



Holden R-III School District

Safe Drinking Water Plan

www.holdenschools.org

Holden R-III School District
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Introduction: Purpose of this Plan

The Holden R-III School District is committed to providing a safe, healthy learning & work environment for all students and staff. We recognize the importance of protecting our students and staff from potential lead exposure and are confident the procedures established in this plan will accomplish this goal. This plan is designed to mitigate the exposure of students and staff to lead in drinking water and food preparation water sources throughout our facilities. This plan was developed in compliance with Missouri Statutes RSMO 160.077 (Get the Lead out of School Act 2022) and the Missouri Department of Health and Senior Services (MDHSS).

Regulations

Get the Lead Out of School Drinking Water Act (RSMo 160.077)

<https://revisor.mo.gov/main/OneSection.aspx?section=160.077&bid=51364&hl=>

Other Resources:

Fact Sheet: Tips for Schools

<https://health.mo.gov/living/environment/lead/pdf/tips-for-schools-fact-sheet.pdf>

Frequently Asked Questions

<https://health.mo.gov/living/environment/get-the-lead-out-of-school/pdf/faqs.pdf>

EPA 3Ts for Reducing Lead in Drinking Water

<https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>

Step 1 - Sampling Program Development

Fixture Inventory

The Holden R-III School District has identified water sources used for consumption (drinking water & food preparation) at each of the District facilities.

- This includes any drinking water outlet or potable water fixture that is used or potentially used for drinking, food preparation, cooking or cleaning kitchen utensils, water fountains or coolers, bottle fillers, ice machines, faucets, hydrants, spigots or taps.
- The facilities department has evaluated drinking fountains to ensure they do not have lead-lined tanks as defined by EPA Lead Contamination and Control Act.

Sampling Schedule

The district will have all drinking water outlets initially tested prior to August 1, 2024, or the first day students are present in the building, whichever is later. Remediated sources must be tested prior to being placed back in service to ensure the remediation was effective.

- All drinking water outlets found to have lead concentrations less than 5 parts per billion must be tested every 5 years.
- New or replaced plumbing pipes, fittings, fixtures, or other components must be tested prior to being placed into service ensuring to include all outlets impacted by these efforts.
- The district shall conduct testing annually of at least 25% of remediated drinking water outlets until all remediated outlets have been tested as recommended by EPA's 2018 version of the 3Ts program.

Sampling Logistics & Water Analysis:

The Holden R-III School District has contracted Axiom Service Professionals to conduct the sampling of the drinking and potable water sources. They will submit all samples to a Missouri Department of Natural Resources certified laboratory for testing.

The district has determined that using an independent company for sample collections is best for the following reasons:

- Axiom Service Professionals staff is trained in the sampling and chain of custody procedures to ensure integrity of sample analysis.
- Sampling and analysis is completed by a third party and provides a more independent review and transparency.

Step 2 - Conduct First Draw Sampling

According to Missouri RSMo 160.077 regulations, Axiom Service Professionals staff will conduct first draw sampling of all previously identified water sources. First draw means that the samples are collected before the fixture is used or flushed for the day. First draw testing represents the **worst-case scenario** for lead in water.

- The day before sampling - flush each water source to be sampled for a minimum of five minutes.
- Affix signage to each water source to prevent source from being used prior to sample collection.
- Return to each facility between 8 and 18 hours after flushing.
- Collect a water sample from each water source into a laboratory supplied 250-ml sample container.
- Complete field information form.
- Transfer samples under chain-of-custody procedures to TekLab, a NELAP accredited laboratory.

Step 3 - Communicate Results

Upon completion of sampling and receipt of laboratory analysis results, Axiom Service Professionals will prepare a report and maps for each facility. The maps will include the approximate sample location, unique sample identification number, type of sample (drinking fountain, faucet, ice machine, etc.), and lead concentration. Axiom Service Professionals will highlight those samples on the map exceeding the Action Level. Axiom Service Professionals will provide recommendations for those water sources that exceed the action levels, which may include removal of the location from service, filtering, etc., depending on the individual results.

Axiom Service Professionals will provide two hardcopies and one electronic PDF of the laboratory analytical reports, chain of custody documentation, field forms, summary tables and maps organized by facility to the district within 30 days of receipt of the lab results. Upon receipt of documentation from Axiom Service Professionals, Holden R-III School District will post all results on the district website (www.holdenschools.org) within 2 weeks. For any facility that has a sample or samples exceeding the action level, the district will contact parents and staff via written notification within 7 days. This notification will include the following information.

- The test results and a summary that explains the results.
- A description of any remedial steps taken.
- A description of general health effects of lead contamination and community specific resources.

Holden R-III School District will also report all findings in an annual report to the Missouri Department of Health and Senior Services.

Step 4 - Interpretation of Sample Results

Lead in water results are expressed in parts per billion (ppb). The Missouri Department of Health and Senior Services action level for lead in water is 5 ppb as measured on a first draw sampling basis. Lead hazard remediation options are implemented at any school facility or at targeted tap locations where lead in water levels are at or above 5 ppb. In most schools the lead hazard remediation options are implemented at targeted taps and in some instances may be a building wide plan.

Step 5 - Remediation

Following lead in water testing at a school, results are evaluated to determine the best remediation option. The removal of lead sources is the first option considered and is implemented where and when feasible.

Short term:

Initial course of action is to limit any further exposure to lead in water. This can be accomplished by taking drinking fountains and faucets out of service until the lead source can be identified. Per State law, for those sources that are not critical for drinking, food preparation and utensil cleaning, signage will be placed to discontinue use until long term remediation actions can be taken. The sign at the source may state “Sink for hand washing and curricular use only”.

Long term:

If sinks are determined to not be used for drinking or food preparation signage may remain per state law as a long-term remediation. For those necessary for drinking, food preparation and utensil cleaning the following actions may be taken:

- Taps identified above 5 ppb are evaluated by the district facilities department to determine if the possible source of lead is at the fixture. If the source of lead is determined to be at the fixture, the fixture is either removed from service or replaced, or fixture components are replaced.
- It has been found in a few cases that the lead source is in the debris trapped in the faucet strainer. In this case the strainer is removed and cleaned before being reinstalled.
- To minimize the introduction of lead into the drinking water systems, Holden R-III School District requires that plumbing materials and fixtures used are certified lead free.
- Holden R-III School District has included a filtered bottle filler/fountain to the standard in new construction and renovation projects. In the last few years, the facilities department has added filtered bottle fillers on our drinking fountains at each school.