SIENNA
ENVIRONMENTAL TECHNOLOGIES

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

December 1, 2016

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

Re: Lead in Water Sampling Report
Kenmore Tonawanda UFSD
Edison Elementary 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 UFSD.

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 UFSD
Edison Elementary School

PREPARED BY:

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

PREPARED FOR:

Kenmore Tonawanda UFSD
1500 Colvin Boulevard
Buffalo, NY 14223

CONDITIONS AS OF:

September 27, 2016

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Summary Tabulation

1. Lead in Water Sampling

Appendices

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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 27, 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:

- Edison Elementary 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	
Edison Elementary School				
9-27-2016	EDI-CFC-223-04	Room 223- South Wall	Classroom Faucet	16
9-27-2016	EDI-CFC-220-05	Room 220- North Wall	Classroom Faucet	45
9-27-2016	EDI-CFC-214-12	Room 214- North Wall	Classroom Faucet	16
9-27-2016	EDI-BFC-215-13	Room 215- Bathroom	Bathroom Faucet	26
9-27-2016	EDI-CSC-2ndFloorhall-16	2nd Floor Hall- SE Custodian Closet	Custodial Slop Sink	55
9-27-2016	EDI-CFC-211-17	Room 211- South Wall	Classroom Faucet	28
9-27-2016	EDI-CFC-208-23	Room 208- North Wall	Classroom Faucet	22
9-27-2016	EDI-CSC-2ndFloorhall-26	2nd Floor Hall- NW Custodian Closet	Custodial Slop Sink	56
9-27-2016	EDI-BFC-Kitchen-28	Kitchen Bathroom- West Wall	Bathroom Faucet	35

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Sample Date	Client ID Sample No.	Sample Description		Result (µg/L)
		Location of Outlet	Type of Outlet	
9-27-2016	EDI-CSC-CenterCustodialCloset-50	Center Hall Custodial Closet	Custodial Slop Sink	82
9-27-2016	EDI-CFC-130-52	Room 130- East Wall	Classroom Faucet	17
9-27-2016	EDI-CFC-129-55	Room 129- East Wall	Classroom Faucet	27
9-27-2016	EDI-CFC-Library-58	Library Sink	Classroom Faucet	21
9-27-2016	EDI-BFC-LibraryBR-60	Library Bathroom- South Wall- Left Outlet	Bathroom Faucet	19
9-27-2016	EDI-CFC-125-63	Room 125- East Wall	Classroom Faucet	17
9-27-2016	EDI-CSC-SHallNorth-64	South Hall- North Wall	Slop Sink	82
9-27-2016	EDI-CFC-122-74	Room 122- North Wall	Classroom Faucet	27
9-27-2016	EDI-BFC-PrincipalBR-75	Principal's Office- Bathroom- SW Corner	Bathroom Faucet	23
9-27-2016	EDI-CFC-NurseStorage-78	Nurse's Office Storage Room- Sprayer on Sink	Classroom Faucet	18
9-27-2016	EDI-BFC-112-81	Room 112- Bathroom Sink- North Wall- Left Outlet	Bathroom Faucet	15
9-27-2016	EDI-BFC-110-87	Room 110- North Wall- Left Outlet	Bathroom Faucet	21
9-27-2016	EDI-CFC-109-91	Room 109- South Wall	Classroom Faucet	31
9-27-2016	EDI-CFC-107-97	Room 107- South Wall	Classroom Faucet	18
9-27-2016	EDI-CFC-102-112	Room 102- North Wall- Left Outlet	Classroom Faucet	15
9-27-2016	EDI-CSC-garage-115	Garage- East Wall	Custodial Slop Sink	120
9-27-2016	EDI-BFC-garage-116	Garage East Wall	Bathroom Faucet	56

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

Laboratory Certification#: 11467

National Testing Laboratories, Ltd.
Quality Water Analysis
556 South Mansfield Street
Ypsilanti, MI 48197
1-800-604-1995

Lead Only

Analysis Report

Customer: Sienna Environmental
350 Elmwood Avenue
Buffalo NY 14222-2204

Report Number: 16-10-00316
Received Date: 9/29/2016
Reported Date: 10/20/2016
Sampled By: Tim Bly
Tech. Certification #: 16-04989

P.O. Number:
Project Test/Address: KenTon CSD - Edison Elementary, Tonawanda, NY 14150
Client Number: 33-5983

Sample #	Sample ID	Method	Parameter	Level Detected	EPA Standard	Units	LRL	Sampled	Analyzed
742067	EDI-BFC-2G.Bathroom-01 Southwall Right SE Bathroom	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/15/2016
742068	EDI-BFC-2G.Bathroom-02 Southwall Left SE Bathroom	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/15/2016
742069	EDI-CFC-222-03 Northwall Sink	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/15/2016
742070	EDI-CFC-223-04 Southwall Sink	3113B	Lead	16.0	15	ug/L	1	9/27/2016	10/15/2016
742071	EDI-CFC-220-05 North wall sink	3113B	Lead	45.0	15	ug/L	1	9/27/2016	10/15/2016
742072	EDI-CFC-221-06 South wall Sink	3113B	Lead	11.0	15	ug/L	1	9/27/2016	10/15/2016
742073	EDI-DW-2ndFloorHall-07 Right water fountain SE	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/15/2016
742074	EDI-BFC-2BBathroom-08 North wall right sink	3113B	Lead	8.0	15	ug/L	1	9/27/2016	10/16/2016
742075	EDI-BFC-2BBathroom-09 North wall left sink	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742076	EDI-CFC-219-10 S. wall sink	3113B	Lead	13.0	15	ug/L	1	9/27/2016	10/16/2016
742077	EDI-CFC-216-11 N Wall Sink	3113B	Lead	10.0	15	ug/L	1	9/27/2016	10/16/2016
742078	EDI-CFC-214-12 N Wall Sink	3113B	Lead	16.0	15	ug/L	1	9/27/2016	10/16/2016
742079	EDI-BFC-215-13 Bathroom Sink	3113B	Lead	26.0	15	ug/L	1	9/27/2016	10/16/2016
742080	EDI-CFC-212-14 N Wall Sink	3113B	Lead	11.0	15	ug/L	1	9/27/2016	10/16/2016
742081	EDI-CFC-210-15 N Wall Sink	3113B	Lead	2.0	15	ug/L	1	9/27/2016	10/16/2016
742082	EDI-CSC-2ndFloorhall-16 Slop Sink-SE Custodian Closet	3113B	Lead	55.0	15	ug/L	2	9/27/2016	10/16/2016
742083	EDI-CFC-211-17 S. Wall Sink	3113B	Lead	28.0	15	ug/L	1	9/27/2016	10/16/2016
742084	EDI-BFC-2G.Bathroom-18 2nd Floor NE Girls	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742085	EDI-BFC-2G.Bathroom-19 2nd Floor NE Girls	3113B	Lead	3.0	15	ug/L	1	9/27/2016	10/16/2016
742086	EDI-DW-2ndFloorHall-20 NE drinking fountain Right	3113B	Lead	8.0	15	ug/L	1	9/27/2016	10/16/2016

Sample #	Sample ID	Method	Parameter	Level Detected	EPA Standard	Units	LRL	Sampled	Analyzed
742087	EDI-DW-2ndFloorHall-21 NE Drinking Fountain Left	3113B	Lead	8.0	15	ug/L	1	9/27/2016	10/16/2016
742088	EDI-CFC-209-22 S. Wall Sink	3113B	Lead	11.0	15	ug/L	1	9/27/2016	10/16/2016
742089	EDI-CFC-208-23 N. Wall Sink	3113B	Lead	22.0	15	ug/L	1	9/27/2016	10/16/2016
742090	EDI-BFC-2B.Bathroom-24 NW Bathroom Right	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/16/2016
742091	EDI-BFC-2B.Bathroom-25 NW Bathroom Left	3113B	Lead	6.0	15	ug/L	1	9/26/2016	10/16/2016
742092	EDI-CSC-2ndFloorhall-26 NW Custodian closet	3113B	Lead	56.0	15	ug/L	2	9/27/2016	10/16/2016
742093	EDI-CFC-207-27 S. Wall Sink	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016
742094	EDI-BFC-Kitchen-28 W Wall Sink in Bathroom	3113B	Lead	35.0	15	ug/L	1	9/27/2016	10/16/2016
742095	EDI-KFC-Kitchen-29 N Wall	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016
742096	EDI-KFC-Kitchen-30 E Wall	3113B	Lead	1.0	15	ug/L	1	9/27/2016	10/16/2016
742097	EDI-KFC-Kitchen-31 S. Wall	3113B	Lead	10.0	15	ug/L	1	9/27/2016	10/16/2016
742098	EDI-KCC-Kitchen-32 W. Wall	3113B	Lead	ND	15	ug/L	1	9/27/2016	10/16/2016
742099	EDI-DW-Cafe-33 S. Wall	3113B	Lead	10.0	15	ug/L	1	9/27/2016	10/16/2016
742100	EDI-BFC-OT/PT-34 B. Bathroom Sink	3113B	Lead	8.0	15	ug/L	1	9/27/2016	10/16/2016
742101	EDI-DW-OT/PT-35 drinking fountain	3113B	Lead	12.0	15	ug/L	1	9/27/2016	10/16/2016
742102	EDI-BFC-GLR-36 girl's locker room office sink	3113B	Lead	12.0	15	ug/L	1	9/27/2016	10/16/2016
742103	EDI-DW-GLR-37 girl locker room water fountain	3113B	Lead	14.0	15	ug/L	1	9/27/2016	10/16/2016
742104	EDI-BFC-GLR-38 E. Wall	3113B	Lead	9.0	15	ug/L	1	9/27/2016	10/16/2016
742105	EDI-BFC-OT/PT-39 OT/PT Office Sink	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/16/2016
742106	EDI-BFC-1GBathroom-40 1st Floor W. end E. wall Right	3113B	Lead	2.0	15	ug/L	1	9/27/2016	10/16/2016
742107	EDI-BFC-1G-Bathroom-41 1st Floor W. end E. Wall left	3113B	Lead	3.0	15	ug/L	1	9/27/2016	10/16/2016
742108	EDI-BFC-1BBathroom-42 1st Floor W. end W wall Right	3113B	Lead	7.0	15	ug/L	1	9/27/2016	10/16/2016
742109	EDI-BFC-1BBathroom-43 1st Floor W. end W wall left	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016
742110	EDI-BFC-1FacultyBathroom-44 1st Floor Faculty Bathroom W. end	3113B	Lead	10.0	15	ug/L	1	9/27/2016	10/16/2016
742111	EDI-CSC-CustodialCloset-45 West end Custodial Closet N. Wall	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016
742112	EDI-BFC-BasementBathroom-46 West Wall Basement Bathroom	3113B	Lead	11.0	15	ug/L	1	9/27/2016	10/16/2016
742113	EDI-CSC-Basement-47 Basement Slop Sink	3113B	Lead	13.0	15	ug/L	1	9/27/2016	10/16/2016
742114	EDI-DW-CenterHall-48 S. Wall Right	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/16/2016
742115	EDI-DW-CenterHall-49 S. Wall Left	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016

Sample #	Sample ID	Method	Parameter	Level Detected	EPA Standard	Units	LRL	Sampled	Analyzed
742116	EDI-CSC-CenterCustodialCloset-50 Center hall cust. closet	3113B	Lead	82.0	15	ug/L	2	9/27/2016	10/16/2016
742117	EDI-BFC-130BR-51 E. Wall	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742118	EDI-CFC-130-52 E. Wall	3113B	Lead	17.0	15	ug/L	1	9/27/2016	10/16/2016
742119	EDI-DW-129BR-53 E. Wall Right	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742120	EDI-BFC-129BR-54 E. Wall left	3113B	Lead	2.0	15	ug/L	1	9/27/2016	10/16/2016
742121	EDI-CFC-129-55 E. Wall	3113B	Lead	27.0	15	ug/L	1	9/27/2016	10/16/2016
742122	EDI-BFC-128BR-56 E. Wall	3113B	Lead	9.0	15	ug/L	1	9/27/2016	10/16/2016
742123	EDI-CFC-128-57 E. Wall	3113B	Lead	11.0	15	ug/L	1	9/27/2016	10/16/2016
742124	EDI-CFC-Library-58 Sink	3113B	Lead	21.0	15	ug/L	1	9/27/2016	10/16/2016
742125	EDI-BFC-LibraryBR-60 S. wall Left	3113B	Lead	19.0	15	ug/L	1	9/27/2016	10/16/2016
742126	EDI-DW-LibraryBR-59 S. Wall Right	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/16/2016
742127	EDI-BFC-125-61 E. Wall Right	200.8	Lead	14.0	15	ug/L	1	9/27/2016	10/18/2016
742128	EDI-BFC-125-62 E. Wall Left	3113B	Lead	7.0	15	ug/L	1	9/27/2016	10/16/2016
742129	EDI-CFC-125-63 E. Wall	3113B	Lead	17.0	15	ug/L	1	9/27/2016	10/16/2016
742130	EDI-CSC-SHallNorth-64 N. Wall	3113B	Lead	82.0	15	ug/L	2	9/27/2016	10/16/2016
742131	EDI-BFC-126-65 W. Wall Right	3113B	Lead	4.0	15	ug/L	1	9/27/2016	10/16/2016
742132	EDI-BFC-126-66 W Wall Left	3113B	Lead	7.0	15	ug/L	1	9/27/2016	10/16/2016
742133	EDI-DW-126-67 W Wall	3113B	Lead	ND	15	ug/L	1	9/27/2016	10/16/2016
742134	EDI-CFC-126-68 W Wall	3113B	Lead	10.0	15	ug/L	1	9/27/2016	10/16/2016
742135	EDI-DW-124-69 N Wall	3113B	Lead	3.0	15	ug/L	1	9/27/2016	10/16/2016
742136	EDI-BFC-124-70 N Wall	3113B	Lead	2.0	15	ug/L	1	9/27/2016	10/16/2016
742137	EDI-CFC-124-71 N Wall	3113B	Lead	12.0	15	ug/L	1	9/27/2016	10/16/2016
742138	EDI-DW-122-72 N. Wall	3113B	Lead	3.0	15	ug/L	1	9/27/2016	10/16/2016
742139	EDI-BFC-122-73 N. Wall	3113B	Lead	1.0	15	ug/L	1	9/27/2016	10/16/2016
742140	EDI-CFC-122-74 N. Wall	3113B	Lead	27.0	15	ug/L	1	9/27/2016	10/16/2016
742141	EDI-BFC-PrincipalBR-75 SW Corner	3113B	Lead	23.0	15	ug/L	1	9/27/2016	10/16/2016
742142	EDI-BFC-NursesOffice-76 E Wall	3113B	Lead	1.0	15	ug/L	1	9/27/2016	10/16/2016
742143	EDI-CFC-NurseStorage-77 Sink	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742144	EDI-CFC-NurseStorage-78 Sprayer on sink	200.8	Lead	18.0	15	ug/L	1	9/27/2016	10/7/2016
742145	EDI-CSC-113-79 Custodian Office N. Wall	200.8	Lead	7.0	15	ug/L	1	9/27/2016	10/7/2016
742146	EDI-DW-112-80 Drinking Fountain N. Wall Right	200.8	Lead	4.0	15	ug/L	1	9/27/2016	10/7/2016
742147	EDI-BFC-112-81 Bathroom Sink N. Wall Left	200.8	Lead	15.0	15	ug/L	1	9/27/2016	10/7/2016
742148	EDI-CFC-112-82 Classroom Sink N. Wall	200.8	Lead	2.0	15	ug/L	1	9/27/2016	10/7/2016
742149	EDI-DW-111-83 S. Wall Right	200.8	Lead	6.0	15	ug/L	1	9/27/2016	10/7/2016
742150	EDI-BFC-111-84 S. Wall Left	200.8	Lead	11.0	15	ug/L	1	9/27/2016	10/7/2016
742151	EDI-CFC-111-85 S. Wall	200.8	Lead	10.0	15	ug/L	1	9/27/2016	10/7/2016
742152	EDI-DW-110-86 N Wall Right	200.8	Lead	5.0	15	ug/L	1	9/27/2016	10/7/2016
742153	EDI-BFC-110-87 N. Wall Left	200.8	Lead	21.0	15	ug/L	1	9/27/2016	10/7/2016
742154	EDI-CFC-110-88 N. Wall	200.8	Lead	6.0	15	ug/L	1	9/27/2016	10/7/2016

Sample #	Sample ID	Method	Parameter	Level Detected	EPA Standard	Units	LRL	Sampled	Analyzed
742155	EDI-DW-109-89 S. Wall Right	200.8	Lead	6.0	15	ug/L	1	9/27/2016	10/7/2016
742156	EDI-BFC-109-90 S. Wall Left	200.8	Lead	10.0	15	ug/L	1	9/27/2016	10/7/2016
742157	EDI-CFC-109-91 S. Wall	200.8	Lead	31.0	15	ug/L	1	9/27/2016	10/7/2016
742158	EDI-DW-108-92 N Wall Right	200.8	Lead	5.0	15	ug/L	1	9/27/2016	10/7/2016
742159	EDI-BFC-108-93 N Wall Left	200.8	Lead	7.0	15	ug/L	1	9/27/2016	10/7/2016
742160	EDI-CFC-108-94 N Wall	200.8	Lead	8.0	15	ug/L	1	9/27/2016	10/7/2016
742161	EDI-DW-107-95 S Wall Right	200.8	Lead	3.0	15	ug/L	1	9/27/2016	10/7/2016
742162	EDI-BFC-107-96 S. Wall Left	200.8	Lead	13.0	15	ug/L	1	9/27/2016	10/7/2016
742163	EDI-CFC-107-97 S. Wall	200.8	Lead	18.0	15	ug/L	1	9/27/2016	10/7/2016
742164	EDI-CSC-N.HallBoysSBR-98 S. Wall	200.8	Lead	13.0	15	ug/L	1	9/27/2016	10/7/2016
742165	EDI-BFC-N.HallBoys-99 N. Wall Right	200.8	Lead	7.0	15	ug/L	1	9/27/2016	10/7/2016
742166	EDI-BFC-N.HallBoys-100 N. Wall Left	200.8	Lead	3.0	15	ug/L	1	9/27/2016	10/7/2016
742167	EDI-BFC-N.HallGirls-101 S. Wall Right	200.8	Lead	2.0	15	ug/L	1	9/27/2016	10/7/2016
742168	EDI-BFC-N.HallGirls-102 S. Wall Left	200.8	Lead	2.0	15	ug/L	1	9/27/2016	10/7/2016
742169	EDI-DW-106-103 N Wall Right	200.8	Lead	12.0	15	ug/L	1	9/27/2016	10/7/2016
742170	EDI-CFC-106-104 N. Wall Left	200.8	Lead	11.0	15	ug/L	1	9/27/2016	10/7/2016
742171	EDI-DW-105-105 S. Wall Right	200.8	Lead	6.0	15	ug/L	1	9/27/2016	10/7/2016
742172	EDI-CFC-105-106 S. Wall Left	200.8	Lead	10.0	15	ug/L	1	9/27/2016	10/7/2016
742173	EDI-DW-104-107 N. Wall Right	200.8	Lead	3.0	15	ug/L	1	9/27/2016	10/7/2016
742174	EDI-CFC-104-108 N. Wall Left	3113B	Lead	5.0	15	ug/L	1	9/27/2016	10/16/2016
742175	EDI-DW-103-109 S. Wall Right	3113B	Lead	7.0	15	ug/L	1	9/27/2016	10/16/2016
742176	EDI-CFC-103-110 S. Wall Left	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742177	EDI-DW-102-111 N Wall Right	3113B	Lead	12.0	15	ug/L	1	9/27/2016	10/16/2016
742178	EDI-CFC-102-112 N Wall Left	3113B	Lead	15.0	15	ug/L	1	9/27/2016	10/16/2016
742179	EDI-DW-101-113 S. Wall Right	3113B	Lead	7.0	15	ug/L	1	9/27/2016	10/16/2016
742180	EDI-CFC-101-114 S. Wall Left	3113B	Lead	6.0	15	ug/L	1	9/27/2016	10/16/2016
742181	EDI-CSC-garage-115 E Wall	3113B	Lead	120.0	15	ug/L	4	9/27/2016	10/16/2016
742182	EDI-BFC-garage-116 E. Wall	3113B	Lead	56.0	15	ug/L	2	9/27/2016	10/16/2016

Sample #	Sample ID	Method	Parameter	Level Detected	EPA Standard	Units	LRL	Sampled	Analyzed

Analyst	Tests
EC, JP	3113B, 200.8

The results herin conform to TNI and ISO/IEC 17025:2005 standards, where applicable, unless otherwise narrated in the body of the report. The uncertainty fo the test results are available upon request. All Dates and Times are reported as Eastern Time.

Report Notes:

Legend:

"ND"	This contaminant was not detected at or above our lower reporting limit (LRL).
"NA"	Not analyzed.
"EPA Standard"	This column indicates the Maximum Contaminant Level (MCL) for EPA Primary Standards or the guideline values for EPA Secondary Standards.
"LRL"	This column indicates the Lower Reporting Limit, which is the lowest level that the laboratory can detect a contaminant.
"P/A"	Presence/Absence

Reviewed by Authorized Signatory

116

2083575

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

16-10-00316

Due Date: 10/13/2016 (Thursday) AF

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– Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04489

SET P.O. #: 2845A Relinquished by: Tim Bly Signature: _____ Date: 9/27/2016

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: NTL #'s ~~Temp at Time of Receipt:~~
1	EDI-BFC-2G-Bathroom-01	Southwall Right SE Bathroom	9/27/16	0411 AM/PM	✓					742067
2	EDI-BFC-2G-Bathroom-02	South wall Left SE Bathroom	9/27/16	0411 AM/PM	✓					742068
3	EDI-CFC-222-03	Northwall Sink	9/27/16	0418 AM/PM	✓					742069
4	EDI-CFC-223-04	Southwall Sink	9/27/16	0419 AM/PM	✓					742070
5	EDI-CFC-220-05	Northwall Sink	9/27/16	0420 AM/PM	✓					742071
6	EDI-CFC-221-06	Southwall Sink	9/27/16	0421 AM/PM	✓					742072
7	EDI-DW-2nd Floor Hall-07	Right water fountain SE	9/27/16	0423 AM/PM	✓					742073
8	EDI-BFC-2B-Bathroom-08	North wall Right Sink	9/27/16	0425 AM/PM	✓					742074
9	EDI-BFC-2B-Bathroom-09	North wall Left Sink	9/27/16	0425 AM/PM	✓					742075
10	EDI-CFC-219-10	Small Sink	9/27/16	0428 AM/PM	✓					742076

Received By: _____

Date: SEP 29 2016 Time: 0930 Temp. Received: N/A

Shipping Tracking #: _____

Page 1 of 12

UPS GROUND

TRACKING #: 1Z 5F6 00Y 90 4500 6277 *Except for Lead /Metals Must Be Shipped On Ice Via Overnight Shipping*

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

NTL Lab ID Number

ENVIRONMENTAL HAZARDS SERVICES, LLC

Lead in Water Chain-of-Custody Form

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

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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 - Edison Elementary City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

SET #: 2545A Relinquished by: Tim Bly Signature: _____ Date: 9 / 27 / 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: NTL #'s ~~Temp at Time of Receipt~~
1	EDI-CFC-216-11	N wall sink	9/27/16	0429 AM/PM	✓					742077
2	EDI-CFC-214-12	N wall Sink	9/27/16	0432 AM/PM	✓					742078
3	EDI-BFC-215-13	Bathroom Sink	9/27/16	0434 AM/PM	✓					742079
4	EDI-CFC-212-14	N. wall Sink	9/27/16	0435 AM/PM	✓					742080
5	EDI-CFC-210-15	N. wall Sink	9/27/16	0437 AM/PM	✓					742081
6	EDI-CSC-2nd Floor Hall-16	Slop Sink-SE custodial closet	9/27/16	0440 AM/PM	✓					742082
7	EDI-CFC-211-17	S. wall Sink	9/27/16	0441 AM/PM	✓					742083
8	EDI-BFC-26-Bathroom-18	2nd Floor NE Girls	9/27/16	0443 AM/PM	✓					742084
9	EDI-BFC-26-Bathroom-19	2nd Floor NE Girls	9/27/16	0444 AM/PM	✓					742085
10	EDI-DW-2nd Floor Hall-20	NE drinking fountain Right	9/27/16	0446 AM/PM	✓					742086

Received By: _____

Date: 9/29/16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 004 90 4560 6277

Page 2 of 12

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

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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 - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

SET ID #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9/27/2016

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~~ NTL #'s: Temp at Time of Receipt:
1	EDI-DW-2nd Floor Hall-21	NE Drinking Fountain Left	9/27/16	0447 AM/PM	✓					742087
2	EDI-CFC-209-22	S. wall Sink	9/27/16	0449 AM/PM	✓					742088
3	EDI-CFC-208-23	N. wall Sink	9/27/16	0451 AM/PM	✓					742089
4	EDI-BFC-2B Bathroom-24	NW Bathroom Right	9/27/16	0453 AM/PM	✓					742090
5	EDI-BFC-2B Bathroom-25	NW Bathroom Left	9/27/16	0453 AM/PM	✓					742091
6	EDI-CSC-2nd Floor Hall-26	NW Custodian Closet	9/27/16	0455 AM/PM	✓					742092
7	EDI-CFC-207-27	S. wall Sink	9/27/16	0458 AM/PM	✓					742093
8	EDI-3FC-Kitchen-28	W wall Sink in Bathroom	9/27/16	0507 AM/PM	✓					742094
9	EDI-KFC-Kitchen-29	N wall	9/27/16	0510 AM/PM	✓					742095
10	EDI-KFC-Kitchen-30	E wall	9/27/16	0510 AM/PM	✓					742096

Received By: JRupert

Date: 9/29/16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 12 5F6 004 90 4560 6277

Page 3 of 12

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

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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 - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

~~P.O.~~ Set #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9 / 27 / 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
1	EDI-KFC-Kitchen-31	S. wall	9/27/16	0511 AM/PM	✓					NTL #s ~~Temp at Time of Receipt:~~ 742097
2	EDI-KLC-Kitchen-32	W. wall	9/27/16	0511 AM/PM	✓					742098
3	EDI-DW-Cafe-33	S. wall	9/27/16	0516 AM/PM	✓					742099
4	EDI-BFC-OT/PT-34	B. Bathroom Sink	9/27/16	0519 AM/PM	✓					742100
5	EDI-DW-OT/PT-35	drinking fountain	9/27/16	0520 AM/PM	✓					742101
6	EDI-~~BFC~~-GLR-36	g/rl's locker room office sink	9/27/16	0522 AM/PM	✓					742102
7	EDI-DW-GLR-37	girl locker Room water fountain	9/27/16	0525 AM/PM	✓					742103
8	EDI-BFC-GLR-38	E. wall	9/27/16	0528 AM/PM	✓					742104
9	EDI-BFC-OT/PT-39	OT/PT office Sink	9/27/16	0531 AM/PM	✓					742105
10	EDI-BFC-16 ~~Bathroom~~ 1st Floor	W. end E. wall Right	9/27/16	0535 AM/PM	✓					742106

Received By: [signature]

Date: SEP 29 2016 Time: 0930 Temp. Received: N/A

Shipping Tracking #: _____ TRACKING #: 1Z 5F6 00Y 90 4577 3088

Page 4 of 12

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

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(For Multi-Sample Projects)

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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 - Edison Elementary City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: IC-04989

Set P.O. #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9 / 27 / 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
1	EDI-BFC-1G Bath room	-41 1st Floor W. end E wall left	9/27/16	0537 AM / PM	✓					NTL #'S ~~Temp at Time of Receipt:~~ 742107
2	EDI-BFC-1B Bath room	-42 1st Floor W end W wall Right	9/27/16	0539 AM / PM	✓					742108
3	EDI-BFC-1B Bath room	-43 1st Floor W end W wall left	9/27/16	0539 AM / PM	✓					742109
4	EDI-BFC-1B Faculty Bathroom	-44 1st Floor Faculty Bathroom W. end	9/27/16	0541 AM / PM	✓					742110
5	EDI-CSC-Custodial Closet	-45 West end Custodial closet N. wall	9/27/16	0543 AM / PM	✓					742111
6	EDI-BFC-Basement Bathroom	-46 West wall Basement Bathroom	9/27/16	0547 AM / PM	✓					742112
7	EDI-CSC-Basement	-47 Basement Slop Sink	9/27/16	0549 AM / PM	✓					742113
8	EDI-DW-Center Hall	-48 S wall Right	9/27/16	0556 AM / PM	✓					742114
9	EDI-DW-Center hall	-49 S. wall Left	9/27/16	0556 AM / PM	✓					742115
10	EDI-CSC-Center Custodial Closet	-50 Center hall cust. closet	9/27/16	0558 AM / PM	✓					742116

Received By: JRupert

Date: 9 / 29 / 16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 004 90 4577 3088

Page 5 of 12

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

EHS Laboratories™

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

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: KenTon CSD - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

~~P.O.~~ S# #: 2845A Relinquished by: ~~[illegible]~~ Tim Bly Signature: [signature] Date: 9 / 27 / 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:	NTL # ~~Temp at Time of Receipt~~:
1	EDI-BFC-130BR-51	E. wall	~~08~~09/27/16	0601 AM/PM	✓					742 117
2	EDI-CFC-130-52	E. wall	~~08~~09/27/16	0601 AM/PM	✓					742 118
3	EDI-DW-129BR-53	E. wall right	9/27/16	0603 AM/PM	✓					742 119
4	EDI-BFC-129BR-54	E. wall left	9/27/16	0605 AM/PM	✓					742 120
5	EDI-CFC-129-55	E. wall	9/27/16	0607 AM/PM	✓					742 121
6	EDI-BFC-128BR-56	E. wall	9/27/16	0611 AM/PM	✓					742 122
7	EDI-CFC-128-57	E. wall	9/27/16	0611 AM/PM	✓					742 123
8	EDI-CFC-Library-58	Sink	9/27/16	0615 AM/PM	✓					742 124
9	EDI-BFC-Library-BR-60	S. wall Left	9/27/16	0620 AM/PM	✓					742 125
10	EDI-DW-Library-BR-59	S. wall Right	9/27/16	0619 AM/PM	✓					742 126

Received By: J Rupert

Date: 9/29/16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 004 90 4577 3088

Page 6 of 12

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

556 S. Mansfield St.

Ypsilanti, MI 48197

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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 – Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

S&I P.O. #: 2945A Relinquished by: Tim Bly Signature: _____ Date: 9/27/2016

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
1	EDI-BFC-125-61	E. wall Right	9/27/16	0625 AM/PM	✓					NTL #s 742127
2	EDI-BFC-125-62	E. wall Left	9/27/16	0625 AM/PM	✓					742128
3	EDI-CFC-125-63	E. wall	9/27/16	0627 AM/PM	✓					742129
4	EDI-CSC-SHall Mar 64	N. wall	9/27/16	0629 AM/PM	✓					742130
5	EDI-BFC-126-65	W wall Right	9/27/16	0631 AM/PM	✓					742131
6	EDI-BFC-126-66	W wall Left	9/27/16	0631 AM/PM	✓					742132
7	EDI-DW-126-67	W wall	9/27/16	0631 AM/PM	✓					742133
8	EDI-CFC-126-68	W wall	9/27/16	0633 AM/PM	✓					742134
9	EDI-DW-124-69	N wall	9/27/16	0636 AM/PM	✓					742135
10	EDI-BFC-124-70	N wall	9/27/16	0636 AM/PM	✓					742136

Received By: J Rupert

Date: 9/29/16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 004 90 4597 3088

Page 7 of 12

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:

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Project Name / Collection Address: (Required) KenTon CSD – Edison Elementary City/State: (Required) Tonawanda, NY Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

~~P.O.~~ S.I. #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9 / 27 / 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.

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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:	NTL #'s ~~Temp at Time of~~ Receipt:
1	EDI-CFC-124-71	N. wall	9/27/16	0637 AM/PM	✓					742137
2	EDI-DW-122-72	N wall	9/27/16	0642 AM/PM	✓					742138
3	EDI-BFC-122-73	N. wall	9/27/16	0642 AM/PM	✓					742139
4	EDI-CFC-122-74	N. Wall	9/27/16	0643 AM/PM	✓					742140
5	EDI-BFC-Principal BR-75	SW. corner	9/27/16	0645 AM/PM	✓					742141
6	EDI-BFC-Nurse office-76	E wall	9/27/16	0646 AM/PM	✓					742142
7	EDI-CFC-Nurse Storage-77	sink	9/27/16	0650 AM/PM	✓					742143
8	EDI-CFC-nurse storage-78	Sprayer on sink	9/27/16	0650 AM/PM	✓					742144
9	EDI-CSC-113-79	~~Sto~~ Custodian office N. wall	9/27/16	0654 AM/PM	✓					742145
10	EDI-DW-112-80	Drinking fountain N. wall Right	9/27/16	0702 AM/PM	✓					742146

Received By: JR Hunt

Date: SEP 29 2016 Time: 0830 Temp. Received: N/A

Shipping Tracking #: UPS GROUND

Page 8 of 12 TRACKING #: 1Z 5F8 00Y 90 4469 6691

PLEASE SEND WATER KIT SAMPLES TO THE FOLLOWING ADDRESS:
556 S. Mansfield St.
Ypsilanti, MI 48197

...ples 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: KenTon CSD – Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

~~P.O.~~ S.T. #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9 / 27 / 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: NTL #'s ~~Temp at Time of Receipt~~:
1	EDI-BFC-112-81	Bathroom Sink N.wall left	9/27/16	0704 AM/PM	✓					742147
2	EDI-CFC-112-82	Classroom Sink N. wall	9/27/16	0705 AM/PM	✓					742 148
3	EDI-DW-111-83	S. wall Right	9/27/16	0714 AM/PM	✓					742 149
4	EDI-BFC-111-84	S. wall Left	9/27/16	0715 AM/PM	✓					742 150
5	EDI-CFC-111-85	S. wall	9/27/16	0715 AM/PM	✓					742 151
6	EDI-DW-110-86	N wall Right	9/27/16	0718 AM/PM	✓					742 152
7	EDI-BFC-110-87	N. wall Left	9/27/16	0719 AM/PM	✓					742153
8	EDI-CFC-110-88	N. wall	9/27/16	0719 AM/PM	✓					742154
9	EDI-DW-109-89	S wall Right	9/27/16	0726 AM/PM	✓					742155
10	EDI-BFC-109-90	S. wall Left	9/27/16	0726 AM/PM	✓					742156

Received By: Dan Rupert

Date: 9 / 29 / 16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 0DY 90 4489 1691

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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 - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

~~P.O.~~ Set #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9/27/2016

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:	NTL #'s Temp at Time of Receipt:
1	EDI-CFC-109-91	S. Wall	9/27/16	0727 AM/PM	✓					742157
2	EDI-EW-108-92	N wall Right	9/27/16	0730 AM/PM	✓					742 158
3	EDI-BFC-108-93	N wall Left	9/27/16	0730 AM/PM	✓					742 159
4	EDI-CFC-108-94	N wall ⊕	9/27/16	0731 AM/PM	✓					742 160
5	EDI-DW-107-95	S wall Right	9/27/16	0734 AM/PM	✓					742 161
6	EDI-BFC-107-96	S. wall Left	9/27/16	0734 AM/PM	✓					742 162
7	EDI-BFC-107-97	S. wall	9/27/16	0735 AM/PM	✓					742 163
8	EDI-CSC-N. Hall Boys SBR-98	S. wall	9/27/16	0736 AM/PM	✓					742 164
9	EDI-BFC-N. Hall Boys-99	N. wall Right	9/27/16	0741 AM/PM	✓					742 165
10	EDI-BFC-N. Hall Boys-100	N. wall Left	9/27/16	0741 AM/PM	✓					742166

Received By: Dan Rupert

Date: 9/29/16 Time: 0930 Temp. Received: _____

Shipping Tracking #: 1Z 5F6 004 90 4469 6691

Page 10 of 12

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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 - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04989

Set P.O. #: 28454 Relinquished by: Tim Bly Signature: [signature] Date: 9 / 27 / 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: NTL #s (Temp at Time of Receipt:)
1	EDI-BFC-N.Hall Gird-101	S. wall Right	9/27/16	0748 AM/PM	✓					742167
2	EDI-BFC-N.HallGirds-102	S. wall Left	9/27/16	0744 AM/PM	✓					742168
3	EDI-DW-106-103	N wall Right	9/27/16	0746 AM/PM	✓					742169
4	EDI-CFC-106-104	N. wall Left	9/27/16	0746 AM/PM	✓					742170
5	EDI-DW-105-105	S. wall Right	9/27/16	0747 AM/PM	✓					742171
6	EDI-CFC-105-106	S. wall Left	9/27/16	0747 AM/PM	✓					742172
7	EDI-DW-104-107	N. wall Right	9/27/16	0748 AM/PM	✓					742173
8	EDI-CFC-104-108	N. wall Left	9/27/16	0748 AM/PM	✓					742174
9	EDI-DW-103-109	S. wall Right	9/27/16	0750 AM/PM	✓					742175
10	EDI-CFC-103-110	S. wall Left	9/27/16	0750 AM/PM	✓					742176

Received By: Dan Rupert

Date: 9/29/16 Time: 0930 Temp. Received: N/A

Shipping Tracking #: 12576 004 90 4469 6691

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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 - Edison Elementary (Required) City/State: Tonawanda, NY (Required) Zip: 14150

Age of Property: _____ Well Tag # (If Applicable): _____ Collected by: Tim Bly Certification #: 16-04889

~~P.O.~~ Sub #: 2845A Relinquished by: Tim Bly Signature: [signature] Date: 9/27/2016

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: NTL #s ~~Temp at Time of Receipt~~:
1	EDI-DW-102-111	N wall Right	9/27/16	0751 AM / PM	✓					742177
2	EDI-CFC-102-112	N wall Left	9/27/16	0751 AM / PM	✓					742178
3	EDI-DW-101-113	S. wall Right	9/27/16	0752 AM / PM	✓					742179
4	EDI-CFC-101-114	S. wall Left	9/27/16	0752 AM / PM	✓					742180
5	EDI-CK-garage-115	E wall	9/27/16	0801 AM / PM	✓					742181
6	EDI - BFC -garage-116	E. wall	9/27/16	0803 AM / PM	✓					742182
7				AM / PM	✓					
8				AM / PM	✓					
9				AM / PM	✓					
10				AM / PM	✓					

Received By: Dan Rupert

Date: 9/29/16 Time: 09:30 Temp. Received: N/A

Shipping Tracking #: 1Z 5F6 00Y 90 4469 6691

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ENVIRONMENTAL TECHNOLOGIES

Appendix C Sample Location Maps

No Basement drawings included

Sample 46 taken EDI-BFC-Basement-46-Westwall

Sample 47 taken EDI-CSC-Basement-47-Eastwall Former slop sink location

DW in Rm 125 flow too low to sample

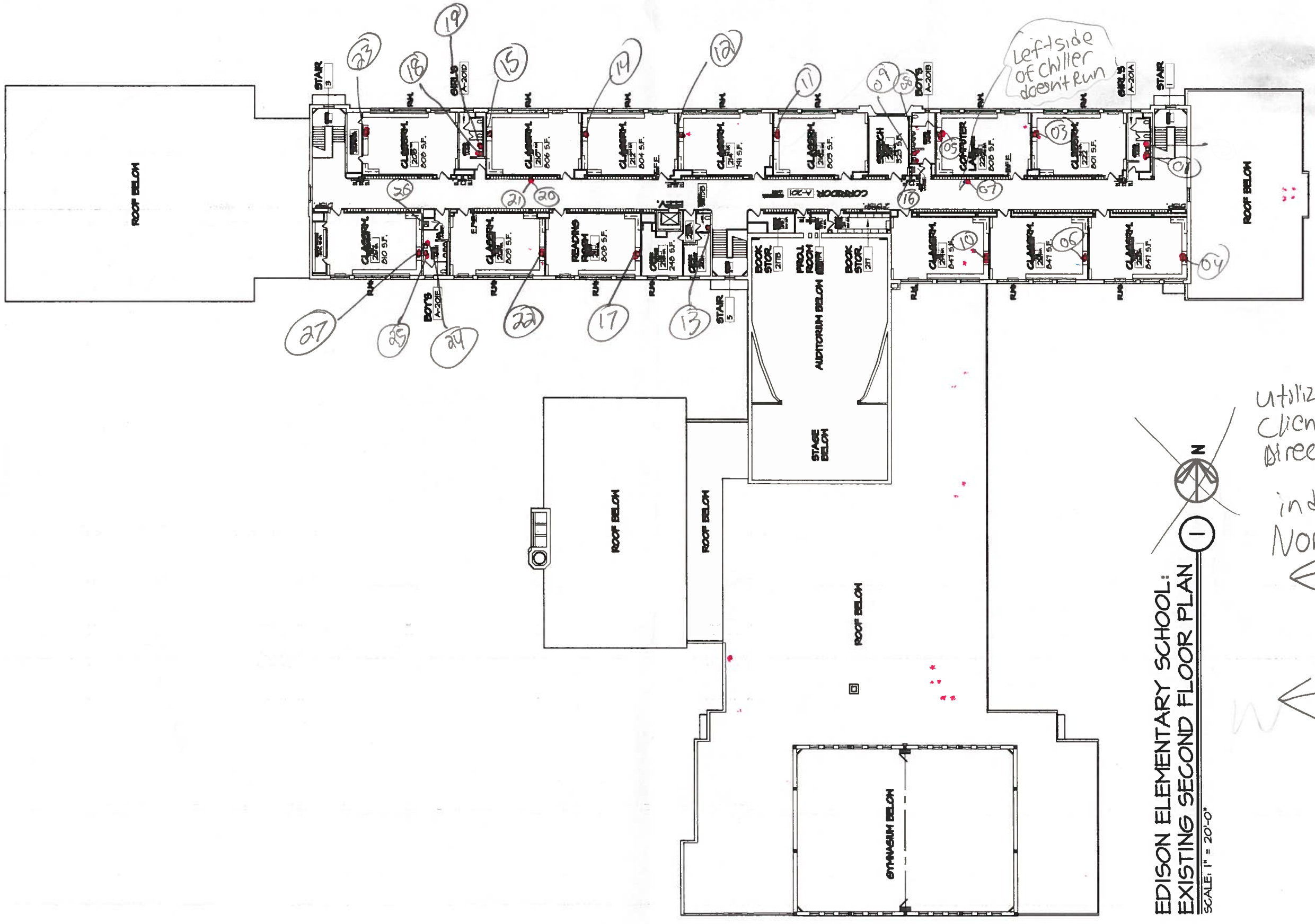
DW in Garage BR is not installed

Client contact advised us That these rooms are only used for storage Shower heads/sinks not needed to be sampled

N

according to client contact in the field

EDISON ELEMENTARY SCHOOL:
EXISTING FIRST FLOOR PLAN
SCALE: 1" = 20'-0"


ROOF BELOW
STAIR 3
GIRLS A-201D
BOYS A-201E
CLASSRM. 236 806 S.F.
CLASSRM. 240 806 S.F.
CLASSRM. 244 806 S.F.
CLASSRM. 248 741 S.F.
CLASSRM. 252 806 S.F.
CORRIDOR A-201
STORAGE 253 553 S.F.
BOYS A-201B
COMPUTER LAB 222 806 S.F.
CLASSRM. 222 801 S.F.
GIRLS A-201A
STAIR 1
CLASSRM. 236 840 S.F.
CLASSRM. 240 806 S.F.
READING 244 806 S.F.
CLASSRM. 248 246 S.F.
STAIR 5
BOOK STOR. 217B
FOYER ROOM 217
BOOK STOR. 217
AUDITORIUM BELOW
STAGE BELOW
CLASSRM. 241 841 S.F.
CLASSRM. 241 841 S.F.
CLASSRM. 241 841 S.F.
ROOF BELOW
ROOF BELOW
ROOF BELOW
GYMNASIUM BELOW
Left side of chiller doesn't run
Utilized Client contacts directions for list indicating that North was
N
N
EDISON ELEMENTARY SCHOOL:
EXISTING SECOND FLOOR PLAN
SCALE: 1" = 20'-0"

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.

Contact Person: Katherine Ceroalo
New York State Department of Health
Bureau of House Counsel, Regulatory Affairs Unit
Corning Tower Building, Rm. 2438
Empire State Plaza
Albany, New York 12237
(518) 473-7488
(518) 473-2019 (FAX)
REGSQNA@health.ny.gov

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.