

November 9, 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: Bailey Elementary
Lead-in-Water Testing
IEA Project #201610819**

Dear Mr. Vogel,

At the request of South Washington County Schools, IEA collected a total of 120 samples of drinking water, 106 on September 16, 2016, six (6) on September 26, 2016 and eight (8) on November 3, 2016, for lead analyses from the Bailey 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 120 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.

INSTITUTE FOR ENVIRONMENTAL ASSESSMENT, INC.
www.ieasafety.com

BROOKLYN PARK
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
13432 Elmwood Drive, Ste. #5
Baxter, MN 56425
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
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 268 ppb. There are six (6) 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 16, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Results (ppb)
16-A48399	Bailey Elementary	Sink Outside Room 130	Faucet	31.0
16-A48421	Bailey Elementary	Sink Room 125	Faucet	29.4
16-A48422	Bailey Elementary	Sink Room 126	Faucet	71.7
16-A48434	Bailey Elementary	Drinking Fountain Room 126	Drinking Fountain	27.9
16-A48441	Bailey Elementary	Sink Outside Rm 124	Faucet	22.6
16-A48445	Bailey Elementary	Sink Outside Rm 123	Faucet	29.7

ppb – parts per billion

The Bailey Elementary kitchen steam kettle #3 sampled on September 16, 2016 indicated a lead level at 268 ppb. This location was re-sampled on November 3, 2016 with a sample result of 60.4 ppb which is greater than the action level of 20 ppb. See *Table 2: Water Testing Results* for these results.

Table 2: Water Testing Results – Bailey Elementary Kitchen Steam Kettle #3

Sample Number	Sample Date	Sampling Location	Fixture Type	Lead Results (ppb)
16-A48341	September 16, 2016	Kitchen Steam Kettle #3	Faucet	268
16-A59940	November 3, 2016	aka BE-7 Kitchen Steam Kettle	Faucet	60.4

ppb – parts per billion

In addition, nine (9) results showed lead levels between 15 ppb and 20 ppb. See *Table 3: Water Testing Results Approaching 20 ppb* for these results. 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 3: Water Testing Results Approaching 20 ppb – September 16, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Results (ppb)
16-A48339	Bailey Elementary	Kitchen Sink # 1	Faucet	15.4
16-A48394	Bailey Elementary	Sink Room 135	Faucet	18.6
16-A48398	Bailey Elementary	Sink Outside Room 129	Faucet	16.5
16-A48401	Bailey Elementary	Sink Outside Room 136	Faucet	15.5
16-A48402	Bailey Elementary	Sink Room 102	Faucet	18.1
16-A48411	Bailey Elementary	Sink Room 115	Faucet	16.6
16-A48416	Bailey Elementary	Sink Room 120	Faucet	16.8
16-A48420	Bailey Elementary	Sink Room 124	Faucet	19.4
16-A48439	Bailey Elementary	Sink Outside Room 117	Faucet	18.4

ppb – parts per billion

The Bailey Elementary kitchen steam kettle #2 sampled on September 16, 2016 indicated a lead level at 127 ppb. This location was re-sampled on November 3, 2016 with a sample result of 19.8 ppb which is below the action level of 20 ppb. See *Table 4: Water Testing Results* for these results.

Table 4: Water Testing Results – Bailey Elementary Kitchen Steam Kettle #2

Sample Number	Sample Date	Sampling Location	Fixture Type	Lead Results (ppb)
16-A48340	September 16, 2016	Kitchen Steam Kettle #2	Faucet	127
16-A59967	November 3, 2016	aka BE-6 Kitchen Steam Kettle	Faucet	19.8

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 fixtures 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.

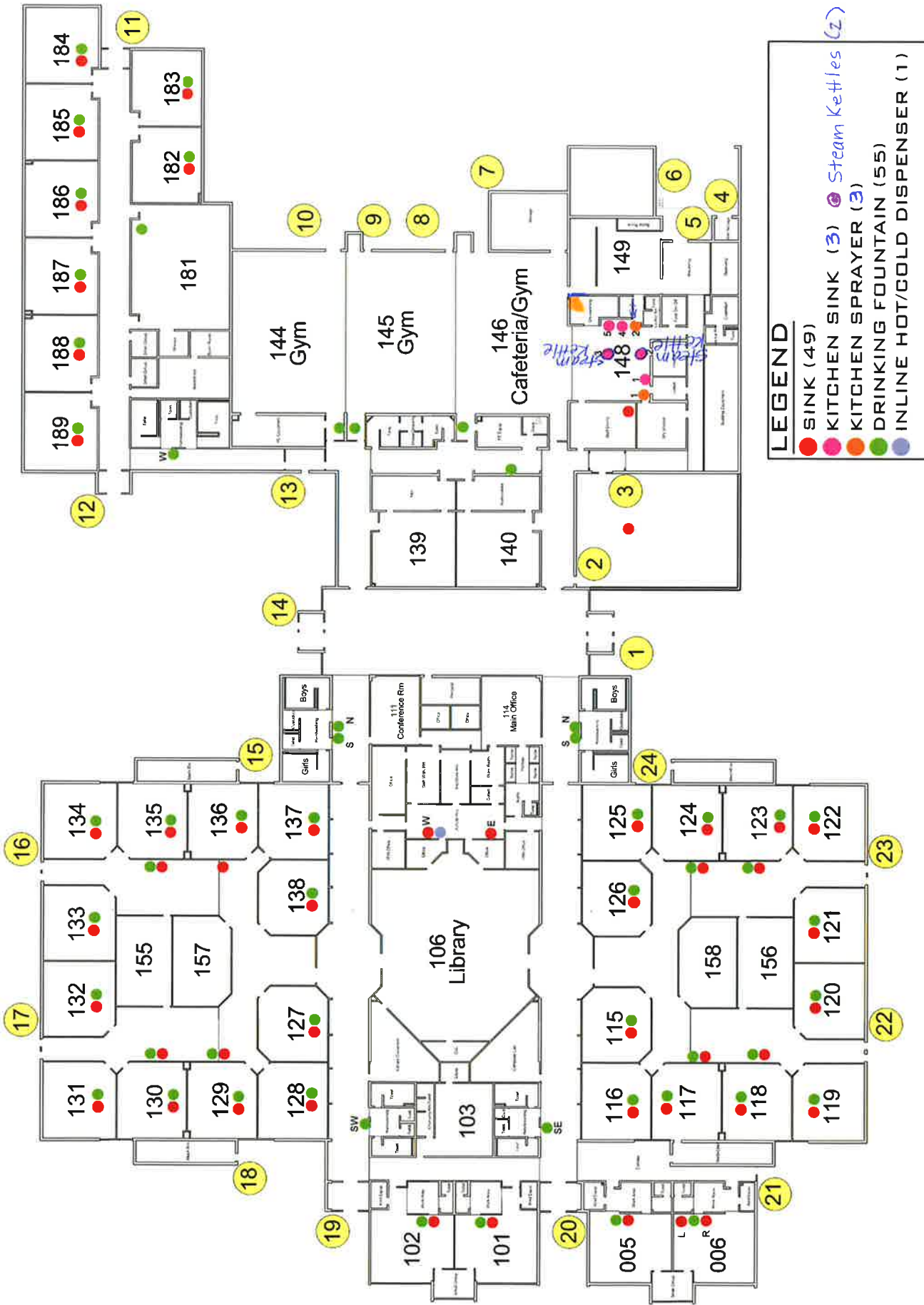

Amy Satterfield, CPPM I
Director of Business Development


Karen Weiblen
EHS/IEQ Consultant
Indoor Environments Division

Enclosure

cc: Damien Nelson, Safety & Security

Appendix A
Site Map/Drawing



LEGEND

- SINK (49)
- KITCHEN SINK (3)
- KITCHEN SPRAYER (3)
- DRINKING FOUNTAIN (55)
- INLINE HOT/GOLD DISPENSER (1)

Handwritten note: Steam Kettles (2)

Appendix B

Laboratory Testing Report



MINNESOTA VALLEY TESTING LABORATORIES, INC.

1126 North Front St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
 2 North German St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
 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



Report Date: 19 Oct 2016

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

Work Order #: 12-14269
 Account #: 002190
 Purchase Order #: 201610819

Date Received: 16 Sep 2016
 Date Sampled: 16 Sep 2016
 Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
 PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A48339	09162016BE-1 KITCHEN SINK #1	15.4 ug/L	15.0	26 Sep 16	RMV
16-A48340	09162016BE-2 KITCHEN STEAM KETTLE #2	127 ~ ug/L	15.0	28 Sep 16	RMV
	~Sample diluted due to result above calibration or linear range.				
16-A48341	09162016BE-3 KITCHEN STEAM KETTLE #3	268 ~ ug/L	15.0	27 Sep 16	RMV
	~Sample diluted due to result above calibration or linear range.				
16-A48342	09162016BE-4 KITCHEN SINK #4	4.91 ug/L	15.0	26 Sep 16	RMV
16-A48343	09162016BE-5 KITCHEN SINK #5	9.63 ug/L	15.0	26 Sep 16	RMV
16-A48344	09162016BE-6 SPRAYER #1	9.83 ug/L	15.0	26 Sep 16	RMV
16-A48345	09162016BE-7 SPRAYER #2	5.46 ug/L	15.0	26 Sep 16	RMV
16-A48346	09162016BE-8 SINK NURSES OFFICE	< 0.5 ug/L	15.0	26 Sep 16	RMV
16-A48347	09162016BE-9 SINK STAFF DINING	6.61 ug/L	15.0	26 Sep 16	RMV
16-A48348	09162016BE-10 DF OUTSIDE CAFETERIA	< 0.5 ug/L	15.0	26 Sep 16	RMV
16-A48349	09162016BE-11 DF GYM (146)	0.79 ug/L	15.0	26 Sep 16	RMV
16-A48350	09162016BE-12 DF GYM (145)	0.59 ug/L	15.0	26 Sep 16	RMV
16-A48351	09162016BE-13 DF GYM (144)	0.54 ug/L	15.0	26 Sep 16	RMV
16-A48352	09162016BE-14 WEST DF BATHROOMS NEAR RM 189	0.57 ug/L	15.0	26 Sep 16	RMV

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

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

The reporting limit was elevated for any analyte requiring a dilution as coded below:
 @ = Due to sample matrix # = Due to concentration of other analytes
 ! = Due to sample quantity + = Due to internal standard response

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

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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Purchase Order #: 201610819

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Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A48353	09162016BE-16 DF RM 181	0.56 ug/L	15.0	26 Sep 16	RMV
16-A48354	09162016BE-17 DF RM 182	8.63 ug/L	15.0	26 Sep 16	RMV
16-A48355	09162016BE-18 DF RM 183	1.11 ug/L	15.0	26 Sep 16	RMV
16-A48356	09162016BE-19 DF RM 184	1.28 ug/L	15.0	26 Sep 16	RMV
16-A48357	09162016BE-20 DF RM 185	1.07 ug/L	15.0	26 Sep 16	RMV
16-A48358	09162016BE-21 DF RM 186	1.34 ug/L	15.0	26 Sep 16	RMV
16-A48359	09162016BE-22 DF RM 187	2.20 ug/L	15.0	26 Sep 16	RMV
Comments: Lab Accident					
16-A48361	09162016BE-24 DF RM 189	1.50 ug/L	15.0	26 Sep 16	RMV
16-A48362	09162016BE-25 SINK RM 182	3.05 ug/L	15.0	26 Sep 16	RMV
16-A48363	09162016BE-26 SINK RM 183	0.82 ug/L	15.0	26 Sep 16	RMV
16-A48364	09162016BE-27 SINK RM 184	1.18 ug/L	15.0	26 Sep 16	RMV
16-A48365	09162016BE-28 SINK RM 185	2.07 ug/L	15.0	26 Sep 16	RMV
16-A48366	09162016BE-29 SINK RM 186	1.63 ug/L	15.0	26 Sep 16	RMV
16-A48367	09162016BE-30 SINK RM 187	1.07 ug/L	15.0	26 Sep 16	RMV
16-A48368	09162016BE-31 SINK RM 188	1.55 ug/L	15.0	26 Sep 16	RMV

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

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www.mvttl.com



Report Date: 19 Oct 2016

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IEA/BROOKLYN PARK
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BROOKLYN PARK MN 55445

Work Order #: 12-14269
Account #: 002190
Purchase Order #: 201610819

Date Received: 16 Sep 2016
Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

Table with 6 columns: LAB NUMBER, SAMPLE DESCRIPTION, LEAD RESULTS, MCL, DATE ANALYZED, ANALYST. Contains 18 rows of data for lead testing at various locations.

Approved by: [Signature]
Dan O'Connell, Chemistry Laboratory Manager New Ulm, MN

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www.mvvl.com



Report Date: 19 Oct 2016

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BROOKLYN PARK MN 55445

Work Order #: 12-14269
Account #: 002190
Purchase Order #: 201610819

Date Received: 16 Sep 2016
Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

Table with columns: LAB NUMBER, SAMPLE DESCRIPTION, LEAD RESULTS, MCL, DATE ANALYZED, ANALYST. Contains 20 rows of lead test data.

Approved by: [Signature]
Dan O'Connell, Chemistry Laboratory Manager New Ulm, MN

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Work Order #: 12-14269
Account #: 002190
Purchase Order #: 201610819

Date Received: 16 Sep 2016
Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

Table with columns: LAB NUMBER, SAMPLE DESCRIPTION, LEAD RESULTS, MCL, DATE ANALYZED, ANALYST. Contains 15 rows of test data for lead levels in various rooms.

Approved by: [Signature]
Dan O'Connell, Chemistry Laboratory Manager New Ulm, MN

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Work Order #: 12-14269
Account #: 002190
Purchase Order #: 201610819

Date Received: 16 Sep 2016
Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

Table with 7 columns: LAB NUMBER, SAMPLE DESCRIPTION, LEAD RESULTS, MCL, DATE ANALYZED, ANALYST. Contains 17 rows of lead test data for various samples.

Approved by: [Signature]
Dan O'Connell, Chemistry Laboratory Manager New Ulm, MN

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

Work Order #: 12-14269
Account #: 002190
Purchase Order #: 201610819

Date Received: 16 Sep 2016
Date Sampled: 16 Sep 2016
Temperature at Receipt: 19.9C

PROJECT NAME: BAILEY ELEM.
PROJECT NUMBER: 201610819

Table with 7 columns: LAB NUMBER, SAMPLE DESCRIPTION, LEAD RESULTS, MCL, DATE ANALYZED, ANALYST. Contains 16 rows of lead test data for various rooms and sinks.

Approved by: [Signature]
Dan O'Connell, Chemistry Laboratory Manager New Ulm, MN

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MEMBER
ACIL

Report Date: 31 Oct 2016


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

Work Order #: 12-16365
 Account #: 002190
 Purchase Order #: 201610819

Date Received: 26 Oct 2016
 Date Sampled: 26 Oct 2016
 Temperature at Receipt: 19.5C

PROJECT NAME: BAILEY ELEM.
 PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A58099	10262016BE-1 DF ROOM 188	2.98 ug/L	15.0	28 Oct 16	RMB
16-A58100	10262016BE-2 N DF-OUTSIDE RESTROOMS NEAR ENTRANCE 14	1.84 ug/L	15.0	28 Oct 16	RMB
16-A58101	10262016BE-3 N DF-OUTSIDE RESTROOMS SW OF LIBRARY	1.41 ug/L	15.0	28 Oct 16	RMB
16-A58102	10262016BE-4 W SINK-AV ROOM	10.9 ug/L	15.0	28 Oct 16	RMB
16-A58103	10262016BE-5 S DF-BATHROOM NEAR MAIN ENTRANCE	1.88 ug/L	15.0	28 Oct 16	RMB
16-A58104	10262016BE-6 ROOM 006 LEFT SINK	3.07 ug/L	15.0	28 Oct 16	RMB

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

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@ = Due to sample matrix # = Due to concentration of other analytes
 ! = Due to sample quantity + = Due to internal standard response

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

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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MEMBER
ACIL

Report Date: 8 Nov 2016

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

Work Order #: 12-16756
Account #: 002190
Purchase Order #: 201610819

Date Received: 3 Nov 2016
Date Sampled: 3 Nov 2016
Temperature at Receipt: 20.8C

PROJECT NAME: BAILEY ELEM.

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A59962	BE-1 KITCHEN SINK MK-SK-1	10.0 ug/L	15.0	6 Nov 16	RMB
16-A59963	BE-2 KITCHEN SINK MK-SK-2	6.07 ug/L	15.0	6 Nov 16	RMB
16-A59964	BE-3 KITCHEN SINK MK-SK-3	10.1 ug/L	15.0	6 Nov 16	RMB
16-A59965	BE-4 KITCHEN SPRAYER MK-SP-1	2.49 ug/L	15.0	6 Nov 16	RMB
16-A59966	BE-5 KITCHEN SPRAYER MK-SP-2	14.0 ug/L	15.0	6 Nov 16	RMB
16-A59967	BE-6 STEAM KETTLE FAUCET MK-SKF-1	19.8 ug/L	15.0	6 Nov 16	RMB
16-A59968	BE-7 STEAM KETTLE FAUCET MK-SKF-2	60.4 ug/L	15.0	6 Nov 16	RMB
16-A59969	BE-8 DISH ROOM SPRAYER DR-SP-1	0.91 ug/L	15.0	6 Nov 16	RMB

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

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