



## **Lead In Water Safety Program**

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**District Facilities Department  
Environmental Services Group**

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# **PURPOSE**

## **Lead in Water**

Saint Paul Public Schools (SPPS) 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 Saint Paul Public Schools 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. Saint Paul Public Schools has used this to develop the following Lead in Water Safety Standard of Operation.

The District Environmental Services Group (ESG) will review the standard annually for particular requirements, which are applicable to the District and adjust this program accordingly.

The standard of operation is designed to be specific to the needs of users of Saint Paul Public Schools.

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 Saint Paul School District 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. Environmental Services Group (ESG) will maintain a copy of this program. A copy can be obtained from ESG.

## ASSIGNMENT OF RESPONSIBILITY

### Management

#### **Environmental Services Group (ESG)**

- ESG is responsible for identifying potable water sources in all schools.
- ESG is responsible for accurately sampling and testing all schools with the aid of an accredited laboratory.
- ESG is responsible for immediately coordinating shutting off and remediating any drinking water source that tests above 5 ppb after results are received from the laboratory.
- ESG is responsible for maintaining sampling results and openly sharing results to the public.

## 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. Saint Paul Public Schools will retest lead in water in each school at minimum every 5 years.

### Drinking Water Sources

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

- Drinking fountains and hydration stations
- Sinks in classrooms
- All kitchen area sources
- All nurse/heath area sources
- Water dispensers
- Restroom sinks
- Office sinks
- Boiler room sinks
- Custodial slop 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**

Saint Paul Public Schools has outlined a testing protocol as follows:

1. Sample collection is performed in the morning the day after flushing or standard use of a fixture to capture the “worst case” sample of the drinking water a person may consume from a fixture in regular operation. Taps must sit stagnant for a minimum of six hours but not more than 18 hours before testing;
2. 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;
3. The sample collection size is 250 ml;
4. The samples are sent to a MDH approved accredited lab for analysis;
5. Do not flush the toilets or turn on the faucets for drinking water or washing hands until all samples are collected and tested.
6. Samples are not kept for record after they have been tested.
7. All drinking water sources shall be sampled, at minimum, every five years.

## **High Test Results and Remediation**

### **Removal:**

Fixtures with results of **5 ppb or greater** shall be turned off until replacement of the fixture is provided. Retesting shall occur to ensure fixtures tests below the action limit before they are deemed safe to drink from.

### **Sample Labeling**

Each lab sheet shall be labeled with the following:

- Name of School and CAFM Number
- Date of Sampling
- Staff Who Conducted Sampling
- Sampled Fixtures with Associated Sample Numbers
  - Example Sample Number: #1020-001 – Dish Room Sprayer

### **Communication of Results**

SPPS maintains current lead in water testing information for each school on the SPPS Facilities webpage: <https://www.spps.org/Page/3483>.

This web page provides the most current lead in water laboratory report for each school. In addition, school principals will be notified of lead in water results for their respective school after the conclusion of all testing in that school. A copy of SPPS Lead in Water Safety Program is also provided on the website.

## RECORDKEEPING REQUIREMENTS

### **Management**

Records of testing results will be maintained by ESG and can be accessed upon request. Test results will be posted on Saint Paul Public Schools/Facilities website.

### **Contact Information**

Any questions, concerns, comments, or other information regarding the District Lead in Water SOP can be directed to:

- ❖ The Environmental Services Group
- ❖ Phone: 651.744.1800
- ❖ Web Site: <https://www.spps.org/Page/3470>
- ❖ Email: [ESG@spps.org](mailto:ESG@spps.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).