

COLOGNE ACADEMY
MANUAL OF SCHOOL POLICIES APPROVED BY THE BOARD

860 MODEL PLAN FOR LEAD TESTING IN WATER

The model plan includes three required steps:

- Step 1. Sampling Program Development
- Step 2. Conduct First Draw Tap Monitoring
- Step 3. Communicate Results

All schools must complete these steps accurately and efficiently to test for the presence of lead in water in school buildings serving pre-kindergarten students and students in kindergarten through grade 12.

Step 1- Sampling Program Development:

- Inventory drinking water taps used for consumption (i.e., drinking water and food preparation):
 - A drinking water faucet or tap is the point of access for people to obtain water for drinking or food preparation. A faucet/tap can be a fixture, faucet, drinking fountain or water cooler. Drinking water taps typically do not include bathroom taps, hose bibbs, laboratory faucets/sinks or custodial closet sinks; these should be clearly marked not for drinking.
 - Taps used for human consumption should only be cold water taps.
 - Hot water taps should never be used to obtain water for drinking water or food preparation.
- Check all drinking fountains to ensure EPA has not identified them as having a lead lined tank under the LCCA. This list can be found at: Lead in Drinking Water Coolers (<http://tinyurl.com/kr8kppf>)
- Schedule for sampling:
 - All taps used for drinking water or food preparation must be tested at a minimum of once every five years.
 - If budget or resources do not allow all taps to be tested in the first year, it is suggested that taps be prioritized, with all high priority taps tested the first year, medium

priority the second, and low priority the third. The fourth year should be used as a “make up” year, if needed.

- Priority levels are:
 - High priority: taps used by children under the age of six years of age or pregnant women (e.g., drinking fountains, nurse’s office sinks, classrooms used for early childhood education and kitchen sinks);
 - Medium priority: other taps regularly used to obtain water for drinking or cooking (e.g., Family and Consumer Science sinks, classroom sinks, and teacher’s lounges); and
 - Low priority: other taps that could reasonably be used to obtain water for drinking but are not typically used for that purpose.
- Logistics for sampling:
 - Water testing will be done consistent with the established schedule. A contractor will conduct the testing and send analysis of the water via written report.

Step 2- Conduct First Draw Tap Monitoring:

Water from taps used for drinking or food preparation must be tested for lead using “first draw” samples. First draw means that the samples are collected before the fixture is used or flushed during the day. Use only cold water for collecting lead samples. It is necessary to consider the order in which tap samples are collected to avoid the potential of accidentally flushing a tap. Always start at taps closest to where the water enters the building.

Sample site preparation and sample collection must be performed consistent with the following conditions:

- Note that it may be necessary to collect samples over a number of days to ensure only first draw samples were collected;
- The day before sampling - normal usage of the sampling tap should occur;
- The night before sampling - secure the fixture from being used (e.g., hang a “Do Not Use” sign);
- Do not use sampling taps for a minimum of six hours. MDH recommends not exceeding 18 hours;
- Do not remove aerators or attachments;
- Collect the first draw

Step 3- Communicate Results:

Minnesota Statutes section 121A.335, subdivision 5 creates a reporting requirement for schools as follows - “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.” In addition to testing for lead and meeting the reporting requirements, a lead hazard reduction program should include a comprehensive communication plan. The purpose of a communication plan is to provide a process for school employees, students and parents to

address questions, report results and provide ongoing, up-to-date information regarding sampling efforts.

School management should:

- Assign a designated person to be the contact;
- Notify affected individuals about the availability of the testing and results within a reasonable time. School employees, students, and parents should be informed and involved in the communication process. Results of initial and any follow-up testing should be easily accessible along with documentation of lead hazard reduction options. Posting the information on a website is preferred, but the information should also be available to those without easily accessible internet access. Examples of other information venues are: meetings, open houses, and public notices; and
- Identify and share specific activities pursued to correct any lead problems. Local health officials can assist in understanding potential health risks, technical assistance and communication strategies.

Room Number	Current FY18=P1, FY19=P2, FY20= P3	Water type	Priority
107		classroom sink	1
110		classroom sink	1
112		classroom sink	1
114		classroom sink	1
115		classroom sink	1
116		classroom sink	1
117		classroom sink	1
118		classroom sink	1
119		classroom sink	1
120		classroom sink	1
121		classroom sink	1
122		classroom sink	1
201		classroom sink	1
202		classroom sink	1
203		classroom sink	1
204		classroom sink	1
205		classroom sink	1
206		classroom sink	1
208		classroom sink	1
	k-2 rest room boys side	drinking fountain	1
	k-2 rest room girls side	drinking fountain	1
	office hallway drinking fountain	drinking fountain	1

	office hallway drinking fountain	drinking fountain	1
	MS water fountain	drinking fountain	1
	MS water fountain	drinking fountain	1
activity hallway	activities hallway water fountain	drinking fountain	1
activity hallway	activities hallway water fountain	drinking fountain	1
lobby	lobby water fountain	drinking fountain	1
lobby	lobby water fountain	drinking fountain	1
lobby	water fountain	drinking fountain	1
lobby	water fountain	drinking fountain	1
	k-2 filling station	filling station	1
	office hallway filling station	filling station	1
	MS water fountain	filling station	1
activity hallway	activities hallway water fountain	filling station	1
lobby	lobby water fountain	filling station	1
107	Kinder bathroom	hand wash sink	1
	Kinder bathroom	hand wash sink	1
214	Nurse	sink	1
	Staff Lounge	sink	1
507		sink	1
525	Staff Lounge	sink	1
	lunchroom	south pot sink	1
207	Gohman	art sink	2
207	Gohman	art sink	2
207	Gohman	art sink	2

207		art sink	2
507	art	art sink	2
507	art	art sink	2
507	art	art sink	2
507	art	art sink	2
401		classroom sink	2
402		classroom sink	2
403		classroom sink	2
404		classroom sink	2
405		classroom sink	2
406		classroom sink	2
407		classroom sink	2
408		classroom sink	2
410		classroom sink	2
510		classroom sink	2
512		classroom sink	2
527		classroom sink	2
	k-2 staff bathroom	hand wash sink	2
	k-2 rest room boys	hand wash sink	2
	k-2 rest room girls	hand wash sink	2
	3-4 bathroom girls	hand wash sink	2
	3-4 bathroom girls	hand wash sink	2
	3-4 bathroom boys	hand wash sink	2
	3-4 bathroom boys	hand wash sink	2

	lunchroom	hand wash sink	2
	lunchroom	hand wash sink	2
	girl bathroom	hand wash sink	2
	boys bathroom	hand wash sink	2
	sped bathroom	hand wash sink	2
	men's staff bathroom	hand wash sink	2
	men's staff bathroom	hand wash sink	2
	girls staff bathroom	hand wash sink	2
	girls staff bathroom	hand wash sink	2
activity hallway	locker room girls	hand wash sink	2
activity hallway	locker room boys	hand wash sink	2
lobby	concessions	hand wash sink	2
lobby	men's restroom	hand wash sink	2
lobby	women's restroom	hand wash sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	teacher science lab sink	lab sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	science lab	lab sink	2
	teacher science lab sink	lab sink	2

	lunchroom	north pot sink	2
lobby	concessions	pot sink	2
lobby	concessions	pot sink	2
	lunchroom	prep sink	2
	lunchroom	diswasher sink/sprayer	3
104		x	
106		x	
108		x	
209		x	
210		x	
502		x	
505		x	
523		x	
529		x	
608		x	
610		x	
614		x	