

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEWARK EDUCATION)	
WORKERS CAUCUS et al.,)	
)	
Plaintiffs,)	Case No. 2:18-cv-11025
)	
v.)	Judge Katharine S. Hayden
)	Magistrate Judge Cathy L. Waldor
CITY OF NEWARK et al.,)	
)	
Defendants.)	
)	

DECLARATION OF DANIEL CARPENTER-GOLD

I, Daniel Carpenter-Gold, declare as follows:

1. I am an attorney for Plaintiff Natural Resources Defense Council (NRDC), 40 W. 20th Street, Fl. 11, New York, New York 10011.

2. Using data from the New Jersey Department of Environmental Protection (NJDEP) Drinking WaterWatch online database, I calculated that the average result for a customer-requested water sample in Newark between January 1, 2017, and August 23, 2018, was 19.3 parts per billion of lead, while the average result for samples drawn during that same period from Newark’s sampling pool was only 7.28 parts per billion of lead.

3. To calculate this, I copied every entry from each of the three complete six-month monitoring periods occurring between January 1, 2017,

and June 30, 2018, and the partially complete six-month monitoring period beginning on July 1, 2018, from the NJDEP drinking water watch online database for the Newark Water Department, which I accessed at https://www9.state.nj.us/DEP_WaterWatch_public/JSP/PBCUSummary.jsp?tinwsys=127&print=true.

4. Each entry was assigned a Sample Point ID, which consists of either “PBCU,” followed by a number, or “DS.” A document provided to NRDC by NJDEP in response to an Open Public Records Act request, containing lead sampling data from July 18, 2012, to April 13, 2018, indicated that all of the water samples taken in Newark assigned a Sample Point ID of “DS” were customer-requested samples, while all of the samples taken from sites in Newark’s sampling pool were assigned Sample Point IDs beginning with “PBCU.” From this, I concluded that the entries with Sample Point IDs beginning with “PBCU” were sampling-pool entries, while entries with “DS” as their Sample Point ID were customer-requested entries.

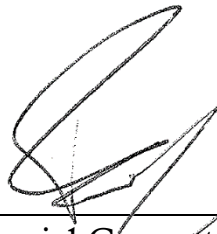
5. Using the Sample Point IDs, I separated the sampling-pool entries from the customer-requested entries.

6. Each entry also contained a “Result,” given in micrograms per liter, which is equivalent to parts per billion. To be conservative, I converted the results that read “<5” parts per billion to zero parts per billion.

7. Using Microsoft Excel's "AVERAGE" function, I calculated the arithmetic mean of the results from each group of entries, rounding to the third significant digit. The arithmetic mean of the results from Newark's sampling-pool entries was 7.28 parts per billion. The arithmetic mean of the results from the customer-requested entries was 19.3 parts per billion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23rd day of August, 2018.



Daniel Carpenter-Gold