

Cromwell-Wright ISD #95 Lead in Drinking Water Sampling Plan

INTRO/OBJECTIVES

In the best interests of our students, staff, and greater community, the Cromwell-Wright School District has decided to take a proactive approach to the potential issue of lead in drinking water. The purpose of this Management Plan (MP) is to identify sources of lead in drinking water throughout school facilities.

In 2017, state legislation was passed (Minnesota Statute 121A.335) requiring school districts and charter schools to test for the presence of lead in all water sources used for food preparation/cooking and drinking. This statute is in addition to any other established testing requirements for school districts and charter schools. It requires schools to adopt a plan to accurately and efficiently test for lead in drinking water at school buildings serving students from prekindergarten through grade 12. This plan is based on the United States Environmental Protection Agency (EPA) standards and/or the model plan developed by the Minnesota Department of Health (MDH) and the Minnesota Department of Education (MDE). Water sample are required to be collected and analyzed by methods approved by the Minnesota Department of Health and/or United State EPA.

**NOTE: This management plan was developed and based on guidance provided by the EPA's Technical Guidance Manual – "3T's for reducing Lead in Drinking Water in Schools" – from herein referred to the EPA's "3T" program. See the below web-link for further detailed information.*

<https://www.epa.gov/dwreginfo/3ts-reducing-lead-drinking-water-schools-and-child-care-facilities>

The Cromwell-Wright School District has a responsibility to proactively collect and report data regarding the concentrations of lead in drinking water throughout all facilities and to provide a safe environment for students and staff. The main objectives of the plan include:

- Provide a safe environment for students and staff to learn, work, and visit which is not impacted by the presence of lead in drinking water.
- Identify sources of lead in drinking water.
- Implement approved strategies to mitigate real and perceived lead in drinking water issues.
- Continue implementing lead reducing practices in new construction and renovations of facilities.

PROGRAM ADMINISTRATION/MANAGEMENT

The implementation of this Management Plan (MP) is the responsibility of the Building and Grounds Department. They will test buildings to determine locations where there is a potential for lead to be ingested by drinking water. Test results and pertinent lead in drinking water information is to be regularly updated and communicated to students, staff and community. The lead in drinking water Program Administrator for the school district is the Lead Custodian. They will be responsible for overseeing and coordinating the overall management of the sampling program including prioritizing the fixtures to be samples, communicating with the sampling team/staff, coordinating with State of Minnesota and/or EPA accredited laboratories, and insuring data/records are reported accurately.

The Cromwell-Wright School District will utilize the United States EPA's guidance which recommends action be taken for taps with detected lead concentrations greater than 20 ppb. The school district currently receives all drinking water from a public water utility. Public water utilities are required to use a 15 ppb threshold as a trigger for treatment and publically available information indicates that drinking water provided by the local public water utility contains lead less than 15 ppb.

SAMPLING PLAN GUIDANCE

This sampling plan has been developed with deference to the EPA's "3T" Guidance Manual.

SAMPLING PLAN SCHEDULE

To comply with Minnesota Statute 121A.335 – each school building water tap that might be consumed by students (used for cooking or directly for drinking) must be tested at least once every five years. Testing must begin by July 1, 2018 and complete testing of all buildings serving students must be done within five years.

Note: Sampling may be collected anytime during the school year.

SAMPLING LOCATIONS/INVENTORIES

The Program Administrator, Lead Custodian, is responsible for identifying, sampling locations (i.e. taps) where there is a potential for lead to be ingested from drinking or cooking water. Examples of potable water taps including the following:

- Drinking fountains
- Water cooler/chillers
- Sink mounted bubblers
- Kitchen fixtures
- Cafeteria fixtures
- Classroom sinks
- Teacher lounge fixtures
- Nurse's office fixtures
- Staff/office fixtures
- Ice making machines (for consumption use)

SAMPLING/ANALYSIS

Samples will be collected using the protocols listed in the EPA's "3T" program (i.e. "First Draw" protocol). Samples will be collected by either trained school staff, certified laboratory staff or other appropriately trained personnel approved by the Cromwell-Wright School District.

Samples will be analyzed in accordance with the EPA's "3T" program. Samples will be analyzed by a State and/or EPA accredited laboratory.

COMMUNICATION/REPORTING

All sampling results will be reviewed and maintained by the Program Administrator, Lead Custodian, for the school district. Based on testing results – mitigation/corrective actions and additional testing may be needed.

The results of all testing will be made available to all students, staff and greater community using one or more of the methods/protocols listed in the EPA "3T" program (i.e. posting on website/email, in person upon request, press release, mailbox stuffer, etc.).

PLAN UPDATES

This Management Plan (MP) has the ability to be changed as new regulations or guidance is put in place and experience and additional knowledge is gained. Any questions regarding this Plan should be addressed to the Cromwell-Wright School District Office.