

J.C. Broderick & Associates, Inc.

Environmental / Construction Consulting & Testing

October 17, 2016

Mr. Frank Scimeca
Brentwood Union Free School District
Buildings and Grounds
Anthony F. Felicia Administration Center
52 Third Avenue
Brentwood, New York 11717

**Re: Addendum No. 1
Lead in Water Sampling
Brentwood Union Free School District**

JCB#: 16-34302

Dear Mr. Scimeca:

J. C. Broderick & Associates, Inc. (JCB) was retained by the Brentwood Union Free School District to perform an assessment and testing of the drinking water outlets servicing the above referenced school buildings for the presence of lead. The assessment and testing was performed in accordance with the United States Environmental Protection Agency (EPA) protocols as recommended in their publication 3Ts for Reducing Lead in Drinking Water in Schools.

On Tuesday, September 6, 2016 the New York State Department of Health (NYS DOH) enacted an emergency Regulation; 10 NYCRR Subpart 67-4, Lead Testing in School Drinking Water. In this regulation, the NYS DOH imposes an action level of fifteen parts per billion (15 ppb), which is lower than the EPA's action level of twenty parts per billion (20 ppb).

The initial assessment and testing performed indicate that the lead levels of all the tested potable (drinking) water outlets currently servicing the School District meet both the federal guidelines and state regulation action levels. Sampling was performed at seven hundred forty-one (741) drinking outlets and lead was detected above the EPA and DOH action level at only one hundred fifty-eight (158) of these locations. All of these outlets have been removed from service and will remain out of service until further investigation, remediation and/or retesting is completed. A summary of these outlets can be referenced in the attached table.

It should be noted that both interim and permanent remediation and retesting efforts have already begun on many of these outlets. When retesting results reveal satisfaction of both the Federal guidelines and State regulation the outlets will be returned to service. When all testing and remediation activities have been completed a final report with all results will be forwarded to the District.

The emergency DOH regulation requires specific notifications to the public, State and Local Health Departments. A summary of these required notifications as they're stated in the regulation is also attached to this letter for your reference.

Please note that the referenced DOH regulation is an emergency regulation, as such; revisions, amendments and/or technical interpretations are expected. These updates may require additional sampling, notifications and/or other requirements. We will monitor the DOH's progress of the regulation and advise you of any relevant findings.

If you need any further assistance, please feel free to contact our office.

Sincerely,



Edward McGuire
J.C. Broderick & Associates, Inc.



**Attachment No. 1
Brentwood Union Free School District
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School Building	Drinking Water Outlets Sampled	Locations which Exceed EPA and/or DOH Action Levels
Northeast Elementary School	59	<p><u>Exceed EPA 20ppb AL</u> Map location 7: Fountain in Classroom 18 Map location 16: Faucet in Classroom 26 Map location 30: Fountain in Classroom 8A</p> <p><u>Exceed DOH 15ppb AL</u> Map location 5: Fountain in Classroom 16 Map location 22: Faucet in Classroom 1A Map location 35: Fountain in Reading Room 2</p>
North Elementary School	56	<p><u>Exceed EPA 20ppb AL</u> Map location 2: Faucet in Kitchen Map location 32: Faucet in Math Lab 3</p> <p><u>Exceed DOH 15ppb AL</u> Map location 18: Fountain in Room A8</p>
Laurel Park Elementary School	40	<p><u>Exceed EPA 20ppb AL</u> Map location 3: Fountain in Classroom 20 Map location 14: Fountain in Classroom 29 Map location 16: Fountain in Room 31 Map location 21: Sink in Nurse's Office/Speech Room 2 Map location 34: Fountain in Classroom 6</p> <p><u>Exceed DOH 15ppb AL</u> Map location 27: Fountain in Classroom 11</p>
South Middle School	34	<p><u>Exceed EPA 20ppb AL</u> Map location 21: Fountain in Hallway by Auditorium Lobby</p> <p><u>Exceed DOH 15ppb AL</u> Map location 5: Fountain in Hallway by 104 Map location 9: Faucet in Home Economics Classroom 106 Map location 14: Fountain in Hallway by Girl's Locker Room Office Map location 32: Faucet in Library</p>
Pine Park Elementary School	41	<p><u>Exceed EPA 20ppb AL</u> Map location 5: Fountain in Art Room 16 Map location 10: Fountain in Classroom 21 Map location 16: Fountain in Classroom 29 Map location 20: Faucet in Nurse's Office Map location 22: Fountain in Classroom 15 Map location 23: Fountain in Classroom 14 Map location 24: Fountain in Classroom 13 Map location 27: Fountain in Classroom 10 Map location 35: Fountain in Kindergarten Room 2 Map location 38: Fountain in Room 52</p> <p><u>Exceed DOH 15ppb AL</u> Map location 2: Faucet in Kitchen Map location 9: Fountain in Classroom 20 Map location 13: Fountain in Classroom 24 Map location 25: Fountain in Classroom 12 Map location 26: Fountain in Classroom 11</p>

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School Building	Drinking Water Outlets Sampled	Locations which Exceed EPA and/or DOH Action Levels
Oak Park Elementary School	53	<p><u>Exceed EPA 20ppb AL</u> Map location 2: Faucet in Kitchen Map location 9: Sink in Nurse's Office</p> <p><u>Exceed DOH 15ppb AL</u> Map location 11: Fountain in Faculty Lounge Room 15 Map location 13: Fountain in Classroom 11</p>
Freshman Center	24	<p><u>Exceed EPA 20ppb AL</u> Map location 1: Faucet in kitchen Map location 5: Faucet in Home Economics Rooms 48 & 50 Map location 6: Faucet in Home Economics Rooms 48 & 50 Map location 8: Faucet in Home Economics Rooms 48 & 50 Map location 10: Sink in Nurse's Office Map location 14: Fountain in Girl's Locker Room Map location 19: Faucet in Classroom 207 Map location 20: Faucet in Science Room 200/202 Prep Room</p> <p><u>Exceed DOH 15ppb AL</u> Map location 4: Service Connector Map location 7: Faucet in Home Economics Rooms 48 & 50</p>
Special Service Building	2	<p><u>Exceed EPA 20ppb AL</u> NONE</p> <p><u>Exceed DOH 15ppb AL</u> Map location 1: Faucet in kitchen</p>
Twin Pines Elementary School	49	<p><u>Exceed EPA 20ppb AL</u> Map location 3: Faucet in Kitchen Map location 13: Fountain in Classroom 28 Map location 14: Fountain in Classroom 27 Map location 29: Fountain in Kindergarten Room 2 Map location 39: Fountain in Classroom 11 Map location 42: Fountain in Computer Room 14 Map location 43: Fountain in Classroom 15A</p> <p><u>Exceed DOH 15ppb AL</u> Map location 11: Fountain in Classroom 30 Map location 20: Fountain in Classroom 22 Map location 23: Fountain in Classroom 19 Map location 41: Fountain in Classroom 13 Map location 47: Nurses Sink</p>
Loretta Park Elementary School	39	<p><u>Exceed EPA 20ppb AL</u> Map location 2: Faucet in Kitchen Map location 5: Fountain in Classroom 18</p> <p><u>Exceed DOH 15ppb AL</u> Map location 4: Fountain in Classroom 16 Map location 32: Fountain in Classroom 1</p>

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School Building	Drinking Water Outlets Sampled	Locations which Exceed EPA and/or DOH Action Levels
East Elementary School	39	<p><u>Exceed EPA 20ppb AL</u> Map location 1: Service connector outside by Kitchen Map location 4: Food prep in the Kitchen Inner Corridor Map location 5: Faucet/ fountain in classroom 32 Map location 7: Faucet/ fountain in classroom 34 Map location 8: Faucet/ fountain in classroom 33 Map location 10: Faucet/ fountain in classroom 35 Map location 11: Faucet/ fountain in classroom 38 Map location 15: Home economics sink in classroom 43 Map location 20: Sink in nurse's office Map location 21: Fountain in corridor from room 7 to Main Office Map location 28: Faucet/ fountain in classroom 12</p> <p><u>Exceed DOH 15ppb AL</u> NONE</p>
Hemlock Park Elementary School	25	<p><u>Exceed EPA 20ppb AL</u> Map location 3: Fountain in Classroom 17 Map location 14: Fountain in Classroom 31</p> <p><u>Exceed DOH 15ppb AL</u> NONE</p>
Southeast Elementary School	31	<p><u>Exceed EPA 20ppb AL</u> Map location 7: Fountain in Classroom 20 Map location 11: Fountain in Classroom 26 Map location 14: Faucet in Kitchen Map location 15: Faucet in Kitchen Map location 27: Fountain in Classroom 9 Map location 31: Fountain in Kindergarten Classroom 101</p> <p><u>Exceed DOH 15ppb AL</u> Map location 5: Fountain in Classroom 18 Map location 18: Faucet in Nurse's Office</p>
North Middle School	29	<p><u>Exceed EPA 20ppb AL</u> NONE</p> <p><u>Exceed DOH 15ppb AL</u> NONE</p>
West Middle School	33	<p><u>Exceed EPA 20ppb AL</u> Map location 8: Fountain in hallway by Home Economics Room 104 Map location 9: Faucet in Home Economic Room 104 Map location 10: Faucet in Room 101 Map location 32: Faucet in Classroom 121</p> <p><u>Exceed DOH 15ppb AL</u> Map location 7: Fountain in Hallway by Room 110 Map location 13: Faucet in Home Economic Room 104 Map location 14: Faucet in Home Economic Room 104</p>

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School Building	Drinking Water Outlets Sampled	Locations which Exceed EPA and/or DOH Action Levels
Brentwood Administration Building	16	<p><u>Exceed EPA 20ppb AL</u> Map location 3: Main Office Suite Kitchen</p> <p><u>Exceed DOH 15ppb AL</u> NONE</p>
East Middle School	35	<p><u>Exceed EPA 20ppb AL</u> Map Location 2: Faucet in Home Economics Room 104-First Sink on Back Left Corner Upon Entry Map Location 4: Faucet in Home Economics Room 104-Third Sink from Back Left Corner Upon Entry Map Location 6: Fountain in Hallway by Room 108 Map Location 7: Faucet in Home Economics Room 106-First Sink on Left Interior Corner Upon Entry Map Location 8: Faucet in Home Economics Room 106-Second Sink on Left Exterior Corner Upon Entry Map Location 9: Faucet in Home Economics Room 106-Sink on Right Exterior Corner Upon Entry Map Location 11: Water Cooler in Boy's Locker Room Map Location 16: Faucet in Kitchen-Third Sink from Left Upon Entry from Hallway Map Location 17: Faucet in Kitchen-Second Sink from Left Upon Entry from Hallway Map Location 18: Faucet in Kitchen-First Sink on Left Upon Entry from Hallway Map Location 21: Faucet in Nurse's Office Map Location 22: Fountain in Hallway by Health Office Map Location 30: Fountain in Hallway by Room 212</p> <p><u>Exceed DOH 15ppb AL</u> Map Location 3: Faucet in Home Economics Room 104-Second Sink from Left Corner Upon Entry Map Location 15: Faucet in Kitchen-Fourth Sink from Left Upon Entry from Hallway Map Location 23: Faucet in Faculty Lounge Room 114</p>
Brentwood High School	31	<p><u>Exceed EPA 20ppb AL</u> Map location 3: Faucet in Kitchen Map Location 11: Fountain in Corridor between Room 1123 to Room 1127 Map Location 19: Fountain in Corridor from Room 1152 to Industrial Arts Room Map Location 20: Fountain in Corridor from Room 1152 to Industrial Arts Room Map Location 21: Sink in Industrial Arts Room</p> <p><u>Exceed DOH 15ppb AL</u> Map Location 22: Sink in Room 1170 Map Location 31: Fountain in Room 2215</p>
Brentwood High School-Sonderling	37	<p><u>Exceed EPA 20ppb AL</u> Map Location 34: Fountain in Second Floor Hallway by Fan Room</p> <p><u>Exceed DOH 15ppb AL</u> Map Location 31: Fountain in Second Floor Hallway by Boy's Bathroom</p>

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School Building	Drinking Water Outlets Sampled	Locations which Exceed EPA and/or DOH Action Levels
Southwest Elementary School	68	<p><u>Exceed EPA 20ppb AL</u> Map Location 2: Faucet in Kitchen-Kettle Map Location 4: Fountain in Room 31 Map Location 17: Fountain in Room 40 Map Location 20: Faucet in Nurse’s Office Map Location 22: Fountain in Art Room 16 Map Location 23: Fountain in Room 17 Map Location 25: Fountain in Room 19 Map Location 28: Fountain in Room 22 Map Location 30: Fountain in Room 24 Map Location 31: Fountain in Room 25 Map Location 32: Fountain in Room 26 Map Location 45: Fountain in Math Lab- Room 2 Map Location 46: Fountain in Room 11A Map Location 47: Water Cooler in Hallway by Room 11A Map Location 49: Fountain in Room 9A Map Location 50: Fountain in Room 8A Map Location 51: Fountain in Room 7A Map Location 53: Fountain in Room 5A Map Location 54: Fountain in Room 4A Map Location 55: Fountain in Room 3A Map Location 56: Fountain in Kindergarten Room 2A Map Location 57: Fountain in Kindergarten Room 1A Map Location 59: Fountain in Room 12A Map Location 62: Fountain in Room 17A Map Location 65: Fountain in Room 18A Map Location 66: Fountain in Room 21A Map Location 68: Fountain in Room 22A Map Location 69: Fountain in Hallway by Room 22A</p> <p><u>Exceed DOH 15ppb AL</u> Map Location 10: Fountain in Room 34 Map Location 12: Fountain in Room 46 Map Location 21: Fountain in Music Room 15 Map Location 29: Fountain in Room 23 Map Location 44: Faucet in Library Map Location 48: Fountain in Room 10A Map Location 58: Fountain in Room 13A Map Location 61: Fountain in Room 14A Map Location 64: Fountain in Room 19A Map Location 67: Fountain in Room 20A</p>

NYS DOH Lead in Water Compliance Checklist for Testing and Notification Date Requirements

Yes No N/A

FIRST DRAW SAMPLING DEADLINES

Any first-draw sampling that occurred after January 1, 2015 shall satisfy the initial first-draw sampling requirement.

Any school serving children in any of the levels prekindergarten through grade five, collection of samples is to be completed by September 30, 2016

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

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

Continued monitoring: Schools shall collect first-draw samples 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.

RESPONSE NOTIFICATIONS (Receipt of first draw sampling laboratory report)

Report results to the local health department as soon as practicable, but no more than 1 business day after the school received the laboratory report

Notify all staff and all persons in parental relation to students of the test results, in writing, as soon as practicable but not 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.

PUBLIC NOTIFICATIONS (After receiving report with lead retesting results and implemented lead remediation actions)

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.

Section 1417 of the Safe Drinking Water Act (SDWA) establishes the definition for "lead free" as a weighted average of 0.25% lead calculated across the wetted surfaces of a pipe, pipe fitting, plumbing fitting, and fixture and 0.2% lead for solder and flux.

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.

For schools that received lead testing results and implemented lead remediation plans in a manner consistent with this Subpart, but prior to effective date of this Subpart, the school shall make available such information, on the school's website, as soon as practicable, but not more than 6 weeks after the effective date of this Subpart.

REPORTING TO DEPARTMENT OF HEALTH

As soon as practicable but no later than November 11, 2016, the school shall report required information to the NYS DOH, local health department, and State Education Department, through the Departments designated statewide electronic reporting system:

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.

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.