

November 1, 2016

Mr. Mike Vogel
Interim Director of Facilities and Construction Management
South Washington County Schools
7362 East Douglas Point Road S
Cottage Grove, MN 55016
P 651-425-6274
E mvogel@sowashco.org



**RE: Royal Oaks Elementary
Lead-in-Water Testing
IEA Project #201610819**

Dear Mr. Vogel,

At the request of South Washington County Schools, IEA collected a total of 71 samples of drinking water on September 27, 2016, for lead analyses from the Royal Oaks Elementary building.

The purpose of the site sampling was to document lead levels in the sampled locations and compare them to the EPA action level of 20 parts per billion (ppb).

INTRODUCTION

The Environmental Protection Agency (EPA) established the Lead Contamination Control Act (LCCA) of 1988 to identify and reduce lead in drinking water. Both the EPA and the Minnesota Department of Health (MDH) recommend testing of potable water sources (water used for consumption) every five years for the presence of lead. Lead is a metal that usually enters drinking water through the distribution system, including pipes, solders, faucets, and valves. Lead levels in water may increase when the water is allowed to sit undisturbed in the system, such as in science, biology, or art areas. Exposure to lead is a significant health concern, especially to infants and young children whose growing bodies absorb lead more readily than adult bodies do. Lead exposure can cause delays in physical and/or mental development in children and damage to the brain, kidneys, nervous system, and red blood cells. The EPA and MDH recommend that action be taken at a specific fixture when the lead concentration exceeds the EPA's action level for schools of 20 parts per billion (ppb).

METHODOLOGY

IEA collected 71 first-draw (unless otherwise noted) samples of approximately 500 milliliters (ml). "First draw" means the samples are collected before the fixture is used or flushed during the day. The first-draw sample results reflect a worst case scenario, i.e., the highest lead level that would be consumed by building occupants. Current protocol calls for flushing locations 8-18 hours prior to sampling.

Site map with sample locations are included in Appendix A. Water samples were analyzed by Minnesota Valley Testing Laboratories (MVTL) in New Ulm, Minnesota, which uses EPA approved analytical methods and quality control/assurance procedures. Samples were analyzed using the ICP/MS EPA Method 200.8.

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210 Woodlake Drive SE
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Baxter, MN 56425
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MARSHALL
1420 East College Drive
Marshall, MN 56258
507-476-3599
FAX 507-537-6985
800-233-9513

VIRGINIA
5525 Emerald Avenue
Mountain Iron, MN 55768
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FAX 763-315-7920
800-233-9513

RESULTS & DISCUSSION

The lead-in-water sampling results ranged from below the level of detection (<0.05 ppb) to 35.4 ppb. There are five (5) sample results greater than 20 ppb. See *Table 1: Water Testing Results Exceeding 20 ppb*. The laboratory report is provided in Appendix B. Laboratory results are reported in micrograms per liter (µg/L) which is equivalent to parts per billion (ppb).

Table 1: Water Testing Results Exceeding 20 ppb – September 27, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Results (ppb)
16-A51754	Royal Oaks Elementary	Sink Room 104	Faucet	20.5
16-A51758	Royal Oaks Elementary	Sink Room 108	Faucet	20.0
16-A51761	Royal Oaks Elementary	Sink Room 111	Faucet	28.4
16-A51781	Royal Oaks Elementary	Sink Room 201	Faucet	26.7
16-A51785	Royal Oaks Elementary	Sink Room 205	Faucet	35.4

ppb – parts per billion

In addition, one (1) result showed lead level between 15 ppb and 20 ppb. See *Table 2: Water Testing Result Approaching 20 ppb* for this result. Although the EPA recommends that school drinking water not exceed 20 ppb, the MDH recommends schools seek to reduce the amount of lead in drinking water to as close to zero as possible.

Table 2: Water Testing Result Approaching 20 ppb – September 27, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Result (ppb)
16-A51797	Royal Oaks Elementary	Drinking Fountain Room 201	Drinking Fountain	15.4

ppb – parts per billion

RECOMMENDATIONS

IEA recommends implementing one of the following treatment options for the fixtures with lead level exceeding the EPA action level of 20 ppb. These recommendations should also be considered for the fixture with lead level approaching 20 ppb.

- Install a point-of-use treatment device, such as the Omnipure OMB934 1M Lead Reduction Filter.
- Conduct flush testing in accordance with EPA or MDH guidelines to determine if flushing will reduce lead levels. If results indicate that flushing will reduce lead to acceptable levels, implement a flushing program which includes documentation of daily flushing and periodic program review.
- Replace fixture with “lead free” fixture certified to NSF/ANSI 372 or NSF/ANSI 61-G. The *Reduction of Lead in Drinking Water Act* redefines “lead free” as “not more than a weighted average of 0.25% lead when used with respect to the wetted surfaces of pipes, pipe fittings, plumbing fittings, and fixtures.” Effective January 4, 2014, drinking water system components sold or installed must adhere to this new requirement.
- Remove fixture from service by disconnecting it from the water supply.
- Post signs that the water is not potable and to notify staff of this.

In addition, IEA recommends that a copy of the district's Lead- in-Drinking Water Testing Report be made available to staff and the public through the district's administrative offices.

GENERAL CONDITIONS

The analysis and opinions expressed in this report are based upon water testing at South Washington County Schools. This report does not reflect variations in conditions that may occur. Actual conditions may vary and may not become evident without further assessment.

The report is prepared for the exclusive use of our client for specific application to the project discussed and has been prepared in accordance with generally accepted environmental, health and safety practices. Other than as provided in the preceding sentence and in our Proposal #5406A dated August 5, 2016 regarding Lead-in-Water Testing, including the General Conditions attached thereto, no warranties are extended or made.

Please contact IEA if you would like assistance with any of the above recommendations or have questions regarding this report.

Sincerely,

IEA, INC.


Amy Satterfield, CPPM I
Director of Business Development


Karen Weiblen
EHS/IEQ Consultant

Enclosure

cc: Damien Nelson, Safety & Security

Appendix A
Site Map/Drawing

LEGEND

- SINK (34)
- KITCHEN SINK (3)
- KITCHEN SPRAYER (3)
- DRINKING FOUNTAIN (30)
- WATER BOTTLE FILLER
- WATER COOLER
- INLINE HOT/COLD DISPENSER (1)



Appendix B
Laboratory Testing Report



MINNESOTA VALLEY TESTING LABORATORIES, INC.

1126 N. Front St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
 2616 E. Broadway Ave. ~ Bismarck, ND 58501 ~ 800-279-6885 ~ Fax 701-258-9724
 1201 Lincoln Highway ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
 www.mvtl.com

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Report Date: 1 Nov 2016

HEIDI SOLBERG
 IEA/BROOKLYN PARK
 9201 W BDWY STE #600
 BROOKLYN PARK MN 55445

Work Order #: 12-14782
 Account #: 002190
 Purchase Order #: 201610819

Date Received: 27 Sep 2016
 Date Sampled: 27 Sep 2016
 Temperature at Receipt: 20.2C

PROJECT NAME: ROYAL OAKS ELEM.
 PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A51738	09272016ROE-1 KITCHEN SINK #1	6.02 ug/L	15.0	24 Oct 16	RMB
16-A51739	09272016ROE-2 KITCHEN SINK #2	7.81 ug/L	15.0	24 Oct 16	RMB
16-A51740	09272016ROE-3 KITCHEN SINK #3	7.28 ug/L	15.0	24 Oct 16	RMB
16-A51741	09272016ROE-4 KITCHEN SPRAYER #1	3.64 ug/L	15.0	24 Oct 16	RMB
16-A51742	09272016ROE-5 KITCHEN SPRAYER #2	3.84 ug/L	15.0	24 Oct 16	RMB
16-A51743	09272016ROE-6 KITCHEN SPRAYER #3	9.69 ug/L	15.0	24 Oct 16	RMB
16-A51744	09272016ROE-9 DF CAFETERIA	8.49 ug/L	15.0	24 Oct 16	RMB
16-A51745	09272016ROE-10 DF #1 GYM B	2.76 ug/L	15.0	24 Oct 16	RMB
16-A51746	09272016ROE-11 DF #2 GYM B	4.60 ug/L	15.0	24 Oct 16	RMB
16-A51747	09272016ROE-12 DF OUTSIDE GYM B	2.91 ug/L	15.0	24 Oct 16	RMB
16-A51748	09272016ROE-13 SINK NURSES OFFICE	2.52 ug/L	15.0	24 Oct 16	RMB
16-A51749	09272016ROE-14 SINK RESOURCE ROOM	5.06 ug/L	15.0	24 Oct 16	RMB
16-A51750	09272016ROE-15 SINK 101 LEFT	14.6 ug/L	15.0	24 Oct 16	RMB

Approved by: 
 Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN

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 CERTIFICATION: MN LAB # 027-015-125 WI LAB # 999447680 ND MICRO # 1013-M ND WW/DW # R-040

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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A51751	09272016ROE-16 SINK 100	2.55 ug/L	15.0	24 Oct 16	RMB
16-A51752	09272016ROE-17 SINK 102	3.52 ug/L	15.0	24 Oct 16	RMB
16-A51753	09272016ROE-18 SINK 103	7.16 ug/L	15.0	28 Oct 16	RMV
16-A51754	09272016ROE-19 SINK 104	20.5 ug/L	15.0	28 Oct 16	RMV
16-A51755	09272016ROE-20 SINK 105	4.48 ug/L	15.0	28 Oct 16	RMV
16-A51756	09272016ROE-21 SINK 106	3.47 ug/L	15.0	28 Oct 16	RMV
16-A51757	09272016ROE-22 SINK 107	5.63 ug/L	15.0	28 Oct 16	RMV
16-A51758	09272016ROE-23 SINK 108	20.0 ug/L	15.0	28 Oct 16	RMV
16-A51759	09272016ROE-24 SINK 109	5.33 ug/L	15.0	28 Oct 16	RMV
16-A51760	09272016ROE-25 SINK 110	7.74 ug/L	15.0	28 Oct 16	RMV
16-A51761	09272016ROE-26 SINK 111	28.4 ug/L	15.0	28 Oct 16	RMV
16-A51762	09272016ROE-27 SINK 112	7.51 ug/L	15.0	28 Oct 16	RMV
16-A51763	09272016ROE-28 SINK 113	6.94 ug/L	15.0	28 Oct 16	RMV

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 Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A51764	09272016ROE-29 SK 101 RIGHT	9.77 ug/L	15.0	28 Oct 16	RMV
16-A51765	09272016ROE-30 DF 100	1.68 ug/L	15.0	28 Oct 16	RMV
16-A51766	09272016ROE-31 DF 102	3.32 ug/L	15.0	28 Oct 16	RMV
16-A51767	09272016ROE-32 DF 103	5.57 ug/L	15.0	28 Oct 16	RMV
16-A51768	09272016ROE-33 DF 104	4.55 ug/L	15.0	28 Oct 16	RMV
16-A51769	09272016ROE-34 DF 105	3.39 ug/L	15.0	28 Oct 16	RMV
16-A51770	09272016ROE-35 DF 106	1.80 ug/L	15.0	28 Oct 16	RMV
16-A51771	09272016ROE-36 DF 107	4.92 ug/L	15.0	28 Oct 16	RMV
16-A51772	09272016ROE-37 DF 108	8.69 ug/L	15.0	28 Oct 16	RMV
16-A51773	09272016ROE-38 DF 109	5.40 ug/L	15.0	28 Oct 16	RMV
16-A51774	09272016ROE-39 DF 110	5.69 ug/L	15.0	28 Oct 16	RMV
16-A51775	09272016ROE-41 DF 112	6.81 ug/L	15.0	28 Oct 16	RMV

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Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A51776	09272016ROE-42 DF 113	5.59 ug/L	15.0	28 Oct 16	RMV
16-A51777	09272016ROE-43 DF NEAR 104	2.90 ug/L	15.0	28 Oct 16	RMV
16-A51778	09272016ROE-44 SINK MEDIA CENTER WORK ROOM	5.63 ug/L	15.0	28 Oct 16	RMV
16-A51779	09272016ROE-45 SINK STAFF LOUNGE	2.86 ug/L	15.0	28 Oct 16	RMV
16-A51780	09272016ROE-46 INLINE FIXTURE STAFF LOUNGE	< 0.5 ug/L	15.0	28 Oct 16	RMV
16-A51781	09272016ROE-47 SINK 201	26.7 ug/L	15.0	28 Oct 16	RMV
16-A51782	09272016ROE-48 SINK 202	5.78 ug/L	15.0	28 Oct 16	RMV
16-A51783	09272016ROE-49 SINK 203	4.24 ug/L	15.0	28 Oct 16	RMV
16-A51784	09272016ROE-50 SINK 204	7.69 ug/L	15.0	28 Oct 16	RMV
16-A51785	09272016ROE-51 SINK 205	35.4 ug/L	15.0	28 Oct 16	RMV
16-A51786	09272016ROE-52 SINK 206	4.16 ug/L	15.0	28 Oct 16	RMV
16-A51787	09272016ROE-53 SINK 207	6.62 ug/L	15.0	28 Oct 16	RMV

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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A51788	09272016ROE-54 SINK 208	4.49 ug/L	15.0	28 Oct 16	RMV
16-A51789	09272016ROE-55 SINK 209	5.93 ug/L	15.0	28 Oct 16	RMV
16-A51790	09272016ROE-56 SINK 210	8.68 ug/L	15.0	28 Oct 16	RMV
16-A51791	09272016ROE-57 SINK 211	3.12 ug/L	15.0	28 Oct 16	RMV
16-A51792	09272016ROE-58 SINK 212	7.65 ug/L	15.0	28 Oct 16	RMV
16-A51793	09272016ROE-59 SINK 213	7.19 ug/L	15.0	28 Oct 16	RMV
16-A51794	09272016ROE-60 SINK 214	13.2 ug/L	15.0	28 Oct 16	RMV
16-A51795	09272016ROE-61 SINK 215	8.71 ug/L	15.0	28 Oct 16	RMV
16-A51796	09272016ROE-62 SINK 216	9.11 ug/L	15.0	28 Oct 16	RMV
16-A51797	09272016ROE-63 DF 201	15.4 ug/L	15.0	28 Oct 16	RMV
16-A51798	09272016ROE-64 DF 202	6.26 ug/L	15.0	28 Oct 16	RMV
16-A51799	09272016ROE-65 DF 203	6.24 ug/L	15.0	28 Oct 16	RMV

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16-A51800	09272016ROE-66 DF 204	3.79 ug/L	15.0	28 Oct 16	RMV
16-A51801	09272016ROE-67 DF 205	14.9 ug/L	15.0	28 Oct 16	RMV
16-A51802	09272016ROE-68 DF 206	3.69 ug/L	15.0	28 Oct 16	RMV
16-A51803	09272016ROE-69 DF 207	4.07 ug/L	15.0	28 Oct 16	RMV
16-A51804	09272016ROE-70 DF 208	2.74 ug/L	15.0	28 Oct 16	RMV
16-A51805	09272016ROE-71 DF 209	4.83 ug/L	15.0	28 Oct 16	RMV
16-A51806	09272016ROE-73 DF 211	2.43 ug/L	15.0	28 Oct 16	RMV
16-A51807	09272016ROE-74 DF 212	3.36 ug/L	15.0	28 Oct 16	RMV
16-A51808	09272016ROE-75 DF OUTSIDE 212	4.23 ug/L	15.0	28 Oct 16	RMV

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