

Atch-223109/230028
Limited Lead Water Assessment
600 6th Street
Coronado, California 92118

February 02, 2023

Coronado Unified School District
201 Sixth Street
Coronado, California 92118

Attn: Ms. Maritza Arrellano

Re: Lead in Drinking Water Assessment – Licensed Childcare Center

Village Elementary
600 6th Street
Coronado, California 92118

Dear Ms. Maritza Arrellano,

Pursuant to your request, A-Tech Consulting, Inc. (A-Tech) performed a Lead in Drinking Water Assessment (LDWA) at Village Elementary, located at 600 6th Street in Coronado, California (hereafter referred to as the site). The assessment was limited to eleven (11) fixtures in various locations of the site. The LDWA report is prepared for the sole use of Coronado Unified School District.

1.0 INTRODUCTION

The LDWA was conducted at the childcare center (CCC) at the referenced site, and includes data from the failed initial assessment and passed re-test assessment. The LDWA report presents a site background, purpose for the assessment, sampling methodology, laboratory results, and analytical discussion. All sampling was performed under the supervision of Robert Williams – CDPH LRC Inspector/Assessor #LRC-00004572.

The initial lead in water sampling was performed by Jeffrey Stallings – CDPH Lead Sampling Technician #LRC-00006812 on December 06 and 07, 2022.

The re-test lead in water sampling was performed by Jeffrey Stallings – CDPH Lead Sampling Technician #LRC-00006812 on January 17, 18, and 19, 2023.

2.0 BACKGROUND

The site inspected is an educational facility comprising of one (1) structure with a brick exterior. The build date is unknown. Please refer to **Appendix B** to view the **Vicinity and Site Maps**.

The initial assessment was performed on December 06 and 07, 2022. During the initial assessment, twelve (12) samples were collected from eleven (11) points of use(s) (POUs); one (1) collected sample contained elevated lead in water content.

The re-test assessment was performed on January 17 and 19, 2023. The one (1) elevated POU from the initial assessment was re-sampled during the re-test assessment, totaling two (2) samples.

3.0 SCOPE OF WORK

The LDWA was performed to identify and assess the lead content in drinking water samples at the site. If lead content in water is found, the LDWA would identify individual water sources and their respective concentrations of lead.

4.0 EVALUATION CRITERIA

The assessment was performed in accordance with the Environmental Protection Agency (EPA) and State of California – Health and Human Services Agency Department of Social Services (CDSS) requirements. For licensed child care centers (CCC), this testing is required by the CDSS per Assembly Bill (AB) 2370, Chapter 676, Statutes of 2018 and Health and Safety Code Section 1597.16. The sampling was performed pursuant to AB 2370 and the EPA's 2018 version of *3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities* (3Ts Guidelines). The CDSS Action Level for lead in drinking water is 5 parts per billion (ppb), or 5 micrograms of lead per 1 liter of water (5 µg/L).

Please refer to **Table 1** for a list of the differing regulatory limits for lead in water.

Table 1: Regulatory Body Governing Lead in Drinking Water in Child Care Centers

| Governing Agency | Regulatory Limit | Outcome |
|------------------|--------------------------|-------------------------|
| CDSS | 5 ppb, or 5 µg/L | Action Level |
| CDSS | ≥ 5.5 ppb, or ≥ 5.5 µg/L | Action Level Exceedance |

CDSS outlines the Action Level as 5 ppb and an Action Level Exceedance as any value equal to or greater than 5.5 ppb. Section 8.0 outlines the remediation requirements for each of the two regulatory limits, as applicable.

5.0 SAMPLING PROCEDURE

The method of testing utilized for the drinking water assessment was in accordance with AB 2370 and the EPA's 2018 version of 3Ts Guidelines. A-Tech's CDPH-certified technician performed the sampling/assessment under the direct supervision of a CDPH-certified Lead Inspector/Assessor. Please reference **Appendix E Inspectors' Certifications**.

Initial Assessment

On December 06, 2022, the technician performed a preliminary site visit to prepare the POU(s) for sampling. Specifically, the technician wrapped and sealed the POU(s) with a zip-type reusable plastic bag and tape to prevent POU use during the eight (8)- to eighteen (18)-hour stagnation period.

On December 07, 2022, the technician obtained twelve (12) 250-mL wide-mouth plastic bottles. All POUs had one (1) first draw cold water sample collected, and one (1) second draw sample was collected from the first sampling location. The first and second draw samples were bagged together in a zip-type reusable plastic bag. The facility ID, sample date and time, sample location, source, matrix, and type (potable or non-potable) were recorded on the chain-of-custody (COC). All sample locations were marked on a site diagram (see **Appendix B Sample Locations**). Specific results are listed in **Appendix A Lead Water Table** and **Appendix D Laboratory Reports** in this report.

Re-Test Assessment

On January 17, 2023, the technician performed a preliminary site visit to prepare the elevated POUs from the initial assessment for re-sampling. Specifically, the technician wrapped and sealed the elevated POU(s) with a zip-type reusable plastic bag and tape to prevent POU use during the eight (8)- to eighteen (18)-hour stagnation period.

On January 18, 2023, the technician did not receive on-site access for sampling.

On January 19, 2023, the technician obtained two (2) 250-mL wide-mouth plastic bottles. All conditioned POU's had one (1) first draw cold water sample collected, and one (1) second draw sample collected. The first and second draw samples were bagged together in a zip-type reusable plastic bag. The facility ID, sample date and time, sample location, source, matrix, and type (potable or non-potable) were recorded on the chain-of-custody (COC). All sample locations were marked on a site diagram (see **Appendix B Sample Locations**). Specific results are listed in **Appendix A Lead Water Table** and **Appendix D Laboratory Reports** in this report.

6.0 ANALYTICAL TESTING

A total of fourteen (14) samples were collected from eleven (11) POU's at the subject site. The samples were shipped under chain-of-custody (COC) procedures to LA Testing located at 5431 Industrial Drive, Huntington Beach, California 92649 (714) 828-4999 for analytical testing. LA Testing located at 5431 Industrial Drive, Huntington Beach, California 92649 is certified under the California Environmental Laboratory Accreditation Program (CA ELAP), certificate number 1406. Please see **Appendix F** for the **CA ELAP Certificate**.

7.0 SUMMARY OF RESULTS

The results are presented in micrograms per liter (µg/L). One (1) µg/L is equivalent to one (1) parts per billion (ppb).

Initial Assessment

One (1) potable drinking water sample obtained from the initial assessment at the site contained lead concentrations above the CDSS Action Level of 5 ppb and/or is considered to be Action Level Exceedance(s). The following table summarizes the detectable analytical results from the eleven (11) POU's tested on December 07, 2022. Remaining sampled locations did not exceed the laboratory reporting limit (i.e., non-detect). Bolded line items indicate a result above the Action Level and/or considered to be an Action Level Exceedance(s).

Table 2: Initial Assessment Detectable Lead Results

| Sample Number | Sample Date & Time | Sample Location | Action Level Exceedance | Analytical Result (µg/L) |
|---------------------------|----------------------------|--|-------------------------|--------------------------|
| 223109-376701527-D | 12/07/2022 07:21 AM | Building 700 (Preschool), 1st Floor, Room 710, Faucet | ≥ 5.5 | 5.68 |
| 223109-376701527-E | 12/07/2022 07:21 AM | Building 700 (Preschool), 1st Floor, Room 710, Drinking Fountain | ≥ 5.5 | 1.63 |
| 223109-376701527-F | 12/07/2022 07:22 AM | Building 700 (Preschool), 1st Floor, Room 709, Faucet | ≥ 5.5 | 1.36 |
| 223109-376701527-H | 12/07/2022 07:23 AM | Building 700 (Preschool), 1st Floor, Room 709, Faucet | ≥ 5.5 | 1.42 |

Based on the initial assessment sampling results, certain sampling locations contained lead in water at concentrations above the Action Level and/or are considered Action Level Exceedance(s). Recommendations are outlined in Section 8.0. Please refer to **Appendix A Lead Water Table** for detailed sample information, and **Appendix C Digital Photographs** for photos of the samples depicted in **Table 2**.

Re-Test Assessment

The potable drinking water samples obtained from the re-test assessment at the site contained lead concentrations below the CDSS Action Level of 5 ppb and are not considered an Action Level Exceedance (≥ 5.5 µg/L). Of the one (1) POU sampled, the following table summarizes the detectable analytical results.

Table 3: Re-Test Assessment Detectable Lead Results

| Sample Number | Sample Date & Time | Sample Location | Action Level Exceedance | Analytical Result (µg/L) |
|--------------------|---------------------|---|-------------------------|--------------------------|
| 230028-376701527-A | 01/19/2023 06:32 AM | Building 700 (Preschool), 1st Floor, Room 710, Faucet | ≥ 5.5 | 2.34 |

Based on the sampling results, the one (1) re-sampled location is within regulatory compliance with regards to lead content levels. Please refer to **Appendix A Lead Water Table** for detailed sample information.

8.0 RECOMMENDATIONS

Initial Assessment Recommendations

For lead in water concentrations with an Action Level Exceedance (≥ 5.5 ppb): CDSS requires that the following outlet(s) either permanently cease use for drinking/food preparation or are replaced. Once replaced, the outlet must be flushed for at least 30 seconds, at least four times a day, for at least three weeks prior to follow-up water sampling. Upon request, A-Tech will perform resampling activities of the replaced outlets at the end of the three-week period; it is noted that flushing must continue daily following the three-week period prior to resampling. Additional details are outlined below.

- Building 700 (Preschool), 1st Floor, Room 710, Faucet

CDSS Requirements for Outlets with Action Level Exceedances (≥ 5.5 ppb): Pursuant CDSS Assembly Bill (AB) 2370, Chapter 676, Statutes of 2018 and Health and Safety Code Section 1597.16, the CDSS has issued Written Directives for Lead Testing in CCC. Page thirteen (13) section 101704, Lead Action Level Exceedance Response Requirements, describes the remediation actions that must be implemented for water outlets that return an Action Level Exceedance result (>5.5 ppb). The outlet must be permanently ceased of use for drinking and food preparation, or it must be remediated by replacing the outlet. Pursuant page fourteen (14) section 101705, Follow-up Corrective Action Water Sampling, replacement outlets must be conditioned by turning them on for at least 30 seconds, at least four times a day, for at least three weeks prior to follow-up water sampling. If sampling does not occur at the end of the three weeks of flushing, the CCC shall continue flushing daily until the day prior to sampling. The CCC shall track the flushing process on a sheet posted next to the replacement outlet and keep this tracking sheet on file.

Once the conditioning steps are completed and an eight (8) to eighteen (18) hour stagnation period has occurred, a certified external water sampler shall collect a first draw and second draw sample from each outlet that has been replaced. The sampler shall complete the following three documents: 1) Facility Sketch (LIC 999), 2) Child Care Center Sampling Checklist Form (LIC 9276), and 3) External Water Sampler Self-Certification Form (LIC 9275). These documents shall be sent to the Licensing Program Analyst (LPA) within two (2) weeks do the completed sampling date. A-Tech recommends following the above corrective actions for any facility that is currently a licensed CCC.

Lead in water concentrations that are less than 5.5 ppb are in compliance with the CDSS Action Level for regulatory purposes; however, there is no safe level for lead.

Re-Test Assessment Recommendations

Subsequent the re-test assessment, no action is required at this time. Pursuant CDSS Assembly Bill (AB) 2370, Chapter 676, Statutes of 2018 and Health and Safety Code Section 1597.16, the CDSS has issued Written Directives for Lead Testing in CCC. Page thirteen (13) section 101703 (c) states if all the ELAP lab results indicate that the levels of lead are at or below the Action Level of 5 ppb, no further action shall be required until the next 5-year testing cycle.

9.0 LIMITATIONS

The conclusions presented in this report are professional opinions based solely upon visual observations at the site and laboratory analysis of the tested samples. They are intended exclusively for the purpose outlined herein, and for the site location and project indicated.

This limited assessment was planned, developed, and implemented based on A-Tech's the scope of services approved by the client. This limited assessment was conducted in compliance with current regulatory protocols. A-Tech utilized state-of-the-art-practices and techniques in accordance with regulatory standards, while performing this limited assessment. A-Tech's evaluation of the relative risk of exposure to lead, identified during this limited assessment, is based on conditions observed at the time of the limited assessment.

A-Tech cannot be responsible for changing conditions that may alter the relative exposure risk or for future changes in accepted methodology. The floor plans and actual test results for each of the tested areas are contained within this report.

Recognizing that even the most comprehensive survey may fail to detect lead in water at a particular site, this study was not intended to identify all potential lead in water present in the building or at the site for such reasons as inaccessibility or limited sampling scope.

There are potential liabilities associated with the presence, and removal, of lead pipes and/or contaminated water. Precautionary measures, as outlined herein, should be taken in accordance with the guidelines set forth by the EPA and other regulatory agencies.

Services performed by A-Tech were conducted in a manner above the care and skill ordinarily and currently exercised by members of the same profession that even the most comprehensive scope of services might fail to detect environmental liabilities on a particular site. Therefore, A-Tech cannot act as insurers and cannot "certify" that a site is free of environmental contamination.

No expressed or implied representation or warranty is included or intended in our reports, except that our services were performed, within the limits prescribed by the Scope of Services, with the customary thoroughness and competence of our profession.

This report is intended for the sole use of the contracted Client and its authorized representatives. The exchange of information was unique between A-Tech and the client regarding the mutually agreed upon scope of service. Unless explicitly authorized in this report, no third party is beneficiary to the contract or findings of this report. The unauthorized use or reliance of this document or the findings, conclusion or recommendations presented herein, by any other party or parties is at the sole risk of any such third party. For the same reasons, no warranties or representations, expressed or implied in this report, are provided to any such third party.

Information and opinions presented herein apply to the existing and reasonable foreseeable site conditions at the time of our investigation. They cannot necessarily apply to site changes of which this office is unaware and have not had the opportunity to review. Changes in the conditions of this property may occur with time due to natural processes or works of man on the site or on adjacent properties. Changes in applicable standards may also occur as a result of legislation or the broadening of knowledge. Accordingly, the findings of this report may be invalidated, wholly or in part by changes beyond our control.

A-Tech representatives are prepared to meet with your staff, to further discuss this project, upon your request. A-Tech trusts that the information presented herein provides the data you require. Should you have any questions or comments please contact A-Tech Consulting, Inc. at (800) 434-1025.

Respectfully submitted,

A-Tech Consulting, Inc.



Robert L. Williams, DPH, CAC, CIEC
Certified Lead Inspector/Assessor #LRC-00004572



Patrick Naffah, CIH

CIH 12604 CP

