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OHIO EPA NEDO

CRESTVIEW

LOCAL

SCHOOL

DISTRICT

Lead

Mapping

2017



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Columbiana, Ohio 44408

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Crestview Local School, Lead Mapping

OH 1534512

Entity: Report Crestview Local Schools Page 1

County: Columbiana

Secondary ID: OH1534512

edoc in color

Crestview Local School District

44100 Crestview Road

Columbiana, Ohio 44408

To:

Kathy Metropulos

Environmental Specialist

Division of Drinking and Ground Waters

Ohio EPA – Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

To.

Ohio Department of Health (ODH)

Attn: Lead Program, 6th Floor

246 North High Street

Columbus, OH 43215

To:

Ohio Department of Job and Family Services (ODJFS)

Office of Family Assistance –

Bureau of Child Care Licensing and Monitoring

P.O. Box 183204

Columbus, OH 43218-3204

Crestview Local School District

44100 Crestview Road

Columbiana, Ohio 44408

Ref: Crestview Local School District Lead Mapping Program

ENCLOSED INFORMATION:

Lead – Copper Building Sampling Sites and Building Construction Dates

Crestview Elementary School, Constructed 1994

Crestview Intermediate School, Constructed 1961

Crestview High School, Constructed 1994

Spread Sheet for lead & copper sampling sites

Open letter in reference to the Ohio Environmental Protection Requirements

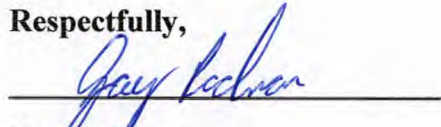
Crestview Local School District Lead Mapping, 2017

Section [Partial] v.

IDENTIFYING CHARACTERISTICS OF BUILDINGS WITH LEAD PIPING, SOLDER OR FIXTURES:

Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacture or installation date is the primary indicator of the lead content. Therefore, the characteristics of buildings and piping solder or fixtures would be buildings built prior to 1988 or that use plumbing material or solder manufactured before 1988 that may have materials with greater than 8% lead and are at a higher risk of contributing lead to the drinking water than materials manufactured after 1988. In addition, buildings built and plumbing materials manufactured after 2014 were required to have less than 0.2% lead by weight and have the lowest risk for contributing lead to the drinking water. It should be noted however that, although prohibited, some use of leaded solder or leaded components may have occurred after the prohibitions became effective.

Respectfully,



Jay Radman

Maintenance Supervisor

Crestview Local School District

jradman@crestviewlocal.k12.oh.us

(330) 482-5368

CRESTVIEW LOCAL SCHOOL DISTRICT-
14400 Crestview Road, Columbiana, Ohio 44408

I. PURPOSE:

This open letter is in reference to the Ohio Environmental Protection Agency requirement for:

Mapping a distribution system to identify areas that are known to contain or likely to contain lead service lines and identify characteristics of buildings served by community water systems that may contain lead piping, solder or fixtures.

II. BACKGROUND:

In June 2016, Ohio HB 512 was passed to enact section 6109.121 of the Ohio Revised Code (ORC) to establish requirements governing lead and copper testing for community and non-transient non-community public water systems and to revise law governing lead contamination from plumbing fixtures. The law also requires community water systems to identify and map areas of their distribution systems which may contain lead service lines and to identify the characteristics of buildings and areas of the distribution system with solder, fixtures or pipes containing lead. Non-transient, non-community water systems are required to map areas of their system that have solder, fixtures and pipes containing lead.

III. APPLICABLE REFERENCES:

1. US EPA Lead and Copper Rule Monitoring and Reporting Guidance for Public Water Systems, EPA 816-R-10-004, March 2010, <https://www.epa.gov/nscep>.
2. US EPA Safe Drinking Water Act (SDWA), <https://www.epa.ohio.gov/sdwa>.
3. Ohio House Bill 512 <https://www.legislature.ohio.gov>.
4. Ohio EPA District Offices <http://epa.ohio.gov/districts.aspx>.

IV. IDENTIFYING DISTRIBUTION AREAS WITH LEAD SERVICE LINES - COMMUNITY PUBLIC WATER SYSTEMS:

The direct identification of lead service lines is very difficult and costly because water infrastructure is buried and currently, no reliable methods exist for identifying these lines other than direct observation. However, community public water systems (CWS) can use a variety of records to identify areas that are known or are likely to have lead service lines. Details to help with identification can be found in plumbing codes and other regulatory changes, historical permit records, and information obtained during maintenance activities such as meter replacements, water main breaks and other instances when service lines have been directly observed provide conclusive information. CWSs are encouraged to utilize customer self-reporting as a way to identify areas with lead service lines. The different data sources are discussed further below.

1. Code and Regulatory Changes. Know the dates regulatory changes are very important. The Safe Drinking Water Act (SDWA) prohibited the use of lead pipe in 1986, so water supplies or buildings built after 1986 would not be expected to contain lead pipe

2. Historical Permit Records. Research into building and plumbing permits may yield information as to the material used in the service line. A survey of many of these permits in a particular area can allow a water system to classify a particular area as having a high, low or no risk of having lead lines. CWSs may also have information by reviewing their own main installation records and drawings. Often times the water main installation records and "as built" drawings will note the service line material used in a particular project.

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3. Maintenance and Operation Records. CWSs have opportunities to directly view the service line materials during a variety of maintenance activities and the updating their maps and building plumbing every five years as required by this law.

4. Self-Reporting. Education efforts, such as how to do a “scratch test” to identify the material used in a water line is often helpful. However this effort may be prone to errors, but it can produce very useful information as to identifying the material used in the building construction.

Once the available information is reviewed, it should be use it to identify areas of distribution which meet the characteristics of having lead lines. CWSs should be conservative in their estimates and assume that lead could have been used for service line materials **unless** the age of the area or specific information exists to rule out lead.

V. IDENTIFYING CHARACTERISTICS OF BUILDINGS WITH LEAD PIPING, SOLDER OR FIXTURES

In **1986**, the Safe Drinking Water Act (SDWA) was amended to ban the use of lead solders which contain more than 0.2% lead. The lead ban provisions of the act became effective in Ohio in 1987. The amendments required the use of lead-free solder, flux and pipes in new installations and repairs of public water systems, or any plumbing within a residential or nonresidential facility which provides water for human consumption. In addition, Section 1417 of the SDWA amendments called for the use of lead-free pipes and pipe fittings. These were defined at the time as having no more than 8.0% lead (note this 8.0% was lowered to 0.25% in **2014**).

In **1996**, the SDWA was further amended to state the following is unlawful:

1. For any person to introduce into commerce any pipe, pipe fitting, plumbing fitting or plumbing fixture, that is not lead free, except for a pipe that is used in manufacturing or industrial processing; or
2. Any person engaged in the business of selling plumbing supplies; except manufacturers, to sell solder or flux that is not lead free; or
3. Any person to introduce into commerce any solder or flux that is not lead free unless the solder or flux bears a prominent label stating that it is illegal to use the solder or flux in the installation or repair of any plumbing providing water for human consumption.

In **2011**, SDWA Section 1417 was amended for the prohibition on use and introduction into commerce of lead pipes, solder and flux. This became effective on **January 1, 2014**. The amendments specifically modified the applicability of the prohibitions by creating exemptions, changed the definition of “lead-free” by reducing lead content from 8% to a weighted average of not more than 0.25% in the wetted surface material (primarily affects brass/bronze), eliminated the provision that required certain products to comply with “voluntary” standards for lead leaching, and established a statutory requirement for calculating lead content.

The exemptions to the SDWA Section 1417 are pipes, pipe fittings, plumbing fittings or fixtures, including backflow preventers, which are used exclusively for non-potable services, such as manufacturing, industrial processing, irrigation, outdoor watering, or any other uses where the water is not anticipated to be used for human consumption. The exemption also applies to toilets, bidets, urinals, fill valves, flush-o-meter valves, tub fillers, shower valves, service saddles, or water distribution main gate valves that are 2 inches in diameter or larger. In addition to the SDWA, the Community Fire Safety Act of 2013 exempted fire hydrants from this requirement.

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As a result of these amendments, buildings constructed **after 2014 are the least likely** to have plumbing containing lead materials, so these consumers are at the lowest risk of exposure to lead from drinking water.

Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that **the manufacture or installation date** is the primary indicator of the lead content. Therefore, the characteristics of buildings and piping solder or fixtures would be **buildings built prior to 1988 or that use plumbing material or solder manufactured before 1988 that may have materials with greater than 8% lead and are at a higher risk of contributing lead to the drinking water than materials manufactured after 1988. In addition, buildings built and plumbing materials manufactured after 2014 were required to have less than 0.2% lead by weight and have the lowest risk for contributing lead to the drinking water. It should be noted however that, although prohibited, some use of leaded solder or leaded components may have occurred after the prohibitions became effective.**

*□ US EPA, Advice to Chicago Residents to view web site titled, "What do lead service lines look like?"
<https://www.epa.gov/il/advice-chicago-residents-about-lead-drinking-water>*

VI. MAPPING REQUIREMENTS

Once identified, areas known or are likely to have lead service lines and areas of the distribution system with solder, fixtures or pipes containing lead must be plotted on a map of the entire distribution system. The different areas on the map must be distinguished by different colors **or other obvious mapping tools**. An electronic copy of the map in a PDF or other generally used file type is the preferred product, but hard copy colored maps are acceptable. The maps must be capable of being copied in color for distribution to the required parties and consumers upon request.

The maps should identify major streets, landmarks, bodies of water or other methods of orientation so that the reader of the map could easily determine the general areas covered by the map. Areas that are known or are likely to contain lead service lines should be a different color to differentiate them from other areas of the system.

VII. SUBMITTAL REQUIREMENTS:

The following requirements are initially to be submitted to respective parties within six months of Sept. 9, 2016, and updated and resubmitted **every five years following the first submittal**.

1. Submit a copy of the map to the Ohio Department of Health (ODH) and the Department of Job and Family Services (ODJFS).
2. Provide a statement to the ODH and ODJFS stating the characteristics of buildings that may contain lead piping, solder or fixtures. This requirement could be met by including **the bold statement** in Section V of this guidance on the map or as a statement accompanying the map.
3. Submit a report to the appropriate Ohio EPA, Division of Drinking and Ground Waters District Office containing at least both of the following:
 - a. The map detailed in Section VI of this guidance.

Public water systems are required to update and **resubmit the above information every five years.**

VIII. FINANCIAL ASSISTANCE:

Financial assistance is available for systems for fulfilling the mapping requirements of ORC Section 6109.121. For more information, please see the tab "Drinking Water Assistance Fund" on the following web site: <http://epa.ohio.gov/ddagw/financialassist>.



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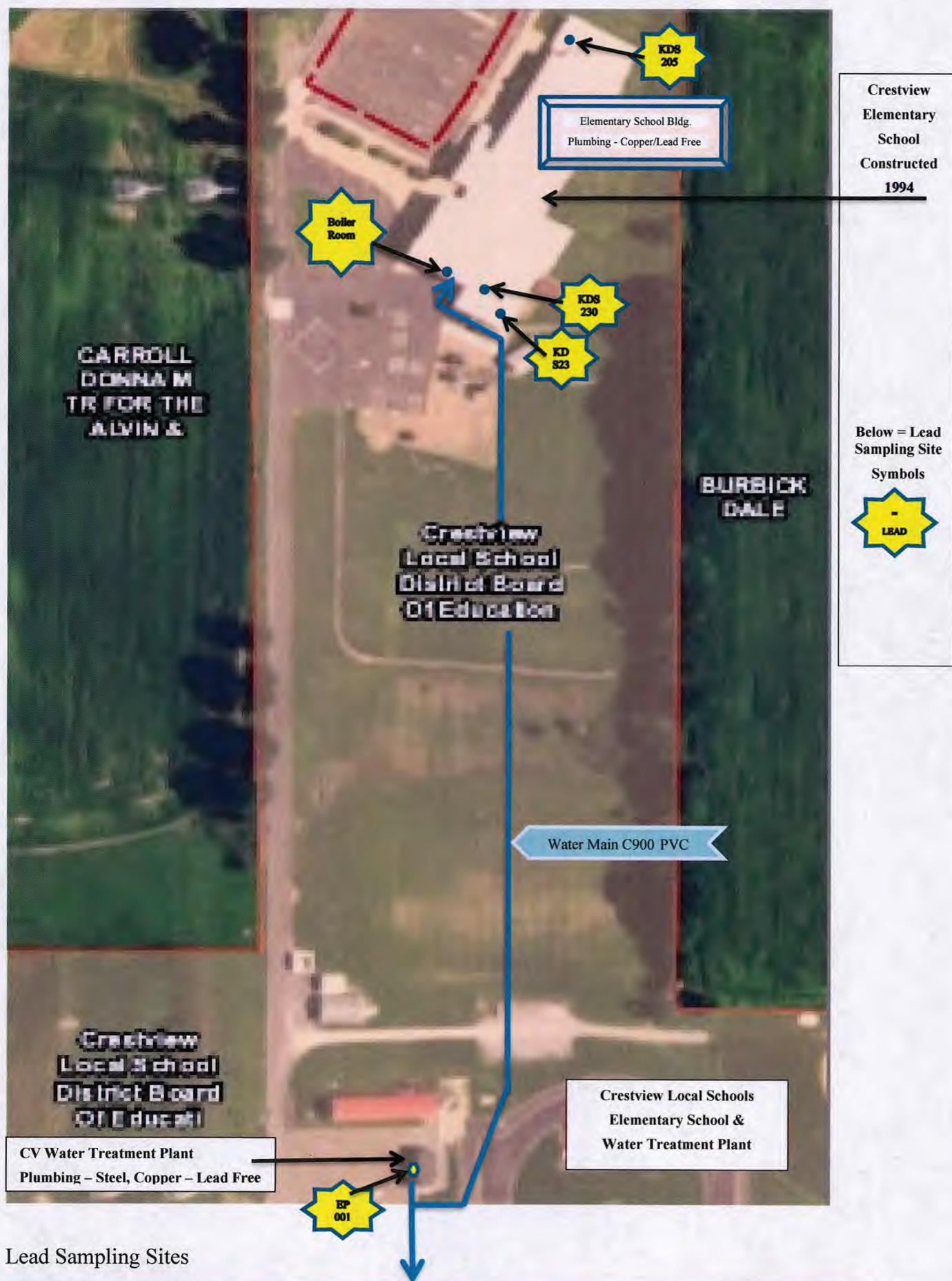
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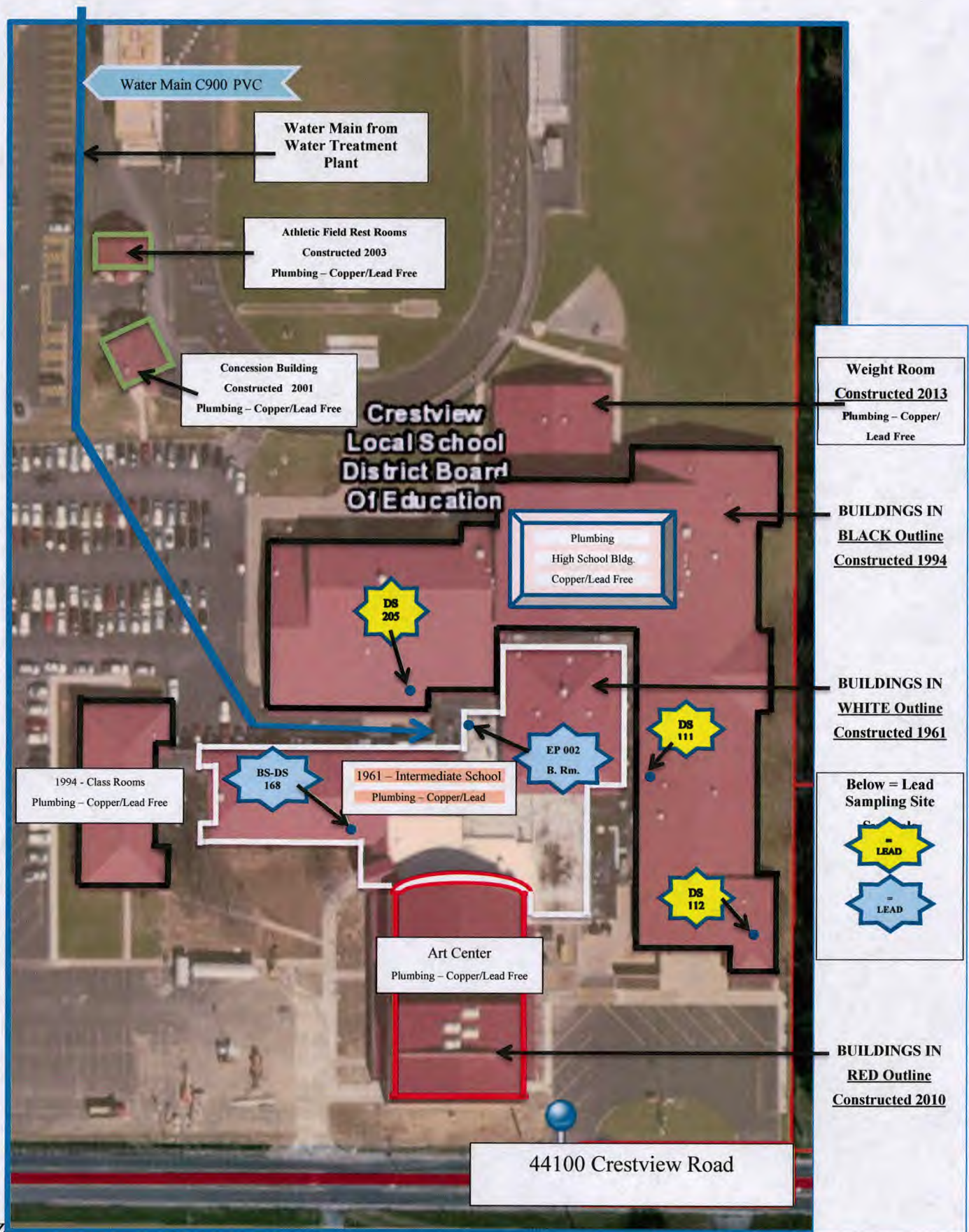
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CRESTVIEW LOCAL SCHOOLS BUS GARAGE

44100 Crestview Road

