9/29/2016	6:14:00 AM	A210 South Wall Right	Furnace	Lead Water	1	µg/L	4.8	µg/L	
17011469	HOM-CFC-216-129	9/29/2016	6:19:00 AM	216 South Wall	Furnace	Lead Water	1	µg/L	13	µg/L	

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Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011470	HOM-CFC-216-130	9/29/2016	6:20:00 AM	216 West Wall	Furnace	Lead Water	1	µg/L	27	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011471	HOM-CFC-218-131	9/29/2016	6:19:00 AM	218 South Wall	Furnace	Lead Water	1	µg/L	9.1	µg/L	
17011472	HOM-CFC-218-132	9/29/2016	6:20:00 AM	218 West Wall	Furnace	Lead Water	1	µg/L	14	µg/L	
17011473	HOM-CFC-219-133	9/29/2016	6:22:00 AM	219 North Wall Left	Furnace	Lead Water	1	µg/L	21	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011474	HOM-CFC-219-134	9/29/2016	6:23:00 AM	219 North Wall Right	Furnace	Lead Water	1	µg/L	20	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011475	HOM-CFC-219-135	9/29/2016	6:22:00 AM	219 South Wall Left	Furnace	Lead Water	1	µg/L	18	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011476	HOM-CFC-219-136	9/29/2016	6:24:00 AM	219 South Wall Right	Furnace	Lead Water	1	µg/L	28	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011477	HOM-BFC-212A-137	9/29/2016	6:26:00 AM	212A South Wall	Furnace	Lead Water	1	µg/L	14	µg/L	
17011478	HOM-BFC-212B-138	9/29/2016	6:26:00 AM	212B North Wall	Furnace	Lead Water	1	µg/L	50	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011479	HOM-BFC-214A-139	9/29/2016	6:28:00 AM	214A East Wall Left	Furnace	Lead Water	1	µg/L	34	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011480	HOM-BFC-214A-140	9/29/2016	6:28:00 AM	214A East Wall Middle	Furnace	Lead Water	1	µg/L	12	µg/L	
17011481	HOM-BFC-214A-141	9/29/2016	6:29:00 AM	214A East Wall Right	Furnace	Lead Water	1	µg/L	3.7	µg/L	
17011482	HOM-BFC-214B-142	9/29/2016	6:29:00 AM	214B East Wall Left	Furnace	Lead Water	1	µg/L	17	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011483	HOM-BFC-214B-143	9/29/2016	6:29:00 AM	214B East Wall Right	Furnace	Lead Water	1	µg/L	13	µg/L	
17011484	HOM-WC-A214-144	9/29/2016	6:28:00 AM	A214 West Wall	Furnace	Lead Water	1	µg/L	6.7	µg/L	

AMA Analytical Services, Inc.

A Specialized Environmental Laboratory

CERTIFICATE OF ANALYSIS

Maryland Water Quality Lab #262W

NY ELAP 10920

Client:	Environmental Hazards Services, LLC	**Job Name:**	KenTon CSD - Hoover Middle School	**Chain Of Custody:**	536988
Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011485	HOM-BFC-301E-145	9/29/2016	6:37:00 AM	301E East Wall Left	Furnace	Lead Water	1	µg/L	2.8	µg/L	
17011486	HOM-BFC-301E-146	9/29/2016	6:38:00 AM	301E East Wall 2nd from Left	Furnace	Lead Water	1	µg/L	3.3	µg/L	
17011487	HOM-BFC-301E-147	9/29/2016	6:39:00 AM	301E East Wall 3rd from Left	Furnace	Lead Water	1	µg/L	4	µg/L	
17011488	HOM-BFC-301E-148	9/29/2016	6:40:00 AM	301E East Wall 4th from Left	Furnace	Lead Water	1	µg/L	2.6	µg/L	
17011489	HOM-BFC-301E-149	9/29/2016	6:41:00 AM	301E East Wall 5th from Left	Furnace	Lead Water	1	µg/L	4.2	µg/L	
17011490	HOM-BFC-301E-150	9/29/2016	6:42:00 AM	301E East Wall Right	Furnace	Lead Water	1	µg/L	2.2	µg/L	
17011491	HOM-BFC-301C-151	9/29/2016	6:39:00 AM	301C South Wall Left	Furnace	Lead Water	1	µg/L	6.2	µg/L	
17011492	HOM-BFC-301C-152	9/29/2016	6:40:00 AM	301C South Wall 2nd from Left	Furnace	Lead Water	1	µg/L	7.2	µg/L	
17011493	HOM-BFC-301C-153	9/29/2016	6:40:00 AM	301C South Wall 3rd from Left	Furnace	Lead Water	1	µg/L	8.8	µg/L	
17011494	HOM-BFC-301C-154	9/29/2016	6:40:00 AM	301C South Wall 4th from Left	Furnace	Lead Water	1	µg/L	4	µg/L	

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		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result			Comments
		Date	Time	Location								
17011495	HOM-BFC-301C-155	9/29/2016	6:40:00 AM	301C South Wall 5th from Left	Furnace	Lead Water	1	µg/L		5	µg/L	
17011496	HOM-BFC-301C-156	9/29/2016	6:41:00 AM	301C South Wall Right	Furnace	Lead Water	1	µg/L		4.1	µg/L	
17011497	HOM-BFC-382A-157	9/29/2016	6:37:00 AM	382A West Wall Left	Furnace	Lead Water	1	µg/L		18	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011498	HOM-BFC-382A-158	9/29/2016	6:38:00 AM	382A West Wall Right	Furnace	Lead Water	1	µg/L		37	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011499	HOM-WC-A302-159	9/29/2016	6:38:00 AM	A302 South Wall Left	Furnace	Lead Water	1	µg/L	<	1	µg/L	
17011500	HOM-WC-A301-160	9/29/2016	6:43:00 AM	A301 East Wall	Furnace	Lead Water	1	µg/L	<	1	µg/L	
17011501	HOM-WC-A302-161	9/29/2016	6:41:00 AM	A302 South Wall Right	Furnace	Lead Water	1	µg/L		3.1	µg/L	
17011502	HOM-CFC-341-162	9/29/2016	6:50:00 AM	341 East Wall	Furnace	Lead Water	1	µg/L		14	µg/L	
17011503	HOM-CFC-342-163	9/29/2016	6:50:00 AM	342 West Wall	Furnace	Lead Water	1	µg/L		13	µg/L	

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Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011504	HOM-CFC-348-164	9/29/2016	6:53:00 AM	348 South Wall	Furnace	Lead Water	1	µg/L	56	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011505	HOM-BFC-350A-165	9/29/2016	6:52:00 AM	350A North Wall	Furnace	Lead Water	1	µg/L	5.3	µg/L	
17011506	HOM-CFC-379-166	9/29/2016	6:58:00 AM	379 Center Island	Furnace	Lead Water	1	µg/L	110	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011507	HOM-CFC-379-167	9/29/2016	6:59:00 AM	379 North Wall	Furnace	Lead Water	1	µg/L	14	µg/L	
17011508	HOM-CFC-379-168	9/29/2016	7:00:00 AM	379 East Wall	Furnace	Lead Water	1	µg/L	110	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011509	HOM-CFC-378-169	9/29/2016	6:58:00 AM	378 South Wall	Furnace	Lead Water	1	µg/L	17	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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A Specialized Environmental Laboratory

CERTIFICATE OF ANALYSIS

Maryland Water Quality Lab #262W

NY ELAP
10920

Client:	Environmental Hazards Services, LLC	**Job Name:**	KenTon CSD - Hoover Middle School	**Chain Of Custody:**	536988
Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011510	HOM-CFC-378-171	9/29/2016	7:00:00 AM	378 Center Island	Furnace	Lead Water	1	µg/L	120	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011511	HOM-CFC-377-172	9/29/2016	6:55:00 AM	377 North Wall	Furnace	Lead Water	1	µg/L	56	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011512	HOM-CFC-314-173	9/29/2016	7:05:00 AM	314 South Wall	Furnace	Lead Water	1	µg/L	31	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011513	HOM-CFC-314-174	9/29/2016	7:06:00 AM	314 West Wall	Furnace	Lead Water	1	µg/L	52	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011514	HOM-CFC-375-175	9/29/2016	7:03:00 AM	375 East Wall	Furnace	Lead Water	1	µg/L	490	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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A Specialized Environmental Laboratory

CERTIFICATE OF ANALYSIS

Maryland Water Quality Lab #262W

NY ELAP 10920

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Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011515	HOM-CFC-375-176	9/29/2016	7:04:00 AM	375 North Wall	Furnace	Lead Water	1	µg/L	38	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011516	HOM-CFC-316-177	9/29/2016	7:07:00 AM	316 Center Island	Furnace	Lead Water	1	µg/L	88	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011517	HOM-CFC-316-178	9/29/2016	7:08:00 AM	316 South Wall	Furnace	Lead Water	1	µg/L	36	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011518	HOM-CFC-316-179	9/29/2016	7:08:00 AM	316 West Wall	Furnace	Lead Water	1	µg/L	14	µg/L	
17011519	HOM-CFC-318-180	9/29/2016	7:09:00 AM	318 Center Island	Furnace	Lead Water	1	µg/L	67	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011520	HOM-CFC-318-181	9/29/2016	7:09:00 AM	318 South Wall	Furnace	Lead Water	1	µg/L	93	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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NY ELAP 10920

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Address:	7469 Whitepine Road	**Job Location:**	Tonawanda, NY	**Date Analyzed:**	11/2/2016
	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit		Final Result		Comments
		Date	Time	Location							
17011521	HOM-CFC-318-182	9/29/2016	7:10:00 AM	318 West Wall	Furnace	Lead Water	1	µg/L	57	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011522	HOM-CFC-319-183	9/29/2016	7:09:00 AM	319 Center Island	Furnace	Lead Water	1	µg/L	52	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011523	HOM-CFC-319-184	9/29/2016	7:10:00 AM	319 North Wall	Furnace	Lead Water	1	µg/L	36	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.
17011524	HOM-CFC-319-185	9/29/2016	7:11:00 AM	319 East Wall	Furnace	Lead Water	1	µg/L	88	µg/L	This result exceeds the federal action level of 15 ppb for lead in drinking water.

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	Richmond, Virginia 23237	**Job Number:**	Not Provided	**Person Submitting:**	NTL
		P.O. Number:	Not Provided	**Report Date:**	02-Nov-16
Attention:	Kathy Tyler				

Summary of Drinking Water Analysis for Metals

AMA Sample Number	Client Sample Number	Sample Collection Information			Analysis Type	Sample Analyte	Reporting Limit	Final Result	Comments
		Date	Time	Location					

All Samples Analyzed by Atomic Absorption Analysis Methods:

Lead (Pb): APHA SM 3113B
Copper (Cu):: APHA SM 3111B
Arsenic (As): APHA SM 3113B

mg/L = Parts Per Million (ppm) N/A= Not Applicable
µg/L = Parts Per Billion (ppb) N/P= Not Provided
All results are to be considered preliminary and subject to change unless signed by the Technical Director or Deputy.

Additional Sample Collection Information:
Sample Collector: Phil Gladwin
Certification: Not Provided

Analyst: G. Carney / N. McGarvey **Technical Manager:** G. Edward Carney

AMA Analytical Services, Inc.
Focused On Results.
AIHA (#100470) NVLAP (#101143-0) NY ELAP (10920)
4475 Forbes Blvd. • Lanham, MD 20706
(301) 459-2640 • (800) 346-0961 • Fax (301) 459-2643
www.amalab.com

(COC # Assigned upon arrival at lab.) 536988

LEAD CHAIN OF CUSTODY

Mailing/Billing Information:

Client Name: EHS
Address:
Address:
Address:
Phone #: Fax #:

Submittal Information:

Job Name: KenTon CSD
Job Location: Hoover Middle School, Tonawanda, NY 14150
Job #: P.O. #:
Point of Contact: Kathy Tyler Phone #:
Submitted by: NTL Signature:

Reporting Info (Results provided as soon as technically feasible). If no TAT/Reporting Info is provided, AMA will assign defaults of 5-Day & email/fax to contacts of file.

TURN AROUND TIME (TAT):			REPORT TO:
After Hours (must be pre-scheduled)	Normal Business Hours		☐ Include COC/Field Data Sheets with Report
☐ Immediate Date Due:	☐ Immediate	☐ 3-Day ☐ Results Required by Noon	☐ Email:
☐ 24 Hours Time:	☐ Next Day	■ 5-Day +	☐ Fax:
Comments:	☐ 2-Day	Due Date: 11/4/2016	☐ Verbals

Sample Type

☐ Paint Chip (QTY) ☐ Air (QTY) ☐ Soil/Solid (QTY) ☐ Dust Wipe (wipe type) (QTY)
☐ TCLP (QTY) ■ Drinking Water 104 (QTY) ☐ Waste Water (QTY) ☐ Furnace (Media type) (QTY)

*If field data sheets are submitted, there is no need to complete bottom section ■ All samples received in good condition unless otherwise noted.

Sample Information					Analysis Matrix				Client Contact (Laboratory Staff Only)
Sample Number	Sample Collection Location/Surface	Date/Time	Volume (L)	Wipe Area	Air	Paint Chip or Soil/Solid	Dust	Water & Other	
									Date/Time: Contact: By:
									Date/Time: Contact: By:
									Date/Time: Contact: By:

LABORATORY STAFF ONLY: (CUSTODY)

1. Date/Time RCVD: 10 / 25 / 16 @ Via: UPS By (print): NRM Sign:
2. Date/Time Analyzed: / / @ By (print): Sign:
3. Results/Reported To: Via: Date: / / Time: Initials:
4. Comments:

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

Richmond, VA - Phone: (800) 347-4010 FAX: (804) 275-4907

ONLINE CLIENT PORTAL AVAILABLE FOR ANALYSIS RESULTS AT: www.leadlab.com

EHS Laboratories™

Analysis By: National Testing Laboratories, Ltd. — Quality Water Analysis

~ For Lab Use Only ~

Company Name: Sienna Environmental Technologies Account #: 33-5983

Address: 350 Elmwood Ave. City/State/Zip: Buffalo, NY 14222

Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: (Required) KenTon CSD- Hoover Middle School City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: _____ Date: 9 / 29 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
81	HOM-CFC-119-81	119 - Northwall, left	09/29/2016	0526 AM / PM	✓					
82	HOM-CFC-119-82	119 - Northwall, middle	09/29/2016	0526 AM / PM	✓					
83	HOM-DW-119-83	119 - Northwall, Right	09/29/2016	0527 AM / PM	✓					
84	HOM-BFC-127-84	127 - Southwall	09/29/2016	0532 AM / PM	✓					
85	HOM-BFC-128-85	128 - Southwall	09/29/2016	0532 AM / PM	✓					
86	HOM-BFC-120A-86	120A - East wall, left	09/29/2016	0534 AM / PM	✓					
87	HOM-BFC-120A-87	120A - Eastwall, middle	09/29/2016	0535 AM / PM	✓					
88	HOM-BFC-120A-88	120A - Eastwall, Right	09/29/2016	0536 AM / PM	✓					
89	HOM-BFC-120B-89	120B - Eastwall, left	09/29/2016	0533 AM / PM	✓					
90	HOM-BFC-120B-90	120B - Eastwall, Right	09/29/2016	0534 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

Page 9 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

Richmond, VA - Phone: (800) 347-4010 FAX: (804) 275-4907

ONLINE CLIENT PORTAL AVAILABLE FOR ANALYSIS RESULTS AT: www.leadlab.com

EHS Laboratories™

Analysis By: National Testing Laboratories, Ltd. — Quality Water Analysis

~ For Lab Use Only ~

Company Name: Sienna Environmental Technologies Account #: 33-5983

Address: 350 Elmwood Ave. City/State/Zip: Buffalo, NY 14222

Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: (Required) KenTon CSD- Hoover Middle School City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: _____ Date: 9/29/2016

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
91	HOM-WC-A120-91	A120 - westwall	09/29/2016	0534 AM / PM	✓					
92	HOM-WC-A209-92	A209 - East wall	09/29/2016	0547 (0547) AM / PM	✓					
93	HOM-BFC-209C-93	209C - Southwall, left (for)	09/29/2016	0549 AM / PM	✓					
94	HOM-BFC-209C-94	209C - Southwall, 2nd from left	09/29/2016	0550 AM / PM	✓					
95	HOM-BFC-209C-95	209C - Southwall, 3rd from left	09/29/2016	0551 AM / PM	✓					
96	HOM-BFC-209C-96	209C - Southwall, 4th from Left	09/29/2016	0549 AM / PM	✓					
97	HOM-BFC-209C-97	209C - Southwall, 5th from Left	09/29/2016	0550 AM / PM	✓					
98	HOM-BFC-209C-98	209C - Southwall, Right (for)	09/29/2016	0551 AM / PM	✓					
99	HOM-CFC-207A-99	207A - East wall	09/29/2016	0554 AM / PM	✓					
100	HOM-CFC-204-100	204 - Southwall	09/29/2016	0554 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
101	HOM-CFC-206-101	206- Southwall	09/29/2016	0553 AM / PM	✓					
102	HOM-WC-A207-102	A207 - Northwall	09/29/2016	0556 AM / PM	✓					
103	HOM-BFC-208A-103	208A - Southwall, left	09/29/2016	0557 AM / PM	✓					
104	HOM-BFC-208A-104	208A - Southwall, 2nd from left	09/29/2016	0558 AM / PM	✓					
105	HOM-BFC-208A-105	208A - Southwall, 3rd from left	09/29/2016	0559 AM / PM	✓					
106	HOM-BFC-208A-106	208A - Southwall, 4th from left	09/29/2016	0557 AM / PM	✓					
107	HOM-BFC-208A-107	208A - Southwall, 5th from left	09/29/2016	0558 AM / PM	✓					
108	HOM-BFC-208A-108	208A - Southwall, Right	09/29/2016	0559 AM / PM	✓					
109	HOM-CFC-210-109	210 - Northwall	09/29/2016	0558 AM / PM	✓					
110	HOM-CFC-250-110	250 - Southwall	09/29/2016	0600 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time:_____ Temp. Received:_____

Shipping Tracking #:_____

Page 11 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

Richmond, VA - Phone: (800) 347-4010 FAX: (804) 275-4907

ONLINE CLIENT PORTAL AVAILABLE FOR ANALYSIS RESULTS AT: www.leadlab.com

EHS Laboratories™

Analysis By: National Testing Laboratories, Ltd. — Quality Water Analysis

~ For Lab Use Only ~

Company Name: Sienna Environmental Technologies Account #: 33-5983

Address: 350 Elmwood Ave. City/State/Zip: Buffalo, NY 14222

Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: (Required) KenTon CSD- Hoover Middle School City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: _____ Date: 9 / 29 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
11	HOM-CFC-250-111	250- Center Island	09/29/2016	0601 AM / PM	✓					
12	HOM-WC-A208-112	A208- Eastwall	09/29/2016	0601 AM / PM	✓					
13	HOM-CFC 255-113	255- Southwall	09/29/2016	0604 AM / PM	✓					
14	HOM-WC-A210-114	A210 - Southwall, left	09/29/2016	0605 AM / PM	✓					
15	HOM-CFC-211-115	211 - Northwall, left	09/29/2016	0607 AM / PM	✓					
16	HOM-CFC-211-116	211- Northwall, Right	09/29/2016	0608 AM / PM	✓					
17	HOM-CFC-211-117	211- Eastwall	09/29/2016	0607 AM / PM	✓					
18	HOM-CFC-211-118	211- Southwall	09/29/2016	0609 AM / PM	✓					
19	HOM-CFC-213-119	213- Eastwall	09/29/2016	0611 AM / PM	✓					
20	HOM-CFC-214-120	214- Southwall	09/29/2016	0611 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
121	HOM-CFL-214-121	214- westwall	09/29/2016	0612 AM / PM	✓					
122	HOM-CFL-215-122	215-westwall	09/29/2016	0613 AM / PM	✓					
123	HOM-CFL-217-123	217- NorthLwall, left	09/29/2016	0614 AM / PM	✓					
124	HOM-CFL-217-124	217 - Northwall, Right	09/29/2016	0615 AM / PM	✓					
125	HOM-CFL-217-125	217 - ~~North~~ Westwall	09/29/2016	0615 AM / PM	✓					
126	HOM-CFL-217-126	217- Southwall, left	09/29/2016	0615 AM / PM	✓					
127	HOM-CFL-217-127	217- Southwall, Right	09/29/2016	0615 AM / PM	✓					
128	HOM-WC-A210-128	A210- Southwall Right	09/29/2016	0614 AM / PM	✓					
129	HOM-CFL-216-129	216-Southwall	09/29/2016	0614 AM / PM	✓					
130	HOM-CFL-216-130	216-Westwall	09/29/2016	0620 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

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No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
131	HOM-CFC-218-131	218 – Southwall	09/29/2016	0619 AM / PM	✓					
132	HOM-CFC-218-132	218 – Westwall	09/29/2016	0620 AM / PM	✓					
133	HOM-CFC-219-133	219 – Northwall, Left	09/29/2016	0622 AM / PM	✓					
134	HOM-CFC-219-134	219 – Northwall, Right	09/29/2016	0623 AM / PM	✓					
135	HOM-CFC-219-135	219 – Southwall, Left	09/29/2016	0622 AM / PM	✓					
136	HOM-CFC-219-136	219 – Southwall, Right	09/29/2016	0624 AM / PM	✓					
137	HOM-BFC-212A-137	212A – Southwall	09/29/2016	0626 AM / PM	✓					
138	HOM-BFC-212B-138	212B – Northwall	09/29/2016	0626 AM / PM	✓					
139	HOM-BFC-214A-139	214A – Eastwall, left	09/29/2016	0628 AM / PM	✓					
140	HOM-BFC-214A-140	214A – Eastwall, ~~Right~~ Middle	09/29/2016	0628 AM / PM	✓					

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
141	HOM-BFC-214A-141	214A, Eastwall, Right	09/29/2016	0629 AM/PM	✓					
142	HOM-BFC-214B-142	214B, – Eastwall, Left	09/29/2016	0629 AM/PM	✓					
143	HOM-BFC-214B-143	214B – Eastwall, Right	09/29/2016	0629 AM/PM	✓					
144	HOM-WC-A214-144	A214 – Westwall	09/29/2016	0628 AM/PM	✓					
145	HOM-BFC-301E-145	301E – Eastwall, Left	09/29/2016	0637 AM/PM	✓					
146	HOM-BFC-301E-146	301E – Eastwall, 2nd from left	09/29/2016	0638 AM/PM	✓					
147	HOM-BFC-301E-147	301E – Eastwall, 3rd from Left	09/29/2016	0639 AM/PM	✓					
148	HOM-BFC-301E-148	301E – Eastwall, 4th from left	09/29/2016	0640 AM/PM	✓					
149	HOM-BFC-301E-149	301E – Eastwall, 5th from left	09/29/2016	0641 AM/PM	✓					
150	HOM-BFC-301E-150	301E – Eastwall, Right	09/29/2016	0642 AM/PM	✓					

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
15 1	HOM-BFC-301C-151	301C - Southwall, left	09/29/2016	0639 AM/PM	✓					
15 2	HOM-BFC-301C-152	301C - Southwall, 2nd from left	09/29/2016	0640 AM/PM	✓					
15 3	HOM-BFC-301C-153	301C - Southwall, 3rd from left	09/29/2016	0640 AM/PM	✓					
15 4	HOM-BFC-301C-154	301C - Southwall, 4th from left	09/29/2016	0640 AM/PM	✓					
15 5	HOM-BFC-301C-155	301C - Southwall, 5th from left	09/29/2016	0640 AM/PM	✓					
15 6	HOM-BFC-301C-156	301C - Southwall, Right	09/29/2016	0641 AM/PM	✓					
15 7	HOM-BFC-382A-157	382A - westwall, Left	09/29/2016	0637 AM/PM	✓					
15 8	HOM-BFC-382A-158	382A - westwall, Right	09/29/2016	0638 AM/PM	✓					
15 9	HOM-WC-A302-159	A302 - Left, Southwall	09/29/2016	0638 AM/PM	✓					
16 10	HOM-WC-A301-160	A301 - Eastwall	09/29/2016	0643 AM/PM	✓					

Received By: _____

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Page 16 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
16 1	HOM-WC-A302-161	A302 - South wall Right	09/29/2016	0641 AM / PM	✓					
16 2	HOM-CFC-341-162	341 - East wall	09/29/2016	0650 AM / PM	✓					
16 3	HOM-CFC-342-163	342 - West wall	09/29/2016	0650 AM / PM	✓					
16 4	HOM-CFC-348-164	348 - South wall	09/29/2016	0653 AM / PM	✓					
16 5	HOM-BFC-350A-165	350A - North wall	09/29/2016	0652 AM / PM	✓					
16 6	HOM-CFC-379-166	379 - Center Island	09/29/2016	0658 AM / PM	✓					
16 7	HOM-CFC-379-167	379 - North wall	09/29/2016	0659 AM / PM	✓					
16 8	HOM-CFC-379-168	379 - East wall	09/29/2016	0700 AM / PM	✓					
16 9	HOM-CFC-378-169	378 - South wall	09/29/2016	0658 AM / PM	✓					
~~17~~ 10	~~HOM-CFC-378-170~~	~~378 - West wall~~	~~09/29/2016~~	AM / PM	✓					

NO sample Taken

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
171	HOM-CFC-378-171	378- Centerisland	09/29/2016	0700 AM/PM	✓					
172	HOM-CFC-377-172	377- Northwall	09/29/2016	0655 AM/PM	✓					
173	HOM-CFC-314-173	314 - Southwall	09/29/2016	0705 AM/PM	✓					
174	HOM-CFC-314-174	314 - westwall	09/29/2016	0706 AM/PM	✓					
175	HOM-CFC-375-175	375 - Eastwall	09/29/2016	0703 AM/PM	✓					
176	HOM-CFC-375-176	375 - Northwall	09/29/2016	0704 AM/PM	✓					
177	HOM-CFC-316-177	316 - Centerisland	09/29/2016	0707 AM/PM	✓					
178	HOM-CFC-316-178	316 - South wall	09/29/2016	0708 AM/PM	✓					
179	HOM-CFC-316-179	316- west wall	09/29/2016	0708 AM/PM	✓					
180	HOM-CFC-318-180	318 - Centerisland	09/29/2016	0709 AM/PM	✓					

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					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
181	HOM-CFC-318-181	318 - Southwall	09/29/2016	0709 AM/PM	✓					
182	HOM-CFC-318-182	318- Westwall	09/29/2016	0710 AM/PM	✓					
183	HOM-CFC-319-183	319 - Centerisland	09/29/2016	0709 AM/PM	✓					
184	HOM-CFC-319-184	319- North wall	09/29/2016	0710 AM/PM	✓					
185	HOM-CFC-319-185	319- Eastwall	09/29/2016	0711 AM/PM	✓					
6	HOM-		09/29/2016	AM/PM	✓					
7	HOM-		09/29/2016	AM/PM	✓					
8	HOM-		09/29/2016	AM/PM	✓					
9	HOM-		09/29/2016	AM/PM	✓					
10	HOM-		09/29/2016	AM/PM	✓					

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16-11-00410

Due Date:
11/08/2016
(Tuesday)
AF

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81	HOM-CFC-119-81	119 - Northwall, left	09/29/2016	0526 AM/PM	✓					
82	HOM-CFC-119-82	119 - Northwall, middle	09/29/2016	0526 AM/PM	✓					
83	HOM-DW-119-83	119 - Northwall, Right	09/29/2016	0527 AM/PM	✓					
84	HOM-BFC-127-84	127 - Southwall	09/29/2016	0532 AM/PM	✓					
85	HOM-BFC-128-85	128 - Southwall	09/29/2016	0532 AM/PM	✓					
86	HOM-BFC-120A-86	120A - East wall, left	09/29/2016	0534 AM/PM	✓					
87	HOM-BFC-120A-87	120A - Eastwall, middle	09/29/2016	0535 AM/PM	✓					
88	HOM-BFC-120A-88	120A - Eastwall, Right	09/29/2016	0536 AM/PM	✓					
89	HOM-BFC-120B-89	120B - Eastwall, left	09/29/2016	0533 AM/PM	✓					
90	HOM-BFC-120B-90	120B - Eastwall, Right	09/29/2016	0534 AM/PM	✓					

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Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: _____ Date: 9/29/2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
91	HOM-WC-A120-91	A120 - West wall	09/29/2016	0534 AM/PM	✓					
92	HOM-WC-A209-92	A209 - East wall	09/29/2016	0547 (0547) AM/PM	✓					
93	HOM-BFC-209C-93	209C - South wall, left (far)	09/29/2016	0549 AM/PM	✓					
94	HOM-BFC-209C-94	209C - South wall, 2nd from left	09/29/2016	0550 AM/PM	✓					
95	HOM-BFC-209C-95	209C - South wall, 3rd from left	09/29/2016	0551 AM/PM	✓					
96	HOM-BFC-209C-96	209C - South wall, 4th from Left	09/29/2016	0549 AM/PM	✓					
97	HOM-BFC-209C-97	209C - South wall, 5th from Left	09/29/2016	0550 AM/PM	✓					
98	HOM-BFC-209C-98	209C - South wall, Right (far)	09/29/2016	0551 AM/PM	✓					
99	HOM-CFC-207A-99	207A - East wall	09/29/2016	0554 AM/PM	✓					
100	HOM-CFC-204-100	204 - South wall	09/29/2016	0554 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

Page 10 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

Richmond, VA - Phone: (800) 347-4010 FAX: (804) 275-4907

ONLINE CLIENT PORTAL AVAILABLE FOR ANALYSIS RESULTS AT: www.leadlab.com

EHS Laboratories™

Analysis By: 410 National Testing Laboratories, Ltd. Quality Water Analysis

~ For Lab Use Only ~

Company Name: Sienna Environmental Technologies Account #: 33-5983

Address: 350 Elmwood Ave. City/State/Zip: Buffalo, NY 14222

Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: KenTon CSD- Hoover Middle School (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: [signature] Date: 9 / 29 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals: 200.8 Lead	Metals: Copper	Metals: Other	Field Parameters: Field pH at time of Collection:	Field Parameters: Temp. at time of Collection:	LAB USE: Temp at Time of Receipt:
101	HOM-CFC-206-101	206 - Southwall	09/29/2016	0553 AM/PM	✓					
102	HOM-WC-A207-102	A207 - Northwall	09/29/2016	0556 AM/PM	✓					
103	HOM-BFC-208A-103	208A - Southwall, left	09/29/2016	0557 AM/PM	✓					
104	HOM-BFC-208A-104	208A - Southwall, 2nd from left	09/29/2016	0558 AM/PM	✓					
105	HOM-BFC-208A-105	208A - Southwall, 3rd from left	09/29/2016	0559 AM/PM	✓					
106	HOM-BFC-208A-106	208A - Southwall, 4th from left	09/29/2016	0557 AM/PM	✓					
107	HOM-BFC-208A-107	208A - Southwall, 5th from left	09/29/2016	0558 AM/PM	✓					
108	HOM-BFC-208A-108	208A - Southwall, Right	09/29/2016	0559 AM/PM	✓					
109	HOM-CFC-210-109	210 - Northwall	09/29/2016	0558 AM/PM	✓					
110	HOM-CFC-250-110	250 - Southwall	09/29/2016	0600 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

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Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: (Required) KenTon CSD- Hoover Middle School City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: PW Gladwin Certification #: _____

SET #: 2845-G Relinquished by: PW Gladwin Signature: [signature] Date: 9 / 28 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals: 200.8 Lead	Metals: Copper	Metals: Other	Field Parameters: Field pH at time of Collection:	Field Parameters: Temp. at time of Collection:	LAB USE: Temp at Time of Receipt:
111	HOM-CFC-250-111	250- Center Island	09/29/2016	0601 AM/PM	✓					
112	HOM-WC-A208-112	A208- East wall	09/29/2016	0601 AM/PM	✓					
113	HOM-CFC-255-113	255- South wall	09/29/2016	0604 AM/PM	✓					
114	HOM-WC-A210-114	A210 - South wall, left	09/29/2016	0605 AM/PM	✓					
115	HOM-CFC-211-115	211 - North wall, left	09/29/2016	0607 AM/PM	✓					
116	HOM-CFC-211-116	211 - North wall, Right	09/29/2016	0608 AM/PM	✓					
117	HOM-CFC-211-117	211 - East wall	09/29/2016	0607 AM/PM	✓					
118	HOM-CFC-211-118	211 - South wall	09/29/2016	0609 AM/PM	✓					
119	HOM-CFC-213-119	213- East wall	09/29/2016	0611 AM/PM	✓					
120	HOM-CFC-214-120	214 - South Wall	09/29/2016	0611 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

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Ypsilanti, MI 48197

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No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
121	HOM-CFL-214-121	214- westwall	09/29/2016	0612 AM/PM	✓					
122	HOM-CFL-215-122	215- westwall	09/29/2016	0613 AM/PM	✓					
123	HOM-CFL-217-123	217 – Northwall, left	09/29/2016	0614 AM/PM	✓					
124	HOM-CFL-217-124	217 – Northwall, Right	09/29/2016	0615 AM/PM	✓					
125	HOM-CFL-217-125	217 – ~~North~~ Westwall	09/29/2016	0615 AM/PM	✓					
126	HOM-CFL-217-126	217- Southwall, left	09/29/2016	0615 AM/PM	✓					
127	HOM-CFL-217-127	217- Southwall, Right	09/29/2016	0615 AM/PM	✓					
128	HOM-WG-A210-128	A210- Southwall Right	09/29/2016	0614 AM/PM	✓					
129	HOM-CFL-216-129	216-Southwall	09/29/2016	0614 AM/PM	✓					
130	HOM-CFL-216-130	216 – Westwall	09/29/2016	0620 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

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No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
131	HOM-CFC-218-131	218 – South wall	09/29/2016	0619 AM / PM	✓					
132	HOM-CFC-218-132	218 – west wall	09/29/2016	0620 AM / PM	✓					
133	HOM-CFC-219-133	219 – North wall, left	09/29/2016	0622 AM / PM	✓					
134	HOM-CFC-219-134	219 – North wall, Right	09/29/2016	0623 AM / PM	✓					
135	HOM-CFC-219-135	219 – South wall, left	09/29/2016	0622 AM / PM	✓					
136	HOM-CFC-219-136	219 – South wall, Right	09/29/2016	0624 AM / PM	✓					
137	HOM-BFC-212A-137	212A – South wall	09/29/2016	0626 AM / PM	✓					
138	HOM-BFC-212B-138	212B – North wall	09/29/2016	0626 AM / PM	✓					
139	HOM-BFC-214A-139	214A – East wall, left	09/29/2016	0628 AM / PM	✓					
140	HOM-BFC214A-140	214A – East wall, ~~Right~~ Middle	09/29/2016	0628 AM / PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

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PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

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Project Name / Collection Address: KenTon CSD- Hoover Middle School (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

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Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
141	HOM-BFC-214A-141	214A, Eastwall, Right	09/29/2016	0629 AM/PM	✓					
142	HOM-BFC-214B-142	214B, – Eastwall, left	09/29/2016	0629 AM/PM	✓					
143	HOM-BFC-214B-143	214B – Eastwall, Right	09/29/2016	0629 AM/PM	✓					
144	HOM-WC-A214-144	A214 – Westwall	09/29/2016	0628 AM/PM	✓					
145	HOM-BFC-301E-145	301E – Eastwall, left	09/29/2016	0637 AM/PM	✓					
146	HOM-BFC-301E-146	301E – Eastwall, 2nd from left	09/29/2016	0638 AM/PM	✓					
147	HOM-BFC-301E-147	301E – Eastwall, 3rd from left	09/29/2016	0639 AM/PM	✓					
148	HOM-BFC-301E-148	301E – Eastwall, 4th from left	09/29/2016	0640 AM/PM	✓					
149	HOM-BFC-301E-149	301E – Eastwall, 5th from left	09/29/2016	0641 AM/PM	✓					
150	HOM-BFC-301E-150	301E – Eastwall, Right	09/29/2016	0642 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

Page 15 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

(For Multi-Sample Projects)

Richmond, VA - Phone: (800) 347-4010 FAX: (804) 275-4907

ONLINE CLIENT PORTAL AVAILABLE FOR ANALYSIS RESULTS AT: www.leadlab.com

EHS Laboratories™

Analysis By: 410

National Testing Laboratories, Ltd. — Quality Water Analysis

~ For Lab Use Only ~

Company Name: Sienna Environmental Technologies Account #: 33-5983

Address: 350 Elmwood Ave. City/State/Zip: Buffalo, NY 14222

Phone: 716-332-3134 Email: labresults@siennaet.com Fax: 716-332-3136

Project Name / Collection Address: KenTon CSD- Hoover Middle School (Required) City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: [signature] Date: 9 / 29 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
151	HOM-BPC-301C-151	301C – Southwall, left	09/29/2016	0639 AM/PM	✓					
152	HOM-BPC-301C-152	301C – Southwall, 2nd from left	09/29/2016	0640 AM/PM	✓					
153	HOM-BPC-301C-153	301C – Southwall, 3rd from left	09/29/2016	0640 AM/PM	✓					
154	HOM-BPC-301C-154	301C – Southwall, 4th from left	09/29/2016	0640 AM/PM	✓					
155	HOM-BPC-301C-155	301C – Southwall, 5th from left	09/29/2016	0640 AM/PM	✓					
156	HOM-BPC-301C-156	301C – Southwall, Right	09/29/2016	0641 AM/PM	✓					
157	HOM-BPC-382A-157	382A – westwall, Left	09/29/2016	0637 AM/PM	✓					
158	HOM-BPC-382A-158	382A – westwall, Right	09/29/2016	0638 AM/PM	✓					
159	HOM-WC-A302-159	A302 – Left, Southwall	09/29/2016	0638 AM/PM	✓					
160	HOM-WC-A301-160	A301 – Eastwall	09/29/2016	0643 AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

Page 16 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

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Project Name / Collection Address: KenTon CSD- Hoover Middle School (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Phil Gladwin Certification #: _____

SET #: 2845-G Relinquished by: Phil Gladwin Signature: [signature] Date: 9 / 29 / 2016

TURNAROUND TIMES: 4 – 5 Days Every effort will be made to meet specified turnaround time. However due to increased water sampling across the nation, turnaround times will vary.

Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals: 200.8 Lead	Metals: Copper	Metals: Other	Field Parameters: Field pH at time of Collection:	Field Parameters: Temp. at time of Collection:	LAB USE: Temp at Time of Receipt:
16 1	HOM-WC-A302-161	A302 - South wall Right	09/29/2016	0641 AM/PM	✓					
16 2	HOM-CFC-341-162	341 - East wall	09/29/2016	0650 AM/PM	✓					
16 3	HOM-CFC-342-163	342 - West wall	09/29/2016	0650 AM/PM	✓					
16 4	HOM-CFC-348-164	348 - South wall	09/29/2016	0653 AM/PM	✓					
16 5	HOM-BFC-350A-165	350A - North wall	09/29/2016	0652 AM/PM	✓					
16 6	HOM-CFC-379-166	379 - Center Island	09/29/2016	0658 AM/PM	✓					
16 7	HOM-CFC-379-167	379 - North wall	09/29/2016	0659 AM/PM	✓					
16 8	HOM-CFC-379168	379 - East wall	09/29/2016	0700 AM/PM	✓					
16 9	HOM-CFC-378169	378 - South wall	09/29/2016	0658 AM/PM	✓					
~~17 0~~	~~HOM-CFC-378170~~	~~378 - West wall~~	~~09/29/2016~~	AM/PM	✓					

No sample Taken

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

Page 17 of 19

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

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Reporting Format: ○ Individual ◉ All

No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals: 200.8 Lead	Metals: Copper	Metals: Other	Field Parameters: Field pH at time of Collection:	Field Parameters: Temp. at time of Collection:	LAB USE: Temp at Time of Receipt:
171	HOM-CFC-378-179	378- Centerisland	09/29/2016	0700 AM/PM	✓					
172	HOM- CFC-377-180	377- Northwall	09/29/2016	0655 AM/PM	✓					
173	HOM-CFC-314-173	314 - Southwall	09/29/2016	0705 AM/PM	✓					
174	HOM-CFC-314-174	314 - Westwall	09/29/2016	0706 AM/PM	✓					
175	HOM-CFC-375-175	375 - Eastwall	09/29/2016	0703 AM/PM	✓					
176	HOM-CFC-375-176	375 - Northwall	09/29/2016	0704 AM/PM	✓					
177	HOM- CFC-316-177	316 - Centerisland	09/29/2016	0707 AM/PM	✓					
178	HOM- CFC-316-178	316 - South wall	09/29/2016	0708 AM/PM	✓					
179	HOM- CFC-316-179	316- West wall	09/29/2016	0708 AM/PM	✓					
180	HOM- CFC-318-180	318 - Centerisland	09/29/2016	0709 AM/PM	✓					

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No.	Client Sample ID	Collection Location (Ex: Kitchen Sink)	Collection Date	Collection Time	Metals			Field Parameters		LAB USE
					200.8 Lead	Copper	Other	Field pH at time of Collection:	Temp. at time of Collection:	Temp at Time of Receipt:
181	HOM-CFC-318-181	318 – Southwall	09/29/2016	0709 AM/PM	✓					
182	HOM-CFC-318-182	318– Westwall	09/29/2016	0710 AM/PM	✓					
183	HOM-CFC-319-183	319 – Centerisland	09/29/2016	0709 AM/PM	✓					
184	HOM-CFC-319-184	319 – North wall	09/29/2016	0710 AM/PM	✓					
185	HOM-CFC-319-185	319 – Eastwall	09/29/2016	0711 AM/PM	✓					
6	HOM-		09/29/2016	AM/PM	✓					
7	HOM-		09/29/2016	AM/PM	✓					
8	HOM-		09/29/2016	AM/PM	✓					
9	HOM-		09/29/2016	AM/PM	✓					
10	HOM-		09/29/2016	AM/PM	✓					

Received By: _____

Date: ___/___/___ Time: _____ Temp. Received: _____

Shipping Tracking #: _____

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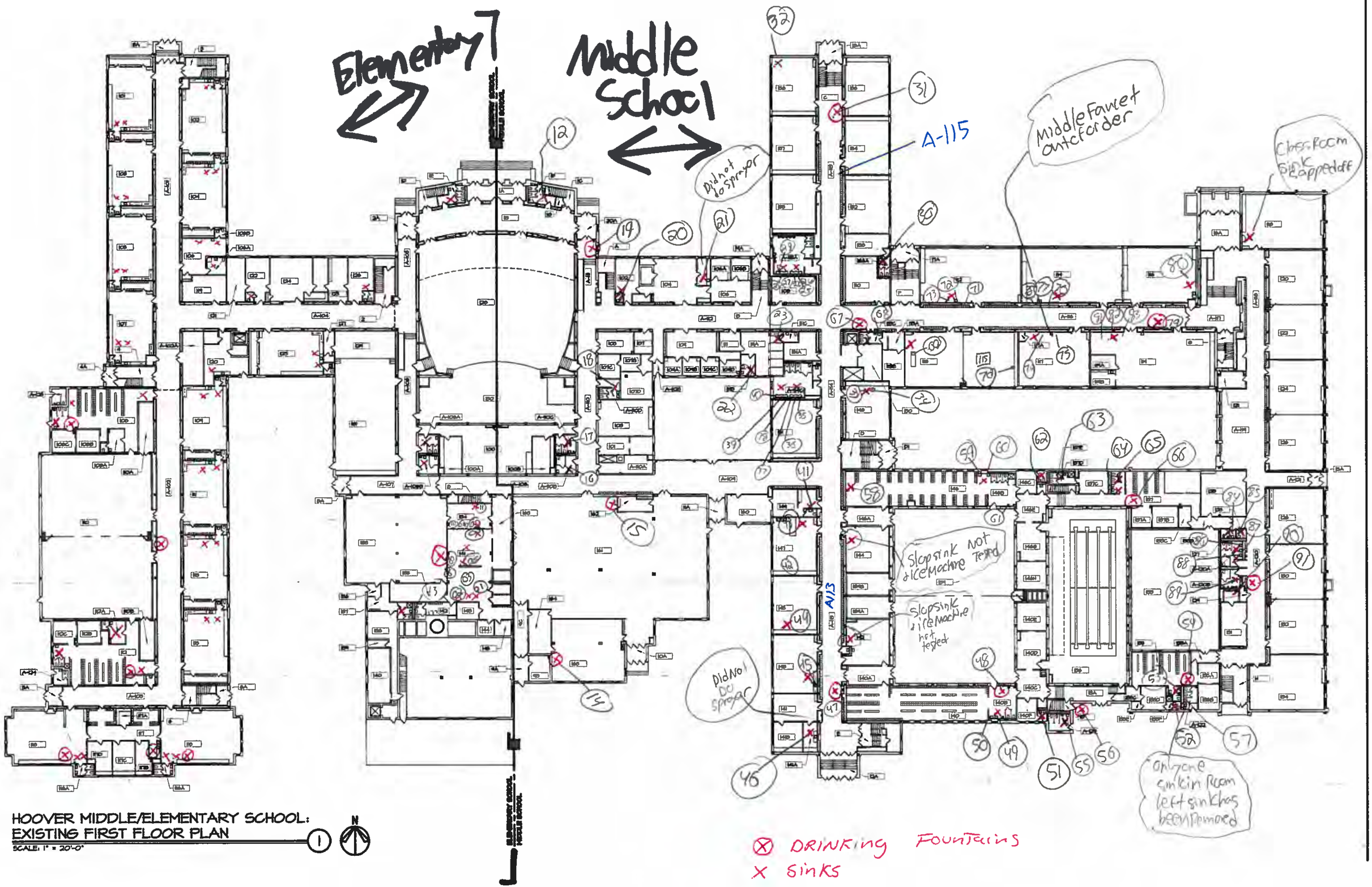
PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:
556 S. Mansfield St.
Ypsilanti, MI 48197
All Samples Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping

NTL Lab ID Number

SIENNA
ENVIRONMENTAL TECHNOLOGIES

Appendix C Sample Location Maps


Elementary
Middle School
Middle Faucet out of order
Classroom sink clogged off
Did not do spraper
A-115
Slop sink ice machine not tested
Slop sink ice machine not tested
Did Not Do Spraper
A113
Only one sink in room left sink has been removed
HOOVER MIDDLE/ELEMENTARY SCHOOL:
EXISTING FIRST FLOOR PLAN
SCALE: 1" = 20'-0"
DRINKING FOUNTAINS
SINKS

Elementary

Middle

HOOVER MIDDLE/ELEMENTARY SCHOOL:
EXISTING SECOND FLOOR PLAN (1)
SCALE: 1" = 20'-0"

N

DRINKING FOUNTAINS ⊗
SINKS ×

Middle School

#170 Not in service Bottle dispenser and a partition on chain

Center island sink Not in service

Capped

HOOVER MIDDLE/ELEMENTARY SCHOOL:
EXISTING THIRD FLOOR PLAN
SCALE: 1" = 20'-0"

1

N

SIENNA
ENVIRONMENTAL TECHNOLOGIES

Appendix D NYCRR Title 10, Subpart 67-4

Pursuant to the authority vested in the Commissioner of Health by Public Health Law sections 1370-a and 1110, Subpart 67-4 of Title 10 (Health) of the Official Compilation of Codes, Rules and Regulations of the State of New York is added, to be effective upon filing with the Secretary of State, to read as follows:

SUBPART 67-4: Lead Testing in School Drinking Water

Section 67-4.1 Purpose.

This Subpart requires all school districts and boards of cooperative educational services, including those already classified as a public water system under 10 NYCRR Subpart 5-1, to test potable water for lead contamination and to develop and implement a lead remediation plan, where applicable.

Section 67-4.2 Definitions.

As used in this Subpart, the following terms shall have the stated meanings:

(a) *Action level* means 15 micrograms per liter (µg/L) or parts per billion (ppb). Exceedance of the action level requires a response, as set forth in this Subpart.

(b) *Building* means any structure, facility, addition, or wing of a school that may be occupied by children or students. The terms shall not include any structure, facility, addition, or wing of a school that is lead-free, as defined in section 1417 of the Federal Safe Drinking Water Act.

(c) *Commissioner* means the State Commissioner of Health.

(d) *Department* means the New York State Department of Health.

(e) *Outlet* means a potable water fixture currently or potentially used for drinking or cooking purposes, including but not limited to a bubbler, drinking fountain, or faucets.

(f) *Potable water* means water that meets the requirements of 10 NYCRR Subpart 5-1.

(g) *School* means any school district or board of cooperative educational services (BOCES).

Section 67-4.3 Monitoring.

(a) All schools shall test potable water for lead contamination as required in this Subpart.

(b) First-draw samples shall be collected from all outlets, as defined in this Subpart. 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 not more than

18 hours, before sample collection. First-draw samples shall be collected pursuant to such other specifications as the Department may determine appropriate.

(c) Initial first-draw samples.

(1) For existing buildings in service as of the effective date of this regulation, schools shall complete collection of initial first-draw samples according to the following schedule:

(i) for any school serving children in any of the levels prekindergarten through grade five, collection of samples is to be completed by September 30, 2016;

(ii) for any school serving children in any of the levels grades six through twelve that are not also serving students in any of the levels prekindergarten through grade five, and all other applicable buildings, collection of samples is to be completed by October 31, 2016.

(2) For buildings put into service after the effective date of this regulation, initial first-draw samples shall be performed prior to occupancy; provided that if the building is put into service between the effective date of this regulation but before October 31, 2016, the school shall have 30 days to perform first-draw sampling.

(3) Any first-draw sampling conducted consistent with this Subpart that occurred after January 1, 2015 shall satisfy the initial first-draw sampling requirement.

(d) Continued monitoring. Schools shall collect first-draw samples in accordance with subdivision (b) of this section again in 2020 or at an earlier time as determined by the commissioner. Schools shall continue to collect first-draw samples at least every 5 years thereafter or at an earlier time as determined by the commissioner.

(e) All first-draw samples shall be analyzed by a laboratory approved to perform such analyses by the Department's Environmental Laboratory Approval Program (ELAP).

Section 67-4.4 Response.

If the lead concentration of water at an outlet exceeds the action level, the school shall:

(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; and, for results of tests performed prior to the effective date of this Subpart, within 10 business days of this regulation's effective date, unless such written notification has already occurred.

Section 67-4.5 Public Notification.

(a) List of lead-free buildings. By October 31, 2016, the school shall make available on its website a list of all buildings that are determined to be lead-free, as defined in section 1417 of the Federal Safe Drinking Water Act.

(b) Public notification of testing results and remediation plans.

(1) The school shall make available, on the school's website, the results of all lead testing performed and lead remediation plans implemented pursuant to this Subpart, as soon as practicable, but no more than 6 weeks after the school received the laboratory reports.

(2) For schools that received lead testing results and implemented lead remediation plans in a manner consistent with this Subpart, but prior to the effective date of this Subpart, the school shall make available such information, on the school's website, as soon as practicable, but no more than 6 weeks after the effective date of this Subpart.

Section 67-4.6 Reporting.

(a) As soon as practicable but no later than November 11, 2016, the school shall report to the Department, local health department, and State Education Department, through the Department's designated statewide electronic reporting system:

(1) completion of all required first-draw sampling;

(2) for any outlets that were tested prior to the effective date of this regulation, and for which the school wishes to assert that such testing was in substantial compliance with this Subpart, an attestation that:

(i) the school conducted testing that substantially complied with the testing requirements of this Subpart, consistent with guidance issued by the Department;

(2) any needed remediation, including re-testing, has been performed;

(3) the lead level in the potable water of the applicable building(s) is currently below the action level; and

(4) the school has submitted a waiver request to the local health department, in accordance with Section 67-4.8 of this Subpart; and

(3) a list of all buildings that are determined to be lead-free, as defined in section 1417 of the Federal Safe Drinking Water Act.

(b) As soon as practicable, but no more than 10 business days after the school received the laboratory reports, the school shall report data relating to test results to the Department, local health department, and State Education Department, through the Department's designated statewide electronic reporting system.

Section 67-4.7 Recordkeeping.

The school shall retain all records of test results, lead remediation plans, determinations that a building is lead-free, and waiver requests, for ten years following the creation of such documentation. Copies of such documentation shall be immediately provided to the Department, local health department, or State Education Department, upon request.

Section 67-4.8 Waivers.

(a) A school may apply to the local health department for a waiver from the testing requirements of this Subpart, for a specific school, building, or buildings, by demonstrating in a manner and pursuant to standards determined by the Department, that:

(1) prior to the publication date of these regulations, the school conducted testing that substantially complied with the testing requirements of this Subpart;

(2) any needed remediation, including re-testing, has been performed; and

(3) the lead level in the potable water of the applicable building(s) is currently below the action level.

(b) Local health departments shall review applications for waivers for compliance with the standards determined by the Department. If the local health department recommends approval of the waiver, the local health department shall send its recommendation to the Department, and the Department shall determine whether the waiver shall be issued.

Section 67-4.9 Enforcement.

(a) Upon reasonable notice to the school, an officer or employee of the Department or local health department may enter any building for the purposes of determining compliance with this Subpart.

(b) Where a school does not comply with the requirements of this Subpart, the Department or local health department may take any action authorized by law, including but not limited to assessment of civil penalties as provided by law.

REGULATORY IMPACT STATEMENT

Statutory Authority:

The statutory authorities for the proposed regulation are set forth in Public Health Law §§ 1110 and 1370-a. Section 1110 of the PHL directs the Department of Health (Department) to promulgate regulations regarding the testing of potable water provided by school districts and boards of cooperative education services (BOCES) (collectively, "schools") for lead contamination. Section 1370-a of the PHL authorizes the Department to establish programs and coordinate activities to prevent lead poisoning and to minimize the risk of exposure to lead.

Legislative Objective:

The legislative objective of PHL § 1110 is to protect children by requiring schools to test their potable water systems for lead contamination. Similarly, PHL § 1370-a authorizes the Department to establish programs and coordinate activities to prevent lead poisoning and to minimize the risk of exposure to lead. Consistent with these objectives, this regulation adds a new Subpart 67-4 to title 10 of the New York Codes, Rules, and Regulations, establishing requirements for schools to test their potable water outlets for lead contamination.

Needs and Benefits:

Lead is a toxic material that is harmful to human health if ingested or inhaled.

Children and pregnant women are at the greatest risk from lead exposure. Scientists have linked lead exposure with lowered IQ and behavior problems in children. It is also possible for lead to

be stored in bones and it can be released into the bloodstream later in life, including during pregnancy. Further, during pregnancy, lead in the mother's bloodstream can cross the placenta, which can result in premature birth and low birth weight, as well as problems with brain, kidney, or nervous system development, and learning and behavior problems. Studies have also shown that low levels of lead can negatively affect adults, leading to heart and kidney problems, as well as high blood pressure and nervous system disorders.

Lead is a common metal found in the environment. The primary source of lead exposure for most children is lead-based paint. However, drinking water is another source of lead exposure due to the lead content of certain plumbing materials and source water.

Laws now limit the amount of lead in new plumbing materials. However, plumbing materials installed prior to 1986 may contain significant amounts of lead. In 1986, the federal government required that only "lead-free" materials be used in new plumbing and plumbing fixtures. Although this was a vast improvement, the law still allowed certain fixtures with up to 8 percent lead to be labeled as "lead free." In 2011, amendments to the Safe Drinking Water Act appropriately re-defined the definition of "lead-free." Although federal law now appropriately defines "lead-free," some older fixtures can still leach lead into drinking water.

Elevated lead levels are commonly found in the drinking water of school buildings, due to older plumbing and fixtures and intermittent water use patterns. Currently, only schools that have their own public water systems are required to test for lead contamination in drinking water.

In the absence of federal regulations governing all schools, the Department's regulations require all schools to monitor their potable drinking water for lead. The new regulations: establish an action level of 15 micrograms per liter (equivalent to parts per billion, or ppb) for lead in the drinking water of school buildings; establish initial and future monitoring requirements; require schools to develop remedial action plans if the action level is exceeded at any potable water outlet; conduct public notification of results to the school community; and report results to the Department. The Environmental Protection Agency's "3Ts for Reducing Lead in Drinking Water in Schools, Revised Technical Guidance" will be used as a technical reference for implementation of the regulation.

Compliance Costs:

Costs to Private Regulated Parties:

These regulations only applies to public schools. No private schools are affected.

Costs to State Government and Local Government

These regulations applies to schools, which are a form of local government. There are approximately 733 school districts and 37 BOCES in New York State, which include over 5,000 school buildings that will be subject to this regulation.

The regulations require schools to test each potable water outlet for lead, in each school building occupied by children, unless the building is determined to be lead-free pursuant to federal standards. The cost for a single lead analysis ranges from $20 - $75 per sample. Initial monitoring requires one sample per outlet. The number of outlets will vary from building to building.

If lead is detected above 15 ppb at any potable water outlet, the outlet must be taken out of service and a remedial action plan must be developed to mitigate the lead contamination, at the school's initial expense. Remediation costs can vary significantly depending on the plumbing configuration and source of lead. The school will also incur minor costs for notification of the school community and local health department, posting the information on their website, and reporting electronically to the Department. Recently enacted legislation authorizes schools to receive State Aid through the State Education Department ("SED") to defray these costs.

Local health departments will also incur some administrative costs related to tracking local implementation, reviewing waiver applications, and compliance oversight. These activities will be eligible for State Aid through the Department's General Public Health Work program.

Local Government Mandates:

Schools, as a form of local government, are required to comply with the regulations, as detailed above.

Paperwork:

The regulation imposes recordkeeping requirements related to: monitoring of potable water outlets; notifications to the public and local health department; and electronic reporting to the Department.

Duplication:

There will be no duplication of existing State or Federal regulations.

Alternatives:

There are no significant alternatives to these regulations, which are being promulgated pursuant to recent legislation.

Federal Standards:

There are no federal statutes or regulations pertaining to this matter. However, the Department's regulations are consistent with the Unites States Environmental Protection Agency's guidance document titled *3Ts for Reducing Lead in Drinking Water in Schools, Revised Technical Guidance* (available at: https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf). EPA's document will serve as guidance to schools for implementing the program.

Compliance Schedule:

For existing buildings put into service as of October 31, 2016, all sampling shall be performed by October 31, 2016. The Department will publish guidance for conducting a phased approach to testing across different grade levels. For buildings put into service after October 31, 2016, sampling shall be performed prior to occupancy.

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REGULATORY FLEXIBILITY ANALYSIS FOR SMALL BUSINESS AND LOCAL GOVERNMENTS

Effect on Small Business and Local Governments:

This regulation applies to schools, which are a form of local government. As explained in the Regulatory Impact Statement, the new regulations: establish an action level of 15 micrograms per liter (equivalent to parts per billion, or ppb) for lead in the drinking water of school buildings; establish initial and future monitoring requirements; require schools to develop remedial action plans if the action level is exceeded at any potable water outlet; conduct public notification of results to the school community; and report results to the Department. The Environmental Protection Agency's *3Ts for Reducing Lead in Drinking Water in Schools, Revised Technical Guidance* will be used as a technical reference for implementation of the regulation. Local health departments will also incur some administrative costs related to tracking local implementation and oversight of the regulation.

Additionally, the regulations require the services of a laboratory certified by the Department under its Environmental Laboratory Approval Program (ELAP). Some schools may also wish to hire environmental consultants to assist with compliance. Some labs and environmental consultants qualify as small businesses and, at least initially, their services will be in greater demand due to the new regulation.

Compliance Requirements:

As noted above, the new regulations: establish an action level of 15 micrograms per liter (equivalent to parts per billion, or ppb) for lead in the drinking water in school buildings; establish initial and future monitoring requirements; require schools to develop remedial action plans if the action level is exceeded at any potable water outlet; conduct public notification of results to the school community; and requiring reporting of results to the Department.

Reporting and Recordkeeping:

The regulation will impose new monitoring, reporting, and public notification requirements for schools.

Professional Services:

As noted above, the regulations require the services of a laboratory certified by the Department under its Environmental Laboratory Approval Program (ELAP). Some schools may also wish to hire environmental consultants to assist with compliance.

Compliance Costs:

The regulation will require schools to test each potable water outlet for lead, in each school building occupied by children. The cost for a single lead analysis ranges from $20 - $75 per sample. Initial monitoring requires one sample per outlet. The number of outlets will vary from building to building.

If lead is detected above 15 ppb at any potable water outlet, the outlet must be taken out of service and a remedial action plan must be developed to mitigate the lead contamination, at the

school's expense. Remediation costs can vary significantly depending on the plumbing configuration and source of lead. The school will also incur minor costs for notification of the school community and local health department, posting the information on their website, and reporting electronically to the Department. Recently enacted legislation authorizes schools to receive State Aid through the State Education Department ("SED") to defray these costs.

Local health departments will also incur some administrative costs related to tracking local implementation, reviewing waiver applications, and compliance oversight. These activities will be eligible for State Aid through the Department's General Public Health Work program.

Cost to Private Parties:

There are no costs to private parties.

Economic and Technological Feasibility:

The technology for lead testing of drinking water is well-established. With respect to schools' costs of compliance, State Aid will be available through the State Education Department to ensure that compliance is feasible. Local health department activities will be eligible for State Aid through the Department's General Public Health Work program.

Minimizing Adverse Impact:

Any school that has already performed testing in compliance with these regulations, as far back as January 1, 2015, does not need to perform sampling again. Further, consistent with the requirements of PHL § 1110, if a school has performed testing that substantially complies with

the regulations, the school may apply to the Department for a waiver, so that additional testing is not required. In either case, the requirement to report sample results, and other requirements, remain in place.

School buildings that are determined to be "lead-free," as defined in section 1417 of the Federal Safe Drinking Water Act, do not need to test their outlets. School will be required to make available on their website a list of all buildings that are determined to be lead-free.

Small Business and Local Government Participation:

Although small businesses were not consulted on these specific regulations, the dangers of lead in school drinking water has garnered significant local, state, and national attention. The New York State School Board Association (NYSSBA) requested a meeting with the Department to discuss the impacts of the enabling legislation. NYSSBA provided feedback on testing, prior monitoring, and other matters. The Department took this feedback into consideration when drafting the regulation. The Department will also conduct public outreach, and there will be an opportunity to comment on the proposed permanent regulations. The Department will review all public comments received.

RURAL AREA FLEXIBILITY ANALYSIS

Pursuant to Section 202-bb of the State Administrative Procedure Act (SAPA), a rural area flexibility analysis is not required. These provisions apply uniformly throughout New York State, including all rural areas. The proposed rule will not impose an adverse economic impact on rural areas, nor will it impose any disproportionate reporting, recordkeeping or other compliance requirements on the regulated entities in rural areas.

JOB IMPACT STATEMENT

The Department expects there to be a positive impact on jobs or employment opportunities. Some school districts will likely hire firms or individuals to assist with regulatory compliance. Schools impacted by this amendment will require the professional services of a certified laboratory to perform the analyses for lead, which will create a need for additional laboratory capacity.

Categories and Numbers Affected:

The Department anticipates no negative impact on jobs or employment opportunities as a result of the proposed regulations.

Regions of Adverse Impact:

The Department anticipates no negative impact on jobs or employment opportunities in any particular region of the state.

Minimizing Adverse Impact:

Not applicable.

EMERGENCY JUSTIFICATION

Lead exposure is associated with impaired cognitive development in children. The known adverse health effects for children from lead exposure include reduced IQ and attention span, learning disabilities, poor classroom performance, hyperactivity, behavioral problems, and impaired growth. Although measures can be taken to help children overcome any potential impairments on cognition, the effects are considered irreversible.

Lead can enter drinking water from the corrosion of plumbing materials. Facilities such as schools, which have intermittent water use patterns, may have elevated lead concentration due to prolonged water contact with plumbing material. This source is increasingly being recognized as an important relative contribution to a child's overall lead exposure. Recent voluntary testing by school districts in New York State and other jurisdictions demonstrate the need to provide clear direction to schools on the requirements and procedures to sample drinking water for lead.

Every school should supply drinking water to students that meets or exceeds federal and state standards and guidelines. Although the federal Environmental Protection Agency ("EPA") has established a voluntary testing program—known as the "3Ts for Reducing Lead in Drinking Water in Schools"—there is no federal law that requires schools to test their drinking water for lead or that requires an appropriate response, if lead is determined to be present in school drinking water.

To help ensure that children are protected from lead exposure while in school, the Commissioner of Health has determined it necessary to file these regulations on an emergency basis. State Administrative Procedure Act § 202(6) empowers the Commissioner to adopt emergency regulations when necessary for the preservation of the public health, safety or general welfare and that compliance with routine administrative procedures would be contrary to the public interest.