Message

From: Mack Jamie [Jamie.Mack@doe.k12.de.us]
Sent: 12/5/2022 8:38:32 PM
To: Richardson, William [Richardson.William@epa.gov]; Crumlish, Karen [Crumlish.Karen@epa.gov]; Carlson Jennifer [Jennifer.Carlson@doe.k12.de.us]
CC: Klein Kimberly [Kimberly.Klein@doe.k12.de.us]; Hanes, James [james.hanes@delaware.gov]
Subject: RE: [External] FW: Lead Letter from DSEA

Thanks Bill. And to be clear, let me know if there is anything pertaining to any future sampling done under WIIN as well, the question was not meant to be specific to state funded work.

If you could provide an intro to Brent I would appreciate it.

Thanks for the quick response.

Jamie

Jamie Mack
Education Associate, Capital Projects
401 Federal Street | Dover, DE 19901
(302) 857-3364
Delaware Department of Education

From: Richardson, William <Richardson.William@epa.gov>
Sent: Monday, December 5, 2022 3:34 PM
To: Mack Jamie <Jamie.Mack@doe.k12.de.us>; Crumlish, Karen <Crumlish.Karen@epa.gov>; Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

Hi Jamie,
I checked in with the R3 WIIN 2107 leads and there was not specific feedback to your question. Ruby did remind me that EPA held a Best Management Practices Workshop earlier this year. The presentation can be found here: https://www.epa.gov/system/files/documents/2022-05/WIIN%202107%20BMPs%20Workshop%20May%202022_FINAL.pdf and the BMP document can be found here: https://www.epa.gov/system/files/documents/2022-10/LeadTesting_BMPs_Document_10112022_0.pdf

PENNVEST has been successfully using a contractor and Brent Sailhamer may be a good person to contact to provide more specific info based on their experiences. If you would like me to provide you an email intro to Brent please let me know.
bsailhamer@pa.gov

Bill Richardson (he/him)
Chief, Drinking Water Section
US EPA Region 3 – Mid Atlantic
Phone 215-814-5675
Email richardson.william@epa.gov

From: Mack Jamie <Jamie.Mack@doe.k12.de.us>
Sent: Monday, December 5, 2022 2:38 PM
To: Crumlish, Karen <Crumlish.Karen@epa.gov>; Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

All—

Just wanted to provide an update that we are working to finalize a contract with an environmental firm to continue sampling using state funds. We're specifying in contract language that the project must comply with the 3Ts, and that the contractor and DOE will work together to cooperatively update and maintain the QAPP as a project-specific guidance document. Just wondering in your experience with other jurisdictions using contractors for this type of work, are there any other QA or project monitoring tools or steps you might suggest?

Thanks

Jamie

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From: Crumlish, Karen <Crumlish.Karen@epa.gov>
Sent: Friday, December 2, 2022 8:39 AM
To: Mack Jamie <Jamie.Mack@doe.k12.de.us>; Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

Good morning, Jamie. Thanks for reaching out for clarification – DE can absolutely continue to consider EPA a resource as sampling moving forward, no matter the funding source for sampling. Please don't hesitate to reach out with any questions on an ongoing basis.

Have a great day, all.
Karrie

Karrie Crumlish *(she/her)*
Chief, Drinking Water & Source Water Protection Branch (3WD20)
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From: Mack Jamie <Jamie.Mack@doe.k12.de.us>
Sent: Thursday, December 01, 2022 7:16 PM
To: Crumlish, Karen <Crumlish.Karen@epa.gov>; Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: Re: [External] FW: Lead Letter from DSEA

Karrie--

Thanks for the response. While I understand the position on moving forward with sampling with state dollars, I'm assuming that we will still have EPA as a resource as we move forward? We've having discussions here on next steps both with federal money as well as the potential for state funds to supplement those efforts. We've benefitted from the recent engagement with EPA and hope to continue on that path as we work further on lead in school drinking water.

Let me know if I'm missing anything or if you'd like to discuss.

Thanks

Jamie

From: Crumlish, Karen <Crumlish.Karen@epa.gov>
Sent: Thursday, December 1, 2022 5:02 PM
To: Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Mack Jamie <Jamie.Mack@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

Hi all,

Following up with additional information about Delaware's request for EPA's approval to move forward with a lead testing program that would use state funding to test consumptive outlets in schools. EPA does not have the authority to approve or deny Delaware's request. We encourage the state to have and follow a documented standard sampling process. This process should include identification of a Quality Management Plan (QMP; template here) and/or the use of properly trained testers to ensure a consistent sampling approach is used in the schools. Please refer to the 3Ts manual and the associated modules to establish a testing program, and for other details as needed. Additionally, we encourage Delaware to ensure that all testing is analyzed by certified drinking water labs.

If you have any questions, please let us know.

Thank you,

Karrie

Karrie Crumlish *(she/her)*

Chief, Drinking Water & Source Water Protection Branch (3WD20)

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Email crumlish.karen@epa.gov

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Sent: Thursday, December 01, 2022 1:02 PM
To: Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Mack Jamie <Jamie.Mack@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

Good afternoon, all. Thank you for submitting previously requested documents to EPA including the revised WIIN 2107 QAPP, specific sample results for each School District collected to date, and information about Delaware's sampling protocol.

Per our discussion yesterday, here is a list of the additional items EPA has requested:

- Communication plan to document communication processes related to grant terms and conditions and 3Ts guidance (e.g., who will conduct sampling, where and when samples will be collected, how stagnation times will be recorded, use of a certified lab, timeframe for communicating results to the public, etc.).
- For outlets that have tested 7.5 ppb and above, whether consumption points or non-consumption points, a summary of steps taken to date and Delaware's recommendations about proposed next steps.
    - Please include specific areas where feedback is requested.
    - Where there is variation in sample results collected from a location on different dates, please provide information about why DE believes this could have occurred (e.g. improper stagnation time, etc.).
    - Include information about comparable taps within specific buildings.

- A date on which DE began using the modified sampling protocol which aligns with the 3Ts guidance. Please include the date in sampling protocol document.
- For schools that conducted independent third-party lead sampling, please provide documentation that the sampling followed all 3Ts guidance.
- Grant amendment (workplan, revised budget, 424A form) to incorporate use of a contract lab, potential for use of a third-party sampler, and remediation costs.
- Processes for future follow-up and new sampling (e.g., prioritization process for resampling consumptive locations with previously elevated results, new sample selection process, how appropriate stagnation time will be ensured, etc.).
- For consumption points where filters are used, describe the process to ensure that filters are certified to remove lead and are replaced appropriately.

Per previous discussions, feel free to provide these documents as they are available.

We are in communication with OW about Delaware's request to use state funding for lead testing in schools in accordance with 3Ts and the QAPP while remaining paused on activities under the WIIN 2107 grant, and will be in touch as soon as possible.

Please let us know if you have any questions.
Thank you,
Karrie

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Sent: Thursday, December 01, 2022 11:45 AM
To: Crumlish, Karen <Crumlish.Karen@epa.gov>; Richardson, William <Richardson.William@epa.gov>
Cc: Klein Kimberly <Kimberly.Klein@doe.k12.de.us>; Mack Jamie <Jamie.Mack@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Subject: RE: [External] FW: Lead Letter from DSEA

Good Morning,
I am just following up on the list of outstanding items for Delaware. As well as, written confirmation that Delaware can proceed with testing using an independent contractor if not using federal funds as long as we follow the 3Ts and QAPP plan (I believe that is what was shared yesterday on our call).
Thank you,
Jenn

From: Crumlish, Karen <Crumlish.Karen@epa.gov>
Sent: Wednesday, November 30, 2022 3:47 PM
To: Carlson Jennifer <Jennifer.Carlson@doe.k12.de.us>; Mack Jamie <Jamie.Mack@doe.k12.de.us>; Hanes, James <james.hanes@delaware.gov>
Cc: Richardson, William <Richardson.William@epa.gov>
Subject: [External] FW: Lead Letter from DSEA
Importance: High

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Hi all,
Please see the attached letter EPA received from the Delaware State Education Association. We will be preparing a response.
Thank you,
Karrie

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To: Rizzo, George <Rizzo.George@epa.gov>; Sherwood, Kelly <Sherwood.Kelly@epa.gov>; Regan, Michael <Regan.Michael@epa.gov>; Ortiz, Adam <Ortiz.Adam@epa.gov>; Crumlish, Karen <Crumlish.Karen@epa.gov>
Cc: Ingram. Stephanie [DE] <Stephanie.Ingram@DSEA.org>; Wright, David [DE] <David.Wright@DSEA.org>; Taschner, Jeff [DE] <Jeff.Taschner@DSEA.org>; McGonigle, Patricia [DE] <Patricia.McGonigle@DSEA.org>
Subject: Lead Letter from DSEA
Importance: High

Good Afternoon – Attached please find a letter regarding lead testing in Delaware from the Delaware State Education Association. Should have any questions, please feel free to contact Stephanie Ingram at (302) 734-5384.

Sandy Dearman (on behalf of Stephanie Ingram)

Sandy Dearman, Executive Assistant
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