

March 3, 2023

Mr. Thomas Touseau
SAU 26, Merrimack School District
Facilities Director
36 McElwain Street
Merrimack, NH 03154

Re: Lead in Water Testing
SAU 26 District
RPF Project No. 221300

Dear Mr. Touseau,

During the period of August 16, 2022, through November 15, 2022, RPF Environmental (RPF) conducted sampling of water fountains and sinks located in six (6) school buildings within Merrimack School District for lead in water. Sampling was conducted by RPF EH&S Consultant, Kenny Arsenault. The results of this survey are presented in the following report and appendices. This report is subject to the limitations presented in Appendix D.

TEST RESULTS

One first draw sample was collected at each of the thirty-seven (37) water fountains and sinks located throughout the six schools. After collection, each water sample was labeled and packaged in a cooler and delivered to Eastern Analytical, Inc. of Concord, NH. The samples were analyzed for Lead EPA method 200.8.

The concentrations of the Lead compounds detected are provided in Tables 1 through 6 of Appendix A, along with the Maximum Contaminant Levels (MCLs) established by New Hampshire Statute Env-Dw 700, as applicable of 0.005 milligrams per liter of water. The full laboratory analytical results are included in Appendix B. The EPA has a guideline for safe drinking water of 0.015 milligrams per liter of water (mg/L).

The following is a list of water outlets with lead concentration exceeding EPA or NH Drinking Water Guidelines from the first round of testing on August 16, 2022:

Merrimack High School	Room D126	0.023 mg/L
Mastricola Elementary School	Room 16	0.0061 mg/L
Upper Mastricola School	Kitchen	0.0081 mg/L
Thorntons Ferry School	Room 7	0.0055 mg/L
Thorntons Ferry School	Room 5	0.0085 mg/L
Thorntons Ferry	Room 1	0.011 mg/L

On September 2, 2022, RPF returned to Thorntons Ferry School to re-test the elevated samples from the locations listed above. After the second round of testing the results were elevated above the NH Water Drinking Guideline and were as follows:

Thorntons Ferry School	Room 7	0.035 mg/L
Thorntons Ferry School	Room 5	0.024 mg/L
Thorntons Ferry School	Room 1	0.018 mg/L

On September 16, 2022, an RPF Environmental consultant returned to Thorntons Ferry school to re-test the elevated sample location in Room 7 and the results was below the NH Drinking water Guideless at <0.001 mg/L.

On October 12, 2022, RPF returned to SAU 26 schools to re-test the elevated samples from Thorntons Ferry, JMUSE and Mastricola Elementary School. JMUSE and Thortons Ferry School Room 5were found to be elevated above the NH Drinking Water Guidelines.

Mastricola Elementary School	Room 16	0.0016 mg/L
Upper Mastricola School	Kitchen	0.95 mg/L
Thorntons Ferry School	Room 5	0.015 mg/L
Thorntons Ferry School	Room 1	0.0035 mg/L

On October 21, 2022, RPF returned to SAU 26 schools to re-test the elevated samples from the locations listed above and the results were as follows:

Upper Mastricola School	Kitchen	0.0013 mg/L
Upper Mastricola School	Supply Line	<0.001 mg/L
Thorntons Ferry School	Room 5	0.0054 mg/L

On November 15, 2022, RPF returned to SAU 26 schools for one final time to re-test the elevated samples from the Thorntons Ferry School. One sample was collected in Thorntons Ferry School Room 5 and the results were below the NH Drinking Water Guidelines and reported at <0.001.

In conclusion, as of the November testing, all water fountains, water faucets and main intakes tested within the SAU 26 district schools are below the NH Drinking Water Guidelines and maximum contaminant action level for lead with varying levels of lead present with a few approaching the NH DES limit. If you have any questions or require additional information on any sample results, please feel free to contact our office. Thank you for utilizing the services of RPF for this important project.

Sincerely,
RPF Environmental



Kara Forsythe, SMS
Sr. EH&S Consultant

Enclosures: Appendix A: Testing Results
 Appendix B: Laboratory Results
 Appendix C: EPA Tool Kit for Lead in Water – Appendix E
 Appendix D: Limitations

221300 SAU 26 081622 Lead in Water Report

APPENDIX A

TABLE 1
SAU 26, MERRIMACK SCHOOL DISTRICT
36 McElwain Street, Merrimack, NH 03054
LEAD IN WATER ANALYSIS RESULTS
Samples Collected: August 16, 2022

Sample ID	School	Sample Description	Lead (mg/L)
081622-D1	Merrimack High School	Room E220	<0.001
081622-D2	Merrimack High School	Room D126	0.023
081622-D3	Mastricola Elementary School	APR	<0.001
081622-D4	Mastricola Elementary School	Room 1B	<0.001
081622-D5	Mastricola Elementary School	Room 4	<0.001
081622-D6	Mastricola Elementary School	Room 11	<0.001
081622-D7	Mastricola Elementary School	Room 16	0.0061
081622-D8	Mastricola Elementary School	Room 24	<0.001
081622-D9	Mastricola Elementary School	Outside E	<0.001
081622-D10	Upper Mastricola School	Kitchen	0.0081
081622-D11	Upper Mastricola School	Gym Fountain	<0.001
081622-D12	Merrimack Middle School	Room 133	<0.001
081622-D13	Merrimack Middle School	Room 137	<0.001
081622-D14	Merrimack Middle School	Room 224	<0.001
081622-D15	Thorntons Ferry School	School Cafeteria	0.0042
081622-D16	Thorntons Ferry School	Room 7	0.0055
081622-D17	Thorntons Ferry School	Room 5	0.0085
081622-D18	Thorntons Ferry School	Room 6	0.0021
081622-D19	Thorntons Ferry School	Room 1	0.011

TABLE 1
(continued)

SAU 26
Merrimack School District

LEAD IN WATER ANALYSIS RESULTS

Samples Collected: August 16, 2022

Sample ID	School	Sample Description	Lead (mg/L)
081622-D20	Thorntons Ferry School	School Faculty	0.0012
081622-D21	Reeds Ferry School	APR	0.0014
081622-D22	Reeds Ferry School	Room 4	0.0031
081622-D23	Reeds Ferry School	Kitchen	<0.001
081622-D24	Reeds Ferry School	Room 28	<0.001
NH	Maximum Containment Level Lead		0.005 mg/l
US EPA	EPA Lead and Copper Rule		0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting
 ug/L: Micrograms per Liter
 mg/L: Milligrams per Liter

TABLE 2
SAU 26, MERRIMACK SCHOOL DISTRICT
36 McElwain Street, Merrimack, NH 03054
LEAD IN WATER ANALYSIS RESULTS
Samples Collected: September 2, 2022

Sample ID	School	Sample Description	Lead (mg/L)
090222-D1	Merrimack High School	Fountain outside of Room D126	0.0025
090222-D2	Thorntons Ferry School	Room 7	0.035
090222-D3	Thorntons Ferry School	Room 5	0.024
090222-D4	Thorntons Ferry School	Room 1	0.018
NH	Maximum Containment Level Lead		0.005 mg/l
US EPA	EPA Lead and Copper Rule		0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting

ug/L: Micrograms per Liter

mg/L: Milligrams per Liter

TABLE 3**SAU 26, MERRIMACK SCHOOL DISTRICT**
36 McElwain Street, Merrimack, NH 03054**LEAD IN WATER ANALYSIS RESULTS****Samples Collected: September 16, 2022**

Sample ID	School	Sample Description	Lead (mg/L)
091622-D1	Thorntons Ferry School	Room 7	<0.001
NH	Maximum Containment Level Lead		0.005 mg/l
US EPA	EPA Lead and Copper Rule		0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting

ug/L: Micrograms per Liter

mg/L: Milligrams per Liter

TABLE 4
SAU 26, MERRIMACK SCHOOL DISTRICT
36 McElwain Street, Merrimack, NH 03054
LEAD IN WATER ANALYSIS RESULTS
Samples Collected: October 12, 2022

Sample ID	School	Sample Description	Lead (mg/L)
101222-D1	Thorntons Ferry School	Room 5	0.015
101222-D2	Thorntons Ferry School	Room 1	0.0035
101222-D3	Mastriola Elementary School	Room 16	0.0016
101222-D4	Upper Mastriola School	Kitchen	0.95
NH		Maximum Containment Level Lead	0.005 mg/l
US EPA		EPA Lead and Copper Rule	0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting

ug/L: Micrograms per Liter

mg/L: Milligrams per Liter

TABLE 5
SAU 26, MERRIMACK SCHOOL DISTRICT
36 McElwain Street, Merrimack, NH 03054
LEAD IN WATER ANALYSIS RESULTS
Samples Collected: October 21, 2022

Sample ID	School	Sample Description	Lead (mg/L)
102122-D1	Thorntons Ferry School	Room 5	0.0054
102122-D2	Upper Mastricola School	Supply Line	<0.001
102122-D3	Upper Mastricola School	Kitchen	0.0013
NH		Maximum Containment Level Lead	0.005 mg/l
US EPA		EPA Lead and Copper Rule	0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting

ug/L: Micrograms per Liter

mg/L: Milligrams per Liter

TABLE 6**SAU 26, MERRIMACK SCHOOL DISTRICT**
36 McElwain Street, Merrimack, NH 03054**LEAD IN WATER ANALYSIS RESULTS****Samples Collected: November 15, 2022**

Sample ID	School	Sample Description	Lead (mg/L)
111522-D1	Thorntons Ferry School	Room 5	<0.001
NH	Maximum Containment Level Lead		0.005 mg/l
US EPA	EPA Lead and Copper Rule		0.015 mg/L

21.0572

Notes: MCL: Maximum Contaminant Level is the highest level of a contaminant that is allowed in drinking water in accordance with NH Administrative Statute Env-Dw 700 Water Quality: Standards, Monitoring, Treatment, Compliance and Reporting

ug/L: Micrograms per Liter

mg/L: Milligrams per Liter

APPENDIX B



Eastern Analytical, Inc.

professional laboratory and drilling services

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 247665
Client Identification: SAU 26 | 22.1300
Date Received: 8/16/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the written approval of the laboratory.

The following standard abbreviations and conventions apply to all EAI reports:

- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

Certifications:

Eastern Analytical, Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012), New York (12072), West Virginia (9910C) and Alabama (41620). Please refer to our website at www.easternanalytical.com for a copy of our certificates and accredited parameters.

References:

- EPA 600/4-79-020, 1983
- Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd edition or noted revision year.
- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

8.22.22
Date



SAMPLE CONDITIONS PAGE

EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Temperature upon receipt (°C): 20.5

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
247665.01	Merrimack HS Room E220 081622-D1	8/16/22	8/16/22 07:00	aqueous		Adheres to Sample Acceptance Policy
247665.02	Merrimack HS Room D126 081622-D2	8/16/22	8/16/22 07:15	aqueous		Adheres to Sample Acceptance Policy
247665.03	James Mastricola Elementary-APR 081622-D3	8/16/22	8/16/22 07:30	aqueous		Adheres to Sample Acceptance Policy
247665.04	James Mastricola Elementary -1B 081622-D4	8/16/22	8/16/22 07:35	aqueous		Adheres to Sample Acceptance Policy
247665.05	James Mastricola Elementary-Room 4 081622-D5	8/16/22	8/16/22 07:40	aqueous		Adheres to Sample Acceptance Policy
247665.06	James Mastricola Elementary-Room 11 081622-D6	8/16/22	8/16/22 07:45	aqueous		Adheres to Sample Acceptance Policy
247665.07	James Mastricola Elementary-Room 16 081622-D7	8/16/22	8/16/22 07:45	aqueous		Adheres to Sample Acceptance Policy
247665.08	James Mastricola Elementary-Room 24 081622-D8	8/16/22	8/16/22 07:50	aqueous		Adheres to Sample Acceptance Policy
247665.09	James Mastricola Elementary-Outside E 081622-D9	8/16/22	8/16/22 07:55	aqueous		Adheres to Sample Acceptance Policy
247665.1	James Mastricola Upper-Kitchen 081622-D10	8/16/22	8/16/22 08:00	aqueous		Adheres to Sample Acceptance Policy
247665.11	James Mastricola Upper-Smith Gym Fountain 081622-D11	8/16/22	8/16/22 08:00	aqueous		Adheres to Sample Acceptance Policy
247665.12	Merrimack MS 133 081622-D12	8/16/22	8/16/22 08:30	aqueous		Adheres to Sample Acceptance Policy
247665.13	Merrimack MS 137 081622-D13	8/16/22	8/16/22 08:30	aqueous		Adheres to Sample Acceptance Policy
247665.14	Merrimack MS 224 081622-D14	8/16/22	8/16/22 08:35	aqueous		Adheres to Sample Acceptance Policy
247665.15	Thorntons Ferry School Cafeteria 081622-D15	8/16/22	8/16/22 09:00	aqueous		Adheres to Sample Acceptance Policy
247665.16	Thorntons Ferry School Room 7 081622-D16	8/16/22	8/16/22 09:05	aqueous		Adheres to Sample Acceptance Policy
247665.17	Thorntons Ferry School Room 5 081622-D17	8/16/22	8/16/22 09:05	aqueous		Adheres to Sample Acceptance Policy
247665.18	Thorntons Ferry School Room 6 081622-D18	8/16/22	8/16/22 09:10	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.



SAMPLE CONDITIONS PAGE

EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Temperature upon receipt (°C): 20.5

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
247665.19	Thorntons Ferry School Room 1 081622-D19	8/16/22	8/16/22 09:10	aqueous		Adheres to Sample Acceptance Policy
247665.2	Thorntons Ferry School Faculty 081622-D20	8/16/22	8/16/22 09:15	aqueous		Adheres to Sample Acceptance Policy
247665.21	Reeds Ferry School-APR 081622-D21	8/16/22	8/16/22 09:35	aqueous		Adheres to Sample Acceptance Policy
247665.22	Reeds Ferry School-Room 4 081622-D22	8/16/22	8/16/22 09:40	aqueous		Adheres to Sample Acceptance Policy
247665.23	Reeds Ferry School-Kitchen 081622-D23	8/16/22	8/16/22 09:40	aqueous		Adheres to Sample Acceptance Policy
247665.24	Reeds Ferry School-Room 28 081622-D24	8/16/22	8/16/22 09:45	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.



LABORATORY REPORT

EAI ID#: **247665**

Client: **RPF Environmental, Inc.**

Client Designation: **SAU 26 | 22.1300**

Sample ID:	Merrimack HS Room E220 081622-D1	Merrimack HS Room D126 081622-D2	James Mastricola Elementary-APR 081622-D3						
Lab Sample ID:	247665.01	247665.02	247665.03						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical		Date of			
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Analysis	Method	Analyst	
Lead	< 0.001	0.023	< 0.001	AqTot	mg/L	8/18/22	200.8	DS	

Sample ID:	James Mastricola Elementary-1B 081622- D4	James Mastricola Elementary-Room 4 081622-D5	James Mastricola Elementary-Room 11 081622-D6						
Lab Sample ID:	247665.04	247665.05	247665.06						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical		Date of			
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Analysis	Method	Analyst	
Lead	< 0.001	< 0.001	< 0.001	AqTot	mg/L	8/18/22	200.8	DS	



LABORATORY REPORT

EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Sample ID:	James Mastricola Elementary-Room 16 081622-D7	James Mastricola Elementary-Room 24 081622-D8	James Mastricola Elementary-Outside E 081622-D9						
Lab Sample ID:	247665.07	247665.08	247665.09						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of	Method	Analyst	
Lead	0.0061	< 0.001	< 0.001	AqTot	mg/L	8/18/22	200.8	DS	

Sample ID:	James Mastricola Upper- Kitchen 081622-D10	James Mastricola Upper-Smith Gym Fountain 081622- D11	Merrimack MS 133 081622-D12						
Lab Sample ID:	247665.1	247665.11	247665.12						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of	Method	Analyst	
Lead	0.0081	< 0.001	< 0.001	AqTot	mg/L	8/18/22	200.8	DS	



LABORATORY REPORT

EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Sample ID:	Merrimack MS 137 081622-D13	Merrimack MS 224 081622-D14	Thorntons Ferry School Cafeteria 081622-D15						
Lab Sample ID:	247665.13	247665.14	247665.15						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of	Method	Analyst	
Lead	< 0.001	< 0.001	0.0042	AqTot	mg/L	8/18/22	200.8	DS	

Sample ID:	Thorntons Ferry School Room 7 081622-D16	Thorntons Ferry School Room 5 081622-D17	Thorntons Ferry School Room 6 081622-D18						
Lab Sample ID:	247665.16	247665.17	247665.18						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of	Method	Analyst	
Lead	0.0055	0.0085	0.0021	AqTot	mg/L	8/18/22	200.8	DS	



LABORATORY REPORT

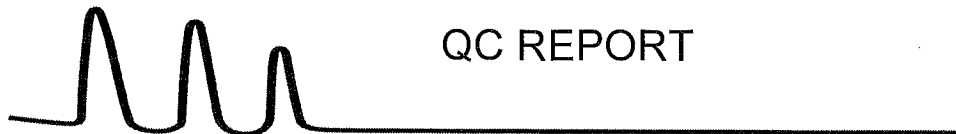
EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Sample ID:	Thorntons Ferry School Room 1 081622-D19	Thorntons Ferry School Faculty 081622-D20	Reeds Ferry School- APR 081622-D21						
Lab Sample ID:	247665.19	247665.2	247665.21						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of Analysis	Method	Analyst	
Lead	0.011	0.0012	0.0014	AqTot	mg/L	8/18/22	200.8	DS	

Sample ID:	Reeds Ferry School- Room 4 081622-D22	Reeds Ferry School- Kitchen 081622-D23	Reeds Ferry School- Room 28 081622- D24						
Lab Sample ID:	247665.22	247665.23	247665.24						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	8/16/22	8/16/22	8/16/22	Analytical					
Date Received:	8/16/22	8/16/22	8/16/22	Matrix	Units	Date of Analysis	Method	Analyst	
Lead	0.0031	< 0.001	< 0.001	AqTot	mg/L	8/18/22	200.8	DS	



QC REPORT

EAI ID#: 247665

Client: RPF Environmental, Inc.

Client Designation: SAU 26 | 22.1300

Parameter Name	Blank	LCS	LCSD	Units	Date of Analysis	Limits	RPD	Method
Lead	< 0.001	0.18 (92 %R)	NA	mg/L	8/18/22	85 - 115	20	200.8
Lead	< 0.001	0.19 (94 %R)	NA	mg/L	8/17/22	85 - 115	20	200.8

*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.

Chain-of-Custody Record

Page 1 of 3

SAMPLE ID	DATE / TIME OF COLLECTION	Lead
081622-D1	A Merrimack HS Room E 220	✓
081622-D2	D126	✓
-D3	James Mastriicola Elementary - APB	✓
-D4	- 1B	✓
-D5	- Room 4	✓
-D6	- Room 11	✓
-D7	- Room 16	✓
-D8	- Room 24	✓
-D9	- Outside E	✓
-D10	James Mastriicola Upper - Kitchen	✓
-D11	- Smiths Gym fountain	✓

PROJECT MANAGER Kara ForsytheCOMPANY NAME RRE EnvironmentalADDRESS 320 First Nt TurnpikeCITY Northwood STATE NH ZIP CODE 03026

PHONE _____

E-MAIL ADDRESS Kara@arrpt.comMONITORING LOCATION IDENTIFIER 22.1300 SAN 26

AUTHORIZED TO UPLOAD TO THE STATE (YES / NO)

TEMPERATURE 20.5
ON ICE ☒ YES ☐ NOCollected by: (Print): Kenny AssmannRelinquished by: 7/2/22Received by: Autumn

8/16/22 1119

Relinquished by:

Received by:

Chain-of-Custody Record

Page 2 of 3

SAMPLE ID	DATE / TIME OF COLLECTION	Lead
081622-D12	Merrimack MS 133	✓
-D13	137	✓
-D14	224	✓
-D15	Thosmtons Ferry Stool Cafeteria	✓
-D16	Room 7	✓
-D17	Room 5	✓
-D18	Room 6	✓
-D19	Room 1	✓
-D20	Faculty	✓

PROJECT MANAGER Kara Forsythe
 COMPANY NAME RPF Environmental
 ADDRESS 320 First NH Turnpike
 CITY Norham Road STATE NH ZIP CODE 03261
 PHONE _____
 E-MAIL ADDRESS Kara@airpf.com

MONITORING LOCATION IDENTIFIER 221300 SHU 26

AUTHORIZED TO UPLOAD TO THE STATE (YES / NO)

TEMPERATURE 70.5
 ON ICE (YES NO)

Collected by: (Print): Karen Arsenault
 Relinquished by: [Signature]
 Received by: Mulhern
8/16/22 1119
 Relinquished by:
 Received by:

Page 11 of 11

[illegible]

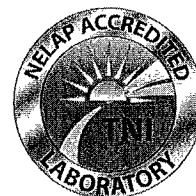
Rev01 04/01/2022



Eastern Analytical, Inc.

professional laboratory and drilling services

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 248476
Client Identification: SAU 26, Merrimack SD | 22.1300
Date Received: 9/2/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

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- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R: % Recovery

Certifications:

Eastern Analytical, Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012), New York (12072), West Virginia (9910C) and Alabama (41620). Please refer to our website at www.easternanalytical.com for a copy of our certificates and accredited parameters.


References:

- EPA 600/4-79-020, 1983
- Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd edition or noted revision year.
- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

9.9.22
Date



SAMPLE CONDITIONS PAGE

EAI ID#: 248476

Client: RPF Environmental, Inc.

Client Designation: SAU 26, Merrimack SD | 22.1300

Temperature upon receipt (°C): 4.8

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
248476.01	090222-D1	9/2/22	9/2/22 07:24	aqueous		Adheres to Sample Acceptance Policy
248476.02	090222-D2	9/2/22	9/2/22 07:42	aqueous		Adheres to Sample Acceptance Policy
248476.03	090222-D3	9/2/22	9/2/22 07:44	aqueous		Adheres to Sample Acceptance Policy
248476.04	090222-D4	9/2/22	9/2/22 07:47	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.



LABORATORY REPORT

EAI ID#: 248476

Client: RPF Environmental, Inc.
Client Designation: SAU 26, Merrimack SD | 22.1300

Sample ID:	090222-D1	090222-D2	090222-D3	090222-D4					
Lab Sample ID:	248476.01	248476.02	248476.03	248476.04					
Matrix:	aqueous	aqueous	aqueous	aqueous					
Date Sampled:	9/2/22	9/2/22	9/2/22	9/2/22	Analytical Matrix	Units	Date of Analysis	Method	Analyst
Date Received:	9/2/22	9/2/22	9/2/22	9/2/22					
Lead	0.0025	0.035	0.024	0.018	AqTot	mg/L	9/6/22	200.8	DS



QC REPORT

EAI ID#: **248476**

Client: **RPF Environmental, Inc.**

Client Designation: **SAU 26, Merrimack SD | 22.1300**

Parameter Name	Blank	LCS	LCSD	Date of		Limits	RPD	Method
				Units	Analysis			
Lead (Aqtot)	< 0.001	0.41 (102 %R)	NA	mg/L	9/6/22	85 - 115	20	200.8
Lead (DWtot)	< 0.001	0.20 (98 %R)	NA	mg/L	9/6/22	85 - 115	20	200.8

*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.

CHAIN-OF-CUSTODY RECORD

BOLD FIELDS REQUIRED. PLEASE CIRCLE REQUESTED ANALYSIS.

248476

SAMPLE I.D.	SAMPLING DATE/TIME *IF COMPOSITE, INDICATE BOTH START & FINISH DATE/TIME	MATRIX (SEE BELOW)	GRAB/% COMPOSITE	VOC		SVOC		TCMP	INORGANICS		MICRO	METALS	OTHER	NOTES MOH VIAL #					
				524.2 524.2 MTBE ONLY 8260 624 VTICS 1, 4 DIOXANE 8021	8015 GRO MAVPH	8270 625 ABN PAH EDB DBCP	TPH8100 LI L2		8015 DRO MAEPH	PEST 608 PCB 608 PEST 8081 PCB 8082					OIL & GREASE 1664 TPH 1664	TCMP 1311 ABN METALS VOC PEST HERB	BOD CBOD TS TSS TDS	Br Cl F SO ₄ NO ₂ NO ₃ NO ₂ NO ₂	TKN NH ₃ TN T. PHOS. O. PHOS.
090222-D1	9/2 7:24																		
-D2	7:42																		
-D3	7:44																		
-D4	7:47																		

MATRIX: A-AIR; S-SOIL; GW-GROUND WATER; SW-SURFACE WATER; DW-DRINKING WATER;
WM-WASTE WATER
PRESERVATIVE: H-HCL; N-HNO₃; S-H₂SO₄; Na-NaOH; M-MEOH

PROJECT MANAGER: Kara Forsythe
COMPANY: RRT Environmental
ADDRESS: 320 First St Hampshire
CITY: Northwood STATE: NH ZIP: 03261
PHONE: _____ EXT: _____
E-MAIL: Kara@airpt.com
SITE NAME: San 261 Merrimack SD
PROJECT #: 22.1306
STATE: NH MA ME VT OTHER: _____
REGULATORY PROGRAM: NPDES: RGP POTW STORMWATER OR
GMP, Oil FUND, BROWNFIELD OR OTHER: _____
QUOTE #: _____ PO #: _____

QA/QC REPORTING	REPORTING OPTIONS	TURN AROUND TIME
A B C MA MCP	PRELIMS: YES OR NO ELECTRONIC OPTIONS PDF EXCEL EQUIS OTHER _____	24hr* 48hr* 3-4 Days* 5 Day 7 Day 10 Day *Pre-approval Required

SAMPLER(S): Kenny Arsenault
RELINQUISHED BY: Kenny Arsenault DATE: 9/2 8:40 RECEIVED BY: [Signature]

RELINQUISHED BY: _____ DATE: _____ TIME: _____ RECEIVED BY: _____
RELINQUISHED BY: _____ DATE: _____ TIME: _____ RECEIVED BY: _____

METALS: 8 RCRA 13 PP FE, MN PB, CU
OTHER METALS: Pb
SAMPLES FIELD FILTERED? ☐ YES ☐ NO
NOTES: (IE SPECIAL DETECTION LIMITS, BILLING INFO, IF DIFFERENT)

SITE HISTORY: _____
SUSPECTED CONTAMINATION: _____
FIELD READINGS: _____



Eastern Analytical, Inc.

professional laboratory and drilling services

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 249194
Client Identification: SAU 26, Merrimack - Thorntons | 22.1300
Date Received: 9/16/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the written approval of the laboratory.

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- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

Certifications:

Eastern Analytical, Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012), New York (12072), West Virginia (9910C) and Alabama (41620). Please refer to our website at www.easternanalytical.com for a copy of our certificates and accredited parameters.


References:

- EPA 600/4-79-020, 1983
- Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd edition or noted revision year.
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- Hach Water Analysis Handbook, 4th edition, 1992

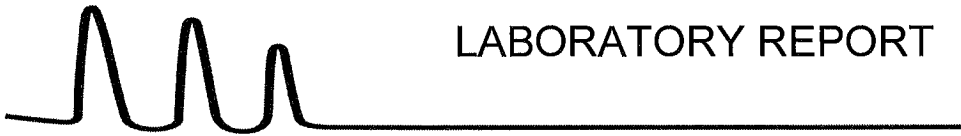
If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

9.22.22
Date



LABORATORY REPORT

EAI ID#: 249194

Client: RPF Environmental, Inc.
Client Designation: SAU 26, Merrimack - Thorntons | 22.1300

Sample ID: 091622-D01

Lab Sample ID: 249194.01

Matrix: aqueous

Date Sampled: 9/16/22

Date Received: 9/16/22

Lead < 0.001

Analytical Matrix	Units	Date of Analysis	Method	Analyst
AqTot	mg/L	9/20/22	200.8	DS



QC REPORT

EAI ID#: **249194**

Client: **RPF Environmental, Inc.**

Client Designation: **SAU 26, Merrimack - Thorntons | 22.1300**

Parameter Name	Blank	LCS	LCSD	Units	Date of Analysis	Limits	RPD	Method
Lead	< 0.001	0.20 (100 %R)		NA mg/L	9/20/22	85 - 115	20	200.8

*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.



Eastern Analytical, Inc.

professional laboratory and drilling services

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 250509
Client Identification: SAU 26 Merrimack | 22.1300
Date Received: 10/12/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

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- Hach Water Analysis Handbook, 4th edition, 1992

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We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

10.18.22
Date



SAMPLE CONDITIONS PAGE

EAI ID#: 250509

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack | 22.1300

Temperature upon receipt (°C): 5.1

Acceptable temperature range (°C): 0-6

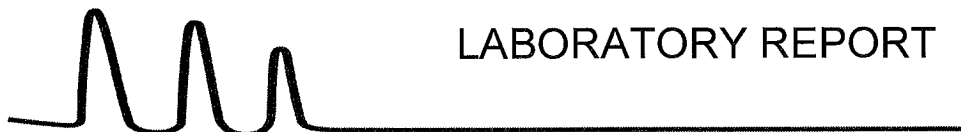
Received on ice or cold packs (Yes/No): Y

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
250509.01	D1 Thorntons Rm 5	10/12/22	10/12/22 07:23	aqueous		Adheres to Sample Acceptance Policy
250509.02	D2 Thorntons Rm 1	10/12/22	10/12/22 07:25	aqueous		Adheres to Sample Acceptance Policy
250509.03	D3 ME Rm 16	10/12/22	10/12/22 07:45	aqueous		Adheres to Sample Acceptance Policy
250509.04	D4 JMUSE Kitchen	10/12/22	10/12/22 07:50	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
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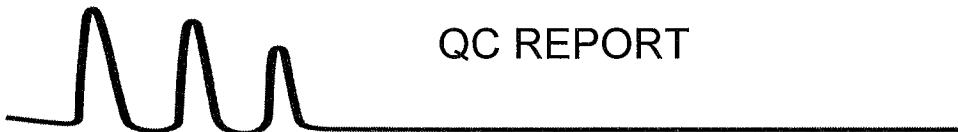
LABORATORY REPORT

EAI ID#: 250509

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack | 22.1300

Sample ID:	D1 Thorntons Rm 5	D2 Thorntons Rm 1	D3 ME Rm 16	D4 JMUSE Kitchen					
Lab Sample ID:	250509.01	250509.02	250509.03	250509.04					
Matrix:	aqueous	aqueous	aqueous	aqueous					
Date Sampled:	10/12/22	10/12/22	10/12/22	10/12/22	Analytical Matrix	Units	Date of Analysis	Method	Analyst
Date Received:	10/12/22	10/12/22	10/12/22	10/12/22					
Lead	0.015	0.0035	0.0016	0.95	AqTot	mg/L	10/14/22	200.8	DS



QC REPORT

EAI ID#: 250509

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack | 22.1300

Parameter Name	Blank	LCS	LCSD	Units	Date of Analysis	Limits	RPD	Method
Lead	< 0.001	0.21 (104 %R)		NA mg/L	10/14/22	85 - 115	20	200.8

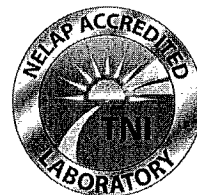
*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.



Eastern Analytical, Inc.

professional laboratory and drilling services

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 251075
Client Identification: SAU 26 Merrimack SD | 22.1300
Date Received: 10/21/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

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- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

10.28.22
Date



SAMPLE CONDITIONS PAGE

EAI ID#: 251075

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack SD | 22.1300

Temperature upon receipt (°C): 13.1

Received on ice or cold packs (Yes/No): Y

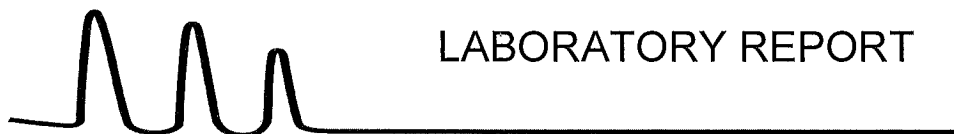
Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
251075.01	D01 Thorntons Rm 5	10/21/22	10/21/22 07:16	aqueous		Adheres to Sample Acceptance Policy
251075.02	D02 JMUES Supply Line	10/21/22	10/21/22 07:32	aqueous		Adheres to Sample Acceptance Policy
251075.03	D03 JMUES Kitchen	10/21/22	10/21/22 08:07	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

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- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.

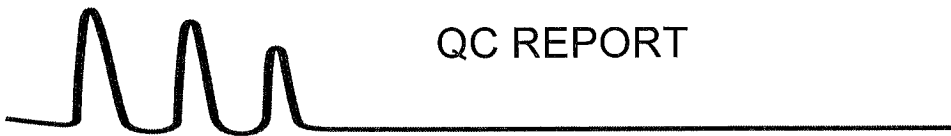


LABORATORY REPORT

EAI ID#: 251075

Client: RPF Environmental, Inc.
Client Designation: SAU 26 Merrimack SD | 22.1300

Sample ID:	D01 Thorntons Rm 5	D02 JMUES Supply Line	D03 JMUES Kitchen						
Lab Sample ID:	251075.01	251075.02	251075.03						
Matrix:	aqueous	aqueous	aqueous						
Date Sampled:	10/21/22	10/21/22	10/21/22	Analytical					
Date Received:	10/21/22	10/21/22	10/21/22	Matrix	Units	Date of			
						Analysis	Method	Analyst	
Lead	0.0054	< 0.001	0.0013	AqTot	mg/L	10/27/22	200.8	DS	



QC REPORT

EAI ID#: 251075

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack SD | 22.1300

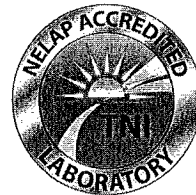
Parameter Name	Blank	LCS	LCSD	Units	Date of Analysis	Limits	RPD	Method
Lead	< 0.001	0.20 (101 %R)		NA mg/L	10/27/22	85 - 115	20	200.8

*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.

251075

EMAIL: CUSTOMERSERVICE@EASTERNANALYTICAL.COM | WWW.EASTERNANALYTICAL.COM

Kara Forsythe
RPF Environmental, Inc.
320 First NH Turnpike
Northwood, NH 03261



Laboratory Report for:

Eastern Analytical, Inc. ID: 252315
Client Identification: SAU 26 Merrimack SD | 22.1300
Date Received: 11/15/2022

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

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- > : "greater than" followed by the reporting limit
- %R : % Recovery

Certifications:

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References:

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- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992
- ASTM International

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,


Lorraine Olashaw, Lab Director

11.21.22
Date



SAMPLE CONDITIONS PAGE

EAI ID#: 252315

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack SD | 22.1300

Temperature upon receipt (°C): 5.1

Received on ice or cold packs (Yes/No): Y

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
252315.01	111522-D1 Thorntons Ferry RMS	11/15/22	11/15/22 07:20	aqueous		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.
- Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.
- Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.
- Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.



LABORATORY REPORT

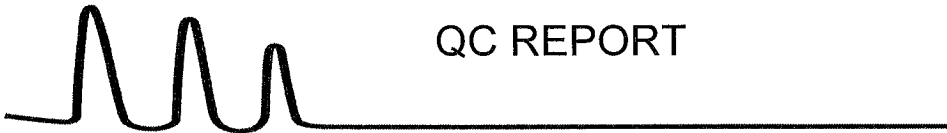
EAI ID#: 252315

Client: RPF Environmental, Inc.
Client Designation: SAU 26 Merrimack SD | 22.1300

Sample ID: 111522-D1 Thorntons
Ferry RMS

Lab Sample ID: 252315.01
Matrix: aqueous
Date Sampled: 11/15/22
Date Received: 11/15/22
Lead < 0.001

Analytical Matrix	Units	Date of Analysis	Method	Analyst
AqTot	mg/L	11/17/22	200.8	DS



QC REPORT

EAI ID#: 252315

Client: RPF Environmental, Inc.

Client Designation: SAU 26 Merrimack SD | 22.1300

Parameter Name	Blank	LCS	LCSD	Units	Date of Analysis	Limits	RPD	Method
Lead	< 0.001	0.19 (95 %R)	NA	mg/L	11/17/22	85 - 115	20	200.8

*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted, flagged data does not impact the sample data.

Page 5 of 5

(WHITE: Lab Conv GREEN: Customer Conv)

APPENDIX C

Appendix E – Water Cooler Summary

The Lead Contamination Control Act (LCCA), which amended the Safe Drinking Water Act, was signed into law on October 31, 1988 (P.L. 100-572). The potential of water coolers to supply lead to drinking water in schools and child care centers was a principal focus of this legislation. Specifically, the LCCA mandated that the Consumer Product Safety Commission (CPSC) order the repair, replacement, or recall and refund of drinking water coolers with lead-lined water tanks. In addition, the LCCA called for a ban on the manufacture or sale in interstate commerce of drinking water coolers that are not lead-free. Civil and criminal penalties were established under the law for violations of this ban. With respect to a water cooler that may come in contact with drinking water, the LCCA defined the term “lead-free” to mean:

“not more than 8 percent lead, except that no drinking water cooler which contains any solder, flux, or storage tank interior surface which may come in contact with drinking water shall be considered lead-free if the solder, flux, or storage tank interior surface contains more than 0.2 percent lead.”

Another component of the LCCA was the requirement that EPA publish and make available to the states a list of drinking water coolers, by brand and model, that are not lead-free. In addition, EPA was to publish and make available to the states a separate list of the brand and model of water coolers with a lead-lined tank. EPA is required to revise and republish these lists as new information or analyses become available.

Based on responses to a Congressional survey in the winter of 1988, three major manufacturers, the Halsey Taylor Company, EBCO Manufacturing Corporation, and Sunroc Corporation, indicated that lead solder had been used in at least some models of their drinking water coolers. On April 10, 1988, EPA proposed in the *Federal Register* (at 54 *FR* 14320) lists of drinking water coolers with lead-lined tanks and coolers that are not lead-free. Public comments were received on the notice, and the list was revised and published on January 18, 1990 (Part III, 55 *FR* 1772). See *Table E-2 for a list of water coolers and lead components*.

Prior to publication of the January 1990 list, EPA determined that Halsey Taylor was the only manufacturer of water coolers with lead-lined tanks.¹ Table E-1 presents a listing of model numbers of the Halsey Taylor drinking water coolers with lead-lined tanks that had been identified by EPA as of January 18, 1990.

¹Based upon an analysis of 22 water coolers at a US Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.

Since the LCCA required the CPSC to order manufacturers of coolers with lead-lined tanks to repair, replace or recall and provide a refund of such coolers, the CPSC negotiated such an agreement with Halsey Taylor through a consent order published on June 1, 1990 (at 55 *FR* 22387). The consent agreement calls on Halsey Taylor to provide a replacement or refund program that addresses all the water coolers listed in Table E-2 as well as “all tank-type models of drinking water coolers manufactured by Halsey Taylor, whether or not those models are included on the present or on a future EPA list.” Under the consent order, Halsey Taylor agreed to notify the public of the replacement and refund program for all tank type models.

SPECIAL NOTE:

Experience indicates that newly installed brass plumbing components containing 8 percent or less lead, as allowed by the SDWA, can contribute high lead levels to drinking water for a considerable period after installation. U.S. water cooler manufacturers have notified EPA that since September 1993, the components of water coolers that come in contact with drinking water have been made with non-lead alloy materials. These materials include stainless steel for fittings and water control devices, brass made of 60 percent copper and 40 percent zinc, terillium copper, and food grade plastic.

Currently, a company formerly associated with Halsey Taylor, Scotsman Ice Systems, has assumed responsibility for replacement of lead-line coolers previously marketed by Halsey Taylor. See below for the address of Scotsman Ice Systems.

Scotsman Ice Systems
775 Corporate Woods Parkway
Vernon Hills, IL 60061
PH: (800) SCOTSMAN or 800-726-8762
PH: (847) 215-4500

Table E-1
Halsey Taylor Water Coolers With Lead-Lined Tanks²

The following six model numbers have one or more units in the model series with lead-lined tanks:

WM8A WT8A GC10ACR GC10A GC5A RWM13A

The following models and serial numbers contain lead-lined tanks:

<u>WM14A Serial No.</u> <u>843034</u>	<u>WM14A Serial No.</u> <u>843006</u>	<u>WT11A Serial No.</u> <u>222650</u>
<u>WT21A Serial No.</u> <u>64309550</u>	<u>WT21A Serial No.</u> <u>64309542</u>	<u>LL14A Serial No.</u> <u>64346908</u>

²Based upon an analysis of 22 water coolers at a US Navy facility and subsequent data obtained by EPA, EPA believes the most serious cooler contamination problems are associated with water coolers that have lead-lined tanks.

Table E-2
Water Coolers With Other Lead Components

EBCO Manufacturing

All pressure bubbler water coolers with shipping dates from 1962 through 1977 have a bubbler valve containing lead. The units contain a single, 50-50 tin-lead solder joint on the bubbler valve. Model numbers for coolers in this category are not available.

The following models of pressure bubbler coolers produced from 1978 through 1981 contain one 50-50 tin-lead solder joint each.

<u>CP3</u>	<u>DP15W</u>	<u>DPM8</u>	<u>7P</u>	<u>13P</u>	<u>DPM8H</u>	<u>DP15M</u>	<u>DP3R</u>	<u>DP8A</u>
<u>DP16M</u>	<u>DP5S</u>	<u>C10E</u>	<u>PX-10</u>	<u>DP7S</u>	<u>DP13SM</u>	<u>DP7M</u>	<u>DP7MH</u>	<u>DP7WMD</u>
<u>WTC10</u>	<u>DP13M-60</u>	<u>DP14M</u>	<u>CP10-50</u>	<u>CP5</u>	<u>CP5M</u>	<u>DP15MW</u>	<u>DP3R</u>	<u>DP14S</u>
<u>DP20-50</u>	<u>DP7SM</u>	<u>DP10X</u>	<u>DP13A</u>	<u>DP13A-50</u>	<u>EP10F</u>	<u>DP5M</u>	<u>DP10F</u>	<u>CP3H</u>
<u>CP3-50</u>	<u>DP13M</u>	<u>DP3RH</u>	<u>DP5F</u>	<u>CP3M</u>	<u>EP5F</u>	<u>13PL</u>	<u>DP8AH</u>	<u>DP13S</u>
<u>CP10</u>	<u>DP20</u>	<u>DP12N</u>	<u>DP7WM</u>	<u>DP14A-50/60</u>				

Halsey Taylor

1. Lead solder was used in these models of water coolers manufactured between 1978 and the last week of 1987:

<u>WMA-1</u>	<u>SCWT/SCWT-A</u>	<u>SWA-1</u>	<u>DC/DHC-1</u>
<u>S3/5/10D</u>	<u>BFC-4F/7F/4FS/7FS</u>	<u>S300/500/100D</u>	

2. The following coolers manufactured for Haws Drinking Faucet Company (Haws) by Halsey Taylor from November 1984 through December 18, 1987, are not lead-free because they contain 2 tin-lead solder joints. The model designations for these units are as follows:

<u>HC8WT</u>	<u>HC14F</u>	<u>HC6W</u>	<u>HWC7D</u>	<u>HC8WTH</u>	<u>HC14F</u> <u>H</u>	<u>HC8W</u>	<u>HC2F</u>	<u>HC14WT</u>
<u>HC14FL</u>	<u>HC14W</u>	<u>HC2FH</u>	<u>HC14WTH</u>	<u>HC8FL</u>	<u>HC4F</u>	<u>HC5F</u>	<u>HC14WL</u>	<u>HCBF7D</u>
<u>HC4FH</u>	<u>HC10F</u>	<u>HC16WT</u>	<u>HCBF7HO</u>	<u>HC8F</u>	<u>HC8FH</u>	<u>HC4W</u>	<u>HWC7</u>	

If you have one of the Halsey Taylor water coolers noted in Table E-2, contact Scotsman Ice Systems (*address and phone noted above*) to learn more about the requirements surrounding their replacement and rebate program.

APPENDIX D

LIMITATIONS

1. The observations and conclusions presented in the Report were based solely upon the services described herein, and not on scientific tasks or procedures beyond the RPF Environmental, Inc. Scope of Work (SOW) as discussed in the proposal and/or agreement. The conclusions and recommendations are based on visual observations and testing, limited as indicated in the Report, and were arrived at in accordance with generally accepted standards of industrial hygiene practice and asbestos professionals. The nature of this survey or monitoring service was limited as indicated herein and in the report or letter of findings. Further testing, survey, and analysis is required to provide more definitive results and findings.
2. For site survey work, observations were made of the designated accessible areas of the site as indicated in the Report. While it was the intent of RPF to conduct a survey to the degree indicated, it is important to note that not all suspect ACM material in the designated areas were specifically assessed and visibility was limited, as indicated, due to the presence of furnishings, equipment, solid walls and solid or suspended ceilings throughout the facility and/or other site conditions. Asbestos or hazardous material may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition proceeds. Access and observations relating to electrical and mechanical systems within the building were restricted or not feasible to prevent damage to the systems and minimize safety hazards to the survey team.
3. Although assumptions may have been stated regarding the potential presence of inaccessible or concealed asbestos and other hazardous material, full inspection findings for all asbestos and other hazardous material requires the use of full destructive survey methods to identify possible inaccessible suspect material and this level of survey was not included in the SOW for this project. For preliminary survey work, sampling and analysis as applicable was limited and a full survey throughout the site was not performed. Only the specific areas and /or materials indicated in the report were included in the SOW. This inspection did not include a full hazard assessment survey, full testing or bulk material, or testing to determine current dust concentrations of asbestos in and around the building. Inspection results should not be used for compliance with current EPA and State asbestos in renovation/demolition requirements unless specifically stated as intended for this use in the RPF report and considering the limitations as stated therein and within this limitations document.
4. Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas. The survey results only apply to areas specifically accessed by RPF during the survey. Interiors of mechanical equipment and other building or process equipment may also have asbestos and other hazardous material present and were not included in this inspection. For renovation and demolition work, further inspection by qualified personnel will be required during the course of construction activity to identify suspect material not previously documented at the site or in this survey report. Bordering properties were not investigated and comprehensive file review and research was not performed.
5. For lead in paint, observations were made of the designated accessible areas of the site as indicated in the Report. Limited testing may have been performed to the extent indicated in the text of the report. In order to conduct thorough hazard assessments for lead exposures, representative surface dust testing, air monitoring and other related testing throughout the building, should be completed. This type of in depth testing and analysis was beyond the scope of services for the initial inspection. For lead surveys with XRF readings, it is recommended that surfaces found to have LBP or trace amount of lead detected with readings of less than 4 mg/cm² be confirmed using laboratory analysis if more definitive results are required. Substrate corrections involving destructive sampling or damage to existing surfaces (to minimize XRF read-through) were not completed. In some instances, destructive testing may be required for more accurate results. In addition, depending on the specific thickness of the paint films on different areas of a building component, differing amounts of wear, and other factors, XRF readings can vary slightly, even on the same building component. Unless otherwise specifically stated in the scope of services and final report, lead testing performed is not intended to comply with other state and federal regulations pertaining to childhood lead poisoning regulations.

6. Air testing is to be considered a “snap shot” of conditions present on the day of the survey with the understanding that conditions may differ at other times or dates or operational conditions for the facility. Results are also limited based on the specific analytical methods utilized. For phase contrast microscopy (PCM) total airborne fiber testing, more sensitive asbestos-specific analysis using transmission electron microscopy (TEM) can be performed upon request.
7. For asbestos bulk and dust testing, although polarize light microscopy (PLM) is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, some industry studies have found that PLM may not be sensitive enough to detect all of the asbestos fibers in certain nonfriable material, vermiculate type insulation, soils, surface dust, and other materials requiring more sensitive analysis to identify possible asbestos fibers. In the event that more definitive results are requested, RPF recommends that confirmation testing be completed using TEM methods or other analytical methods as may be applicable to the material. Detection of possible asbestos fibers may be made more difficult by the presence of other non-asbestos fibrous components such as cellulose, fiber glass, etc., by binder/matrix materials which may mask or obscure fibrous components, and/or by exposure to conditions capable of altering or transforming asbestos. PLM can show significant bias leading to false negatives and false positives for certain types of materials. PLM is limited by the visibility of the asbestos fibers. In some samples the fibers may be reduced to a diameter so small or masked by coatings to such an extent that they cannot be reliably observed or identified using PLM.
8. For hazardous building material inspection or survey work, RPF followed applicable industry standards; however, RPF does not warrant or certify that all asbestos or other hazardous materials in or on the building has been identified and included in this report. Various assumptions and limitations of the methods can result in missed materials or misidentification of materials due to several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspect, assumptions regarding the determination of homogenous groups of suspect material, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar material.
9. Full assessments often requires multiple rounds of sampling over a period of time for air, bulk material, surface dust and water. Such comprehensive testing was beyond the scope of RPF services. In addition clearance testing for abatement, as applicable, was based on the visual observations and limited ambient area air testing as indicated in the report and in accordance with applicable state and federal regulations. The potential exists that microscopic surface dust remains with contaminant present even in the event that the clearance testing meets the state and federal requirements. Likewise for building surveys, visual observations are not sufficient alone to detect possible contaminant in settled dust. Unless otherwise specifically indicated in the report, surface dust testing was not included in the scope of the RPF services.
10. For abatement or remediation monitoring services: RPF is not responsible for observations and test for specific periods of work that RPF did not perform full shift monitoring of construction, abatement or remediation activity. In the event that problems occurred or concerns arouse regarding contamination, safety or health hazards during periods RPF was not onsite, RPF is not responsible to provide documentation or assurances regarding conditions, safety, air testing results and other compliance issues. RPF may have provided recommendations to the Client, as needed, pertaining to the Client’s Contractor compliance with the technical specifications, schedules, and other project related issues as agreed and based on results of RPF monitoring work. However, actual enforcement, or waiving of, contract provisions and requirements as well as regulatory liabilities shall be the responsibility of Client and Client’s Contractor(s). Off-site abatement activities, such as waste transportation and disposal, were not monitored or inspected by RPF.
11. For services limited to clearance testing following abatement or remediation work by other parties: The testing was limited to clearance testing only and as indicated in the report and a site assessment for possible environmental health and safety hazards was not performed as part of the scope of this testing. Client, or Client’s abatement contractor as applicable, was responsible for performing visual inspections

of the work area to determine completeness of work prior to air clearance testing by RPF.

12. For site work, including but not limited to air clearance testing services, in which RPF did not provide full site safety and health oversight, abatement design, full shift monitoring of all site activity, RPF expresses no warranties, guarantees or certifications of the abatement work conducted by the Client or other employers at the job site(s), conditions during the work, or regulatory compliance, with the exception of the specific airborne concentrations as indicated by the air clearance test performed by RPF during the conditions present for the clearance testing. Unless otherwise specifically noted in the RPF Report, visual inspections and air clearance testing results apply only to the specific work area and conditions present during the testing. RPF did not perform visual inspections of surfaces not accessible in the work area due to the presence of containment barriers or other obstructions. In these instances, some contamination may be present following RPF clearance testing and such contamination may be exposed during and after removal of the containment barriers or other obstructions following RPF testing services. Client or Client's Contractor is responsible for using appropriate care and inspection to identify potential hazards and to remediate such hazards as necessary to ensure compliance and a safe environment.
13. The survey was limited to the material and/or areas as specifically designated in the report and a site assessment for other possible environmental health and safety hazards or subsurface pollution was not performed as part of the scope of this site inspection. Typically, hazardous building materials such as asbestos, lead paint, PCBs, mercury, refrigerants, hydraulic fluids and other hazardous product and materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the Report.
14. For mold and moisture survey services, RPF services did not include design or remediation of moisture intrusion. Some level of mold will remain at the site regardless of RPF testing and Contractor or Client cleaning efforts. RPF testing associated with mold remediation and assessments is limited and may or may not be representative of other surfaces and locations at the site. Mold growth will occur if moisture intrusion deficiencies have not been fully remedied and if the site or work areas are not maintained in a sufficiently dry state. Porous surfaces in mold contaminated areas which are not removed and disposed of will likely result in future spore release, allergen sources, or mold contamination.
15. Existing reports, drawings, and analytical results provided by the Client to RPF, as applicable, were not verified and, as such, RPF has relied upon the data provided as indicated, and has not conducted an independent evaluation of the reliability of these data.
16. Where sample analyses were conducted by an outside laboratory, RPF has relied upon the data provided, and has not conducted an independent evaluation of the reliability of this data.
17. All hazard communication and notification requirements, as required by U.S. OSHA regulation 29 CFR Part 1926, 29 CFR Part 1910, and other applicable rules and regulations, by and between the Client, general contractors, subcontractors, building occupants, employees and other affected persons were the responsibility of the Client and are not part of the RPF SOW.
18. The applicability of the observations and recommendations presented in this report to other portions of the site was not determined. Many accidents, injuries and exposures and environmental conditions are a result of individual employee/employer actions and behaviors, which will vary from day to day, and with operations being conducted. Changes to the site and work conditions that occur subsequent to the RPF inspection may result in conditions which differ from those present during the survey and presented in the findings of the report.