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Mold Assessment  
and Remediation

May 31, 2017

Health/Safety and  
Environmental  
Regulatory  
Compliance

Ms. Nancy DeRiso  
Board Secretary/Business Administrator  
Oxford Township Board of Education  
17 Kent Street  
Oxford, NJ 07863

Right-To-Know

re: **Water Sampling for Compliance with N.J.A.C. 6A:26-12.4  
Lead in Drinking Water**

OSHA/EPA/DOT  
Training Programs

Dear Ms. DeRiso,

Asbestos and Lead  
Management

We enclose our project report along with the following documents and related information package for compliance with the new NJ Department of Education Regulation related to Lead in Drinking Water in school buildings:

Industrial Hygiene/  
OSHA Compliance

Sampling Report Narrative	3 pages
Water Sampling Log and Results	1 page
Laboratory Analytical Report	20 pages
Quality Assurance Project Plan (QAPP – please sign 1 <sup>st</sup> page)	11 pages

Indoor Air Quality

Sampling Plan, including:

Underground/  
Aboveground  
Storage Tanks


- Plumbing Profile Questionnaire
- Water Outlet Inventory
- Floor Plan Drawings

Environmental  
Site Assessment

If you have any questions, please don't hesitate to call us.

Sincerely,

Hazardous/  
Medical Waste  
Management

  
Patrick D. McGuinness, MS, P.E.  
Vice President

Environmental  
Audits

PDM/

(file .... \Reports\Water\test\Oxford Twp (17-062)-171)

Expert Witness/  
Litigation Support

Customized  
Software

**Sampling Report - Lead in Drinking Water**  
**Oxford Board of Education**

**1. Sampling Results Summary**

Sample Collection Date	May 18, 2017
Number of Buildings Sampled	1
Total Number of Samples Collected	12
Number of Samples with No Detectible Lead	11
Number of Samples Exceeding 15 PPB (0.015 mg/L) Standard	0
Number of Samples Exceeding 5 PPB	0
Highest Measured Lead Content (mg/L)	0.0049

**2. Water Sampling Procedures**

Sampling protocols and procedures follow the EPA “3-T’s Program” that was developed for schools and Child Care centers. They recognize that the typical school building is actually a conglomeration of an original building with one or more additions, each of which typically having different plumbing system materials.

In addition, building sections constructed before 1986 likely have plumbing systems that used leaded solders on Copper water lines. Very old buildings and public water supply systems may also still have lead piping. Other potential sources of Lead in drinking water systems include brass faucets, fittings, and valves that are used in the municipal and building piping distribution systems. It is important to note that “Lead-Free” plumbing components used since 1986 may actually contain up to 8% Lead by weight. In January 2014, this limit was lowered from 8% to 0.2% Lead.

The sampling protocol requires that water be collected as a “First-Draw” to ensure that the water sample has been standing for at least 8 hours. This is intended to replicate a “worst-case” situation since both the Lead and Copper levels are usually lowered significantly after running the water even for a few moments.

Drinking water samples were collected early on a weekday or Saturday morning before staff and students arrived for classes to represent water that has sat idle in the building piping system overnight.

Laboratory analysis of the water samples was performed for both Lead and Copper since both could be sourced from the building plumbing and both are indicators of system corrosion.

All samples were collected in 250 ml contaminant-free containers. Laboratory analysis of the water samples was performed by Analytical Laboratory Services, Inc. of Middletown, PA (NJ DEP Certification No. PA010). The analytical method is per EPA 600/4-79-020, Method 200.8 via atomic absorption, platform furnace technique.

### **3. Sample Results and Discussion**

Sampling results are discussed below. Water sampling logs and the complete laboratory analytical report are appended to this report. All results are expressed as milligrams of Lead or Copper per liter of water (mg/L) and compared against the current 0.015 mg/L Action Level. Results could also be expressed in equivalent terms of parts per billion (ppb) where the Action level translates to 15 ppb.

A total of 12 water samples were collected on May 18, 2017. None of the samples exceeded the 0.015 mg/L Action Level. In fact, 11 of the 12 water samples had no detectible levels of lead present and none of the water samples had a Lead content greater than 5 PPB.

### **4. Recommendations and Future Work**

All water sample results showed acceptable results for Lead content. The following responses include those required by N.J.A.C. 6A:26-12.4 and our recommendations to maintain the drinking water quality as it relates to Lead contamination.

The NJDOE regulations requires that:

- These sampling results be made publically available at the school building and on the School District's website.
- The School District shall collect drinking water samples and analyze for Lead at any drinking water outlet that has been replaced or after any alterations to the plumbing or service lines to the outlet. Do not consume or cook with water from the affected outlet until acceptable Lead results are obtained.
- Repeat water sampling within 6 years or before July 2023.

In addition, we suggest that the following responses to minimize the potential for Lead contamination of drinking water:

#### **Administrative Responses:**

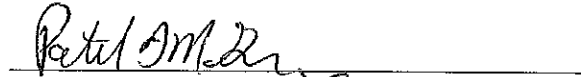
- There are several factors that influence the Lead corrosion potential in drinking water piping systems. These include the chemistry of the water supplied to the building, temperature and water velocity, the age and condition of the plumbing, and the amount of time the water sits "stagnant" in contact with piping and drinking water fixtures. This last factor is the only one that a building owner has any control of.
- School building codes require a minimum of one (1) drinking water tap for every 100 students of building capacity. Wherever a larger number of water taps exists, the usage factor for each tap decreases. This, in turn, increases the "stagnation time" along with the increased potential for Lead corrosion. It is recommended that the need for all the water taps be investigated and reduced where appropriate while maintaining the minimum of 1 tap per 100 students.

- Consider implementing a program to shut-off and replace (if needed) any drinking water fixture of appliance that is more than 30 years old (was installed before the 1986 Lead Ban took effect).

Operational and Maintenance Responses:

- Use cold water only for drinking or cooking. As noted above, higher water temperature can increase its corrosion potential.
- As noted above, the accumulation of line sediment on aerators and screens at the water taps is frequently the cause of higher measured levels of both Lead and Copper. It is recommended that a program be established to regularly inspect for the presence of line sediment at all drinking water taps. Initially, an annual inspection is suggested. The inspection frequency should then be adjusted depending upon the amounts of sediment that is found and where it is found. Higher usage taps may accumulate sediment more quickly and need to be cleaned more often.
- It is known that flushing water through drinking water taps will reduce the levels of both Lead and Copper present in the drinking water. It is also recommended that a program be established to run water at all drinking or cooking taps for at least one minute before students and staff return to school after long breaks, especially after the Summer recess.

Report prepared by:



Patrick D. McGuinness, MS, P.E.

Vice President