Adopted: <u>June 2018</u>

Revised: June 2020

820 - Testing for Lead in School Drinking Water

I. Purpose

This plan is designed to help Howard Lake-Waverly-Winsted School District comply with the requirement of the Minnesota statues.121A.335 Lead in School Drinking Water MN Department of Education with regard to protecting the health and safety of students and staff.

This written plan was developed using the Reducing Lead in Drinking Water A Technical Guidance and Model Plan for Minnesota's Public Schools (See Appendix A) published by the Minnesota Department of Health.

II. General Statement

Sampling Program Development

The Howard Lake-Waverly-Winsted School District will complete a survey of all water sources at its facilities to determine those that may be used for consumption for staff or students.

Determining Sampling Protocol

Inventory drinking water taps used for consumption (i.e., drinking water and food preparation):

A drinking water faucet or tap is the point of access for people to obtain water for drinking or food preparation. A faucet/tap can be a fixture, faucet, drinking fountain or water cooler. Drinking water taps typically do not include bathroom taps, hose bibbs, laboratory faucets/sinks or custodial closet sinks; these should be clearly marked not for drinking.

- Taps used for human consumption should only be cold water taps.
- Hot water taps should never be used to obtain water for drinking water or food preparation.

Check all drinking fountains to ensure EPA has not identified them as having a lead lined tank under the LCCA. This list can be found at: <u>Lead in Drinking Water Coolers (http://tinyurl.com/kr8kppf)</u>;

• If a drinking fountain within the school is found on this list, it should be removed from use immediately.

Determine a schedule for sampling:

All taps used for drinking water or food preparation must be tested at a minimum of once every five years. If budget or resources do not allow all taps to be tested in the first year, it is suggested that taps be prioritized, with all high priority taps tested the first year, medium priority the second, and low priority the third. The fourth year should be used as a "make up" year, if needed.

Priority levels are:

High priority: taps used by children under the age of six years of age or pregnant women (e.g., drinking fountains, nurse's office sinks, classrooms used for early childhood education and kitchen sinks);

Medium priority: other taps regularly used to obtain water for drinking or cooking (e.g., Family and Consumer Science sinks, classroom sinks, and teacher's lounges); and

Low priority: other taps that could reasonably be used to obtain water for drinking but are not typically used for that purpose

5 Year Rotation of Building Testing

HLWW Facilities will be tested in the following order: Winsted Elementary – 2018-19 – 30 tests Humphrey Elementary – 2019-20 – 31 tests HLWW Middle School – 2020-21 – 30 tests HLWW High School – 2021-22 - 41 tests MAWSECO Education Center – 2022-23 – 12 tests

Rotation will start over again after all sites have been tested in a 5 year time frame.

Analysis by an Accredited Laboratory:

Laboratory analysis typically involves a school district or consultant contracting with an accredited lab to obtain sample bottles. The laboratory will send instructions for sampling, sample bottles, and a chain-of-custody form to document time and date collected, collector name, and sample location.

Conduct First Draw Sampling

Once the sampling protocol has been set, water sampling must be conducted according to the established schedule and priority. Water from taps used for drinking or food preparation must be tested for lead using "first draw" samples. First draw means that the samples are collected before the fixture is used or flushed during the day. Use only cold water for collecting lead samples. It is necessary to consider the order in which tap samples are collected to avoid the potential of accidentally flushing a tap. Always start at taps closest to where the water enters the building.

Sample site preparation and sample collection must be performed consistent with the following conditions:

- Note that it may be necessary to collect samples over a number of days to ensure only first draw samples were collected;
- The day before sampling normal usage of the sampling tap should occur;
- The night before sampling secure the fixture from being used (e.g., hang a "Do Not Use" sign);
- Do not use sampling taps for a minimum of six hours. MDH recommends not exceeding 18 hours;
- Do not remove acrators or attachments;
- Collect the first draw sample using a 250 mL bottle. Be sure to start sampling at taps closest to where the water enters the building so that no accidental flushing occurs; Complete all scheduled sampling for that sampling period; and
- Have samples analyzed by sending to a laboratory Be sure to follow all instructions from the lab.
- Schools with active flushing programs or considering a flushing program may also want to collect a flushed sample in order to verify flushing effectiveness.

Communicate Results:

Howard Lake-Waverly-Winsted School District shall:

- Notify parents/staff of the availability of the sampling results and provide the name of the designated contact to answer any questions.
- Make the results of the testing available to the public for review.
- Share specific activities used to correct/address any lead concerns.

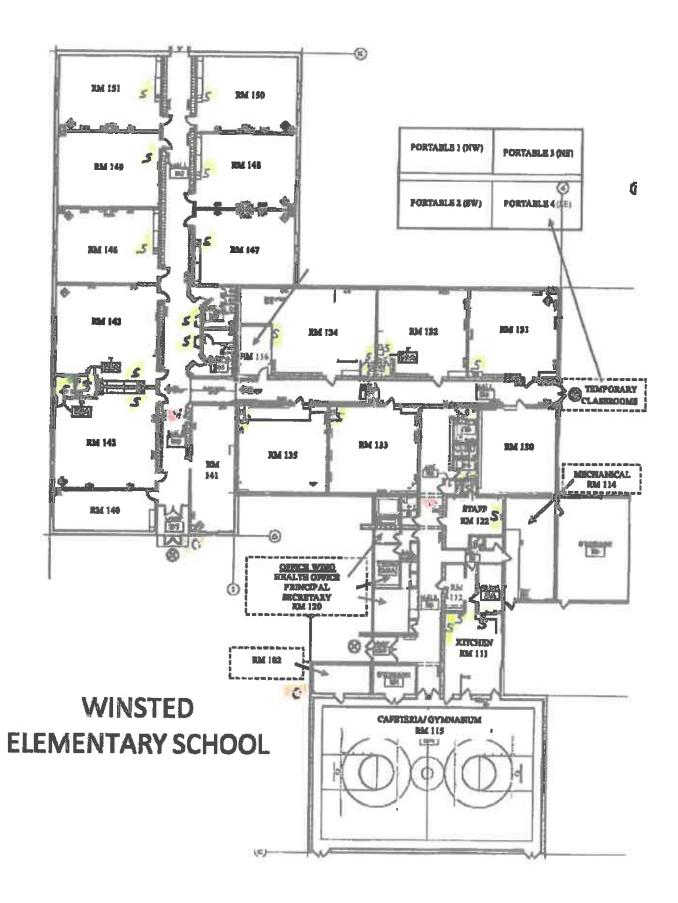
Appendix A

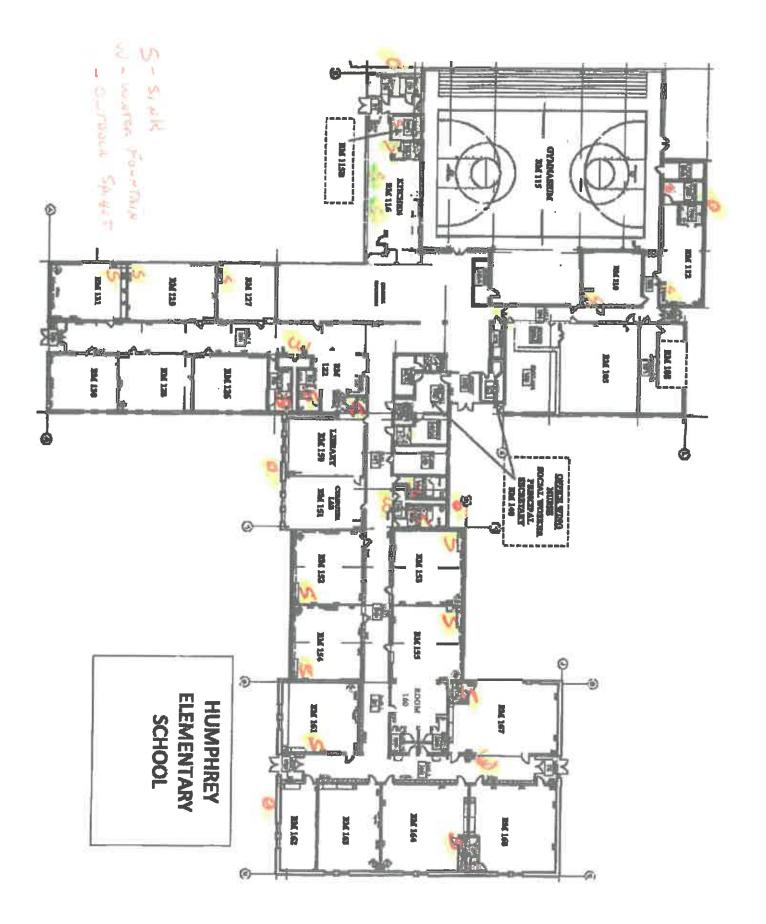
Reducing Lead in Drinking Water A Technical Guidance and Model Plan for Minnesota's Public Schools

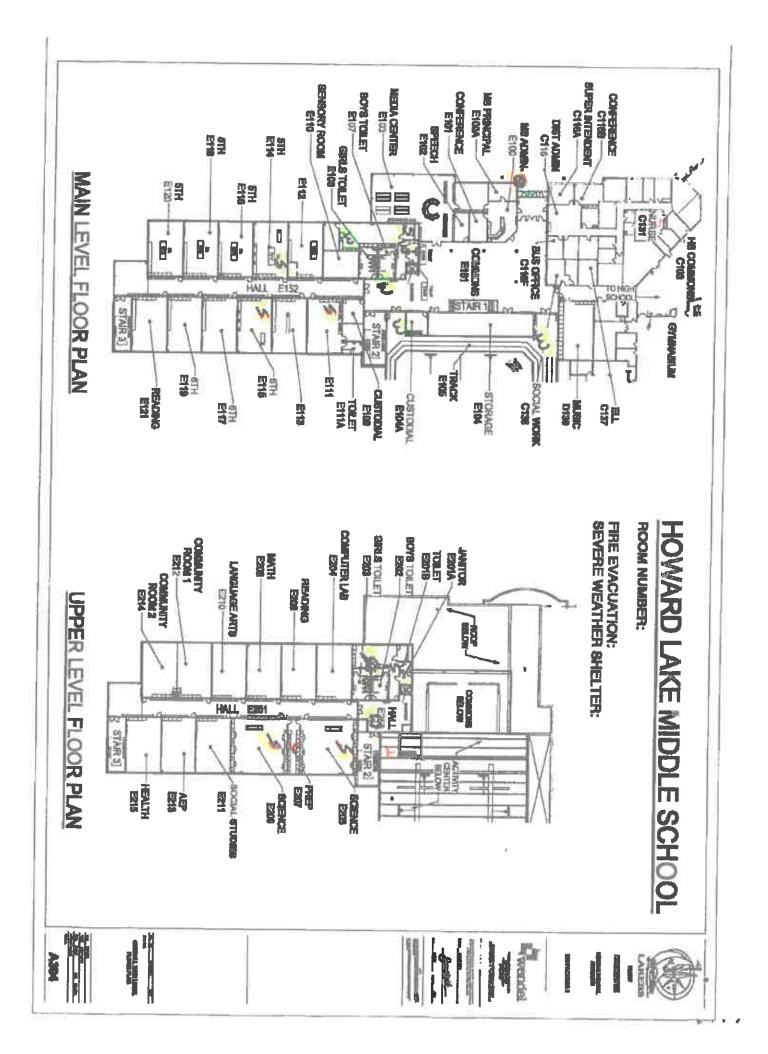
Visit: http://www.health.state.mn.us/divs/eh/water/schools/pbschoolguide.pdf

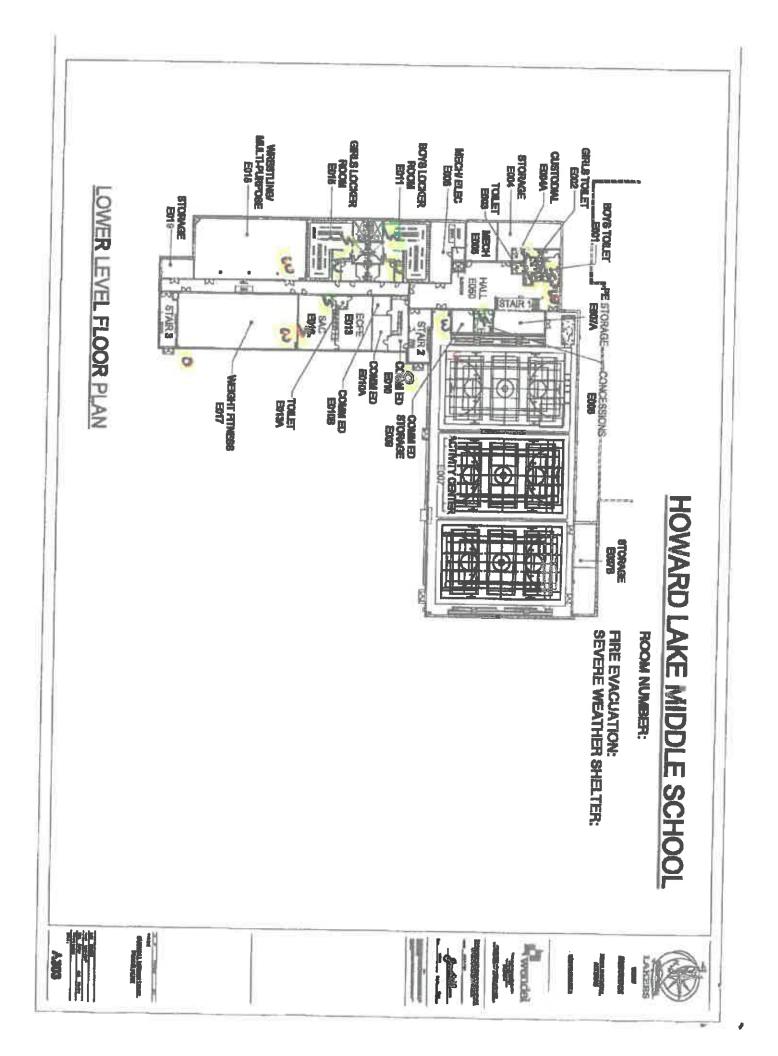
Appendix B

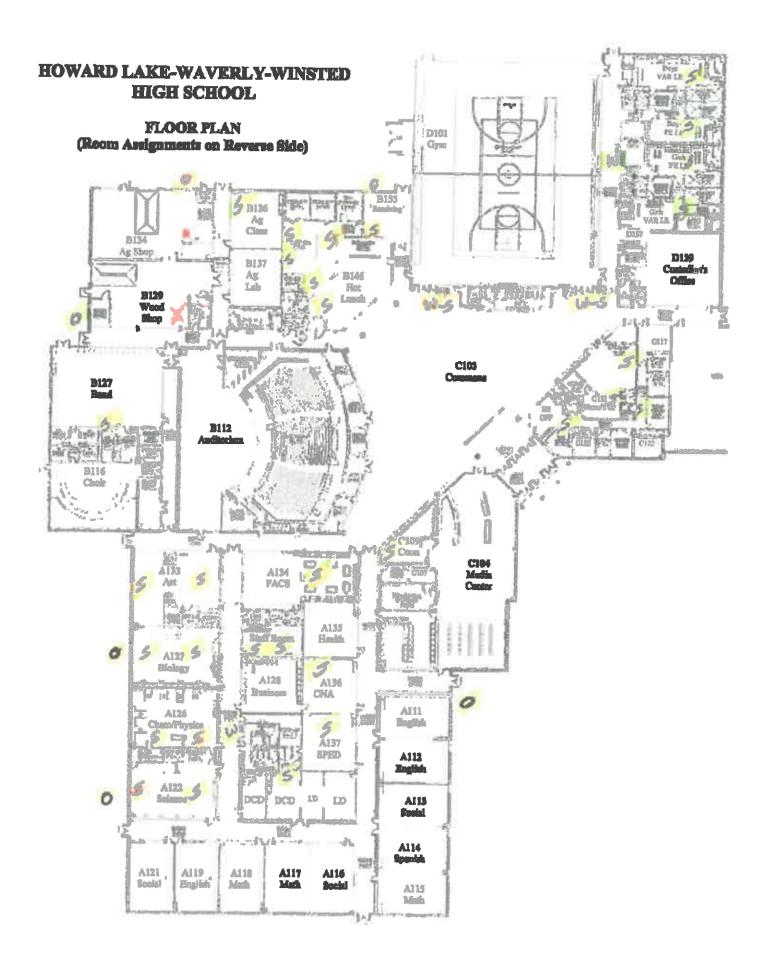
Building Maps

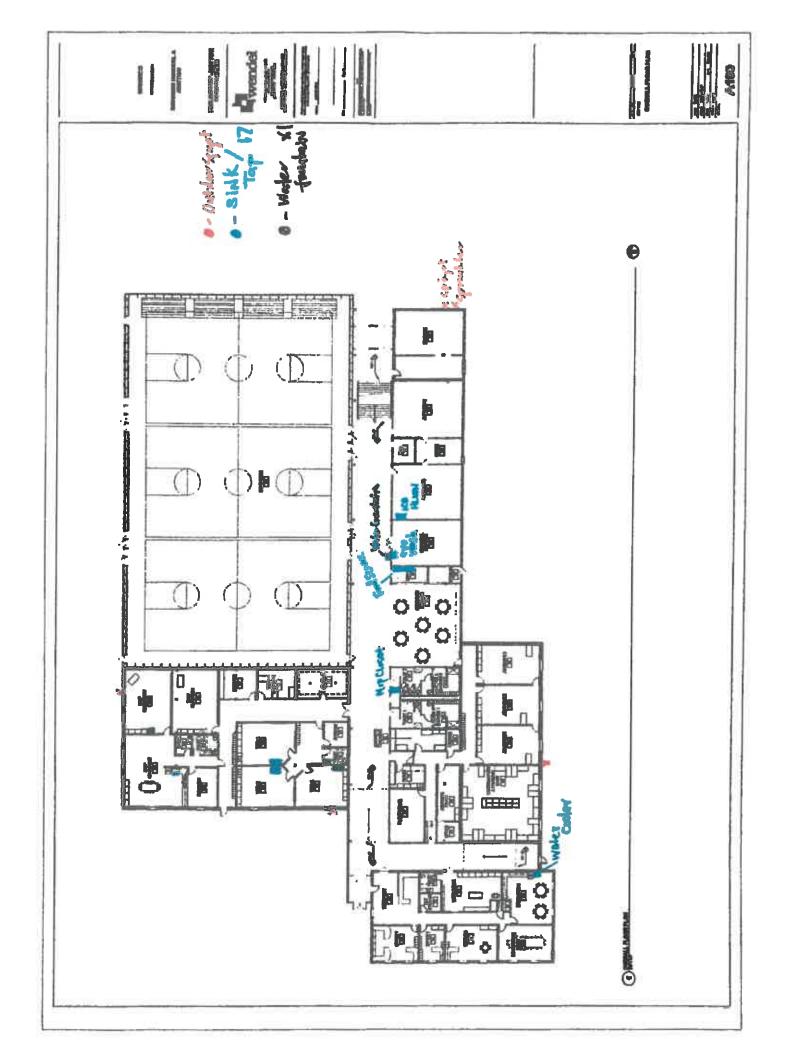












Appendix C

Sample Record

Lead in Drinking Water Management Review & Update Report

Program review and changes are documented below. Documented reviews indicate that the plan continues to meet the needs of the District, or has been modified to do so more effectively.