

May 22, 2023

Brian Koslofski
Wright Technical Center
1405 3rd Avenue Northeast
Buffalo, MN 55313



**RE: Wright Technical Center
2023 Lead-in-Water Testing
IEA Project #202010396**

Dear Brian Koslofski:

At the request of Wright Technical Center, IEA collected seventeen (17) water samples from identified potable water sources on April 14, 2023, for lead analyses from Wright Technical Center.

The purpose of the sampling is to document lead content in the sampled locations.

INTRODUCTION

Minnesota Statute 121A.335 requires public school buildings serving pre-kindergarten through grade 12 to test for lead in potable water fixtures every five years. The *3Ts for Reducing Lead in Drinking Water Toolkit (2018)* and the Lead Contamination Control Act (LCCA) of 1988 were created by the Environmental Protection Agency (EPA) to identify and reduce lead in drinking water. Lead is a metal that usually enters drinking water through the distribution system, including pipes, solders, faucets, and valves. Lead content in water may increase when the water is allowed to sit undisturbed in the system. Exposure to lead is a health concern.

The EPA recommends taking action when elevated lead levels are noted in water fixtures. The MDH and MDE recommend taking a fixture out of service if levels are 20 parts per billion (ppb) or higher. The MDH and MDE also recommend taking action according to their guidelines for fixtures with levels of 2 parts per billion (ppb) or higher. MDH recommendations are in Appendix A

METHODOLOGY

IEA collected seventeen (17) first-draw samples of approximately 250 milliliters (ml) of water. "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. MDH recommends fixtures not be used 6 to 18 hours prior to sampling fixtures.

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9201 West Broadway, #600
Brooklyn Park, MN 55445
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800-233-9513

MANKATO
610 North Riverfront Drive
Mankato, MN 56001
507-345-8818 / FAX 507-345-5301
800-233-9513

ROCHESTER
210 Woodlake Drive SE
Rochester, MN 55904
507-281-6664 / FAX 507-281-6695
800-233-9513

BRAINERD
601 NW 5th Street, Ste. #4
Brainerd, MN 56401
218-454-0703 / FAX 218-454-0703
800-233-9513

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
218-410-9521
800-233-9513

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 MVTL Method: ICP/MS EPA Method 200.8.

RESULTS & DISCUSSION

The lead-in-water sampling results ranged from below the level of detection <0.5 ppb to 13.7 ppb. The laboratory results indicated that sampling results were below the MDHs recommendations to take the fixture out of commission. Results indicated three (3) fixtures that were between 2ppb to 20 ppb which MDH and MDE has recommendations to take action. Laboratory results are reported in micrograms per liter ($\mu\text{g/L}$) which is equivalent to parts per billion (ppb). The laboratory reports are provided in Appendix B.

Table 1: Water Testing Results Exceeding 2 ppb – April 14, 2023

Sample Number	Sampling Location	Fixture Type	Lead Results (ppb)
0423WTC-7	242	Sink	13.7
0423WTC-15	101	Sink	2.72
0423WTC-17	Student Coat Room 103	Sink	7.5

ppb – parts per billion

RECOMMENDATIONS

- Sampled fixtures showed lead levels below the MDH and MDE’s recommendation to take the fixture out of service of 20 ppb. Based on the sample results, no further action is required at this time.
- Three (3) fixtures had results between 2 ppb and 20 ppb. MDH and MDE action level recommendations are located in Appendix A.
- In addition, the MDH recommends labeling any water fixtures not included in the sampling program, including bathroom taps, hose bibbs, laboratory faucets/sinks, or custodial closet sinks.
- If the school receives its water from a Community Public Water Supply, such as a municipal water supply, MDH encourages the school to work with them to assess the source contribution of lead coming into the school.
- It is recommended that a copy of the district's Lead in Water Testing Report be made available to staff and the public through the district's administrative offices. Per Minnesota Statutes, section 121A.335, a school district that has tested its buildings for the presence of lead shall make the results of the testing available to the public for review and must notify parents of the availability of the information.

GENERAL CONDITIONS

The analysis and opinions expressed in this report are based upon data obtained from Wright Technical Center at the indicated locations. This report does not reflect variations in conditions that may occur across the site, property, or facility. 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 #8865 dated March 13, 2020, regarding EHS services 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.

Reviewed by:



Annie Shimkus
EHS Account Manager



Mary Ferrian, CSP
EHS Division Manager

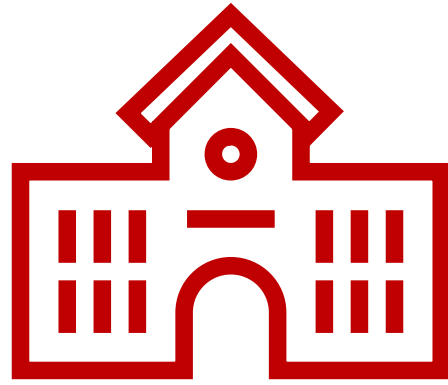
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Enc.

Appendix A

MDH Recommendations Flow Chart

Testing for lead in school drinking water



What you must do:



Develop sampling program following state statute



Take corrective actions as required



Collect water samples



Communicate lead results and any corrective actions taken

There is no safe level of lead. If a tap tests at these levels:

>20ppb

- Do not use for cooking or drinking
- Remove tap from service until problem addressed

2-20ppb

- Water may continue to be used as options are considered
- Consider measures such as cleaning aerators, flushing the water
- Retest to verify correction actions work

Non-detect or <2ppb

- Non-detect means lead was not present
- Normal tap use
- Retest in 5 years

In all cases: Communication about results and corrective actions to the school board and community should be on-going.

For more information, email health.drinkingwater@state.mn.us or call 651-201-4700.

Environmental Health - Drinking Water Protection



Appendix B

Laboratory Testing Results



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2616 East Broadway Ave. ~ Bismarck, ND 58501 ~ 800-279-6885 ~ Fax 701-258-9724
1201 Lincoln Hwy. ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.MVTL.com



Workorder: Wright Technical Center (12682)
Account #: 2190
Project #: 202010396

Client: Institute for Environmental Assessment (IEA)
PO: 202010396

Emma Squires-Sperling
IEA / Brooklyn Park
9201 W Broadway Suite #600
Brooklyn Park, MN 55445

Certificate of Analysis

Approval

All data reported has been reviewed and approved by:

Dave Smahel, Inorganic Chemistry/Feed Lab Manager New Ulm, MN

Analyses performed under Minnesota Department of Health Accreditation conforms to the current TNI standards.

NEW ULM LAB CERTIFICATIONS:
MN LAB # 027-015-125ND WW/DW # R-040

BISMARCK LAB CERTIFICATIONS:
MN LAB # 038-999-267ND W/DW # ND-016

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.

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Workorder: Wright Technical Center (12682)

Client: Institute for Environmental Assessment (IEA)

Workorder Summary

Workorder Comments

All samples were preserved with nitric acid upon receipt at the laboratory.

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization for publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.

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**Workorder:** Wright Technical Center (12682)**Client:** Institute for Environmental Assessment (IEA)**Analytical Results**

Lab ID: 12682001 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-1 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 303 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:14	

Lab ID: 12682002 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-2 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 303 WBF

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:15	

Lab ID: 12682003 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-3 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 239 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:19	

Lab ID: 12682004 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-4 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 239 WBF

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:20	

Lab ID: 12682005 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-5 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 248 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:21	

Lab ID: 12682006 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-6 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 237 SNK NFD

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:22	

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**Workorder:** Wright Technical Center (12682)**Client:** Institute for Environmental Assessment (IEA)**Analytical Results**

Lab ID: 12682007 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-7 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 242 SNK

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	13.7	ug/L	15	EPA 200.8	04/28/2023 16:23	

Lab ID: 12682008 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-8 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 214 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:31	

Lab ID: 12682009 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-9 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 103 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:32	

Lab ID: 12682010 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-10 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 103 WBF NFD

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:34	

Lab ID: 12682011 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-11 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 201 SNK NFD

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	1.07	ug/L	15	EPA 200.8	04/28/2023 16:35	

Lab ID: 12682012 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-12 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 220 WC

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:36	

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**Workorder:** Wright Technical Center (12682)**Client:** Institute for Environmental Assessment (IEA)**Analytical Results**

Lab ID: 12682013 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-13 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Across 220 WBF

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:37	

Lab ID: 12682014 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-14 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 226 SNK

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	<0.5	ug/L	15	EPA 200.8	04/28/2023 16:38	

Lab ID: 12682015 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-15 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 101 SNK

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	2.72	ug/L	15	EPA 200.8	04/28/2023 16:39	

Lab ID: 12682016 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-16 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: 308 SNK

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	0.54	ug/L	15	EPA 200.8	04/28/2023 16:40	

Lab ID: 12682017 **Date Collected:** 04/14/2023 07:00 **Matrix:** Potable Water
Sample ID: 0423WTC-17 **Date Received:** 04/17/2023 13:30
Temp @ Receipt (C):
Sample Desc: Student Coat Room 103 SNK

Parameter	Results	Units	MCL	Method	Analyzed	Qual
Lead	7.50	ug/L	15	EPA 200.8	04/28/2023 16:41	

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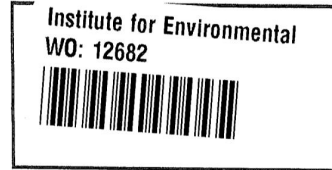
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1 of 16

Chain of Custody

9203 West Broadway North, Suite 600
Brooklyn Park, MN 55445
763.315.7900 1.800.233.9513 IEA

12682
55

Table with columns: Client Name, Building Name, Analytical Lab, Contact Name, Project #, Project Name, Phone #, IEA Fax #, Written Sample Results To, Other Information, Sampled By, Date, Time, Analyzed By, Analyst, Date & Time, Shipped By, Date, Time, Turnaround Time, Received By, Date, Time, Sample Condition, Temperature, Lab Number, Sample Number, Sample Location, Sample Type (Water, Soil, Other), Date Sampled, Volume/Bottle Type, Analysis Required, Comments & Observations.

Original - Analytical Lab
Copy - Client File
Copy - IEA Lab

Handwritten notes: H-LP, 17 Apr 23, 0910, AMB, DS Amp, 17 Apr 23, 1330, Tm 774, 20.4

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Workorder: Wright Technical Center (12682)

Client: Institute for Environmental Assessment (IEA)



Sample Condition Checklist

Date: 17 Apr 23 Time: 1330 AM/PM By: OS
Account Name: wright technical center / IEA Account #
Bill of Lading #:
Temp: 20.4 °C ROI Ambient Ice Crystals Present in Sample
TM#: 774
MVTL Courier: Dan Other:
MVTL Route: Metro Walk-in UPS Air FedEx Air Speedee
Mail UPS Ground Fed Ex Ground

Containers Supplied by MVTL: Yes No Designate customer supplied containers as "Other" in container size column
Comments:
Table with columns: Number, Containers Size (mL), Container Type, Preservation, pH. Includes rows for various container sizes and types, and a note: **DO NOT OPEN THE PLASTIC BAGS HOLDING THE SAMPLE BOTTLES!!**

*ANY CONTAINER SENT TO A SUBCONTRACT LABORATORY WILL NOT BE CHECKED FOR PRESERVATION!

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