

December 19, 2024

John Jordan
Director of Business & Financial Services
Jacquelyn Y. Kelley Discovery Charter School
4700 Parkside Avenue
Philadelphia, PA 19131

**Subject: Total Lead Testing – Drinking Water Fountains
4700 Parkside Avenue, Philadelphia, PA**

Dear Mr. Jordan:

Urban Engineers, Inc. (Urban) is pleased to submit this total lead in drinking water analysis letter report for Jacquelyn Y. Kelley Discovery Charter School, located at 4700 Parkside Avenue, Philadelphia, Pennsylvania (Please refer to **Attachment A** for the site location maps). Urban performed the lead in water sampling on December 9, 2024. Some water fountains at the school are not in use and are inaccessible. All in-service water fountains and bottle filling stations were sampled and are included in this report. The sampling consisted of collecting 8 drinking water samples from 4 accessible water fountains and 4 bottle-filling stations located throughout the school complex.

SITE ACTIVITIES AND METHODOLOGY

For the sampling event, Urban personnel arrived on site at approximately 10:00 AM to meet school personnel, who then escorted the Urban employee to each water fountain. During the sampling event, 4 single-water fountains and 4 bottle-filling stations were tested throughout the building, for a total of 8 samples. Some water fountains in the facility are out of service. A photograph displaying an in-service water bottle filler with out-of-service fountains is included as **Attachment B**. First-draw samples were collected in 250 milliliter wide-mouth, sterile, laboratory-approved jars. Nitrile gloves were worn while sampling, which were changed and discarded after each water sample. Samples were then submitted to Pace Analytical for total lead analyses, EPA Method 200.8.

RESULTS

A laboratory report was provided to Urban outlining the analytical results of the lead testing. Table 1 provides a summary of the results from each water fountain. The complete lab report from the 12/9/2024 sampling event is provided as **Attachment C**.

TABLE 1: TOTAL LEAD CONCENTRATION

Sample Name**	Floor - Room	Date Sampled	Result (ppb)
DC-1A	1 st Floor – Restroom	12/9/2024	<0.22 (ND*)
DC-2A	1 st Floor – Gym	12/9/2024	<0.22 (ND*)
DC-2B	1 st Floor – Gym	12/9/2024	<0.22 (ND*)
DC-2C	1 st Floor – Gym	12/9/2024	<0.22 (ND*)
DC-3A	2 nd Floor – Elevator	12/9/2024	<0.22 (ND*)
DC-4A	2 nd Floor – Restroom	12/9/2024	<0.22 (ND*)
DC-4B	2 nd Floor – Restroom	12/9/2024	<0.22 (ND*)
DC-4C	2 nd Floor – Restroom	12/9/2024	<0.22 (ND*)

* ND: non-detectable, as result was below the laboratory method detection limit

** As seen in Attachment C, samples were collected as DC-1A, DC-1B, DC-2A where it was assumed that each location had one single-water fountain and one bottle-filling station. These samples are presented above to accurately associate water fountains and bottle-filling stations by location.

STANDARDS TO COMPARE

Environmental Protection Agency (EPA) - In 1974, Congress passed the Safe Drinking Water Act. This law requires EPA to determine the level of contaminants in drinking water at which no adverse health effects are likely to occur with an adequate margin of safety. These non-enforceable health goals, based solely on possible health risks are called maximum contaminant level goals (MCLGs). The MCLG for lead is zero. EPA has set this level based on the best available science which shows there is no safe level of exposure to lead.

For most contaminants, EPA sets an enforceable regulation called a maximum contaminant level (MCL) based on the MCLG. MCLs are set as close to the MCLGs as possible, considering cost, benefits and the ability of public water systems to detect and remove contaminants using suitable treatment technologies.

However, because lead contamination of drinking water often results from corrosion of the plumbing materials belonging to water system customers, EPA established a treatment technique rather than an MCL for lead. A treatment technique is an enforceable procedure or level of technological performance which water systems must follow to ensure control of a contaminant.

The treatment technique regulation for lead (referred to as the “Lead and Copper Rule”) requires water systems to control the corrosivity of the water. The regulation also requires systems to collect tap samples from sites served by the system that are more likely to have plumbing materials containing lead. If more than 10 percent of tap water samples exceed the lead action level of 15 parts per billion (ppb), then water systems are required to take additional actions (<https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water#regs>).

No samples exceeded the EPA lead action level of 15 ppb. No action required.

City of Philadelphia - The City of Philadelphia Ordinance - Section A-703.1 of Title 4 of the Philadelphia Code, titled "Special Certificate of Inspection", states that lead in drinking water from a fountain or sink must not exceed 10 ppb.

No samples exceeded the City of Philadelphia action level of 10 ppb. No action required.

Should you have any questions regarding this report, please feel free to contact me at ktconway@urbanengineers.com.

Sincerely,

URBAN ENGINEERS, INC.

A handwritten signature in black ink, appearing to read "Kevin Conway", with a stylized flourish at the end.

Kevin Conway
Environmental Scientist

Attachments:

- Attachment A: Site Location Maps
- Attachment B: Sample Photograph
- Attachment C: Laboratory Analytical Results