

11 June 2021

Mr. Ryan Dunn
MCAS Beaufort, SC
Via email: ryan.m.dunn@usmc.mil

Subject: *EPA 3T Drinking Water Assessment – Resampling Activities*
Marine Corps Air Station (MCAS) Beaufort
Contract W91278-19-D-0043, TO W91278-20-0453

Dear Mr. Dunn,

After the initial round of EPA 3T Drinking Water Assessment sampling activities were completed, the results indicated that eight sample locations required further investigation. Follow up activities were scheduled for and completed on May 22, 2021. Technicians acquired samples from six of the eight locations.

Sample location “BFT-3TS-611” is located in room 146 of the MCAS Beaufort CDC. No water flow could be established at this location. Technicians tried opening the valves to the sink, but this did not solve the issue. It appeared to the sampler that the solenoid that is supposed to open when motion is detected would not fire.

Additionally, sample location “BFT-3TS-388” could not be accessed. This fixture is located in the kitchen of the Elliot School. It is a gooseneck style pot-filler type spigot mounted on the end of a hose. This device is integral to a commercial braising pan and has been reported as not used by the kitchen staff. The CN3S sampler had coordinated with the new DoDEA facility manager to meet the local DoDEA technician before 2:00 PM on Friday, May 21, 2021. Upon arrival at the air station it was determined that the local DoDEA facility technician had went on leave earlier in the day.

Resampling activities followed the guidance provided in the *CN3S Final Sampling Plan, Section 4.2 Determine Source of Lead*. This section describes the procedure for collecting sequential samples depending upon the type of outlet to be tested. This method of data collection is designed to provide the data required to determine the most likely source of any lead present at a specific sample location.

A brief table showing both the initial and follow up results is presented below for reference and comparison purposes. A discussion and analysis of the resampling results follows this table:

Sample ID	Initial Result	Follow Up Event Sample ID			Bldg	Room Number
		"1"	"2"	"3"		
BFT-3TS-102	23.2	13.0	2.62	N/A	Beaufort CDC	172

Sample ID	Initial Result	Follow Up Event Sample ID			Bldg	Room Number
		"1"	"2"	"3"		
BFT-3TS-107	60.2	51.4	8.04	N/A	Beaufort CDC	169
BFT-3TS-118	19.9	30.1	4.79	N/A	Beaufort CDC	155
BFT-3TS-612	15.4	13.3	1.45	N/A	Beaufort CDC	152
BFT-3TS-131	21.8	25.6	2.02	N/A	Beaufort CDC	124
BFT-3TS-064	19.9	9.76	1.63		Beaufort CDC	108
BFT-3TS-611	24.8	Unable to sample – no flow			Beaufort CDC	146
BFT-3TS-388	22.9	Unable to sample – no access			Elliot School	A128B

Sample Location BFT-3TS-102

- Description – Faucet at high counter sink in room 172 of the CDC.
- Initial result – 23.2 ug/l
- Resample results
 - Sample "1B" – 13.0 ug/l
 - Sample "2B" – 2.62 ug/l
- Analysis – Initial remedial actions appear successful. Water from this fixture has demonstrated compliance.
- Recommendation – No further remedial action indicated

Sample Location BFT-3TS-107

- Description: Faucet at low classroom sink in room 169 of the CDC.
- Initial Result – 60.2 ug/l
- Resample Results
 - Sample "1B" – 51.4 ug/l
 - Sample "2B" – 8.04 ug/l
- Analysis –The first of the sequential samples (1B) is above action levels and the second of the sequential samples (2B) is approximately 8-ppb. EPA guidance indicates that the most likely source of lead in the water at this location is the faucet.
- Recommendation – Consider replacing the faucet at this location. Alternatively, instituting an engineering control (such as signage) indicating that this faucet should be purged for a predetermined period before each use may be employed. This purge period could be brief as the water in the second sequential sample container (2B), obtained after 250 mL of flow, was compliant. As the age of the children in this classroom is quite low, this may not be a practical solution

Sample Location BFT-3TS-118

- Description: Faucet at low classroom sink in room 155 of the CDC.
- Initial Result – 19.9 ug/l
- Resample Results
 - Sample "1B" – 30.1 ug/l

- Sample “2B” – 4.79 ug/l
- Analysis –The first of the sequential samples (1B) is above action levels and the second of the sequential samples (2B) is approximately 5-ppb. EPA guidance indicates that the most likely source of lead in the water at this location is the faucet.
- Recommendation – Consider replacing the faucet at this location. Alternatively, instituting an engineering control (such as signage) indicating that this faucet should be purged for a predetermined period before each use may be employed. This purge period could be brief as the water in the second sequential sample container (2B), obtained after 250 mL of flow, was compliant. As the age of the children in this classroom is quite low, this may not be a practical solution

Sample Location BFT-3TS-612

- Description: Faucet at a low classroom sink in room 152 of the CDC.
- Initial Result – 15.4 ug/l
- Resample Results
 - Sample “1B” – 13.3 ug/l
 - Sample “2B” – 1.45 ug/l
- Analysis – Initial remedial actions appear successful. Water from this fixture has demonstrated compliance.
- Recommendation – No further remedial action indicated

Sample Location BFT-3TS-131

- Description: Wall mounted handwashing sink in room 124 of the CDC.
- Initial Result – 21.8 ug/l
- Resample Results
 - Sample “1B” – 25.6 ug/l
 - Sample “2B” – 2.02 ug/l
- Analysis –The first of the sequential samples (1B) is above action levels and the second of the sequential samples (2B) is approximately 2-ppb. EPA guidance indicates that the likely source of lead in the water at this location is the faucet.
- Recommendation – Consider replacing the faucet at this location. Alternatively, instituting an engineering control (such as signage) indicating that this faucet should be purged for a predetermined period before each use may be employed. This purge period could be brief as the water in the second sequential sample container (2B), obtained after 250 mL of flow, was compliant. Since this sink is located in the kitchen of the CDC where children are not present, signage may be the most appropriate control in this scenario.

Sample Location BFT-3TS-064

- Description: Faucet at a low classroom sink in room 108 of the CDC
- Initial Result – 19.9 ug/l
- Resample Results
 - Sample “1B” – 9.76 ug/l
 - Sample “2B” – 1.63 ug/l

- Analysis – Initial remedial actions appear successful. Water from this fixture has demonstrated compliance.
- Recommendation – No further remedial action indicated

Sample Location BFT-3TS-611

- Description: Faucet at a low classroom sink in room 146 of the CDC.
- Initial Result – 24.8 ug/l
- Resample Results
 - No Sample Acquired – no flow from faucet
- Recommendation – Discontinue use of this faucet or employ engineering controls (such as signage) to indicate this faucet should not be used for consumption.

Sample Location BFT-3TS-388

- Description: Spigot at braising pan in room A128B (kitchen) of the Elliot School.
- Initial Result – 22.9 ug/l
- Resample Results
 - No Sample Acquired – no access to school available
- Recommendation – Discontinue use of this faucet and/or employ engineering controls (such as signage) to indicate this faucet should not be used for consumption.

Please contact me at (910) 603-9602 or hugh.nelson@cherokee-federal.com if you have questions or comments regarding the information presented in this document.

Regards,

Hugh Nelson
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Enclosed:
N/A