



## **LEAD IN WATER SAFETY PROGRAM**

### **PURPOSE**

Lead in Water: Progeny Academy Charter School (PACS) is committed to providing a safe and healthful learning and work environment for all students and staff. We recognize the importance of protecting our students and staff from potential lead exposure and will accomplish this via the following model plan. The following Lead in Water Standard of Operation is provided as a guide to assist employers and employees of ACS in complying with Minnesota Statute 121A.335, and the Minnesota Department of Health (MDH) and the Minnesota Department of Education requirement for lead in drinking water for public schools, as well as to provide other helpful information.

Minnesota Statute 121A.335 requires public school buildings serving kindergarten through grade 12 to test for lead in water in potable water sources (consumable water) every 5 years. The MDH and MDE have published "Reducing Lead in Drinking Water: A Technical Guidance and Model Plan for Minnesota's Public Schools," which presents a model plan that is available for schools to adopt. PACS has used this to develop the following Lead in Water Safety Standard of Operation.

PACS will review the standard annually for particular requirements, which are applicable to the charter school and adjust this program accordingly.

The standard of operation is designed to be specific to the needs of users of Progeny Academy Charter School. The standard of operation is intended to comply with the State of Minnesota's requirements.

If there are conflicts or discrepancies between this standard of operation and the State of Minnesota's requirements, the State of Minnesota shall take precedence.

### **OBJECTIVE**

The objective of the Progeny Academy Charter School Lead in Water Standard of Operation is to provide lead-safe drinking water sources throughout all of its facilities. Minnesota Statute 121A.335 requires lead concentration to be under 5 ppb in any tap that could be used as a drinking water source in a public school.

### **ASSIGNMENT OF RESPONSIBILITY**

Management: School Director (SD), Support Staff (SS), Custodian (C)

- SD is responsible for identifying potable water sources in all schools.
- C is responsible for accurately sampling and testing all schools.
- C is responsible for retesting any source that tests at or above 5 ppb with a flush sample.
- SD is responsible for immediately remediating any drinking water source that tests above 5 ppb after a flush sample.



- SD is responsible for securing the school's samples and sending them to an independent certified lab for QA/QC.
- SD is responsible for maintaining sampling results.



## PROCEDURES

This program is modeled after the Minnesota Department of Health's "Reducing Lead in Drinking Water: A Technical Guidance and Model Plan for Minnesota's Public Schools". The program identifies drinking water sources, provides testing for these sources for lead and outlines follow-up procedures for fixtures testing high in lead content. Progeny Academy Charter School will retest lead in water in each school at minimum every 5 years.

### **Drinking Water Sources**

PACS recognizes that any fixture that can be used for consumption must be tested for lead in water. These fixtures include:

- Drinking fountains;
- Sinks in classrooms;
- All kitchen area sources;
- All nurse/health area sources;
- Water dispensers (not bottled); and
- Restroom sinks.

Only cold water taps will be tested. Additional sources may be added if they are identified as sources of consumption by facility occupants.

### **Testing Methodology**

PACS has outlined a testing protocol as follows:

- Sample collection is performed on days when the water sources have been stagnant for 6-18 hours to obtain a "worst case" sample of the drinking water a person may consume from a fixture. The day before sampling, normal usage of the sampling tap should occur. Taps must sit stagnant for a minimum of six hours but not more than 18 hours before testing;
- The water is the "first draw" of water from a fixture; "first draw" means that the samples are collected before the fixture is used or flushed for the day. "First draw" represents a worst case scenario;
- The sample collection size is 250 ml;
- The samples are sent to a contracted lab for analysis.
- Test results should be at or below 5 parts per billion (ppb); If the results are at or above 5 ppb a flush sample is then taken;
- Flush sample – flush the water for exactly 15 sec before collecting the sample from the sample source. Collect a sample of 250 mL. The flush sample will be tested using the same contracted lab. A flush sample will be taken only once and not repeated even if the flush sample results are higher than 5ppb.
- Do not flush the toilets or turn on the faucets for drinking water or washing hands until all samples are collected and tested.



- Samples are not kept for record after they have been tested.
- All drinking water sources shall be sampled, at minimum, every five years.

### **High Test Results and Remediation**

Flushing:

- Flushing is a best management practice used to eliminate lead in water by controlling the amount of time water is allowed to be unused. The longer water is stagnant in a system, the greater the likelihood of lead in water levels will increase. The flushing procedure works by removing water that has been in the system overnight prior to consumption.
- Fixtures testing above 5 ppb shall have a follow-up “flush” sample collected and tested using the same contracted lab where the original samples were analyzed. A flush test means that the fixture is run for 15 seconds before a new sample is collected in a new 250 mL container. If the flush sample analysis is below 5 ppb, the district mandates the tap be flushed for 15 seconds before being used for consumption. Signs reading: PLEASE FLUSH FOR 15 SECONDS BEFORE CONSUMPTION Shall be placed near affected sinks and all staff shall be notified.

Removal:

- Fixtures failing the flush test, meaning their results still read at or above 5 ppb after running the fixture for 15 seconds, shall be turned off until replacement of the fixture is provided.

### **Sample Labeling**

Each sample shall be labeled with the following:

- Name of School
- Date of sampling
- Location/Room Number
- Water Source Number\*

\*All sources will be clearly labeled with a code i.e. Drinking Fountain #1= DF#1

### **Communication of Results**

PACS maintains current lead in water testing information for each school on the ACS Facilities webpage: <https://progenyacademy.org/lead-testing/>

This web page provides the most current lead in water laboratory reports for PACS. In addition, school staff will be notified of lead in water results after the conclusion of all testing in the school.

## **RECORDKEEPING REQUIREMENTS**

**Management:** Records of testing results will be maintained by PACS and can be accessed upon request. Test results will be posted on the Progeny Academy Charter School website.

**Contact Information:** Any questions, concerns, comments, or other information regarding the PACS



Lead in Water SOP can be directed to:

PACS

Phone: 763.325.9150

Director: Nicole Nelson, Ed.S.

Web Site:

<https://progenyacademy.org/lead-testing/>

Email: [info@progenyacademy.org](mailto:info@progenyacademy.org)

## RESOURCES & APPENDIX

Reducing Lead in Drinking Water: Reducing Lead in Drinking Water: A Technical Guidance and Model Plan for Minnesota's Public Schools. Minnesota Department of Health. Minnesota Department of Education. April 2018.

MDH Drinking Water in Schools for Educators and School Professionals: ) Minnesota Department of Health Drinking Water in Schools for Educators and School Professionals. Minnesota Department of Health. Accessed May 29, 2018. <http://www.health.state.mn.us/divs/eh/water/schools/>.

MDH Education and Communication Toolkit: Reducing Lead in Drinking Water ) Minnesota Department of Health Education and Communication Toolkit: Reducing Lead in Drinking Water. Minnesota Department of Health. Minnesota Department of Education. Accessed May 29, 2018. <http://www.health.state.mn.us/divs/eh/water/schools/toolkit.pdf>.

EPA 3Ts for Reducing Lead in Drinking Water in Schools ) 3Ts for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance. Environmental Protection Agency. October 2006. Accessed May 29, 2018. [https://www.epa.gov/sites/production/files/2015-09/documents/toolkit\\_leadschools\\_guide\\_3ts\\_leadschools.pdf](https://www.epa.gov/sites/production/files/2015-09/documents/toolkit_leadschools_guide_3ts_leadschools.pdf).