

ENVIRONMENTAL HEALTH DIVISION  
[www.tompkinscountyny.gov/health/eh](http://www.tompkinscountyny.gov/health/eh)

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February 22, 2016

David M. Brown  
Chief Administration Officer  
P.O. Box 549  
Ithaca, New York 14851

Subject: **Immediate Concern with Lead Testing Procedures**

Dear David:

At the Ithaca City School District's (ICSD) request, W2O Operator Training Group recently obtained samples from all drinking water fixtures at Caroline and Enfield Elementary Schools. In the sampling procedures that were recently submitted for the Caroline school, W2O reported that:

*At 10:00 pm the water system was shut off at the point of entry into Caroline Elementary in order to prevent any accidental water draw from the well and disturbing the six hour minimum residence time.*

W2O noted that the same procedures were followed at Enfield Elementary School.

This is a significant departure from normal water system operation and standard sampling procedures. During a meeting with TCHD, ICSD and BOCES on February 18, the ICSD reported information indicating that there was a leak in the Caroline water system and the system depressurized during the time between when the entry point shut-off valve was closed and when sampling was conducted the following morning. Both shutting off the system and the reported depressurization of the Caroline Elementary School water system may have created disruptive, turbulent or scouring conditions in the water pipes, potentially releasing lead-containing particles into the distribution system.

At the ICSD's request, TST BOCES recently collected samples from all other schools in the District. At the February 18 meeting, BOCES noted that they shut off the valve at each fixture the night before the sampling. The EPA guidance (Exhibit 4.4 Drinking Water Fountains: Bubblers) states:

*Do not close the shut-off valves to the water fountains to prevent their use prior to sample collection. Minute amounts of scrapings from the valves will produce inaccurate results showing higher than actual lead levels in the water.*

The Tompkins County Health Department consulted the New York State Department of Health regarding this. Because of concerns with these improper sampling procedures, the results may not be representative of actual conditions and may have produced inaccurate results.

Please contact me if you would like to discuss this further.

Respectively,

A handwritten signature in blue ink that reads "Elizabeth Cameron".

Elizabeth Cameron, P.E.  
Director of Environmental Health

ec: ICSD: Paul Alexander, Director of Facilities; Matt Landahl, Deputy Superintendent;  
Amanda Verba, Chief Operations Officer  
TCHD: Frank Kruppa, Public Health Director; Chris Laverack, Public Health Sanitarian;  
Adriel Shea, Sr. Public Health Sanitarian; Steve Maybee, Public Health Engineer  
NYSDOH: John Strepelis, Regional Environmental Health Director

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