

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: Middleton Elementary
Lead-in-Water Testing
IEA Project #201610819**

Dear Mr. Vogel,

At the request of South Washington County Schools, IEA collected a total of 110 samples of drinking water, 102 on September 22, 2016 and eight (8) on November 3, 2016, for lead analyses from the Middleton 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 110 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.
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9201 West Broadway, #600
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610 North Riverfront Drive
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ROCHESTER
210 Woodlake Drive SE
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13432 Elmwood Drive, Ste. #5
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1420 East College Drive
Marshall, MN 56258
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5525 Emerald Avenue
Mountain Iron, MN 55768
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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 30.4 ppb. There are five (5) 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 22, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Results (ppb)
16-A50522	Middleton Elementary	Kitchen Sprayer #2	Sprayer	23.8
16-A50549	Middleton Elementary	Sink Room 187	Faucet	25.9
16-A50577	Middleton Elementary	South Sink Library Workroom	Faucet	23.4
16-A50584	Middleton Elementary	Sink Outside Room 117	Faucet	27.8
16-A50605	Middleton Elementary	Sink Room 115	Faucet	30.4

ppb – parts per billion

In addition, two (2) results showed lead levels between 15 ppb and 20 ppb. See *Table 2: 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 2: Water Testing Results Approaching 20 ppb – September 22, 2016

Sample Number	Building	Sampling Location	Fixture Type	Lead Results (ppb)
16-A50564	Middleton Elementary	Sink Room 127	Faucet	17.4
16-A50572	Middleton Elementary	Sink Room 135	Faucet	15.9

ppb – parts per billion

The Middleton Elementary kitchen sink #3 sampled on September 22, 2016 indicated a lead level at 21.0 ppb. This location was re-sampled on November 3, 2016 with a sample result of 7.18 ppb which is below the action level of 20 ppb. See *Table 3: Water Testing Results* for these results.

Table 3: Water Testing Results – Middleton Elementary Kitchen Sink #3

Sample Number	Sample Date	Sampling Location	Fixture Type	Lead Results (ppb)
16-A50519	September 22, 2016	Kitchen Sink #3	Faucet	21.0
16-A59940	November 3, 2016	aka ME-3 Kitchen Sink	Faucet	7.18

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

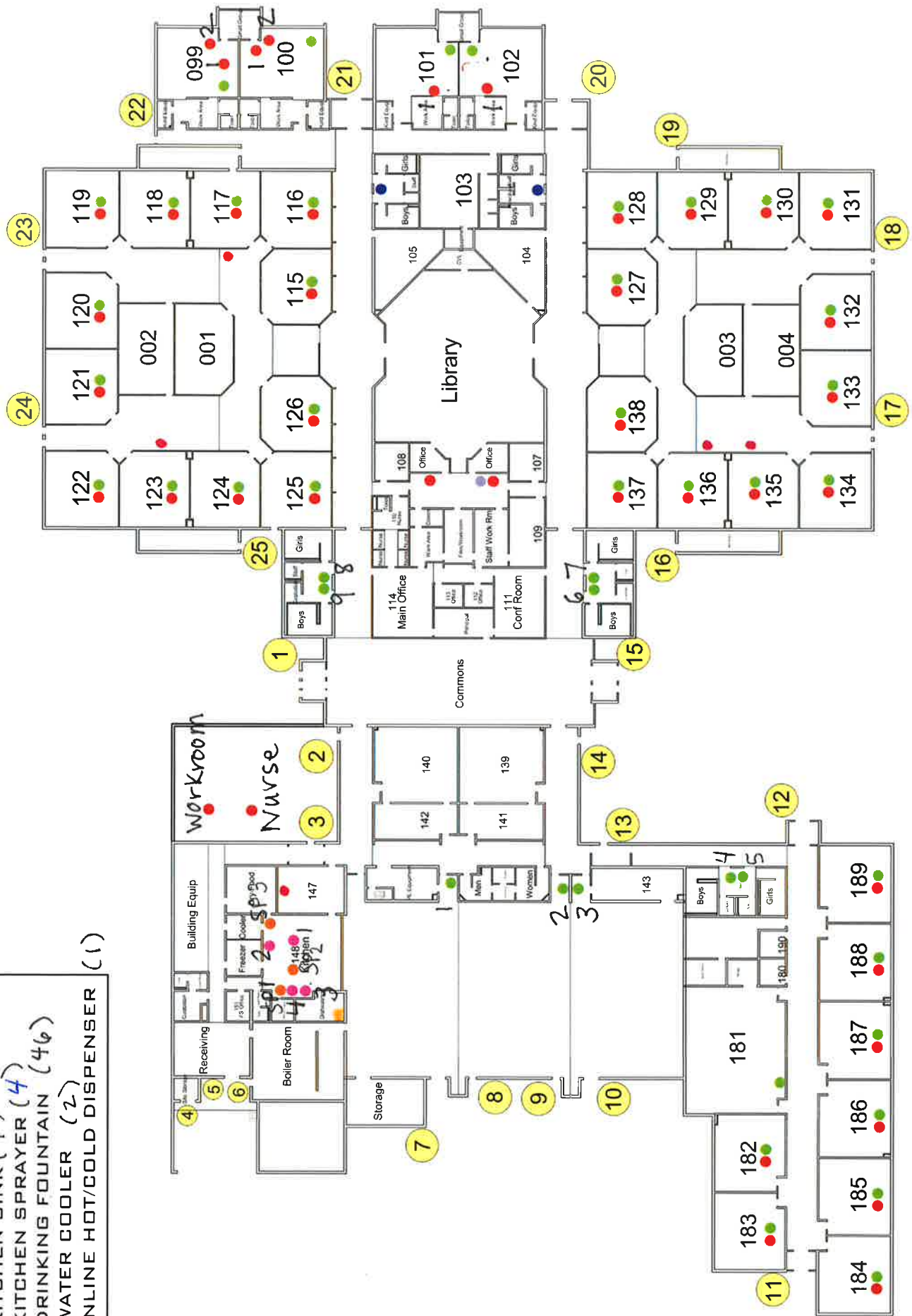
Enclosure

cc: Damien Nelson, Safety & Security

Appendix A
Site Map/Drawing

LEGEND

- SINK (47)
- KITCHEN SINK (4)
- KITCHEN SPRAYER (4)
- DRINKING FOUNTAIN (46)
- WATER COOLER (2)
- INLINE HOT/COLD DISPENSER (1)



INSTITUTE FOR ENVIRONMENTAL ASSESSMENT

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Appendix B

Laboratory Testing Report

MINNESOTA VALLEY TESTING LABORATORIES, INC.

MVTL

1126 N. Front St. ~ New Ulm, MN 56073 ~ 800-782-3557 ~ Fax 507-359-2890
2616 E. Broadway Ave. ~ Bismarck, ND 58501 ~ 800-279-6885 ~ Fax 701-258-9724
1201 Lincoln Highway ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.mvttl.com

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Report Date: 13 Oct 2016

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

Work Order #: 12-14657
Account #: 002190
Purchase Order #: 201610819

Date Received: 22 Sep 2016
Date Sampled: 22 Sep 2016
Temperature at Receipt: 21.1C

PROJECT NAME: MIDDLETON ELEM.
PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50517	09222016ME-1 KITCHEN SINK #1	5.78 ug/L	15.0	10 Oct 16	RMB
16-A50518	09222016ME-2 KITCHEN SINK #2	11.3 ug/L	15.0	10 Oct 16	RMB
16-A50519	09222016ME-3 KITCHEN SINK #3	21.0 ug/L	15.0	10 Oct 16	RMB
16-A50520	09222016ME-4 KITCHEN SINK #4	8.89 ug/L	15.0	10 Oct 16	RMB
16-A50521	09222016ME-5 KITCHEN SPRAYER #1	6.89 ug/L	15.0	10 Oct 16	RMB
16-A50522	09222016ME-6 KITCHEN SPRAYER #2	23.8 ug/L	15.0	10 Oct 16	RMB
16-A50523	09222016ME-7 KITCHEN SPRAYER #3	2.74 ug/L	15.0	10 Oct 16	RMB
16-A50524	09222016ME-8 SINK WORKROOM	1.67 ug/L	15.0	10 Oct 16	RMB
16-A50525	09222016ME-9 SINK NURSES OFFICE	0.92 ug/L	15.0	10 Oct 16	RMB
16-A50526	09222016ME-10 DF #1	0.84 ug/L	15.0	10 Oct 16	RMB
16-A50527	09222016ME-11 DF #2	2.14 ug/L	15.0	10 Oct 16	RMB
16-A50528	09222016ME-12 DF #3	2.49 ug/L	15.0	10 Oct 16	RMB
16-A50529	09222016ME-13 DF #4	< 0.5 ug/L	15.0	10 Oct 16	RMB

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

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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50530	09222016ME-14 DF #5	0.75 ug/L	15.0	10 Oct 16	RMB
16-A50531	09222016ME-15 DF #6	2.42 ug/L	15.0	10 Oct 16	RMB
16-A50532	09222016ME-16 DF #7	1.92 ug/L	15.0	10 Oct 16	RMB
16-A50533	09222016ME-17 DF #8	2.14 ug/L	15.0	10 Oct 16	RMB
16-A50534	09222016ME-18 DF #9	3.01 ug/L	15.0	10 Oct 16	RMB
16-A50535	09222016ME-19 DF RM 181	1.05 ug/L	15.0	10 Oct 16	RMB
16-A50536	09222016ME-20 DF RM 182	1.20 ug/L	15.0	10 Oct 16	RMB
16-A50537	09222016ME-21 DF RM 183	1.45 ug/L	15.0	10 Oct 16	RMB
16-A50538	09222016ME-22 DF RM 184	1.96 ug/L	15.0	10 Oct 16	RMB
16-A50539	09222016ME-23 DF RM 185	1.06 ug/L	15.0	10 Oct 16	RMB
16-A50540	09222016ME-24 DF RM 186	0.56 ug/L	15.0	10 Oct 16	RMB
16-A50541	09222016ME-25 DF RM 187	14.0 ug/L	15.0	10 Oct 16	RMB
16-A50542	09222016ME-26 DF RM 188	1.42 ug/L	15.0	10 Oct 16	RMB

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Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50543	09222016ME-27 DF RM 189	2.21 ug/L	15.0	10 Oct 16	RMB
16-A50544	09222016ME-28 SINK RM 182	0.96 ug/L	15.0	10 Oct 16	RMB
16-A50545	09222016ME-29 SINK RM 183	2.12 ug/L	15.0	10 Oct 16	RMB
16-A50546	09222016ME-30 SINK RM 184	1.88 ug/L	15.0	10 Oct 16	RMB
16-A50547	09222016ME-31 SINK RM 185	1.40 ug/L	15.0	10 Oct 16	RMB
16-A50548	09222016ME-32 SINK RM 186	1.09 ug/L	15.0	10 Oct 16	RMB
16-A50549	09222016ME-33 SINK RM 187	25.9 ug/L	15.0	10 Oct 16	RMB
16-A50550	09222016ME-34 SINK RM 188	1.48 ug/L	15.0	10 Oct 16	RMB
16-A50551	09222016ME-35 SINK RM 189	1.97 ug/L	15.0	10 Oct 16	RMB
16-A50552	09222016ME-36 DF RM 127	1.02 ug/L	15.0	10 Oct 16	RMB
16-A50553	09222016ME-37 DF RM 128	7.54 ug/L	15.0	10 Oct 16	RMB
16-A50554	09222016ME-38 DF RM 129	0.99 ug/L	15.0	10 Oct 16	RMB

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Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50555	09222016ME-39 DF RM 130	1.41 ug/L	15.0	10 Oct 16	RMB
16-A50556	09222016ME-40 DF RM 131	9.46 ug/L	15.0	10 Oct 16	RMB
16-A50557	09222016ME-41 DF RM 132	1.10 ug/L	15.0	10 Oct 16	RMB
16-A50558	09222016ME-42 DF RM 133	1.66 ug/L	15.0	10 Oct 16	RMB
16-A50559	09222016ME-43 DF RM 134	1.70 ug/L	15.0	10 Oct 16	RMB
16-A50560	09222016ME-44 DF RM 135	1.34 ug/L	15.0	10 Oct 16	RMB
16-A50561	09222016ME-45 DF RM 136	0.94 ug/L	15.0	10 Oct 16	RMB
16-A50562	09222016ME-46 DF RM 137	1.29 ug/L	15.0	10 Oct 16	RMB
16-A50563	09222016ME-47 DF RM 138	2.54 ug/L	15.0	10 Oct 16	RMB
16-A50564	09222016ME-48 SINK RM 127	17.4 ug/L	15.0	10 Oct 16	RMB
16-A50565	09222016ME-49 SINK RM 128	8.83 ug/L	15.0	10 Oct 16	RMB
16-A50566	09222016ME-50 SINK RM 129	11.6 ug/L	15.0	10 Oct 16	RMB
16-A50567	09222016ME-51 SINK RM 130	11.2 ug/L	15.0	10 Oct 16	RMB

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16-A50568	09222016ME-52 SINK RM 131	0.59 ug/L	15.0	10 Oct 16	RMB
16-A50569	09222016ME-53 SINK RM 132	10.9 ug/L	15.0	10 Oct 16	RMB
16-A50570	09222016ME-54 SINK RM 133	10.9 ug/L	15.0	10 Oct 16	RMB
16-A50571	09222016ME-55 SINK RM 134	12.1 ug/L	15.0	10 Oct 16	RMB
16-A50572	09222016ME-56 SINK RM 135	15.9 ug/L	15.0	10 Oct 16	RMB
16-A50573	09222016ME-57 SINK RM 136	12.0 ug/L	15.0	10 Oct 16	RMB
16-A50574	09222016ME-58 SINK RM 137	12.9 ug/L	15.0	10 Oct 16	RMB
16-A50575	09222016ME-59 SINK RM 138	10.2 ug/L	15.0	10 Oct 16	RMB
16-A50576	09222016ME-60 NORTH SINK LIBRARY WRKRM	9.23 ug/L	15.0	10 Oct 16	RMB
16-A50577	09222016ME-61 SOUTH SINK LIBRARY WRKRM	23.4 ug/L	15.0	10 Oct 16	RMB
16-A50578	09222016ME-62 INLINE COOLER LIBRARY WRKROM	< 0.5 ug/L	15.0	10 Oct 16	RMB
16-A50579	09222016ME-63 DF RM 102	1.38 ug/L	15.0	10 Oct 16	RMB

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Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
Page: 5

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LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50580	09222016ME-64 SINK #1 RM 102	7.86 ug/L	15.0	10 Oct 16	RMB
16-A50581	09222016ME-65 SINK OUTSIDE RM 123	11.4 ug/L	15.0	10 Oct 16	RMB
16-A50582	09222016ME-66 DF RM 101	1.36 ug/L	15.0	10 Oct 16	RMB
16-A50583	09222016ME-67 SINK #1 RM 101	11.2 ug/L	15.0	10 Oct 16	RMB
16-A50584	09222016ME-68 SINK OUTSIDE RM 117	27.8 ug/L	15.0	10 Oct 16	RMB
16-A50585	09222016ME-69 WATER COOLER NEAR 104	1.84 ug/L	15.0	10 Oct 16	RMB
16-A50586	09222016ME-70 WATER COOLER NEAR 105	3.76 ug/L	15.0	10 Oct 16	RMB
16-A50587	09222016ME-71 DF RM 100	0.66 ug/L	15.0	10 Oct 16	RMB
16-A50588	09222016ME-72 SINK #1 RM 100	1.45 ug/L	15.0	10 Oct 16	RMB
16-A50589	09222016ME-73 SINK #2 RM 100	1.70 ug/L	15.0	10 Oct 16	RMB
16-A50590	09222016ME-74 DF RM 99	< 0.5 ug/L	15.0	10 Oct 16	RMB
16-A50591	09222016ME-75 SINK #1 RM 99	1.61 ug/L	15.0	10 Oct 16	RMB

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1201 Lincoln Highway ~ Nevada, IA 50201 ~ 800-362-0855 ~ Fax 515-382-3885
www.mvttl.com

**MEMBER
ACIL**

Report Date: 13 Oct 2016

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

Work Order #: 12-14657
Account #: 002190
Purchase Order #: 201610819

Date Received: 22 Sep 2016
Date Sampled: 22 Sep 2016
Temperature at Receipt: 21.1C

PROJECT NAME: MIDDLETON ELEM.
PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50592	09222016ME-76 SINK #2 RM 99	1.51 ug/L	15.0	10 Oct 16	RMB
16-A50593	09222016ME-77 DF RM 115	1.35 ug/L	15.0	10 Oct 16	RMB
16-A50594	09222016ME-78 DF RM 116	2.68 ug/L	15.0	10 Oct 16	RMB
16-A50595	09222016ME-79 DF RM 117	0.92 ug/L	15.0	10 Oct 16	RMB
16-A50596	09222016ME-80 DF RM 118	2.07 ug/L	15.0	10 Oct 16	RMB
16-A50597	09222016ME-81 DF RM 119	0.60 ug/L	15.0	10 Oct 16	RMB
16-A50598	09222016ME-82 DF RM 120	1.09 ug/L	15.0	10 Oct 16	RMB
16-A50599	09222016ME-83 DF RM 121	0.85 ug/L	15.0	10 Oct 16	RMB
16-A50600	09222016ME-84 DF RM 122	1.30 ug/L	15.0	10 Oct 16	RMB
16-A50601	09222016ME-85 DF RM 123	1.11 ug/L	15.0	10 Oct 16	RMB
16-A50602	09222016ME-86 DF RM 124	1.55 ug/L	15.0	10 Oct 16	RMB
16-A50603	09222016ME-87 DF RM 125	1.06 ug/L	15.0	10 Oct 16	RMB
16-A50604	09222016ME-88 DF RM 126	1.34 ug/L	15.0	10 Oct 16	RMB

Approved by: 
Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
Page: 7

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Report Date: 13 Oct 2016

HEIDI SOLBERG
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 BROOKLYN PARK MN 55445

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Date Received: 22 Sep 2016
 Date Sampled: 22 Sep 2016
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PROJECT NAME: MIDDLETON ELEM.
 PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50605	09222016ME-89 SINK RM 115	30.4 ug/L	15.0	10 Oct 16	RMB
16-A50606	09222016ME-90 SINK RM 116	6.90 ug/L	15.0	10 Oct 16	RMB
16-A50607	09222016ME-91 SINK RM 117	14.4 ug/L	15.0	10 Oct 16	RMB
16-A50608	09222016ME-92 SINK RM 118	9.81 ug/L	15.0	10 Oct 16	RMB
16-A50609	09222016ME-93 SINK RM 119	9.17 ug/L	15.0	10 Oct 16	RMB
16-A50610	09222016ME-94 SINK RM 120	11.3 ug/L	15.0	10 Oct 16	RMB
16-A50611	09222016ME-95 SINK RM 121	10.3 ug/L	15.0	10 Oct 16	RMB
16-A50612	09222016ME-96 SINK RM 122	9.84 ug/L	15.0	10 Oct 16	RMB
16-A50613	09222016ME-97 SINK RM 123	12.4 ug/L	15.0	10 Oct 16	RMB
16-A50614	09222016ME-98 SINK RM 124	13.6 ug/L	15.0	10 Oct 16	RMB
16-A50615	09222016ME-99 SINK RM 125	12.1 ug/L	15.0	10 Oct 16	RMB
16-A50616	09222016ME-100 SINK RM 126	8.51 ug/L	15.0	10 Oct 16	RMB

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 Dan O'Connell, Asst. Chemistry Laboratory Manager New Ulm, MN
 Page: 8

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ACIL

Report Date: 13 Oct 2016

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

Work Order #: 12-14657
Account #: 002190
Purchase Order #: 201610819

Date Received: 22 Sep 2016
Date Sampled: 22 Sep 2016
Temperature at Receipt: 21.1C

PROJECT NAME: MIDDLETON ELEM.
PROJECT NUMBER: 201610819

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A50617	09222016ME-101 SINK OUTSIDE RM 135	11.9 ug/L	15.0	10 Oct 16	RMB
16-A50618	09222016ME-102 SINK OUTSIDE RM 136	12.9 ug/L	15.0	10 Oct 16	RMB

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

Report Date: 8 Nov 2016

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

Work Order #: 12-16753
Account #: 002190
Purchase Order #: 201610819

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

PROJECT NAME: MIDDLETON ELEM.

LAB NUMBER	SAMPLE DESCRIPTION	LEAD RESULTS	MCL	DATE ANALYZED	ANALYST
16-A59938	ME-1 SINK ROOM 147-RM147-SK-1	1.34 ug/L	15.0	6 Nov 16	RMB
16-A59939	ME-2 KITCHEN SINK-MK-SK-1	7.99 ug/L	15.0	6 Nov 16	RMB
16-A59940	ME-3 KITCHEN SINK-MK-SK-2	7.18 ug/L	15.0	6 Nov 16	RMB
16-A59941	ME-4 KITCHEN SINK-MK-SK-3	13.6 ug/L	15.0	6 Nov 16	RMB
16-A59942	ME-5 KITCHEN SPRAYER-MK-KSP-1	9.60 ug/L	15.0	6 Nov 16	RMB
16-A59943	ME-6 KITCHEN SPRAYER-MK-KSP-2	8.11 ug/L	15.0	6 Nov 16	RMB
16-A59944	ME-7 STEAM KETTLE FAUCET-MK SKF-1	6.01 ug/L	15.0	6 Nov 16	RMB
16-A59945	ME-8 DISH ROOM SPRAYER-DR-SP-1	1.34 ug/L	15.0	6 Nov 16	RMB

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

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