

Janae Collins

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Sent: Wednesday, November 30, 2016 3:12 PM
To: Chen, Bryan G CTR (US); Moeller, Michael B (Mike) CIV USARMY USAG (US); Houston, Gary A CIV (US); Allen, Michelle D CTR (US)
Cc: Carr, David J CIV USARMY IMCOM HQ (US); Hilton, Kenneth R CIV USARMY MEDCOM RHC-A (US); Richards, Steven C CIV USARMY MEDCOM APHC (US); Brokaw, John K CIV USARMY MEDCOM APHC (US)
Subject: Lead (Pb) Sample Results - Fort Hunter Liggett HRFs and AFH residences / IMCOM OPORD 16-080

Bryan,

Attached are the analytical results for the sampling conducted IAW IMCOM OPORD 16-080 (attached excel sheet).

Summary:

1. The kitchen sinks in the CDC, bldg. 178, and the Youth Center, bldg. 177, were sampled. Sample results for both sinks were all below 15 parts per billion (ppb), IMCOM's criteria for taking corrective action at an individual sink or fountain. Sample results ranged from non-detect (< 1 ppb) to 2.2 ppb lead.
2. The kitchen sinks in 15 Army Family Housing (AFH) residences were sampled. Sample results for these sinks were all below 15 ppb, ranging from non-detect to 3.4 ppb lead.
3. One fountain in bldg. 212 was sampled. This facility doesn't appear to be either an HRF or an AFH residence. Sample results for this fountain showed the first draw sample measured 22 ppb lead, greater than the 15 ppb criteria. The 30-second and 2-minute flushed sample results were both non-detect (< 1 ppb lead). These results suggest that the source of lead is associated with the fountain. If this is a bubbler-type fountain (e.g., a fountain without a refrigeration unit) the most likely source of the elevated lead is brass to include the bubbler head, brass components internal to the fountain (e.g., compression fittings/ferrules that are in contact with the water), and the brass shut-off valve. If the fountain is a water cooler-type fountain (e.g., has a refrigeration unit and storage reservoir) the source of lead is likely the brass fountain head. Some older water cooler-type fountains have been identified to contain leaded parts. This is less likely to be the case, but this should be verified.

Recommendations:

1. Immediately remove the fountain in bldg. 212 from service until a permanent corrective action can be implemented. Since the facility isn't an AFH residence and if it's not an HRF, the likelihood of exposure to the at-risk population (6 yrs of age and younger) is comparatively much lower.
2. Permanent corrective actions include:
 - a. Physical removal of the fountain. If the fountain is rarely used by the patrons of the facility, this may be an attractive option provided access to drinking water is reasonably available by other means such as a breakroom/kitchen sink that's frequently used.
 - b. Replacement of brass components. Replace brass components with ones that are 3rd party certified to meet the current Safe Drinking Water Act lead free definition. For a bubbler-type fountain this would include all accessible brass components (bubbler head, shut-off valve, etc.). For a water cooler-type fountain this would include the fountain head. It may be more cost effective to replace the entire fountain (regardless of type) and the associated shut-off valve. Plumbing components (or fountains) should be 3rd party to meet ANSI/NSF Standard 61 Annex G or ANSI/NSF Standard 372 (we recommend Standard 61 Annex G since it's requires a more stringent testing protocol). The attached EPA brochure (pdf document) shows how to identify 3rd party certified plumbing components. If this course of action is pursued - conduct confirmation sampling (repeat the initial sampling) after replacement to ensure low lead levels in the drinking water.
 - c. Verify the fountain is not one identified as containing leaded parts (only for water cooler-type fountains). The EPA info (word document) contains information on this.
3. Provide notification of results to facility staff, parents with children attending/using the HRFs, and residents where sampling was conducted. The attached templates can be used to develop your notification letters. We recommend including the FAQs documents with the results notification. Note that the attached template "HRF_Results Notification Template - some elevated levels_2016" could be used for notifying staff in bldg. 212.

Please contact me if you have any questions.

V/r,
Steve

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